

# **CONSOLIDATED PILLAR 3 REPORT**

FOR THE YEAR ENDED  
**31 DECEMBER 2025**

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## Introduction – General Information

### 1. Introduction – General Information

On 12 December 2025, the merger by absorption of “Eurobank Ergasias Services and Holdings S.A.” (Eurobank Holdings) by Eurobank S.A. (Eurobank or the Bank) was completed and Eurobank S.A. became the ultimate parent company of the Group. The Bank along with its subsidiaries (the Group), are active in retail, corporate and private banking, asset management, treasury, capital markets, insurance and other services. The Group operates mainly in Greece, Bulgaria, Cyprus and Luxembourg. The Bank is incorporated in Greece and its shares are listed on the Athens Stock Exchange and the Cyprus Stock Exchange.

Eurobank S.A. is supervised on a standalone and consolidated basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

#### 1.1 Highlights

##### Risk profile

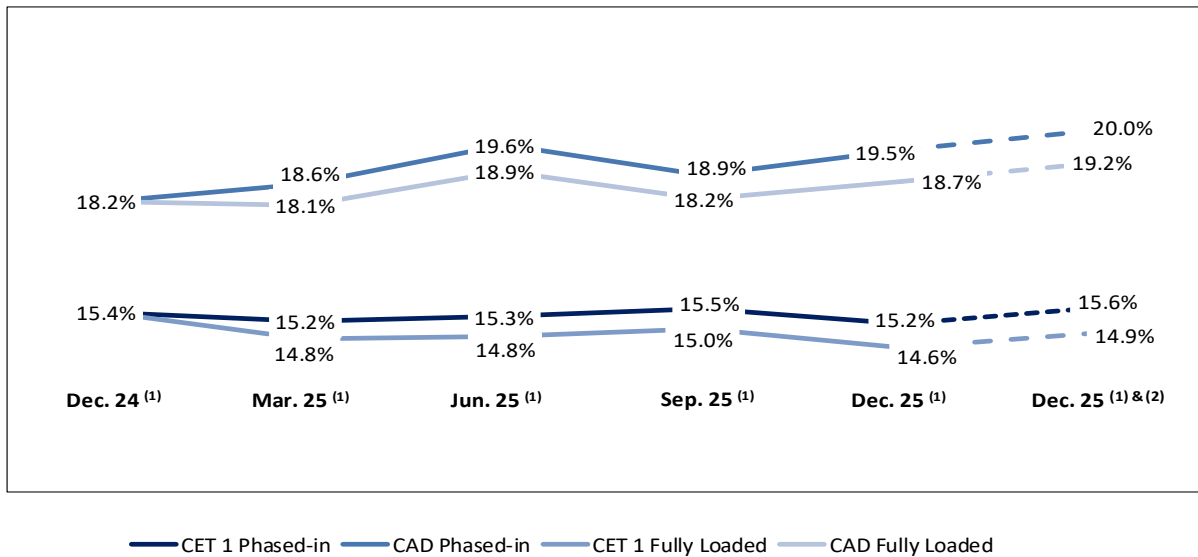
	31 December 2025 <sup>(1) &amp; (2)</sup>	31 December 2025 <sup>(1)</sup>	30 September 2025 <sup>(1)</sup>	31 December 2024 <sup>(1)</sup>
	€ million	€ million	€ million	€ million
<b>Available own funds</b>				
Common Equity Tier 1 (CET1) capital	8,132	8,134	8,049	7,718
Tier 1 capital	9,221	9,224	8,544	7,718
Total capital	10,437	10,439	9,775	9,093
<b>Risk-weighted exposure amounts</b>				
Total risk-weighted exposure amount	52,245	53,647	51,836	49,977
<b>Capital ratios</b>				
Common Equity Tier 1 ratio (%)	15.6%	15.2%	15.5%	15.4%
Tier 1 ratio (%)	17.7%	17.2%	16.5%	15.4%
Total capital ratio (%)	20.0%	19.5%	18.9%	18.2%
<b>Leverage ratio</b>				
Leverage ratio	8.1%	8.1%	7.7%	7.3%
<b>Liquidity Ratio</b>				
Liquidity coverage ratio (%)		172.2%	180.4%	188.2%
Net Stable Funding Ratio (%)		144.2%	142.7%	144.7%

<sup>(1)</sup> Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

<sup>(2)</sup> Pro-forma with the completion of project “Sun (ex-Solar)” and “Wave III” securitization upside.

**Introduction – General Information**

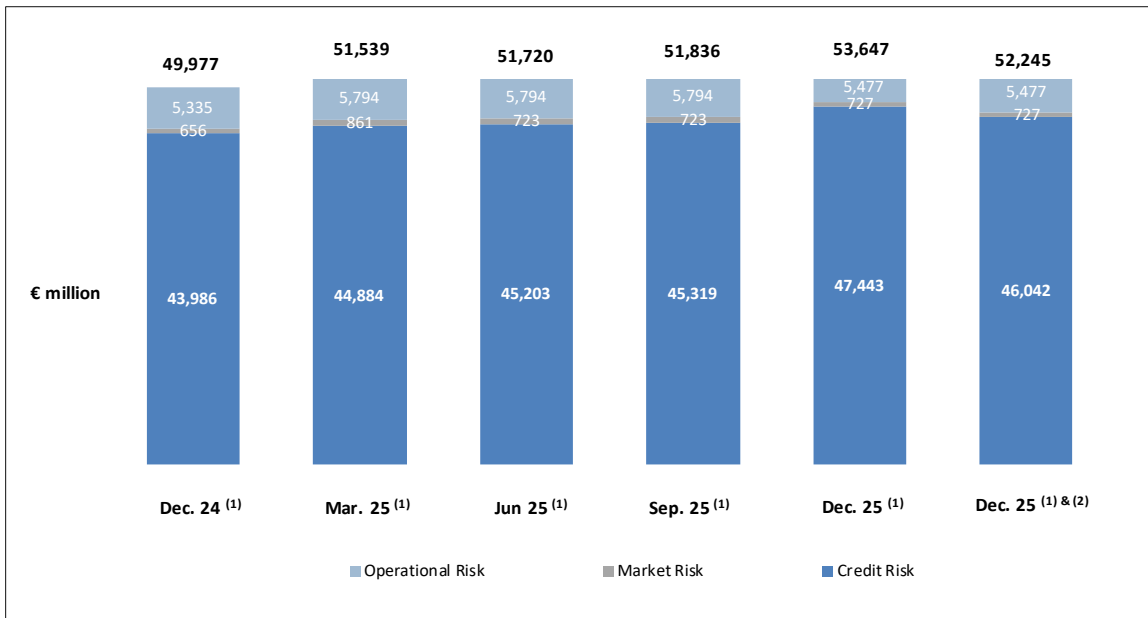
**Evolution of Capital Ratios**



<sup>(1)</sup> Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders’ remuneration policy), subject to Supervisory Authorities’ approval.

<sup>(2)</sup> Pro-forma with the completion of project “Sun (ex-Solar)” and “Wave III” securitization upsze.

**Evolution of Risk Weighted Exposure Amount**



<sup>(1)</sup> Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders’ remuneration policy), subject to Supervisory Authorities’ approval.

<sup>(2)</sup> Pro-forma with the completion) of project “Sun (ex-Solar)” and “Wave III” securitization upsze.

## Introduction – General Information

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### 1.2 Non-Performing exposures (NPE) Operational targets

As at 31 December 2025 the Group's NPE stock amounting to € 1,434 million (30 September 2025: € 1,531 million). The Group NPE ratio amounted to 2.6% (30 September 2025: 2.8%) while the NPE coverage ratio improved to 95.2% (30 September 2025 94.0%).

### 1.3 Project Sun (ex-“Solar”)

In the context of its NPE management strategy, the Group had participated, since 2018, in a joint initiative with the other Greek systemic banks, to structure an NPE securitization transaction (project “Solar”) under the provisions of Hellenic Asset Protection Scheme (HAPS), that was finally abandoned in the first half of 2025. As Management remains committed to its plan to recover the carrying amount of the respective loan portfolio through its disposal, the Group retained the classification of the underlying loans as held for sale. In December 2025, negotiations with potential investors regarding the sale of the loan portfolio were concluded for a consideration of ca. € 23 million. The sale and legal transfer of the abovementioned loan portfolio is expected to be completed within the first half of 2026.

As at 31 December 2025, the carrying amount of Sun loan portfolio reached € 18 million, comprising loans with gross carrying amount of € 240 million and impairment allowance of € 222 million, including the additional impairment loss of € 25 million recognized within 2025 and calculated by reference to the expected consideration as adjusted to reflect the loans' collections from the transaction's reference date up to 31 December 2025 and the estimated selling costs.

For further details, please refer to Consolidated Financial Statements, Note 20.

### 1.4 Other loans held for sale (including project “Leon”)

In December 2023, the Group, in the context of its NPE reduction plan, initiated the sale process of a mixed NPE portfolio that was concluded on 13 September 2024 via a securitization structure (SPV-LEON CAPITAL FINANCE DAC) under the requirements of Hellenic Asset Protection Scheme law. Accordingly, as of the aforementioned date, the Group derecognized the underlying loan portfolio on the basis that it transferred substantially all risks and rewards of the portfolio's ownership and relinquished its control over it, and recognized the retained notes on its balance sheet, i.e. 100% of the senior and 5% of the mezzanine and junior notes of Leon securitization, at fair value. At 31 December 2025 the carrying amount of the retained notes is € 274 million (31 December 2024: € 276 million).

As at 31 December 2025, the remaining loan portfolio designated for sale that was not finally included in the securitization structure, with a gross carrying amount of € 42 million and an equal impairment allowance, was written off in its entirety, as the Group concluded that there was no reasonable expectation of recovering the portfolio's expected cash flows.

For further details, please refer to Consolidated Financial Statements, Note 20.

### 1.5 Project “Moon”

In December 2025, the Group, as part of its NPE strategy plan, initiated a structured process for the disposal of a portfolio of secured non-performing retail exposures of gross carrying amount of ca. € 126 million. As at the reporting date, given the Management's commitment to the abovementioned portfolio's disposal plan that is expected to be completed by the end of 2026, the Group classified the respective loans as held for sale. Moreover, in accordance with the Group's accounting policy for the impairment of financial assets, the Group remeasured the portfolio's expected credit losses by reference to the estimated selling price and recognized an impairment loss of ca. € 47 million.

As at 31 December 2025, the carrying amount of the aforementioned loan portfolio reached € 61 million, comprising loans with gross carrying amount of € 126 million, which carried an impairment allowance of € 65 million.

## Introduction – General Information

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### 1.6 Project “Wave”

In the context of the Group’s initiatives for the optimization of its regulatory capital, In December 2025, the Bank proceeded with the execution of the upsize of the existing (“Wave III”) synthetic risk transfer transaction referencing shipping loans (Project “Wave III Upsize” or “Transaction”). The Transaction provides credit protection over the mezzanine loss in the form of a financial guarantee and is actually an upsize of the original non disclosed reference portfolio of Shipping loan exposures of USD 1.68 billion (closed on 22 December 2022) to USD 2 billion. In order to upsize the reference portfolio to a total USD 2.0 billion, Credit Linked Notes (CLN) of USD 240 million, due 2033, were issued in place of the existing CLNs.

### 1.7 Corporate actions in relation to Hellenic Bank group

Hellenic Bank Public Company Ltd (“Hellenic Bank”), a financial institution based in Cyprus was accounted for as a Group’s associate under the equity method from April 2023 until June 2024.

In June 2024, the Bank acquired an additional 26.3% holding in Hellenic Bank and also announced, pursuant to the Takeover Bids Law of 2007 of the Republic of Cyprus (“Law”), the submission of a Mandatory Takeover Bid to all shareholders of Hellenic Bank for the acquisition of up to 100% of its issued share capital. The acceptance period for the Mandatory Takeover Bid expired on 30 July 2024 and the Bank acquired control over Hellenic Bank group within July, despite being the holder of 55.48% of Hellenic Bank’s shares as at 30 June 2024. Accordingly, Hellenic Bank and its subsidiaries were included in the Company’s consolidated financial statements from the beginning of the third quarter of 2024. The total percentage of acceptance of the Takeover Bid reached 0.481%, giving Eurobank total participation of 55.962% in the issued share capital of Hellenic Bank.

Moreover, in November 2024, the Bank announced that it has entered into share purchase agreements with certain shareholders of the Hellenic Bank, pursuant to which, it has agreed to acquire an additional total holding of 37.51% in the entity.

On 11 February 2025 after the receipt of the relevant regulatory approvals, the acquisition of a total 37.51% stake in Hellenic Bank, was completed resulting in the Bank’s total holding in Hellenic Bank at 93.47%. Following that and pursuant to the provisions of the Takeover Bids Law in Cyprus, the Bank also announced the submission of a Mandatory Takeover Bid to the shareholders of Hellenic Bank for the acquisition of up to 100% of the issued share capital of Hellenic Bank.

On 25 April 2025, the Bank announced that the total percentage of acceptance of the Takeover Bid reached 4.525%, resulting in the Bank’s total participation of 97.994% in the issued share capital of Hellenic Bank. Moreover, on 28 April 2025, the Bank applied to the Cyprus Securities and Exchange Commission for the exercise of the Squeeze Out right provided by Article 36 of the Takeover Bids Law, for the acquisition of the remaining shares of Hellenic Bank.

On 11 June 2025, the Bank announced the completion of the Squeeze Out procedure. It acquired the remaining 8,279,967 shares of Hellenic Bank, representing 2.006% of its issued share capital. Following this transaction, the Bank’s holding in the company’s share capital reached 100%.

As of the second quarter of 2025, the fair value exercise performed by the Group to measure the identifiable assets acquired and liabilities incurred from the acquisition of Hellenic Bank has been completed, without any significant differences identified, compared to the acquisition values that were presented in the consolidated financial statements for the year ended 31 December 2024. Moreover, from 1 January 2025, the fair value adjustments that were previously included on a provisional basis within the balance sheet lines ‘Other assets’ and ‘Other liabilities’, are presented to the respective balance sheet lines they relate to.

For further details, please refer to Consolidated Financial Statements, Note 23.3.

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### 1.8 Acquisition of CNP Cyprus Insurance Holdings Limited

On 16 April 2025, Hellenic Bank (currently Eurobank Limited) announced that following the receipt of all relevant regulatory approvals, the acquisition of CNP Cyprus Insurance Holdings Limited from CNP Assurances (the “Transaction”) was completed, with a total consideration of € 182 million. As of May 2025, the acquired entity has been renamed ERB Cyprus Insurance Holdings Limited.

The transaction is in line with Eurobank’s strategic objective to expand in the Cypriot insurance market. The acquired entity’s subsidiaries, hold a leading position in Cyprus in the insurance sector and offer life and general insurance products and services through a large network of independent agents. The Transaction is expected to further expand and strengthen the existing position of Eurobank Limited in the insurance market, increasing significantly its market share in the life and general insurance sectors.

The results of the former CNP Cyprus subgroup were incorporated in the Group’s financial statements prospectively, as of 1 April 2025.

For prudential purposes, the aforementioned companies are accounted for as Group’s associates and are consolidated under the equity method.

For further details, please refer to Consolidated Financial Statements, Note 23.4.

### 1.9 Merger process between Eurobank Holdings and Eurobank S.A.

In respect of the merger process between Eurobank Ergasias Services and Holdings S.A. and Eurobank S.A., on 30 April 2025, the Board of Directors of both companies approved the draft merger agreement. On 19 May 2025, the companies announced the completion of the publicity formalities for the Draft Merger Agreement, pursuant to which Eurobank S.A. will absorb Eurobank Holdings, in accordance with the provisions of the applicable laws. In addition, on 22 October 2025, the General Meeting of Eurobank S.A. approved the above merger.

On 12 December 2025, following the approvals granted by the Extraordinary General Meetings of the shareholders of both Companies and the receipt of all necessary permits and approvals from the competent authorities, Eurobank announced that the merger had been completed.

For further details, please refer to Consolidated Financial Statements, Note 23.1.

### 1.10 Agreement with Fairfax for the acquisition of Eurolife FFH Life Insurance and the partial disposal of ERB Asfalistiki Ltd

On 13 October 2025, Eurobank Holdings and the Bank, announced that Eurobank Holdings has signed a term sheet with Fairfax Financial Holdings Limited (“Fairfax”) pursuant to which Eurobank shall acquire 80% of the life insurance business (“Eurolife Life”) (the Transaction) for a cash consideration of € 813 million. Following this acquisition, Eurobank will hold 100% of Eurolife Life and will retain its 20% interest in Eurolife Holdings’ general insurance business (“Eurolife General Insurance”).

In addition to the aforementioned Transaction, Fairfax shall procure that certain affiliates of Fairfax will acquire 45% of the share capital of ERB Asfalistiki (“ERBA”), the non-life (property and casualty) insurance company of Eurobank Limited in Cyprus, for a cash consideration of € 59 million. Fairfax will also have the right to acquire the remaining 55% of the share capital of ERBA over time. This strategic partnership will allow both companies to combine their strengths in underwriting, risk management, and product development, driving greater operational efficiency and unlocking new market opportunities in Greece and Cyprus.

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The signing of both share purchase agreements is expected within the first quarter of 2026, whilst their completion within the second quarter of 2026 is subject to the required approvals from the relevant authorities and the process for related party transactions.

For further details, please refer to Consolidated Financial Statements, Note 23.2.

### 1.11 Dividends/Shareholders' remuneration

On 29 April 2025, the Company received the approval from the ECB to remunerate its shareholders with an amount of € 674 million for the financial year 2024, with a combination of cash and share buyback, corresponding to a 50% payout ratio of the Group's net profit for 2024 excluding the gain on acquisition of a shareholding in Hellenic Bank of € 99.5 million.

In May 2025, the Bank, further to the distribution of € 240 million in December 2024, proceeded with the distribution of an additional amount of € 405 million from its non-mandatory reserves, as part of the Bank's overall contribution to its sole shareholder, Eurobank Holdings, in order to enable the latter to remunerate its shareholders out of the profits for the financial year 2024.

In October 2025, the BoD of Eurobank Holdings approved, in accordance with the provisions of paragraph 3 of article 162 of Law 4548/ 2018 and in line with its shareholders' remuneration policy, the distribution of an interim cash dividend of € 170 million for the financial year 2025 from its non-mandatory reserves. Eurobank Holdings obtained the necessary approval from the ECB in late October and proceeded with the payment of the interim dividend to its shareholders on 12 November 2025.

Based on the Group's financial performance for the financial year 2025, the Bank intends to remunerate its shareholders with a total amount of € 717 million, of which € 170 million has already been distributed in the form of an interim dividend, as noted above. This corresponds to a 55% payout ratio of the Group's net profit for 2025 less the € 58 million gain on acquisition of the CNP Cyprus subgroup and is subject to approval of the Annual General Meeting (AGM) of its shareholders and the regulatory authorities. The final remuneration will be delivered through a combination of a cash dividend and a share buyback programme.

For further details, please refer to Consolidated Financial Statements, Note 39.

### 1.12 Additional Tier 1 capital instruments

On 4 June 2025, Eurobank Holdings issued fixed rate reset Additional Tier 1 perpetual contingent temporary write-down notes (the "Notes") of nominal value € 500 million. On the same date, the Bank issued notes of equivalent terms, which are held by Eurobank Holdings until its merger with the Bank in December 2025. Upon completion of the merger, these notes were cancelled, and the Bank assumed the corresponding Notes held by third parties. The Notes, subject to their terms and conditions, are redeemable in full at the Bank's sole and full discretion on any interest payment date falling on or after 4 June 2031 (the first reset date) or at any time following the occurrence of certain events. They bear non-cumulative interest, which is cancellable subject to conditions, at a fixed rate of 6.625% per annum until the first reset date, and thereafter at a reset rate based on the aggregate of 5-year mid-swap rate plus a margin of 445.4 bps. The interest is payable semi-annually in arrears, commencing on 4 December 2025.

On 10 November 2025, Eurobank Holdings issued fixed rate reset Additional Tier 1 perpetual contingent temporary write down notes (the "Notes" – second issuance) with a nominal value of € 600 million. On the same date, the Bank issued notes of equivalent terms, which were held by Eurobank Holdings until its merger with the Bank in December 2025. Upon completion of the merger, these notes were cancelled, and the Bank assumed the corresponding Notes held by third parties. The said Notes are callable by the Bank, subject to their terms and conditions, on any interest payment date falling on or after 10 November 2033 and bear non-cumulative interest at a fixed rate of 6.250% per annum until the first reset

## Introduction – General Information

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date, and thereafter at a reset rate based on the aggregate of 5-year mid-swap rate plus a margin of 379 bps, payable semi-annually in arrears, commencing on 10 May 2026.

The issued Notes are listed on the Euro MTF market of the Luxembourg Stock Exchange.

Based on their terms, such as the fully discretionary and non-cumulative nature of interest, perpetual maturity, and loss-absorbing features that relate to specific regulatory requirements or trigger events, the Notes have been classified as equity instruments with coupon payments, if any, to be recognized as dividends in accordance with the principles of IAS 32. The Notes also qualify as Additional Tier 1 capital instruments under the CRR. For the year ended 31 December 2025, the coupon payment to AT1 capital holders amounted to € 16.5 million (€ 12 million after tax).

The issuances are in line with the Group's strategy to further optimize its capital structure and enhance its capacity to support future strategic initiatives.

Further information is available on the Company's website.

### 1.13 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 had a maturity of ten years (until 17 January 2028) and paid fixed nominal interest rate of 6.41%, payable semi-annually. In September 2025 Eurobank Holdings proceeded with the early redemption of the above Tier 2 capital instruments of face value of € 950 million.

On 30 November 2022, the Company announced the issuance of a € 300 million subordinated Tier 2 debt instrument which matures in December 2032, is callable in December 2027 offering a coupon of 10% per annum and is listed on the Luxembourg Stock Exchange's Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Company.

On 19 January 2024, the Company announced the issuance of a € 300 million subordinated Tier 2 debt instrument which matures in April 2034, is callable at par in April 2029 offering a coupon of 6.25% per annum and is listed on the Luxembourg Stock Exchange's Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Company.

As at 31 December 2024, Tier 2 subordinated instruments include notes issued by Hellenic Bank with nominal value € 200 million, out of which € 33 million were held by Group entities. The notes were issued in March 2023 at par offering a coupon of 10.25% per annum, mature in 14 June 2033, are callable at par for a 3-month period commencing on 14 March 2028 and are listed on the Luxembourg Stock Exchange's Euro MTF market.

In January 2025, Eurobank Holdings announced that it has successfully priced the issuance of € 400 million subordinated Tier 2 debt instruments (New Instruments) which mature in April 2035, are callable at par from 30 January 2030 until 30 April 2030, offering a coupon of 4.25% per annum and are listed on the Luxembourg Stock Exchange's Euro MTF market. In addition, Eurobank Holdings announced an any-and-all exchange offers for Hellenic Bank's outstanding € 200 million Tier 2 notes, out of which € 33 million were held by Group entities, with additional Eurobank Holdings Tier 2 subordinated notes, issued under a single series and with same terms with the € 400 million subordinated notes. The offer period was set from 21 January 2025 until 27 January 2025.

On 28 January 2025, Eurobank Holdings announced that it has decided to accept all existing notes offered for exchange, pursuant to the exchange offer, with nominal value of € 157 million. The nominal value of new instruments issued is € 188.5 million, which form a single series with the New Instruments with a combined aggregate nominal amount of € 589

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million. As a result of the aforementioned exchange, the Group recognized a buy-back loss of approximately € 9 million, in the income statement line “Other income/(expenses)”.

Following the merger of Eurobank Holdings with the Bank the latter assumed the above mentioned instruments.

The purpose of the Exchange Offer and the issuance of the Eurobank Holdings subordinated notes is to optimize the regulatory efficiency of Eurobank Holdings’ capital base while the proceeds will be used for general financing purposes.

In January 2026, the Bank announced that it has successfully completed the pricing of € 400 million subordinated Tier II debt instruments which mature in April 2037, are callable at par from 29 January 2032 until 29 April 2032, offering a coupon of 4.125% per annum and are listed on the Luxembourg Stock Exchange’s Euro MTF market. The proceeds from the issues will support Eurobank Group’s strategy to ensure ongoing compliance with its MREL requirements and will be used for Eurobank’s general funding purposes.

### 1.14 Regulatory framework

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

- Pillar 1 defines the minimum regulatory capital requirements, based on principles, rules and methodologies specifying and measuring credit, market and operational risk. These requirements are covered by regulatory own funds, according to the rules and specifications of CRR. The Basel IV revisions introduce substantial enhancements to Pillar 1, aiming to improve the consistency and comparability of risk-weighted asset calculations.
- Pillar 2 addresses the internal processes for assessing overall capital and liquid asset holdings are adequate in relation to risk 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 checks that banks are equipped to manage those risks properly. The Basel IV framework indirectly reinforces Pillar 2 by elevating supervisory expectations regarding model governance, stress testing practices, and the integration of revised risk metrics into ICAAP methodologies.
- 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. Basel IV further strengthens Pillar 3 by expanding transparency obligations enhancing comparability and accountability across institutions.

According to the CRD IV provisions:

- Minimum Common equity Tier 1 (CET1) ratio: 4.5%;
- Minimum Tier 1 ratio: 6%; and
- Minimum Total Capital ratio: 8%.

Furthermore, banks are required to maintain in addition to the above minimum ratios, a Capital Conservation Buffer (CCB) equal to 2.5% of their total risk exposure amount calculated.

As a result, the minimum ratios which must be met, including the CCB are:

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

Additional capital buffers that CRD IV introduces are the following:

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### 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 may be required under the CRD IV to build up an additional buffer up to 2.5% of CET1 capital during periods of excess credit growth, according to national circumstances. According to BoG Executive Committee Act No 202/1/11.03.2022, which lays down the procedure for applying the CCyB rate in Greece and the relevant calibration methodology, BoG assesses, on a quarterly basis, the intensity of cyclical systemic risk and the appropriateness of the CCyB rate, taking into account the standardised credit-to-GDP (Gross Domestic Product) gap, the buffer guide and, in particular, additional indicators for monitoring the build-up of cyclical systemic risk.

Under Executive Committee Act 235/2/07.10.2024, the CCyB rate that credit institutions are required to maintain is 0.25% for the period from 1.10.2025 to 30.09.2026. From 1 October 2026, under Executive Committee Act 248/1/06.10.2025, the BoG has decided to set the CCyB rate for Greece at 0.5%, i.e. to the level of the target positive neutral CCyB rate, applicable. The positive neutral CCyB is activated at an early stage in the economic and financial cycle, when cyclical systemic risks are neither elevated nor subdued.

### b) Global systemic institution buffer

CRD IV includes a mandatory Systemic Risk Buffer (SyRB) 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 22 December 2022, ECB published the November 2022 Governing Council statement on macroprudential policies regarding the revised floor methodology for assessing capital buffers for O-SIIs. The revised floor methodology increases the number of buckets to which O-SIIs are allocated from four to six and raises the floor level for the highest bucket to 1.50% while keeping the floor of the lowest bucket unchanged at 0.25%. The ECB uses the revised floor methodology to assess O-SII buffers proposed by national authorities as of 1 January 2024.

From 1 January 2024, the O-SII buffer for the Group increased to 1.25% (from 1.00% in 2023), in accordance with the Executive Committee Act 221/1/17.10.2023 of BoG, following the above change in the floor methodology. Based on the Executive Committee Act 234/23.09.2024, BoG decided that would keep O-SIIs buffer for the Group unchanged at 1.25% for 2025. On 15 September 2025, BoG published the Executive Act 246/15.9.2025 for the determination of O-SIIs and the O-SII buffer thereof for 2026. BoG has decided that it would keep O-SIIs buffer for the Group unchanged at 1.25% for 2026 with effect from 1 January 2026.

### 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 SyRB and of identifying the sets of institutions to which it applies. According to BoG Executive Committee Act No 197/2/21.12.2021, BoG decided to adopt the European Banking Authority (EBA) guidelines on the appropriate subsets of exposures to which the competent authority or the designated authority may apply a SyRB based on paragraph 5 of article 133 of CRD.

The SyRB consists of CET1 capital and is expressed as a percentage of the total risk exposure amount of credit institutions. It can be set in multiples of 0.5% and may exceed 3% provided that the relevant procedures laid down in EU law are respected. The BoG has set neither a sectoral nor a broader SyRB rate as yet.

### 1.14.1 Regulatory Developments

On 20 December 2023, the EBA published its final draft ITS on amendments to disclosure and reporting of the minimum requirement for MREL and TLAC. These amendments reflect the new requirement to deduct investments in eligible liabilities instruments of entities belonging to the same resolution group, the so called 'daisy chain' framework, and other

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changes to the prudential framework. The amendments apply for the reference date as of end-June 2024 for banks subject to the obligation to meet the final MREL target.

On 9 April 2024, EBA published its final Guidelines on the resubmission of historical data under the EBA reporting framework. The Guidelines provide a common approach to the resubmission of historical data by the financial institutions to the competent and resolution authorities in case of errors, inaccuracies or other changes in the data reported, in accordance with the supervisory and resolution reporting framework developed by the EBA.

The Guidelines set out a general approach for the resubmission of historical data with the aim of limiting the number of historical periods. Under this general approach, financial institutions are expected to resubmit the corrected data for the current reporting date, and historical data for past reference dates, going back at least one calendar year (except for the data with monthly reporting frequency). The Guidelines also clarify the general circumstances under which the resubmission may not be required. The new precision requirement is applicable from 1 April 2025.

On 19 June 2024, the following were published in the Official Journal of the EU:

- Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 amending the Capital Requirements Directive IV as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks (CRD 6).
- Regulation (EU) 2024/1623 of the European Parliament and of the Council of 31 May 2024 amending the Capital Requirements Regulation as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor (CRR 3).

Member States will have 18 months to transpose CRD 6 into national legislation, whilst CRR 3 applied from 1 January 2025.

In addition, following its publication in the Official Journal of the European Union, the Commission Implementing Regulation (EU) 2024/1872 of 1 July 2024, amended the implementing technical standards laid down in Implementing Regulation (EU) 2016/1799 as regards the mapping tables specifying the correspondence between the credit risk assessments of external credit assessment institutions and the credit quality steps set out in Regulation (EU) No 575/2013 of the European Parliament and of the Council.

On 8 January 2025, EBA published the final guidelines on the management of environmental, social and governance (ESG) risks. The guidelines specify requirements regarding the internal processes and ESG risk management arrangements that institutions should have in place in accordance with the Capital Requirements Directive (CRD6). These guidelines, which will apply from 11 January 2026, establish requirements for institutions' internal processes and ESG risk management arrangements, including embedding ESG risks into their risk appetite, internal controls, and the ICAAP, as well as developing specific transition plans to manage the impact of ESG factors over short, medium, and long-term horizons.

On 12 February 2025, EBA published its final draft ITS on the Pillar 3 data hub for large and other institutions, which will centralise prudential disclosures by institutions through a single electronic access point on the EBA website. This project is part of the Banking Package laid down in the CRR3 and CRD6. The ITS detail the IT solutions and processes to be followed by large and other institutions when submitting their respective Pillar 3 disclosures. This includes the IT solutions to be used, the data exchange formats to be considered and the technical validations to be performed by the EBA.

On 22 May 2025, EBA published an onboarding plan for large and other institutions, setting out the steps required for accessing and submitting information to the new Pillar 3 Data Hub (P3DH) – the EBA's centralised platform for public disclosures under CRR3.

The onboarding plan outlines the procedural steps that institutions need to follow to ensure timely and accurate submissions of Pillar 3 information. The onboarding plan provides a step-by-step guide for the identification of institutions and to give them access to the EBA's EUCLID Regulatory Reporting Platform, through which the Pillar 3 data will be

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submitted. It also spells out the timeline for the process, which will follow a phased-in approach. This means that institutions will be able to continue to fulfil their Pillar 3 disclosure obligations during 2025 as usual, and the submissions to the P3DH will occur only at a later stage. This approach will give institutions enough time to complete the onboarding process and align their internal processes, without impacting the compliance with the CRR requirements. P3DH information is available to the public from December 2025.

On 22 May 2025, EBA launched a public consultation on proposed amendments to the European Commission’s Implementing Regulation on Pillar 3 disclosures under the CRR3. The proposal specifies enhanced and proportionate disclosure requirements related to ESG-related risks, equity exposures and aggregate exposure to shadow banking entities. It also implements the new codes for the statistical classification of economic activities in the EU (NACE). The consultation paper was published for a three-month consultation period i.e. until 22 August 2025.

On 16 June 2025, EBA published three final draft technical standards that are crucial for the implementation of the EU Banking Package and will allow supervisors to monitor institutions’ compliance. In particular, the EBA is publishing the following Regulatory Technical Standards (RTS) and Implementing Technical Standards (ITS):

- RTS concerning the calculation and adjustments of the Business Indicator (BI), which is central to the standardised and harmonised application of the operational risk capital requirements.
- ITS on the mapping to FINREP, which will ensure consistency and reduce implementation, administrative and operational costs.
- Amending ITS on operational risk reporting, which will keep the supervisory reporting framework relevant, meaningful and aligned with the amended regulation.

After the submission of the final draft ITS to the Commission for adoption, the EBA published on the website the IT tools, including binding instructions. The EBA has published a technical package, including the Data Point Model (DPM), validation rules and taxonomy, that shall be used by institutions to submit this supervisory reporting information to supervisors. The first applicable reference date for reporting under the draft ITS is 31 March 2026.

On 5 November 2025, EBA published its final guidelines on environmental scenario analysis, clarifying supervisory expectations on how institutions should incorporate physical and transition climate risks into both short-term stress-testing exercises and longer-term resilience assessments. The Guidelines complement the broader ESG risk management framework and set out high-level criteria for selecting scenarios, identifying transmission channels and integrating the results into risk management and strategic planning. The guidelines will apply from 1 January 2027.

On 3 December 2024, the SRB published a consultation paper on the ‘Operational guidance for banks on resolvability self-assessment’, outlining the capabilities that banks are expected to maintain over time in order to be deemed resolvable. The final document was published on 7 August 2025. On 17 March 2025, the SRB launched a public consultation on ‘Operational Guidance on Resolvability Testing for Banks’ that seeks to promote a harmonized approach for the implementation of the multi-annual testing programme across the main resolvability dimensions. The final document was published on 26 September 2025. Lastly, on 2 April 2025, the SRB started a public consultation on ‘Expectations on Valuation Capabilities’ that introduces an updated, comprehensive set of information necessary for performing valuations, the minimum functionalities expected for Data Repositories for resolution, as well as establishing expectations on the content and structure of the valuation playbooks (consultation ended on 2 July 2025).

On 4 November 2025, EBA released several updates to ensure consistency with the latest regulatory and reporting framework developments. These include an updated Mapping Tool reflecting recent amendments to the Pillar 3 disclosure and supervisory reporting frameworks.

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**1.15 Supervisory Review and Evaluation Process (SREP)**

Since November 2014, within the context of the SSM, the ECB has been responsible for the supervision of the largest and most significant banks located in the euro area and other EU countries wishing to participate in the SSM (e.g. Bulgaria). National supervisory authorities in close cooperation with the ECB, remain responsible for the supervision of the less significant banks.

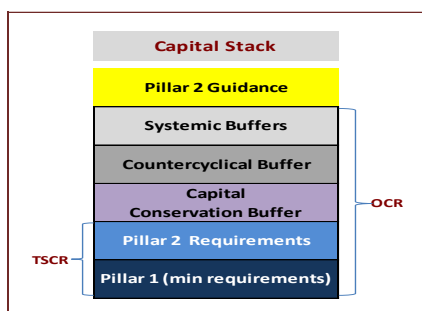
Among others, the ECB conducts annually a Supervisory Review and Evaluation Process (SREP) assessment, in order to assess banks’ risk profiles and determine quantitative and qualitative requirements for banks. The key purpose of SREP is to ensure that banks have adequate arrangements, strategies, processes 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 methodology followed provides for a holistic and forward-looking assessment of the viability of the supervised institution.

The common SREP framework is built around:

- a business model and profitability assessment;
- an internal governance and risk management assessment;
- an assessment of risks to capital on a risk-specific basis (i.e. credit risk, market risk, operational risk, interest rate risk in the banking book (IRRBB) and credit spread risk in the banking book CSRBB), of the institution’s internal capital adequacy assessment process (ICAAP) and of capital adequacy; and
- an assessment of risks to liquidity and funding on a risk-specific basis (i.e. short-term funding, long-term funding and banks’ internally identified risks in normal scenarios and under stressed conditions), of the banks’ internal liquidity adequacy assessment process (ILAAP) and of the adequacy of liquidity.

On the basis of the ECB’s assessment of the Groups’ risk profile (through SREP), the following apply:

- The minimum required CET1 ratio and the minimum required Total capital adequacy ratio (Total SREP Capital Requirement or TSCR) that the Group must meet at all times;
- The Pillar 2 Requirement (P2R) is a bank specific capital requirement included in the TSCR, which typically 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. The P2R is determined via the SREP.
- The Overall Capital Requirement (OCR), which includes, 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 at consolidated level over and above the OCR. The P2G indicates the level of capital that the ECB expects the Group to maintain in order to ensure it can absorb potential losses resulting from adverse scenarios.



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### 1.15.1 Requirements for excessive Leverage

Apart from the capital requirements, a bank may be subject to a Pillar 2 requirement (P2R) with regard to the leverage ratio, in addition to the 3% minimum requirement, if ECB determines that the bank has an elevated risk of excessive leverage. This is intended to capture contingent leverage risk originating from a bank extensively using derivatives, securities financing transactions and off-balance sheet items, as well as engaging in regulatory arbitrage and providing step-in support. Similarly, to the P2R for capital requirements, the leverage ratio Pillar 2 Requirement is legally binding.

Additionally, a bank may be subject to leverage ratio Pillar 2 Guidance (P2G), which is a bank-specific recommendation that indicates the level of capital a bank has to maintain in addition to their binding leverage ratio requirements. Based on the latest SREP Decision, the Group is not subject to a P2R or P2G with regard to the leverage ratio.

### 1.16 Implementation of Capital Adequacy framework

#### 1.16.1 Credit risk

The Group is applying since Q1 2023 the Common Reports requirements of EU Regulation 575/2013 ('CRR') under Title II, Chapter 2 ('Standardised approach') and its subsequent amendments for all credit risk exposures. The Group utilizes its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring.

#### 1.16.2 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 Incremental Risk Charge (IRC) 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 (STD) 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, further supplemented by sensitivity analysis and stress testing, historical simulation and other market risk metrics (e.g., expected shortfall).

#### 1.16.3 Interest Rate risk in the Banking Book (IRRBB) and Credit Spread risk in the Banking Book (CSRBB)

Interest Rate Risk in the Banking Book (IRRBB) is part of the SREP and refers to the current or prospective risk to the Bank's capital and to its earnings, arising from the impact of adverse movements in interest rates in its banking book. The Bank has updated its infrastructure to reflect changes in the market and supervisory practices so as to effectively manage and control such risks. This includes the implementation of a specialised software, so as to identify, measure and monitor IRRBB.

The established software tools are under continuous evolution in order to cover any part of the Bank's balance sheet. They offer a wide range of modelling capabilities for demand deposits, pre-payable loans, mortgage pipelines, revolving facilities and off-balance sheet items.

The Bank uses sensitivity analysis to monitor risk on earnings (NII) and on economic value of equity (EVE) on a continuous basis, covering both supervisory and internal monitoring reporting needs.

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In addition to the above, the Bank in response to the regulatory developments and requirements (EBA/GL/2022/14), has further enhanced its infrastructure, governance and limit structure accordingly, so as to measure and monitor its CSRBB.

### 1.16.4 Operational risk

Basel IV introduces a single Standardised Approach for operational risk, replacing previous methods and simplifying the framework. Capital requirements are driven solely by the Business Indicator, which reflects the scale of an institution's activities based on selected income and expense components averaged over three years. Following the transition to the new framework, the Group applies this methodology for calculating its operational risk capital requirements from 2025 onwards.

1.17 2025 EU - wide stress test  
The EU-wide stress test exercise was carried out on a sample of banks covering broadly 75% of the banking sector in the euro area, each non-euro area EU Member State and Norway, as expressed in terms of total consolidated assets as of end 2023. To be included in the sample, banks have to have a minimum of € 30 billion total assets.

As per the 2025 EU-Wide Stress Test Methodological Note (published on 11 November 2024, footnote 92), Eurobank Holdings has been excluded from the sample of the EU-wide stress test exercise because of a major acquisition (Hellenic Bank).

### 1.18 SSM 2026 Geopolitical Reverse Stress Test

The European Central Bank (ECB) has conducted in 2026 a geopolitical risk reverse stress test on 110 directly supervised banks, including Eurobank S.A. The stress test was launched on 16 December 2025, while a publication summarizing aggregate findings will be published at the end of July 2026. No bank individual results will be published.

In line with previous ECB thematic stress tests conducted to comply with Article 100 of the Capital Requirements Directive (CRD), the geopolitical risk reverse stress test is not intended to have any implications for Pillar 2 Guidance (P2G).

The outcome will be used to inform and complement the Supervisory Review and Evaluation Process (SREP) in a qualitative way and in line with the broader 2026 ICAAP.

### 1.19 Scope of Pillar 3

The purpose of Pillar 3 report is to provide updated information on the Group's risk management practices, risk assessment processes and regulatory capital adequacy ratios.

Pillar 3 disclosures consist of both qualitative and quantitative information and are provided on a consolidated basis. They have been prepared in accordance with Part 8 of the Capital Requirements Regulation within CRD IV (Regulation 2013/575/EU) and according to the prudential consolidation framework, which is described in the following section.

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, for templates that require the disclosure for current and previous reporting periods, the previous reporting period is always referred to as the last data disclosed according to the frequency of the template. 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. Considering that Group's NPEs ratio remained consistently below 5% for five consecutive quarters, templates CQ2, CQ6, CQ8 and CR2a of the EBA Disclosure ITS are not published from 31 December 2024 and onwards.

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In June 2019, the EP and the Council published the Regulation (EU) No 876/2019 or CRR2 amending the CRR, regarding among others the reporting and disclosure framework. The CRR2 rules follow a phased implementation with significant elements entering into force in 2021.

In June 2020, EBA published new ITS on public disclosures by institutions and revised final draft ITS on supervisory reporting that implements changes introduced in the revised 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.

On 24 May 2022, EBA published an updated mapping between quantitative disclosure data points and the relevant supervisory reporting data points. The amendments mainly address issues raised by competent authorities and the industry. The updated mapping applies to the reporting framework 3.0 and the ITS on institutions' Pillar 3 public disclosures.

On 19 December 2022, the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 was published in the Official Journal. The ITS amending the ITS laid down in Implementing Regulation (EU) 2021/637 as regards the uniform disclosure formats for the disclosure of ESG risks. This Implementing Regulation was entered into force on 8 January 2023.

On 20 June 2024, EBA published a new draft ITS on Pillar 3 framework in order to cover all disclosures requirements for institutions under the new legislative CRR3 which is applicable from 01 January 2025. As the relevant disclosures are published for the first time in their entirety, the data of the previous periods are not reported as the templates are not comparable.

### 1.20 Pillar 3 Written attestation

Pursuant to article 431(3) of Part Eight of CRR2, the Group has issued an internal approved by the BoD "Consolidated 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.

The Pillar 3 governance process ensures that both the Group's Management and the Board are given sufficient opportunity to debate and challenge the disclosures before their publication, hence, to examine that these have been subject to adequate verification, and they comply with applicable regulatory framework.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee and was approved by the BoD on 29 April 2026 prior to their publication on the Group's website.

It should be noted that:

- data refers to the prudential (regulatory) scope of consolidation;
- the amounts reported are consistent with the recent submissions of the regulatory reporting for each period.

### 1.21 Location, timing and frequency of disclosures

Pillar 3 disclosures are provided on a quarterly basis in electronic format, after taking into consideration the relevant recommendation of EBA Guidelines 2016/11, which include the list of requirements to be considered for more frequent, than annual basis, disclosures.

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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 Group 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.

Based on the internal "Consolidated Pillar 3 Disclosures Policy" the Group ensures consistent and continuous compliance with the Pillar 3 disclosures requirements. In addition, the Group puts in place and maintains internal processes, systems and controls to verify that the disclosures are appropriate and in compliance with the aforementioned regulatory framework.

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 Company's website <https://www.eurobank.gr/en/group/investor-relations/oikonomika-apotelesmata-eurobank> in chronological order and cover both quantitative and qualitative information.

Quantitative information, which is included in the Group's Consolidated Financial Statements, is also provided at the above location. In this way, the Company 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 Group's Pillar 3 disclosures report will be published in accordance with EBA expectations the latest, as follows:

- Year-end Pillar 3 reports (reference date December): by end-June, with the exception of the remuneration policies information that would be expected by end-August;
- Quarterly and Semi-annual Pillar 3 reports: by "reference date + 4 months".

### 1.22 EBA Pillar 3 Data Hub

The EBA Pillar 3 Data Hub (P3DH), established under CRR 3 (Regulation (EU) 2024/1623) and CRD 6 (Directive (EU) 2024/1619), constitutes a centralised digital platform aimed at enhancing the transparency, accessibility and comparability of prudential disclosures across EU credit institutions.

In accordance with the applicable regulatory framework, large and other relevant institutions are required to submit their Pillar 3 disclosures to the EBA in XBRL-CSV format starting from the reporting reference date of December 2025. The submitted information is published centrally by the EBA and made publicly available through the EBA Data Access Portal (EDAP).

Submissions are expected to take place on the same date as the publication of the financial statements or shortly thereafter, depending on the reporting frequency and the nature of the disclosures. Institutions may continue to publish the required prudential disclosures on their own websites. In this context, the Bank may also provide a reference or link to the EBA Data Access Portal, where the Pillar 3 information is available in a centralised manner.

### 1.23 Compliance with CRR

The Group operates as follows:

- Pillar 3 disclosures are provided on a consolidated basis;
- The data refers to the prudential (regulatory) scope of consolidation;
- The amounts reported are consistent with the submissions of the regulatory reporting for each period;

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- The Group includes in its disclosures all information deemed necessary to provide users with a clear, complete and accurate view of the Group’s structure, capital management, risk management system, unencumbered assets and remuneration policy and corporate governance principles. During this procedure the Bank also identifies information that is material, confidential and proprietary;
- The Group has opted to present the full set of Pillar 3 disclosures in a separate document “Consolidated Pillar 3 Report”, which is published at least annually on the Bank’s website, in conjunction with the date of publication of its financial statements. The Remuneration and Corporate Governance disclosures are published as separate documents;
- The Group re-examines the extent and type of information provided at each disclosure date and revises its policy as necessary;
- The Group assesses the need to publish some or all disclosures more frequently than annually, taking into consideration factors such as scale of operations, range of activities, presence in different countries, involvement in different financial sectors, participation in international financial markets and payment, settlement and clearing systems and paying particular attention to information on own funds, capital requirements, risk exposure and other items prone to rapid change; and
- The Audit Committee of the Group is responsible to review and assess the process for the preparation of the Pillar 3 report, while the BoD of the Bank is responsible to approve it.

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

### 1.24 Governance arrangements

Eurobank is headed by a Board of Directors (Board or BoD) which is collectively responsible for the long-term success of the Bank. The Board exercises its responsibilities effectively and in accordance with the Greek legislation and international best practices, while its role is to provide entrepreneurial leadership to the Bank and its subsidiaries (Group) within a framework of prudent and effective controls which enables risk to be assessed and managed.

The Board is assisted in carrying out its duties by Board Committees. The Board delegates some of its responsibilities to the Board Committees, approves their composition and mandates and receives regular and ad hoc reports from them.

The Bank has adopted the Board Nomination Policy which sets out the guidelines and formal process for the identification, selection and nomination of candidates for the Board and ensures that the appointments are made: (a) in accordance with legal and regulatory requirements; (b) with due regard to the expectations of the major shareholders, and (c) on the basis of individual merit and ability, following a best practice process.

In addition, the Bank has adopted the Directors Diversity Policy which sets out the approach to diversity on the Board and it is in accordance with international best practices and the EU and Greek banking law provisions. According to this Policy, Nomination and Corporate Governance Committee’s priority is to ensure that the Board continues to have strong leadership and the right mix of skills to deliver the business strategy. Within this context and in regard to the less represented gender in the Board, Nomination and Corporate Governance Committee ensures that at least 25% (rounded to the previous integer) of the Board is composed of members of the less represented gender, with a target to increase this representation to a minimum of 33% (rounded to the nearest integer) as soon as practicable, and in any case no later than mid 2026. This target aligns with legal and regulatory requirements and industry best practices and shall be maintained at all times, reflecting evolving legal frameworks and market trends. Additionally, if the Board includes three (3) or more executive members, at least one (1) executive member of the less represented gender must be included in the aforementioned 33% percentage. Compliance with this requirement is expected upon the first, after mid 2026, expiration of a term or of the next term in case of one renewal or upon a replacement of an already serving executive member of the Board of Directors for any reason after mid 2026.

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More information concerning the Corporate Governance Arrangements is also available in the Board of Director's Report, in the 2025 Annual Financial Report <https://www.eurobank.gr/en/group/investor-relations/oikonomika-apotelesmata-eurobank/financial-year-2025>.

### 1.25 Prudential versus accounting consolidation

The Pillar 3 disclosures are different from the disclosures presented in the Consolidated Financial Statements, which have been prepared in accordance with the International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB), as endorsed by the European Union (EU). This is mainly due to differences between the prudential consolidation and the accounting consolidation used by the Group. Following the changes introduced in the CRR, Article 18(7) has been amended in order to regulate the treatment of subsidiaries which are excluded from the scope of prudential consolidation since they are different from institutions. The Pillar 3 disclosures are based on disclosure requirements set out in Regulation EU 575/2013 (CRR) as amended and pertain to the conditions of the Group's prudential consolidation, which excludes insurance subsidiaries.

#### 1.25.1 Accounting consolidation

The accounting consolidation of the Group is based on the International Financial Reporting Standards (IFRS) and specifically IFRS 10 Consolidated Financial Statements, IAS 28 Investments in Associates and Joint Ventures and IFRS 11 Joint Arrangements.

Subsidiaries are all entities controlled by the Group. The Group controls an entity when it is exposed, or has rights to, variable returns from its involvement with the entity and has the ability to affect those returns through its power over the entity. The Group consolidates an entity only when all the above three elements of control are present.

Power is considered to exist when the Group's existing rights give it the current ability to direct the relevant activities of the entity, i.e. the activities that significantly affect the entity's returns and the Group has the practical ability to exercise those rights. Power over the entity may arise from voting rights granted by equity instruments such as shares or, in other cases, may result from contractual arrangements.

Where voting rights are relevant, the Group is deemed to have control where it holds, directly or indirectly, more than half of the voting rights over an entity, unless there is evidence that another investor has the practical ability to unilaterally direct the relevant activities.

The Group may have power even when it holds less than a majority of the voting rights of the entity through a contractual arrangement with other vote holders, rights arising from other contractual arrangements, substantive potential voting rights, ownership of the largest block of voting rights in a situation where the remaining rights are widely dispersed ('de facto power'), or a combination of the above. In assessing whether the Group has de facto power, it considers all relevant facts and circumstances including the relative size of the Group's holding of voting rights and dispersions of holdings of other vote holders to determine whether the Group has the practical ability to direct the relevant activities.

The Group is exposed or has rights to variable returns from its involvement with an entity when these returns have the potential to vary as a result of the entity's performance.

In assessing whether the Group has the ability to use its power to affect the amount of returns from its involvement with an entity, the Group determines whether in exercising its decision-making rights it is acting as an agent or as a principal. The Group acts as an agent when it is engaged to act on behalf and for the benefit of another party and as a result does not control an entity. Therefore, in such cases, the Group does not consolidate the entity. In making the above assessment, the Group considers the scope of its decision-making authority over the entity, the rights held by other parties, the remuneration to which the Group is entitled from its involvement and its exposure to variability of returns from other interests in that entity.

## Introduction – General Information

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The Group has interests in certain entities which are structured so that voting rights are not the dominant factor in deciding who controls the entity, such as when any voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual rights. In determining whether the Group has control over such structured entities, it considers the following factors:

- The purpose and design of the entity;
- Whether the Group has certain rights that give it the ability to direct the relevant activities of the entity unilaterally, as a result of existing contractual arrangements that give it the power to govern the entity and direct its activities;
- In case another entity is granted decision making rights, the Group assesses whether this entity acts as an agent of the Group or another investor;
- The existence of any special relationships with the entity; and
- The extent of the Group's exposure to variability of returns from its involvement with the entity, including its exposure in the most subordinated securitised notes issued by the entity as well as subordinated loans or other credit enhancements that may be granted to the entity, and if the Group has the power to affect such variability.

The Group reassesses whether it controls an entity if facts and circumstances indicate that there are changes to one or more elements of control. This includes circumstances in which the rights held by the Group and intended to be protective in nature become substantive upon a breach of a covenant or default on payments in a borrowing arrangement and lead to the Group having power over the investee.

Subsidiaries are fully consolidated from the date on which control is transferred to the Group and are no longer consolidated from the date that control ceases. Total comprehensive income is attributed to the owners of the parent and to the non-controlling interests even if this results in the non-controlling interests having a deficit balance.

Investments in joint ventures (the contractually agreed sharing of control of an arrangement, which exists only when decisions about the relevant activities require the unanimous consent of the parties sharing control and, under which, the parties have rights to the net assets of the arrangement) and investments in associates (investments in which the Group has a significant influence, but which it does not control), are also part of the accounting consolidation scope, but are accounted for using the equity method.

### ***Business combinations involving entities under common control***

Pursuant to IAS 8 'Accounting Policies, Changes in Accounting Estimates and Errors', since business combinations between entities under common control are excluded from the scope of IFRS 3 'Business Combinations', such transactions are accounted for in the Group's financial statements by using the pooling of interests method (also known as merger accounting), with reference to the most recent pronouncements of other standard-setting bodies that use a similar conceptual framework and comply with the IFRSs general principles, as well as accepted industry practices.

Under the pooling of interests method, the Group incorporates the assets and liabilities of the acquiree at their pre-combination carrying amounts, as derived from the highest level of common control unless the substance of the transaction and the underlying facts and circumstances indicate a different value, without any fair value adjustments. Any difference between the cost of the transaction and the carrying amount of the net assets acquired is recorded in Group's equity.

The Group accounts for the cost of such business combinations at the fair value of the consideration given, being the amount of cash or shares issued or if that cannot be reliably measured, the consideration received.

Common control transactions that involve the formation of a new Group entity to effect a business combination by bringing together two or more previously uncombined businesses under the new Group entity are also accounted for by using the pooling of interests method.

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Under a capital reorganization, the acquiring entity incorporates the assets and liabilities of the acquired entity at their carrying amounts, as presented in the books of that acquired entity, rather than those from the highest level of common control. Any difference between the cost of the transaction and the carrying amount of the net assets acquired is recognized in the equity of the new entity. Capital reorganization transactions do not have any impact on the Group's consolidated financial statements.

For further details, please refer to Consolidated Financial Statements, Note 2.2.1.

### 1.25.2 Prudential consolidation

The prudential consolidation applied for reporting to regulatory authorities follows the principles used for the accounting consolidation with the following difference: participation in insurance companies is excluded from prudential consolidation and are accounted for using the equity method.

According to CRD IV, holdings in insurance companies and financial institutions that the Bank has a significant investment, must be deducted from CET1 in case the total investment exceeds 10% of the aggregate amount of CET1. Amount, which is not deducted, is risk weighted by 250%.

The following table presents a list of the Group's subsidiaries at 31 December 2025 for which prudential consolidation is different compared to the accounting consolidation:

**Table 1:** Group's insurance subsidiaries

a	b	c & g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation	Description of the entity
Hellenic Bank Insurance Holding Ltd <sup>(1)</sup>	Full consolidation	Equity consolidation	Insurance services
ERB Cyprus Insurance Holdings Ltd <sup>(2)</sup>	Full consolidation	Equity consolidation	Holding company
Cyprialife Greece Single Member S.A. <sup>(3)</sup>	Full consolidation	Equity consolidation	Life Insurance
ERB Cyprialife Ltd <sup>(3)</sup>	Full consolidation	Equity consolidation	Life Insurance
ERB Asfalistiki Ltd <sup>(2)</sup>	Full consolidation	Equity consolidation	General Insurance
Cyprialife Insurance Brokers Ltd <sup>(2)</sup>	Full consolidation	Equity consolidation	Insurance Brokerage
Laiki Brokers (Insurance & Consultancy Services) Ltd <sup>(2)</sup>	Full consolidation	Equity consolidation	Insurance Brokerage
Laiki Insurance Agencies Ltd <sup>(2)</sup>	Full consolidation	Equity consolidation	Insurance agency services

<sup>(1)</sup> Entities of former Hellenic Bank group, which were consolidated as of the third quarter of 2024.

<sup>(2)</sup> CNP Cyprus Insurance Holdings Limited and its subsidiaries (former "CNP Cyprus subgroup") were acquired by Hellenic Bank in April 2025.

<sup>(3)</sup> Merger of Group's Cypriot insurance companies: In October 2025, the merger of the Group's Cypriot insurance companies was completed. This involved the transfer of all insurance portfolios, assets, and liabilities of Hellenic Life Insurance Company Ltd and Pancyprian Insurance Ltd to ERB Cyprialife Ltd and ERB Asfalistiki Ltd, respectively.

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**Table 2: EU LI3 – Outline of the differences in the scopes of consolidation**

The following table presents a list of all Company's subsidiaries based on the method of accounting and prudential consolidation.

a	b	c & g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation	Description of the entity
Be Business Exchanges Single Member Societe Anonyme of Business Exchanges Networks and Accounting and Tax Services	Full consolidation	Full consolidation	Business-to-business e-commerce, accounting, tax and sundry services
Eurobank Asset Management Mutual Fund Mngt Company Single Member S.A.	Full consolidation	Full consolidation	Mutual fund and asset management
Eurobank Equities Investment Firm Single Member S.A.	Full consolidation	Full consolidation	Capital markets and advisory services
Eurobank Leasing Single Member S.A.	Full consolidation	Full consolidation	Leasing
Eurobank Factors Single Member S.A.	Full consolidation	Full consolidation	Factoring
Herald Greece Single Member Real Estate development and services S.A. 1	Full consolidation	Full consolidation	Real estate
Piraeus Port Plaza 1 Single Member Development S.A.	Full consolidation	Full consolidation	Real estate
(Under liquidation) Anchor Hellenic Investment Holding Single Member S.A.	Full consolidation	Full consolidation	Real estate
Athinaiki Estate Investments Single Member S.A.	Full consolidation	Full consolidation	Real estate
Piraeus Port Plaza 2 Single Member Development S.A.	Full consolidation	Full consolidation	Real estate
Piraeus Port Plaza 3 Single Member Development S.A.	Full consolidation	Full consolidation	Real estate
Tenberco Real Estate Single Member S.A.	Full consolidation	Full consolidation	Real estate
Value Touristiki Single Member Development S.A.	Full consolidation	Full consolidation	Real estate
Insignio Single Member S.A.	Full consolidation	Full consolidation	Real estate
Anaptyxeis Plagias Single Member S.A. <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
Eurobank Ananeosimes Single Member S.A.	Full consolidation	Full consolidation	Production and distribution of solar generated electric energy
Eurobank Bulgaria AD	Full consolidation	Full consolidation	Banking
PB Personal Finance EAD	Full consolidation	Full consolidation	Pension assurance intermediary business
Berberis Investments Ltd	Full consolidation	Full consolidation	Holding company
Eurobank Limited <sup>(1)</sup>	Full consolidation	Full consolidation	Banking
Hellenic Bank (Investments) Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Investment banking, asset management and brokerage
HB Data Analytics Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Auxiliary services
Ezmero Holdings Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Real estate
Anolia Industrial Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Real estate
Drypto Holdings Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Real estate
Arzetio Holdings Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Real estate
Katlero Holdings Ltd <sup>(1)</sup>	Full consolidation	Full consolidation	Real estate
ERB Cyprus Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Holding company
ERB Cyprus Tower Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
LCYL Karpenisiou Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
LCYL Kiti Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
LCYL Dramas Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
LCYL Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
CL Archangelos Anaptyxis Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
CL Archangelos Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate

## Introduction – General Information

a	b	c & g	h
Name of the entity	Method of accounting consolidation	Method of prudential consolidation	Description of the entity
Montper Enterprises Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Holding company
CL (Mesa Geitonia) Properties Ltd <sup>(2)</sup>	Full consolidation	Full consolidation	Real estate
Foramonio Ltd	Full consolidation	Full consolidation	Real estate
Lenevino Holdings Ltd	Full consolidation	Full consolidation	Real estate
Rano Investments Ltd	Full consolidation	Full consolidation	Real estate
Neviko Ventures Ltd	Full consolidation	Full consolidation	Real estate
Zivar Investments Ltd	Full consolidation	Full consolidation	Real estate
Amvanero Ltd	Full consolidation	Full consolidation	Real estate
Revasono Holdings Ltd	Full consolidation	Full consolidation	Real estate
Volki Investments Ltd	Full consolidation	Full consolidation	Real estate
Adariano Investments Ltd	Full consolidation	Full consolidation	Real estate
Elerovio Holdings Ltd	Full consolidation	Full consolidation	Real estate
Ovedrio Holdings Ltd	Full consolidation	Full consolidation	Real estate
Primoxia Holdings Ltd	Full consolidation	Full consolidation	Real estate
Severdor Ltd	Full consolidation	Full consolidation	Holding company
Eurobank Private Bank Luxembourg S.A.	Full consolidation	Full consolidation	Banking
Eurobank Fund Management Company (Luxembourg) S.A.	Full consolidation	Full consolidation	Fund management
ERB Lux Immo S.A.	Full consolidation	Full consolidation	Real estate
ERB New Europe Funding B.V.	Full consolidation	Full consolidation	Finance company
ERB New Europe Funding II B.V.	Full consolidation	Full consolidation	Finance company
ERB IT Shared Services S.A.	Full consolidation	Full consolidation	Informatics data processing
Seferco Development S.A.	Full consolidation	Full consolidation	Real estate
ERB Leasing A.D. Beograd-in Liquidation	Full consolidation	Full consolidation	Leasing
IMO Property Investments A.D. Beograd	Full consolidation	Full consolidation	Real estate services
Karta II Plc	Full consolidation	Full consolidation	Special purpose financing vehicle
Astarti Designated Activity Company	Full consolidation	Full consolidation	Special purpose financing vehicle
ERB Recovery Designated Activity Company	Full consolidation	Full consolidation	Special purpose financing vehicle
Femion Ltd	Equity consolidation	Equity consolidation	Special purpose investment vehicle
Global Finance S.A.	Equity consolidation	Equity consolidation	Investment financing
Odyssey GP S.a.r.l.	Equity consolidation	Equity consolidation	Special purpose investment vehicle
Eurolife FFH Insurance Group Holdings S.A.	Equity consolidation	Equity consolidation	Holding company
Alpha Investment Property Commercial Stores S.A.	Equity consolidation	Equity consolidation	Real estate
Peirga Kythnou P.C.	Equity consolidation	Equity consolidation	Real estate
doValue Greece Loans and Credits Claim Management S.A.	Equity consolidation	Equity consolidation	Loans and Credits Claim Management
Perigenis Business Properties S.A.	Equity consolidation	Equity consolidation	Real estate

<sup>(1)</sup> Entities of the former Hellenic Bank group, which was consolidated as of the third quarter of 2024. As of November 2024, following the share purchase agreements with certain shareholders of Hellenic Bank and Eurobank's squeeze-out right to acquire the remaining shares of Hellenic Bank, the entity is included in the Group's financial statements with 100% consolidation percentage. As of June 2025, following the completion of the Squeeze Out procedure, the Bank's holding in the company's share capital reached 100%.

<sup>(2)</sup> CNP Cyprus Insurance Holdings Limited and its subsidiaries (former "CNP Cyprus subgroup") were acquired by Hellenic Bank in April 2025.

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The following table shows a comparison between the Balance Sheet included in the Consolidated Financial Statements and the Balance Sheet prepared under the prudential scope of consolidation as at 31 December 2025 and 30 September 2025.

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

	Ref. <sup>(1)</sup>	31 December 2025		
		Balance sheet per published financial statements	Deconsolidation of insurance and consolidation by the equity method	Balance sheet per prudential scope of consolidation
		€ million	€ million	€ million
<b>Assets</b>				
Cash and Balances with central banks		15,628	-	15,628
Due from credit institutions <sup>(2)</sup>		2,356	(184)	2,172
Securities held for trading		516	-	516
Derivative financial instruments		780	-	780
Loans and advances to customers <sup>(2)</sup>		54,663	157	54,820
Investment securities		24,884	(857)	24,027
Investments in associates and joint ventures	<i>a</i>	251	279	530
Property, plant and equipment		1,067	(25)	1,042
Investment property		1,331	(55)	1,276
Intangible assets	<i>b</i>	511	(8)	503
Deferred tax asset		3,629	(2)	3,627
<i>of which deferred tax assets that rely on future profitability and do not arise from temporary differences</i>	<i>c</i>	1	-	1
<i>of which deferred tax assets that do not rely on future profitability</i>		2,832	-	2,832
<i>of which deferred tax assets that rely on future profitability and arise from temporary differences</i>	<i>d</i>	794	-	794
Other assets		2,032	(56)	1,976
Assets of disposal group classified as held for sale		328	-	328
<b>Total assets</b>		<b>107,976</b>	<b>(751)</b>	<b>107,225</b>
<b>Liabilities</b>				
Due to central banks		1,001	-	1,001
Due to credit institutions <sup>(2)</sup>		2,850	(322)	2,528
Derivative financial instruments		915	-	915
Due to customers <sup>(2)</sup>		82,704	360	83,064
Debt securities in issue		7,352	-	7,352
<i>of which tier 2 instruments</i>	<i>e</i>	1,220	-	1,220
Other liabilities		2,531	(789)	1,742
<b>Total liabilities</b>		<b>97,353</b>	<b>(751)</b>	<b>96,602</b>
<b>Equity</b>				
Ordinary share capital	<i>f</i>	799	-	799
Share premium	<i>g</i>	1,140	-	1,140
Reserves and retained earnings	<i>h</i>	7,594	-	7,594
<i>of which cash flow hedge reserves</i>	<i>i</i>	(16)	-	(16)
AT1 Capital Instruments	<i>j</i>	1,090	-	1,090
<b>Total equity</b>		<b>10,623</b>	<b>-</b>	<b>10,623</b>
<b>Total equity and liabilities</b>		<b>107,976</b>	<b>(751)</b>	<b>107,225</b>

## Introduction – General Information

	30 September 2025		
	Balance sheet per published financial statements	Deconsolidation of insurance and consolidation by the equity method	Balance sheet per prudential scope of consolidation
	€ million	€ million	€ million
<b>Assets</b>			
Cash and Balances with central banks	13,339	-	13,339
Due from credit institutions	2,250	(146)	2,104
Securities held for trading	364	-	364
Derivative financial instruments	785	-	785
Loans and advances to customers	52,881	125	53,006
Investment securities	24,270	(880)	23,390
Investments in associates and joint ventures	237	321	558
Property, plant and equipment	1,047	(33)	1,014
Investment property	1,327	(54)	1,273
Intangible assets	484	(8)	476
Deferred tax asset	3,633	(2)	3,631
<i>of which deferred tax assets that rely on future profitability and do not arise from temporary differences</i>	1	-	1
<i>of which deferred tax assets that do not rely on future profitability</i>	2,880	-	2,880
<i>of which deferred tax assets that rely on future profitability and arise from temporary differences</i>	752	(2)	750
Other assets	2,039	(56)	1,983
Assets of disposal group classified as held for sale	313	-	313
<b>Total assets</b>	<b>102,969</b>	<b>(733)</b>	<b>102,236</b>
<b>Liabilities</b>			
Due to central banks	-	-	-
Due to credit institutions	3,073	(284)	2,789
Derivative financial instruments	976	-	976
Due to customers	78,999	324	79,323
Debt securities in issue	7,423	-	7,423
<i>of which tier 2 instruments</i>	1,234	-	1,234
Other liabilities	2,590	(773)	1,817
Liabilities of disposal group classified as held for sale	-	-	-
<b>Total liabilities</b>	<b>93,061</b>	<b>(733)</b>	<b>92,328</b>
<b>Equity</b>			
Ordinary share capital	811	-	811
Share premium	1,145	-	1,145
Reserves and retained earnings	7,457	-	7,457
<i>of which cash flow hedge reserves</i>	(16)	-	(16)
Preferred securities	-	-	-
AT1 Capital Instruments	495	-	495
<b>Total equity</b>	<b>9,908</b>	<b>-</b>	<b>9,908</b>
<b>Total equity and liabilities</b>	<b>102,969</b>	<b>(733)</b>	<b>102,236</b>

<sup>(1)</sup> References provide the mapping of items of the statement of financial position prepared under the regulatory scope of consolidation used to calculate regulatory capital as reflected in column "References" in Section 2.5 "Composition of regulatory capital".

<sup>(2)</sup> According to Annex V "Reporting on Financial Information", specific amounts are categorised as Credit Institutions in Financial Statements while in Regulatory scope of consolidation as Other Financial Corporations (Loans and advances to customers or Due to customers).

### 1.26 Impediments to the prompt transfer of capital

Subordinated loans given by Eurobank S.A. to its subsidiaries, financial institutions operating outside Greece, are subject to local regulations and subsequently restrictions set by local laws and supervisory authorities. The most common of all restrictions is minimum duration (5 to 7 years in most cases) with no possibility of prepayment without prior permission by the respective supervisory authority.

## Capital Management

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### 2. Capital Management

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

#### 2.1 Regulatory capital – definition

The Pillar 1 regulatory capital of the Group at consolidated level is calculated on the basis of IFRS figures and according to the rules set by Regulation (EU) No 575/2013 as amended.

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

CET1 capital is composed of ordinary shareholders' equity, and minority interest allowed in consolidated CET1, after the following deductions:

- 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 for 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;
- 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 comprises long term subordinated liabilities that meet certain regulatory specified criteria. 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 Reconciliation of Balance Sheets-financial accounting to prudential scope of consolidation

As noted in section "1.25 Prudential versus accounting consolidation", the prudential consolidation is different compared to the accounting consolidation. As a result, the table below presents the Balance Sheet separately as per published financial statements and prudential consolidation broken down into different risk types. Certain assets and liabilities can be subject to multiple risk frameworks.

**Capital Management**

**Table 4: EU L11 - Differences between accounting and regulatory scopes of consolidation and the mapping of financial statement categories with regulatory risk categories**

		a	b	c	d	e	f	g
		31 December 2025						
		Carrying values of items						Not subject to capital requirements or subject to deduction from capital
Balance sheet per published financial statements	Balance sheet per regulatory consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework			
Ref.	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
<b>Assets</b>								
	Cash and Balances with central banks	15,628	15,628	15,628	-	-	-	-
	Due from credit institutions	2,356	2,172	1,710	462	-	-	-
	Securities held for trading	516	516	-	-	-	516	-
	Derivative financial instruments	780	780	-	780	-	780	-
	Loans and advances to customers	54,663	54,820	48,056	4,542	6,443	-	279
	Investment securities	24,884	24,027	22,266	879	1,761	-	-
a	Investments in associate and joint ventures	251	530	524	-	-	-	6
	Property and equipment	1,067	1,042	1,042	-	-	-	-
	Investment property	1,331	1,276	1,276	-	-	-	-
b	Goodwill and other intangible assets	511	503	153	-	-	-	350
	Deferred tax asset	3,629	3,627	3,618	-	-	-	9
	of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	c	1	1	-	-	-	1
	of which deferred tax credit	2,832	2,832	2,832	-	-	-	-
	of which deferred tax assets arising from temporary differences	d	794	794	786	-	-	8
	Other assets	2,032	1,976	1,947	-	-	-	29
	Assets of disposal group classified as held for sale	328	328	328	-	-	-	-
	<b>Total assets</b>	<b>107,976</b>	<b>107,225</b>	<b>96,547</b>	<b>6,663</b>	<b>8,204</b>	<b>1,296</b>	<b>673</b>
<b>Liabilities</b>								
	Due to central banks	1,001	1,001	-	1,001	-	-	-
	Due to credit institutions	2,850	2,528	-	1,905	-	-	623
	Derivative financial instruments	915	915	-	915	-	915	-
	Due to customers	82,704	83,064	-	-	-	-	83,064
	Debt securities in issue	7,352	7,352	-	-	-	-	7,352
	Other liabilities	2,531	1,742	50	-	-	-	1,692
	<b>Total liabilities</b>	<b>97,353</b>	<b>96,602</b>	<b>50</b>	<b>3,821</b>	<b>-</b>	<b>915</b>	<b>92,731</b>
e	of which tier 2 instruments	1,220	1,220	-	-	-	-	1,220
<b>Equity</b>								
f	Ordinary share capital	799	799	-	-	-	-	799
g	Share premium	1,140	1,140	-	-	-	-	1,140
h	Reserves and retained earnings	7,594	7,594	-	-	-	-	7,594
	of which cash flow hedge reserves	(16)	(16)	-	-	-	-	(16)
	of which own credit risk	-	-	-	-	-	-	-
	Preference shares	-	-	-	-	-	-	-
	<b>Total equity attributable to shareholders of the Bank</b>	<b>9,533</b>	<b>9,533</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>9,533</b>
	Preferred securities	-	-	-	-	-	-	-
	Non controlling interests	1,090	1,090	-	-	-	-	1,090
i	<b>Total equity</b>	<b>10,623</b>	<b>10,623</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>10,623</b>
	<b>Total equity and liabilities</b>	<b>107,976</b>	<b>107,225</b>	<b>50</b>	<b>3,821</b>	<b>-</b>	<b>915</b>	<b>103,354</b>

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	a	b	c	d	e	f	g
	31 December 2024						
	Carrying values of items						Not subject to capital requirements or
Balance sheet per published financial statements	Balance sheet per regulatory consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Subject to the deduction from capital	
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
<b>Assets</b>							
Cash and Balances with central banks	16,131	16,131	16,131	-	-	-	-
Due from credit institutions	2,196	2,025	1,991	34	-	-	-
Financial instruments at fair value through profit or loss	285	285	-	-	-	285	-
Derivative financial instruments	838	838	-	838	-	838	-
Loans and advances to customers	50,953	51,120	43,386	2,120	6,934	-	746
Investment securities	22,184	22,070	20,066	687	2,004	-	-
Investments in associate and joint ventures	203	258	258	-	-	-	-
Property and equipment	975	969	969	-	-	-	-
Investment property	1,404	1,403	1,403	-	-	-	-
Intangible assets	415	413	127	-	-	-	286
Deferred tax asset	3,780	3,780	3,780	-	-	-	-
of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	-	-	-	-	-	-	-
of which deferred tax credit	3,022	3,022	3,022	-	-	-	-
of which deferred tax assets arising from temporary differences	758	758	758	-	-	-	-
Other assets	1,695	1,666	1,637	-	-	-	29
Assets of disposal group classified as held for sale	91	91	91	-	-	-	-
<b>Total assets</b>	<b>101,150</b>	<b>101,049</b>	<b>89,838</b>	<b>3,679</b>	<b>8,938</b>	<b>1,123</b>	<b>1,061</b>
<b>Liabilities</b>							
Due to central banks	-	-	-	-	-	-	-
Due to credit institutions	2,800	2,584	-	1,952	-	-	632
Derivative financial instruments	1,120	1,120	-	1,120	-	1,120	-
Due to customers	78,593	78,819	-	-	-	-	78,819
Debt securities in issue	7,056	7,056	-	-	-	-	7,056
Other liabilities	2,682	2,571	43	-	-	-	2,528
<b>Total liabilities</b>	<b>92,251</b>	<b>92,150</b>	<b>43</b>	<b>3,072</b>	<b>-</b>	<b>1,120</b>	<b>89,035</b>
of which tier 2 instruments	1,759	1,759	-	-	-	-	1,759
<b>Equity</b>							
Ordinary share capital	809	809	-	-	-	-	809
Share premium	1,145	1,145	-	-	-	-	1,145
Reserves and retained earnings	6,945	6,945	-	-	-	-	6,945
of which cash flow hedge reserves	(15)	(15)	-	-	-	-	(15)
of which own credit risk	-	-	-	-	-	-	-
Preference shares	-	-	-	-	-	-	-
<b>Total equity attributable to shareholders of the Bank</b>	<b>8,899</b>	<b>8,899</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>8,899</b>
Preferred securities	-	-	-	-	-	-	-
Non controlling interests	-	-	-	-	-	-	-
<b>Total equity</b>	<b>8,899</b>	<b>8,899</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>8,899</b>
<b>Total equity and liabilities</b>	<b>101,150</b>	<b>101,049</b>	<b>43</b>	<b>3,072</b>	<b>-</b>	<b>1,120</b>	<b>97,934</b>

Note: The amounts shown in column "Balance sheet per published financial statements and per prudential consolidation" do not equal to the sum of the amounts shown in the remaining columns, as some assets are subject to multiple risk frameworks.

**Capital Management**

The table below provides a reconciliation of the consolidated regulatory balance sheet to the Exposure at Default (EAD), allocated to different risk frameworks.

**Table 5: EU LI2 – Main sources of differences between regulatory exposure amounts and carrying values in financial statements**

	a	b	c	d	e
31 December 2025					
	Items subject to				
	Total	Credit risk framework	CCR framework	Securitisation framework	Market risk framework
	€ million	€ million	€ million	€ million	€ million
1 Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1) <sup>(1)</sup>	106,552	96,547	6,663	8,204	1,296
2 Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1) <sup>(1)</sup>	3,871	50	3,821	-	915
3 <b>Total net amount under the regulatory scope of consolidation</b>	<b>102,681</b>	<b>96,497</b>	<b>2,842</b>	<b>8,204</b>	<b>381</b>
4 Off-balance-sheet amounts	19,707	19,707	-	-	-
5 Differences in valuations	-	-	-	-	-
6 Differences due to different netting rules, other than those already included in row 2	1	1	(2,158)	-	915
7 Differences due to consideration of provisions	(75)	(75)	-	-	-
8 Differences due to the use of credit risk mitigation techniques (CRMs)	(2,014)	1,060	-	(3,074)	-
9 Differences due to credit conversion factors	(15,864)	(15,864)	-	-	-
10 Differences due to Securitisation with risk transfer	-	-	-	-	-
11 Other differences	-	-	2,032	-	-
12 <b>Exposure amounts considered for regulatory purposes</b>	<b>104,436</b>	<b>101,326</b>	<b>2,716</b>	<b>5,130</b>	<b>1,296</b>

	a	b	c	d	e
31 December 2024					
	Items subject to				
	Total	Credit risk framework	CCR framework	Securitisation framework	Market risk framework
	€ million	€ million	€ million	€ million	€ million
1 Assets carrying value amount under the scope of regulatory consolidation (as per template EU LI1)	99,988	89,838	3,679	8,938	1,123
2 Liabilities carrying value amount under the regulatory scope of consolidation (as per template EU LI1)	3,115	43	3,072	-	1,120
3 <b>Total net amount under the regulatory scope of consolidation</b>	<b>96,873</b>	<b>89,795</b>	<b>607</b>	<b>8,938</b>	<b>3</b>
4 Off-balance-sheet amounts	13,940	13,940	-	-	-
6 Differences due to different netting rules, other than those already included in row 2	44	44	(590)	-	1,120
7 Differences due to consideration of provisions	-	-	-	-	-
8 Differences due to the use of credit risk mitigation techniques (CRMs)	(1,844)	1,237	-	(3,081)	-
9 Differences due to credit conversion factors	(10,183)	(10,183)	-	-	-
10 Differences due to Securitisation with risk transfer	-	-	-	-	-
11 Other differences	-	-	1,909	-	-
12 <b>Exposure amounts considered for regulatory purposes</b>	<b>98,830</b>	<b>94,833</b>	<b>1,926</b>	<b>5,857</b>	<b>1,123</b>

<sup>(1)</sup> Excludes amounts subject to deduction from capital or not subject to regulatory capital requirements.

## Capital Management

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### 2.3 Basel 4 implementation

On 19 June 2024, Regulation 2024/1623/EU and Directive 2024/1619/EU of the European Parliament and of the Council of 31 May 2024, amending Regulation 575/2013/EU and Directive 2013/36/EU, respectively, were published in the Official Journal of the European Union. The revised CRR (CRR3 Basel IV) became, in general, applicable from 1 January 2025, with a transitional period envisaged for certain rules set out therein.

The main changes that affect the Group's RWEAs under the new framework are described below:

#### 2.3.1 Credit risk

- Unconditionally cancellable limits previously at 0% CCF will gradually receive a 10% CCF (transition period 2030-2032);
- Exposures to natural persons with unhedged currency mismatch (i.e. CHF mortgage loans) are penalized with an RWEAs multiplier of 1.5x;
- Acquisition of Land, Development & Construction (ADC) loans are distinguished from the secured by real estate asset class and receive 150% Risk Weighting Factor (RWF) (or 100% under specific conditions for RRE property);
- In the secured by real estate exposures class, the RWF/LTV mapping is changing, providing benefit to the very low LTVs of loans secured by RRE and increased RWEAs for the remaining exposure. Income Producing Real Estate (IPRE) exposures are also distinguished from the secured by real estate asset class and their risk weight factor is linked to the LTV and the collateral type (RRE/CRE) resulting in more punitive risk weights;
- For externally rated corporates/institutions the Credit Quality Step (CQS)/RWF mapping is changing, providing a lower RW in certain cases;
- Unrated Project Finance clients are categorized in 3 segments based on the project phase (pre-operational at 130%; operational at 100%) and specific conditions (high quality operational at 80% RWF);
- Shipping clients may benefit of 80% RWF subject to specific conditions; and
- Retail asset class is segmented to transactors (revolving accounts acting as a transactional rather than a credit facility) which receive a lower risk weight (45% instead of 75%) and to non-transactors.

#### 2.3.2 Counterparty and Issuer Risk

- Change of the applicable risk weights on exposures from Corporates and Financial Institutions (subordinated, senior preferred / non-preferred);
- Revised treatment on exposures from unrated Institutions and impact from the application of original maturity (removal of the residual maturity);
- Change in the calculation of exposure from SFTs under master netting agreements concerning the Financial Collateral Comprehensive Method;
- Revision of the credit valuation adjustment (CVA) framework, including the removal of the existing exceptions following specific criteria (mainly corporate clients) and the application of the reduced version of the basic approach (BA-CVA); and
- Change of the applicable risk weight for Equities (new prevailing RWF mainly at 250% vs 100%-150%-250%), subject to transition period (full application from 2030).

#### 2.3.3 Market Risk

In light of ongoing delays in the international implementation of the Basel FRTB standards—particularly by the United States and the United Kingdom—the European Commission adopted a Delegated Regulation to defer by one year the application of the revised market risk capital requirements under Regulation (EU) No 575/2013. This decision, supported by the majority of stakeholders during a public consultation held between March and April 2025, aims to preserve a level playing field for EU institutions. According to this Regulation the FRTB framework is scheduled to apply from 1 January 2027.

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**2.3.3 Operational Risk**

Basel IV introduces a new Standardised Approach (SA) for calculating operational risk capital requirements. This method is a single, non-model-based approach and replaces all previous methods, including the Basic Indicator, Standardised, and Advanced Measurement Approaches.

The capital requirement is now based on a Business Indicator (BI) reflecting the scale of business operations through income and expense components. BI is calculated as the average over the past three years.

**2.4 Key Metrics**

The following table provides an overview of Group’s prudential regulatory metrics.

**Table 6: EU KM1 - Key Metrics template**

	a	b	c	d	e
	31 December 2025	30 September 2025	30 June 2025	31 March 2025	31 December 2024
	€ million	€ million	€ million	€ million	€ million
<b>Available own funds (amounts)</b>					
1 Common Equity Tier 1 (CET1) capital	8,134	7,874	7,932	7,692	7,718
2 Tier 1 capital	9,224	8,369	8,427	7,692	7,718
3 Total capital	10,439	9,600	10,132	9,444	9,093
<b>Risk-weighted exposure amounts</b>					
4 Total risk exposure amount	53,647	51,756	51,720	51,471	49,977
4a Total risk exposure pre-floor	53,647	51,756	51,720	51,471	
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>					
5 Common Equity Tier 1 ratio (%)	15.2%	15.2%	15.3%	14.9%	15.4%
5b Common Equity Tier 1 ratio considering unfloored TREA (%)	15.2%	15.2%	15.3%	14.9%	
6 Tier 1 ratio (%)	17.2%	16.2%	16.3%	14.9%	15.4%
6b Tier 1 ratio considering unfloored TREA (%)	17.2%	16.2%	16.3%	14.9%	
7 Total capital ratio (%)	19.5%	18.5%	19.6%	18.3%	18.2%
7b Total capital ratio considering unfloored TREA (%)	19.5%	18.5%	19.6%	18.3%	
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>					
EU 7d Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.85%	2.85%	2.85%	2.85%	2.85%
EU 7e of which: to be made up of CET1 capital (percentage points)	1.60%	1.60%	1.60%	1.60%	1.60%
EU 7f of which: to be made up of Tier 1 capital (percentage points)	2.14%	2.14%	2.14%	2.14%	2.14%
EU 7g Total SREP own funds requirements (%)	10.85%	10.85%	10.85%	10.85%	10.85%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>					
8 Capital conservation buffer (%)	2.50%	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%	0.00%
9 Institution specific countercyclical capital buffer (%)	0.68%	0.55%	0.55%	0.54%	0.56%
EU 9a Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
10 Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a Other Systemically Important Institution buffer	1.25%	1.25%	1.25%	1.25%	1.25%
11 Combined buffer requirement (%)	4.43%	4.30%	4.30%	4.29%	4.31%
EU 11a Overall capital requirements (%)	15.28%	15.15%	15.15%	15.14%	15.16%
12 CET1 available after meeting the total SREP own funds requirements (%)	8.61%	7.70%	8.15%	7.32%	7.30%
<b>Leverage ratio</b>					
13 Leverage ratio total exposure measure	113,523	108,295	107,100	105,673	106,049
14 Leverage ratio	8.1%	7.7%	7.9%	7.3%	7.3%
<b>Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)</b>					
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>					
EU 14d Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%

## Capital Management

	a	c	d	e	e
	31 December 2025	30 September 2025	30 June 2025	31 March 2025	31 December 2024
	€ million	€ million	€ million	€ million	€ million
<b>Liquidity Coverage Ratio</b>					
15 Total high-quality liquid assets (HQLA) (Weighted value - average)	22,307	22,674	22,191	21,259	20,159
EU 16a Cash outflows - Total weighted value	14,313	14,055	13,643	12,968	12,324
EU 16b Cash inflows - Total weighted value	2,073	2,073	1,963	1,717	1,546
16 Total net cash outflows (adjusted value)	12,240	11,982	11,680	11,251	10,778
17 Liquidity coverage ratio (%) (adjusted value) <sup>(1)</sup>	182.6%	189.3%	190.1%	188.7%	186.6%
Liquidity coverage ratio (%)	172.2%	180.4%	194.4%	182.8%	188.2%
<b>Net Stable Funding Ratio</b>					
18 Total available stable funding	83,136	80,021	79,366	77,797	77,562
19 Total required stable funding	57,650	56,067	55,301	54,452	53,612
20 NSFR ratio (%)	144.2%	142.7%	143.5%	142.9%	144.7%

<sup>(1)</sup> Average figures based on previous monthly data points.

### Notes:

(a) Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission granted by the Supervisory Authorities and the AGM of the shareholders.

(b) Pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 31 December 2025 with the completion of project "Sun (ex-Solar)" and "Wave III" securitization upsized would be 15.6%, 17.7% and 20.0%, respectively.

## 2.5 Regulatory capital

The Group has sought to maintain an actively managed capital base to cover risks inherent in the business. The adequacy of the Group'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 Group.

The following table shows the composition of the Group's regulatory capital as at 31 December 2025 and 30 September 2025 which is calculated according to CRD IV as amended.

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**Table 7:** Composition of regulatory capital

	c	a & b	
		31 December 2025 <sup>(1)</sup>	30 September 2025 <sup>(1)</sup>
		€ million	€ million
	Ref.		
Total equity	f, g, h	9,533	9,413
<b>Regulatory adjustments</b>			
Interim or year-end profit not eligible <sup>(1)</sup>		(657)	(633)
Minority interest not allowed in CET1		-	-
Cash flow hedge reserves	i	16	16
Intangible assets	b	(350)	(379)
<i>of which Goodwill</i>		(42)	(42)
Deferred tax assets that rely on future profitability and do not arise from temporary differences	c	(1)	(1)
Deferred tax assets that rely on future profitability and arise from temporary differences (amount above 10% threshold)	d	-	-
Prudent Valuation Adjustments <sup>(2)</sup>		(5)	(4)
Other regulatory adjustments		(389)	(338)
Amount exceeding the 17.65% threshold	a, d	(13)	(24)
<b>Common Equity Tier 1 capital</b>		<b>8,134</b>	8,049
Additional Tier 1 capital <sup>(3)</sup>	j	1,090	495
<b>Total Tier 1 capital</b>		<b>9,224</b>	8,544
Tier 2 capital - subordinated debt	e	1,215	1,231
<b>Total Regulatory Capital</b>		<b>10,439</b>	9,775
<b>Risk Weighted Assets</b>		<b>53,647</b>	51,836
<b>Ratios</b>			
Common Equity Tier 1 <sup>(4)</sup>		15.2%	15.5%
Tier 1		17.2%	16.5%
Total Capital Adequacy Ratio		19.5%	18.9%

<sup>(1)</sup> Figures and ratios include profits for the financial year 2025 and 9M 2025 accordingly, less the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities and AGM approval.

<sup>(2)</sup> The Additional Value Adjustments calculation is based on the simplified approach according to Commission Delegated Regulation (EU) No 101/2016. The total AVAs are deducted from CET1 capital, in accordance with Article 34 of the CRR.

<sup>(3)</sup> Additional Tier 1 capital increased mainly due to the issuance of € 600 million fixed rate reset Additional Tier 1 perpetual contingent temporary write-down notes.

<sup>(4)</sup> CET1 ratio decreased mainly due to increased RWEAs from the new production of loans, the termination of synthetic securitizations ("Wave I" & "Wave III"), the payout accrual and the acceleration of DTC amortization, which is partially offset by the Group's organic profitability and the decrease in RWEAs of Operational Risk.

Note: The pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 31 December 2025 with the completion of project "Sun (ex-Solar)" and "Wave III" securitization upside would be 15.6%, 17.7% and 20.0%, respectively.

**Capital Management**

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

As at 31 December 2025, pursuant to the Law 4172/2013, as in force, the Bank’s eligible Deferred Tax Assets/Deferred Tax Credits (DTCs) against the Greek State amounted to € 2,832 million (30 September 2025 € 2,880 million). DTCs are accounted for on: (a) the unamortised losses from the Private Sector Involvement and the Greek State Debt Buyback Program, which are subject to amortization over a thirty-year period and (b) on the sum of (i) the unamortised part of the DTC eligible crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period, (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. 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.

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%.

In line with the Bank’s initiative to enhance the quality of its regulatory capital, the amortisation of DTC has been accelerated for regulatory purposes starting from 01.01.2025, by an amount equal to 29% of accrued shareholders remuneration, aiming at its elimination by 2033 or earlier. Following this, the DTC included in the calculation of the Group’s capital ratios stands at € 2,624 million (30 September 2025 € 2,738 million) accounting for 32.3% of CET 1 capital.

**2.6 Countercyclical buffer**

The 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 following table presents the geographical distribution of the Group’s credit exposures relevant for the calculation of its countercyclical capital buffer, which includes all private sector exposures according to Regulation (EU) 1152/2014.

**Table 8: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of countercyclical buffer**

	a	b	c	d	e	f	g	h	i	j	k	l	m
	31 December 2025												
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures	Total exposure value	Own funds requirements			Total	Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate
	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		Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
010 Breakdown by country:													
Greece <sup>(1)</sup>	35,451	-	16	-	1,161	36,628	1,967	1	17	1,985	24,813	61%	0.25%
Romania	99	-	-	-	-	99	5	-	-	5	63	0.2%	1.00%
Bulgaria <sup>(2)</sup>	9,178	-	-	-	-	9,178	457	-	-	457	5,713	14%	2.00%
United Kingdom	1,096	-	-	-	180	1,276	59	-	3	62	775	2%	2.00%
Cyprus	6,512	-	-	-	35	6,547	390	-	3	393	4,913	12%	1.00%
Luxemburg	282	-	-	-	-	282	23	-	-	23	288	1%	0.50%
Ireland	11	-	-	-	5,285	5,296	1	-	91	92	1,150	3%	1.50%
Other Countries	4,769	-	1	-	1,543	6,313	209	-	26	235	2,938	7%	0.49%
020 Total	57,398	-	17	-	8,204	65,619	3,111	1	140	3,252	40,653	100%	0.68%

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30 June 2025													
General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures	Total exposure value	Own funds requirements				Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate	
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		Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total				
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)	
010 Breakdown by country:													
Greece	33.146	-	7	-	3	33.156	1.802	-	-	1.802	22.525	59%	0,00%
Romania	87	-	-	-	-	87	4	-	-	4	50	0,1%	1,00%
Bulgaria	8.428	-	-	-	-	8.428	429	-	-	429	5.363	14%	2,00%
United Kingdom	1.097	-	-	-	139	1.236	62	-	2	64	800	2%	2,00%
Cyprus	6.218	-	-	-	74	6.292	384	-	8	392	4.900	13%	1,00%
Luxemburg	262	-	-	-	-	262	22	-	-	22	275	1%	0,50%
Ireland	16	-	-	-	6.578	6.594	1	-	105	106	1.325	3%	1,50%
Other Countries	4.501	-	1	-	1.692	6.194	190	-	28	218	2.725	7%	0,50%
020 Total	53.755	-	8	-	8.486	62.249	2.894	-	143	3.037	37.963	100%	0,55%

<sup>(1)</sup> For the period from 1.10.2025 to 30.09.2026, the CCyB rate is increased to 0.25%, in accordance with Executive Committee Act 235/2/07.10.2024. Under Executive Committee Act 248/1/06.10.2025, the BoG has decided to set the CCyB rate for Greece at 0.5%, applicable from 1 October 2026.

<sup>(2)</sup> The increase in the exposure value under the standardised approach is mainly due to the credit growth of Greece and Bulgaria and in the securitization exposures in Greece is due to the Wave VI securitization.

Note: The tables above exclude exposures on Central governments or Central banks, Regional governments or local authorities, Public sector entities, Multilateral development banks, International organisations and Institutions asset classes.

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

**Table 9: EU CCyB2 - Amount of institution-specific countercyclical capital buffer**

	a	a
	31 December 2025	30 June 2025
1 Total risk exposure amount (€ million)	53,647	51,720
2 Institution specific countercyclical capital buffer rate <sup>(1)</sup>	0.68%	0.55%
3 Institution specific countercyclical capital buffer requirement (€ million)	365	284

<sup>(1)</sup> The increase in the specific countercyclical capital buffer rate is mainly due to credit growth of Greece and Bulgaria and the CCyB rate of Greece which is 0.25% from 1.10.2025.

**2.7 Supervisory Review and Evaluation Process (SREP) capital requirements**

According to the 2024 SREP decision, from December 2024 the P2R for the Group is set at 2.85% in terms of total capital (or at 1.60% in terms of CET1 capital). The change in the P2R is the outcome of the consolidation of Hellenic Bank. Based on the ECB’s ‘Guide on the supervisory approach to consolidation in the banking sector’, in case of M&As, the P2R of the combined entity/group is determined based on the weighted average of the P2R (based on RWEAs) of the two entities (i.e. Eurobank Group: 2.75%, Hellenic Bank: 3.45%). Based on the 2025 SREP decision, from 1 January 2026 the P2R is reduced to 2.75% (or 1.55% in terms of CET1 capital), reflecting the Group’s progress in the areas assessed by the ECB, and particularly in the integration of Hellenic Bank into the Group.

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Thus, as of 31 December 2025, the Group is required to meet a CET1 ratio of at least 10.98% (including Tier 2 shortfall) and a Total Capital Adequacy Ratio of at least 15.28% (Overall Capital Requirements - OCR) including Combined Buffer Requirement of 4.43%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

In addition, in accordance with the Executive Committee Act 235/07.10.2024 of the Bank of Greece, from 1 October 2025, a countercyclical capital buffer rate of 0.25% applies to banks' exposures to Greece, which increased the Group's capital requirements by 15 bps. The countercyclical capital buffer is updated on a quarterly basis in accordance with the countercyclical capital buffer rates applicable in each country to which the Group has exposures. Under Executive Committee Act 248/1/06.10.2025, the Bank of Greece has decided to set the CCyB rate for Greece at 0.5% from 1 October 2026, resulting in a further increase of the Group's capital requirements by 15 bps.

The breakdown of the Group's CET1 and Total Capital requirements, applicable from 31 December 2025, is presented in the following table:

**Table 10:** Pillar 2 Requirements

	31 December 2025	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.60%	1.60%
<b>Total SREP Capital Requirement (TSCR)</b>	<b>6.10%</b>	<b>10.85%</b>
<u>Combined Buffer Requirement (CBR)</u>		
Capital conservation buffer (CCB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.68%	0.68%
Other systemic institutions buffer (O-SII)	1.25%	1.25%
<b>Overall Capital Requirement (OCR)</b>	<b>10.53%</b>	<b>15.28%</b>
Tier 2 capital shortfall	0.45%	-
<b>Overall Capital Requirement (OCR), including shortfall</b>	<b>10.98%</b>	<b>15.28%</b>

The above CET1 capital requirement of 10.98 % takes into account i) that the Group issued in June 2025 and in November 2025 AT1 instruments of € 500 million and € 600 million respectively, fully utilizing its capacity to issue AT1, as well as ii) the redemption, in September 2025, of the Tier 2 instrument of € 950 million issued to the Hellenic Republic resulting in a Tier 2 shortfall of 45 bps. Assuming the Group had fully utilized the Tier 2 capital capacity, the CET1 requirement would stand at 10.53% as of December 2025.

Considering the reduction in P2R mentioned above, on 1 January 2026, the Group is required to meet a CET1 Ratio of at least 10.89% (including Tier 2 shortfall) and a Total Capital Adequacy Ratio of at least 15.18% (Overall Capital Requirement or OCR) including Combined Buffer Requirement of 4.43%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

As at 31 December 2025, Eurobank's consolidated CET1 ratio and Total Capital ratio, including the profit attributable to the equity holders of the Parent Company for the year amounting to € 1,363 million and adjusted with the payout accrual of € 547 million from the profits for the financial year 2025 in accordance with the Group shareholders' remuneration policy, were 15.2% and 19.5% respectively, which exceeded the 2025 OCR of 10.98% and 15.28%.

### 2.8 Minimum Requirement for Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (Bank Recovery and Resolution Directive) as in force, which was transposed into the Greek legislation pursuant to Law 4335/2015 as in force, European banks are required to meet the MREL. The SRB has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry strategy for resolution purposes. The applicable MREL target for Eurobank S.A. on a consolidated basis from 30 June 2025 is set at 27.88% of its total Risk Weighted Exposure Amounts (RWEAs), including a combined buffer requirement (CBR) of 4.43%. The MREL target is updated by the SRB on an annual basis. As at 31 December 2025, the Bank's MREL ratio at consolidated level stands at

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29.4 % of RWEAs including profit for the year ended 31 December 2025, after deducting payout accrual (30 June 2025: 29.4%), while, the Bank’s MREL ratio at consolidated level, including profit for the year, after deducting aforementioned payout accrual, pro-forma with the completion of the projects “Sun (ex-Solar)” and “Wave III” upside stands at 30.17% of RWEAs, exceeding the MREL target, as stated above.

In July 2025, the Bank successfully completed the issuance of € 500 million senior preferred notes. Furthermore, in September 2025, the Bank successfully completed, through a private placement, a tap of € 200 million to the aforementioned senior preferred notes of € 500 million, issued in July 2025.

In November 2025, Eurobank Holdings successfully completed the issuance of € 600 million AT1 instrument, fully utilizing its capacity to issue AT1.

In January 2026, the Bank successfully completed the issuance of € 400 million Subordinated Tier 2 debt instrument, fully utilizing its capacity to issue Tier 2.

The proceeds from the above issues will support the Group’s strategy to ensure ongoing compliance with its total capital adequacy and MREL.

**Table 11: EU KM2 - Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities**

	a	a	b	c	d	e	f
	Minimum requirement for own funds and eligible liabilities (MREL)	Minimum requirement for own funds and eligible liabilities (MREL)	G-SII Requirement for own funds and eligible liabilities (TLAC)				
	31 December 2025	30 June 2025	31 December 2025	30 September 2025	30 June 2025	31 March 2025	31 December 2024
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
<b>Own funds and eligible liabilities, ratios and components</b>							
1	Own funds and eligible liabilities	15,765	15,211				
EU-1a	Of which own funds and subordinated liabilities	10,439	10,618				
2	Total risk exposure amount of the resolution group (TREA)	53,647	51,725				
3	Own funds and eligible liabilities as a percentage of the TREA	29.4%	29.4%				
EU-3a	Of which own funds and subordinated liabilities	19.5%	20.5%				
4	Total exposure measure (TEM) of the resolution group	113,523	107,110				
5	Own funds and eligible liabilities as percentage of the TEM	13.9%	14.2%				
EU-5a	Of which own funds or subordinated liabilities	9.2%	9.9%				
6a	Does the subordination exemption in Article 72b(4) of Regulation (EU) No 575/2013 apply? (5% exemption)						
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b(3) of Regulation (EU) No 575/2013 is applied (max 3.5% exemption)						
6c	If a capped subordination exemption applies in accordance with Article 72b (3) of Regulation (EU) No 575/2013, the amount of funding issued that ranks <i>pari passu</i> with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks <i>pari passu</i> with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)						
<b>Minimum requirement for own funds and eligible liabilities (MREL)</b>							
EU-7	MREL expressed as a percentage of the TREA <sup>(1)</sup>	23.5%	23.5%				
EU-8	Of which to be met with own funds or subordinated liabilities	-	-				
EU-9	MREL expressed as a percentage of the TEM	5.9%	5.9%				
EU-10	Of which to be met with own funds or subordinated liabilities	-	-				

<sup>(1)</sup> Including a combined buffer requirement (CBR) of 4.43%, the MREL target stands at 27.88%.

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**Table 12: EU TLAC1 - Composition - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities**

	a	b	c
	31 December 2025		
	Minimum requirement for own funds and eligible liabilities (MREL)	G-SII requirement for own funds and eligible liabilities (TLAC)	Memo item: Amounts eligible for the purposes of MREL, but not of TLAC
	€ million	€ million	€ million
<b>Own funds and eligible liabilities and adjustments</b>			
1 Common Equity Tier 1 capital (CET1)	8,134		
2 Additional Tier 1 capital (AT1)	1,090		
6 Tier 2 capital (T2)	1,215		
11 Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	10,439		
<b>Own funds and eligible liabilities: Non-regulatory capital elements</b>			
12 Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	-		
EU-12a Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)	-		
EU-12b Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)	-		
EU-12c Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	-		
13 Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	5,296		
EU-13a Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)	80		
14 Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR	5,376		
17 Eligible liabilities items before adjustments	5,376		
EU-17a Of which subordinated liabilities items	-		
<b>Own funds and eligible liabilities: Adjustments to non-regulatory capital elements</b>			
18 Own funds and eligible liabilities items before adjustments	15,815		
19 (Deduction of exposures between multiple point of entry (MPE) resolution groups)			
20 (Deduction of investments in other eligible liabilities instruments) <sup>(1)</sup>	(50)		
22 Own funds and eligible liabilities after adjustments	15,765		
EU-22a Of which: own funds and subordinated liabilities	10,439		
<b>Risk-weighted exposure amount and leverage exposure measure of the resolution group</b>			
23 Total risk exposure amount (TREA)	53,647		
24 Total exposure measure (TEM)	113,523		
<b>Ratio of own funds and eligible liabilities</b>			
25 Own funds and eligible liabilities as a percentage of TREA	29.4%		
EU-25a Of which own funds and subordinated liabilities	19.5%		
26 Own funds and eligible liabilities as a percentage of TEM	13.9%		
EU-26a Of which own funds and subordinated liabilities	9.2%		
27 CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	5.9%		
28 Institution-specific combined buffer requirement			
29 of which capital conservation buffer requirement			
30 of which countercyclical buffer requirement			
31 of which systemic risk buffer requirement			
EU-31a of which Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer			
<b>Memorandum items</b>			
EU-32 Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013			

<sup>(1)</sup> Including amounts covered by a permission to call, redeem, repay or repurchase eligible liabilities instruments in accordance with Article 78a of Regulation (EU) No 575/2013, to the extent the disclosing entity has not yet used up that amount to call, redeem, repay or repurchase instruments.

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**Table 13: EU TLAC3b - Creditor ranking - resolution entity**

1 Description of insolvency rank (free text)	31 December 2025						
	Insolvency ranking						Sum of 1 to 6
	1	2	3	4	5	6	
	(most junior)					(most senior)	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
	Common Equity Tier 1 (CET1) instruments	Additional Tier 1 (AT1) instruments	Tier 2 instruments	Other contractually subordinated claims	Senior non-preferred bonds and other claims <sup>(1)</sup>	Senior preferred bonds and other claims <sup>(2)</sup>	
5 Own funds and liabilities potentially eligible for meeting MREL	5,476	1,090	1,215	-	-	5,326	13,107
6 of which residual maturity ≥ 1 year < 2 years	-	-	-	-	-	551	551
7 of which residual maturity ≥ 2 year < 5 years	-	-	-	-	-	3,675	3,675
8 of which residual maturity ≥ 5 years < 10 years	-	-	1,215	-	-	750	1,965
9 of which residual maturity ≥ 10 years, but excluding perpetual securities	-	-	-	-	-	350	350
10 of which perpetual securities	5,476	1,090	-	-	-	-	6,566

<sup>(1)</sup> (i) Claims arising from guarantees provided by the parent credit institution to its subsidiaries for debt instruments, (ii) Claims of subsidiaries of the credit institution when these claims arise from a loan or deposit agreement with the credit institution through which the proceeds of the issuance of debt instruments by the subsidiaries are borrowed by or deposited with the credit institution, (iii) Claims arising from common bonds (which are statutorily or contractually subordinated, and thus rank lower than the group of claims immediately above) issued prior to 18.12.2018.

<sup>(2)</sup> (i) All claims, which neither fall under more senior rankings nor are subordinated according to the respective contract, arising in particular from loans and other credit contracts, from supply or service contracts or from derivatives e.g. claims arising from common bonds (which are not statutorily or contractually subordinated), (ii) Claims from guarantees provided by the parent credit institution to its subsidiaries for debt instruments, as well as claims of subsidiaries of the credit institution when these claims arise from a loan or deposit agreement with the credit institution through which the proceeds of the issuance of debt instruments by the subsidiaries are borrowed by or deposited with the credit institution.

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### 2.9 Capital requirements under Pillar 1

The following table shows the Group's RWEAs and capital requirements as at 31 December 2025 and 30 September 2025. The minimum capital requirements under Pillar 1 are calculated as 8% of RWEAs.

**Table 14: EU OV1 - Overview of risk weighted exposure amounts**

	a	b	c
	Risk weighted exposure amounts (RWEAs)		Total own funds requirements
	31 December 2025	30 September 2025	31 December 2025
	€ million	€ million	€ million
1 <b>Credit risk (excluding CCR)</b>	<b>41,906</b>	39,714	<b>3,352</b>
2 Of which the standardised approach <sup>(1)</sup>	41,906	39,714	3,352
3 Of which the foundation IRB (FIRB) approach	-	-	-
4 Of which: slotting approach	-	-	-
EU 4a Of which: equities under the simple riskweighted approach	-	-	-
5 Of which the advanced IRB (AIRB) approach	-	-	-
6 <b>Counterparty credit risk - CCR</b>	<b>459</b>	462	<b>37</b>
7 Of which the standardised approach	273	264	22
8 Of which internal model method (IMM)	-	-	-
EU 8a Of which exposures to a CCP	11	12	1
9 Of which other CCR	175	186	14
10 <b>Credit valuation adjustments risk - CVA risk</b>	<b>164</b>	161	<b>13</b>
EU 10a Of which the standardised approach (SA)	-	-	-
EU 10b Of which the basic approach (F-BA and R-BA)	164	161	13
EU 10c Of which the simplified approach	-	-	-
15 <b>Settlement risk</b>	-	-	-
16 <b>Securitisation exposures in the non-trading-book (after the cap)</b>	<b>1,744</b>	1,870	<b>140</b>
17 Of which SEC-IRBA approach	-	-	-
18 Of which SEC-ERBA (including IAA)	367	370	29
19 Of which SEC-SA approach	1,377	1,500	110
EU 19a Of which 1250%/ deduction	-	-	-
20 <b>Position, foreign exchange and commodities risks (Market risk)</b>	<b>727</b>	723	<b>58</b>
21 Of which the alternative standardised approach (A-SA)	-	-	-
EU 21a Of which the Simplified standardised approach (S-SA)	138	127	-
22 Of which Alternative Internal Model Approach (A-IMA)	-	-	-
EU 22a <b>Large exposures</b>	-	-	-
23 <b>Reclassifications between the trading and non-trading books</b>	-	-	-
24 <b>Operational risk <sup>(1)</sup></b>	<b>5,477</b>	5,794	<b>438</b>
24a <b>Exposures to crypto-assets</b>	-	-	-
25 <b>Amounts below the thresholds for deduction (subject to 250% risk weight)</b>	<b>3,170</b>	3,032	<b>254</b>
26 Output floor applied (%)	0.725	0.725	-
27 Floor adjustment (before application of transitional cap)	-	-	-
28 Floor adjustment (after application of transitional cap)	-	-	-
29 <b>Total</b>	<b>53,647</b>	51,756	<b>4,292</b>

<sup>(1)</sup> The increase of total RWEAs compared to 30 September 2025 is mainly due to the new production of loans, and the termination of synthetic securitizations ("Wave I" & "Wave III"), which is partially offset by the decrease in RWEAs of Operational Risk.

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The following table presents a comparison of modelled and standardised risk weighted exposure amounts at risk level as at 31 December 2025 and 30 September 2025.

**Table 15: EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level**

	a	b	c	d	EU d
<b>31 December 2025</b>					
<b>Risk weighted exposure amounts (RWEAs)</b>					
	<b>RWEAs for modelled approaches that banks have supervisory approval to use</b>	<b>RWEAs for portfolios where standardised approaches are used</b>	<b>Total actual RWEAs (a + b)</b>	<b>RWEAs calculated using full standardised approach</b>	<b>RWEAs that is the base of the output floor</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Credit risk (excluding counterparty credit risk)	-	45,076	45,076	45,076	45,076
2 Counterparty credit risk	-	459	459	459	459
3 Credit valuation adjustment	-	164	164	164	164
4 Securitisation exposures in the banking book	-	1,744	1,744	1,744	1,744
5 Market risk	589	138	727	1,907	1,907
6 Operational risk	-	5,477	5,477	5,477	5,477
7 Other risk weighted exposure amounts	-	-	-	-	-
<b>8 Total</b>	<b>589</b>	<b>53,058</b>	<b>53,647</b>	<b>54,827</b>	<b>54,827</b>
<b>30 September 2025</b>					
<b>Risk weighted exposure amounts (RWEAs)</b>					
	<b>RWEAs for modelled approaches that banks have supervisory approval to use</b>	<b>RWEAs for portfolios where standardised approaches are used</b>	<b>Total actual RWEAs (a + b)</b>	<b>RWEAs calculated using full standardised approach</b>	<b>RWEAs that is the base of the output floor</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Credit risk (excluding counterparty credit risk)	-	42,746	42,746	42,746	42,746
2 Counterparty credit risk	-	462	462	462	462
3 Credit valuation adjustment	-	161	161	161	161
4 Securitisation exposures in the banking book	-	1,870	1,870	1,870	1,870
5 Market risk	596	127	723	1,912	1,912
6 Operational risk	-	5,794	5,794	5,794	5,794
7 Other risk weighted exposure amounts	-	-	-	-	-
<b>8 Total</b>	<b>596</b>	<b>51,160</b>	<b>51,756</b>	<b>52,945</b>	<b>52,945</b>

The table below provides the Bank’s significant investments in insurance holding companies 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 16: INS1 – Non deducted participation in insurance undertakings**

	a	b	a	b
	<b>31 December 2025</b>		<b>31 December 2024</b>	
	<b>Exposure value</b>	<b>Risk-weighted exposure amount</b>	<b>Exposure value</b>	<b>Risk-weighted exposure amount</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Own fund instruments held in insurance or re-insurance undertakings or insurance holding company not deducted from own funds <sup>(1)</sup>	<b>442</b>	<b>1,106</b>	<b>187</b>	<b>468</b>

<sup>(1)</sup> The exposure increase is due to the consolidation of ERB Cyprus Insurance Holdings Limited subsidiaries.

## Capital Management

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### 2.10 Internal Capital Adequacy Assessment Process (ICAAP)

ICAAP aims to identify and assess risks that are inherent in the Group's business model, determine their materiality and allocation at an entity and Group 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.

To accomplish these objectives, the ICAAP leverages upon and integrates the Group'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 Group's risk management at high levels of sophistication. The BoD's vision and guidance are distilled in the Group's risk appetite framework, which describes the risk boundaries within which the Group 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 Group'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 Group level, 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 Group needs to hold for the purpose of absorbing unexpected losses deriving from its risk profile.

All 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 Group's senior management.

The Group uses the regulatory capital requirements as a starting point for the internal determination of its capital requirements, adjusting where appropriate. Compared to regulatory capital requirements, "the internally estimated capital requirement" takes into account a wider range of risks and utilizes more sophisticated calculation approaches. This approach allows the Group 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 Group'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 Group'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 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.

## Capital Management

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The Group maintains adequate profitability and robust risk management practices, which along with the capital actions already executed or underway, allow the Group to meet both regulatory and internal capital requirements. As a result, the Group will be in a position to support the risk profile of its balance sheet and its business operations going forward.

### 2.11 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.

## Risk Management Overview

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### 3. Risk management overview

#### 3.1 Risk management objectives and policies

The Group acknowledges that taking risks is an integral part of its operations in order to achieve its business objectives. Therefore, the Group's management sets adequate mechanisms to identify those risks at an early stage and assesses their potential impact on the achievement of these objectives.

Due to the fact that economic, industry, regulatory and operating conditions will continue to change, risk management mechanisms are set in a manner that enables the Group to identify and deal with the risks associated with those changes. The Group's structure, internal processes and existing control mechanisms ensure both the independence principle and the exercise of sufficient supervision.

The Group's Management considers effective risk management as a top priority, as well as a major competitive advantage, for the organization. As such, the Group has allocated significant resources for upgrading its policies, methods and infrastructure, in order to ensure compliance with the requirements of the ECB and the SRB, the guidelines of the EBA and the Basel Committee of Banking Supervision and the best international banking practices. The Group implements a well-structured credit approval process, independent credit reviews and effective risk management policies for all material risks it is exposed to, both in Greece and in each country of its international operations.

The amount of risk which the Group is willing to assume in the pursuit of its strategic objectives is articulated via a set of quantitative and qualitative statements, namely the Risk Appetite Statements (RAS), which cover inter alia all risk types assessed as material. The Group sets specific Risk Appetite thresholds for its RAS, as described in its Risk Appetite Framework. Their objective is to support the Bank's business growth, to balance a strong capital position with higher returns on equity and to ensure adherence to regulatory requirements.

Aiming to identify its material risks, the Bank maintains a well-defined Risk Identification and Materiality Assessment (RIMA) Framework.

The identification and the assessment of all risks is the cornerstone for an effective Risk Management. The Bank, aiming to ensure a collective view on the risks linked to the execution of its strategy, acknowledges the new developments at an early stage and assesses the potential impact.

Issues relating to risk management are discussed, assessed and approved at the level of senior management (Management Risk Committee) and management body (Board Risk Committee).

The Board Risk Committee (BRC) is a committee of the BoD and its task is to assist the BoD in the risk-related issues regarding the Group, including:

- to advise and support the BoD regarding the monitoring of the Group's overall actual and future risk appetite and strategy, taking into account all types of risks to ensure that they are in line with the business strategy, objectives, corporate culture and values of the Group;
- to assist the BoD in overseeing the implementation of the Group's risk strategy and the corresponding limits set;
- to oversee the implementation of the strategies for capital and liquidity management as well as for all material risks including financial and non-financial risks indicatively credit risk, market risk, interest rate risk and credit spread risk in the banking book, counterparty risk, operational risk, climate risk, country risk, reputational risks, conduct risk, risks stemming from strategic projects, in order to assess their adequacy against the approved risk appetite limits.

The BRC consists of five (5) non-executive directors meets at least 10 times per year and reports to the BoD on a quarterly basis and on ad hoc instances if it is needed.

The Management Risk Committee (MRC) is a management committee established by the CEO and its main responsibility is to oversee the risk management framework of the Group. As part of its responsibilities, the MRC facilitates reporting

## Risk Management Overview

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to the BRC on the range of risk-related topics under its purview. The MRC supports the Group Chief Risk Officer to identify material risks, to promptly escalate them to the BRC and to ensure that the necessary policies and procedures are in place to prudently manage risk and to comply with regulatory requirements.

The Group Risk Management, which is headed by the Group Chief Risk Officer (GCRO), operates independently from the business units and is responsible for the identification, assessment, monitoring, measurement, and management of the risks that the Group is exposed to. It comprises the Group Credit (GC), the Group Credit Control (GCC), the Group Credit Risk Capital Adequacy Control (GCRCAC), the Group Market and Counterparty Risk (GMCR), the Group Operational and Non-Financial Risks (GONFR), the Group Model & Data Validation and Governance (GMVG), the Supervisory Relations and Resolution Planning (SRRP), the Group Sustainability Risk, the Group Risk Management Strategy & Oversight and the Risk Analytics (RA).

### 3.2 Risk appetite framework

The amount of risk which the Group is willing to assume in the pursuit of its strategic objectives is articulated via a set of quantitative and qualitative statements for all risks assessed as material, that are described in the Group's Risk Appetite Framework (RAF). The key objectives that RAF encompasses include the following:

- Supports the Board of Directors and the senior management in planning, formulating and executing strategic business decisions to achieve the long-term targets of the Bank;
- Links strategic objectives, stakeholder's expectations, and regulatory requirements, with risk profile, appetite and capacity limitations ensuring optimization of risk and reward trade-offs;
- Defines the levels of risk that the Group is willing to undertake, considering its strategy and business objectives.

Risk appetite is clearly communicated throughout the Group, determines risk culture and forms the basis on which risk policies and risk limits are established at Group, business and regional level.

The Group's Risk Appetite Framework comprises the following components:

- Risk Profile - is defined as a point-in time assessment of the Group's net exposures to risks, monitored through qualitative and quantitative Key Performance Indicators (KPIs) and Key Risks Indicators (KRIs) based on the Group's business activities and needs. The indicators are frequently updated, monitored and reported resulting to the effective identification of risks, as well as their prompt management and remediation by the Group;
- Risk Appetite – this reflects the maximum level of risk that the Group is willing to assume (seek, accept or tolerate) under business-as-usual conditions in order to achieve its strategic and business objectives;
- Risk Capacity – this reflects the maximum amount of risk the Group can assume given its current level of resources before breaching any regulatory, operating, capital base, or liquidity constraints and other obligations;
- Early Warning threshold – are set at levels prior to reaching Risk Appetite threshold Levels in order to avoid breach and to ensure sufficient time to respond with mitigating actions.

The risk appetite is structured as a series of qualitative and quantitative statements that cover the following broad risk categories:

- Capital adequacy and leverage;
- Credit risk and asset quality;
- Market risk;
- Interest Rate Risk in the Banking Book (IRRBB);
- Credit Spread Risk in the Banking Book (CSRBB);
- Liquidity risk;
- Non-Financial risks (including reputational risk);
- Earnings risk;

## Risk Management Overview

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- Country risk;
- Business and strategic risk;
- Real Estate risk;
- Climate risk.

The Risk Appetite Framework is appropriately documented and revisited at least on an annual basis. The BOD and BRC reviews and approves the risk appetite statements and thresholds at least on an annual basis to ensure compliance with the regulatory requirements and the Bank's risk appetite in the prevailing business environment. Setting risk appetite aims to ensure that risk is proactively managed to the level desired and approved by the BoD and BRC. Senior management has the responsibility to monitor and manage risk exposures in order to remain within risk appetite levels and to ensure an appropriate level of risk is assumed to achieve business objectives. In addition, appropriate arrangements have been put in place for the regular monitoring of the risk appetite indicators. The Group has established a standardised, regular flow of information, based on its Management Information Systems, that ensures timely and accurate monitoring of the indicators' levels. Also, clear escalation requirements are in place in case of limit breaches, in order to enable appropriate actions.

### 3.3 Types of risk

The Group is exposed to various types of risk that are managed at various levels of the organization.

The most important types of risk are:

- Credit risk;
- Market (including IRRBB and CSRBB), counterparty and liquidity risk;
- Operational and other non-financial risks;
- Climate/ ESG risks.

The individual risk types are defined in the subsequent sections.

The risk management functions of the BRC are performed by the GCRO and risk management units, which cover the following areas:

- Credit risk;
- Market (including IRRBB and CSRBB), Counterparty and Liquidity risk;
- Operational and other non-financial risks;
- Climate/ ESG risks.

## Risk Management Overview

Group Chief Risk Officer (GCRO)		
Credit Risk	Market, Counterparty & Liquidity Risk	Operational Risk
<ul style="list-style-type: none"> <li>• Standardised Approach for the Group's capital adequacy ratios in the area of credit risk;</li> <li>• Independent and centralised approval system;</li> <li>• Systematic follow up of credits;</li> <li>• Differentiated credit scoring system for mortgage, consumer and small business banking, full financial and sectorial analysis for corporates based on independent credit rating;</li> <li>• Risk parameters i.e. PD, LGD, EAD are widely used in setting up risk appetite limits and in the pricing of loans;</li> <li>• Disciplined provisioning policy (wholesale) and statistical portfolio behaviour (retail);</li> <li>• Regular and ad hoc reporting to Senior Management (Executive Board Committee, BoD, BRC) regarding progress of portfolios and evolution of provisions.</li> </ul>	<ul style="list-style-type: none"> <li>• First Greek bank with complete and validated market risk management system by local regulator (BoG), which covers both trading and banking books;</li> <li>• Compliance with new CRD IV rules for Trading book (stressed VaR and IRC);</li> <li>• All market risks monitored daily against approved VaR limits;</li> <li>• VaR methodology used for business decisions;</li> <li>• Considerable stress testing development for non-normal market conditions, results monitored on a continuous basis;</li> <li>• Monitoring on a continuous basis the level of liquidity risk using regulatory and internal metrics and methodologies (LCR, NSFR, buffer analysis, cash flow analysis, short-term and medium-term stress test etc.);</li> <li>• Daily monitoring of credit risk of derivatives' positions using PFE methodology;</li> <li>• The operation and the monitoring of credit risk mitigation contracts (ISDA/CSA, GMRA) is done on a daily basis through an appropriate tool;</li> <li>• Country risk, Counterparty and Issuer Risk monitored daily on a Group level through a centralised counterparty risk monitoring tool;</li> <li>• CVA modelling;</li> <li>• International operations: market risk for all International subsidiaries managed centrally in Greece;</li> <li>• Interest rate risk in the Banking Book and Credit Spread Risk in the Banking Book are closely monitored</li> <li>• Regulatory framework for Counterparty Credit Risk (SA-CCR);</li> <li>• New regulatory framework for Market Risk (FRTB (Fundamental Review of the Trading Book) SA).</li> </ul>	<ul style="list-style-type: none"> <li>• Standardised Approach for Eurobank's consolidated operations and Basic Indicator Approach for Hellenic Bank Group;</li> <li>• Documented and functioning operational and non-financial risks management framework &amp; risk management platform implemented Group-wide;</li> <li>• Risk &amp; Control Self Assessment program (RCSA);</li> <li>• Operational risk events collection;</li> <li>• Key Risk Indicator (KRI) set-up &amp; monitoring of risk appetite;</li> <li>• Operational risk scenario analysis;</li> <li>• Operational risk reporting (internal &amp; external);</li> <li>• A number of operational risk mitigation programs underway throughout the Group;</li> <li>• Counter-fraud activity monitoring;</li> <li>• Implementing the governance framework for all products and services groupwide;</li> <li>• Fostering a strong operational risk culture within the Group by increasing risk awareness;</li> <li>• Managing Eurobank's insurance policies.</li> </ul>

**Credit Risk**

**4. Credit Risk**

**4.1 Definition of credit risk**

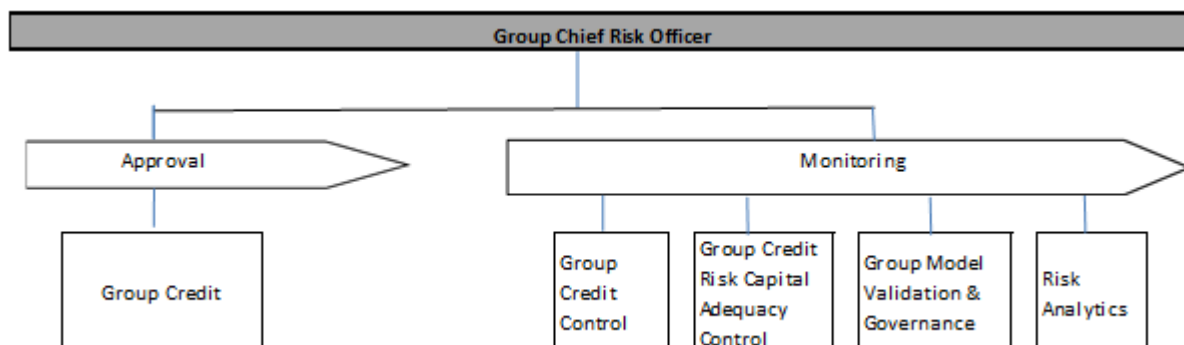
Credit risk is the risk that a counterparty will be unable to fulfill its payment obligations in full when due. Credit risk is also related with country risk and settlement risk specified below:

- a) Country risk is the risk of losses arising from cross-border lending and investment activities and refers to the uncertainty associated with exposure in a particular country. This uncertainty may relate to a number of factors including the risk of losses following nationalization, expropriation and debt restructuring and foreign exchange rates' movement.
- b) 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 Group 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 Group, as well as from credit enhancement provided, such as financial guarantees and letters of credit. The Group 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 primary risk the Group is exposed to, it is very closely managed and monitored by specialised risk units, reporting to the GCRO.

**4.2 Credit risk organization and processes**

**4.2.1 Credit risk organization**



The diagram above depicts the organizational structure of credit risk of the Bank. The functions of each unit are described below.

The organization of the credit risk units of the Group's subsidiary banks in International operations (Bulgaria, Cyprus, Luxembourg) also follows the model of the Bank depicted above. The Risk Executive of each subsidiary bank reports directly to GCRO.

**4.2.2 Credit approval process**

The credit approval and credit review processes are centralised both in Greece and in the International operations. Segregation of duties ensures independence among executives responsible for the customer relationship, the approval process and the loan disbursement, as well as monitoring of the loan during its lifecycle.

**Credit Committees**

The credit approval process in Corporate Banking is centralised through establishment of Credit Committees with escalating Credit Approval Levels. Main Committees of the Bank are the following:

## Credit Risk

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- Credit Committees (Central and Local) authorised to approve new financing, renewals or amendments mainly for domestic groups in the existing credit limits in accordance with their credit approval authority, depending on total limit amount of the customer/group and risk category (i.e. high, medium or low), as well as the value and type of security;
- Special Handling Credit Committees authorised to approve credit requests and take actions for distressed clients;
- International Credit Committees (Regional and Country) established for the wholesale borrowers of the Group's international Bank subsidiaries, authorised to approve new limits, renewals or amendments to existing limits, in accordance with their credit approval authority, depending on total customer exposure and risk category (i.e. high, medium or low), as well as the value and type of security; and
- International Special Handling Committees established for handling distressed wholesale borrowers of the Group's international bank subsidiaries.

The Credit Committees meet on a weekly basis or more frequently, if needed.

### Group Credit (GC)

Within an environment of increased risk requirements, Group Credit's (GC) mission is to safeguard the Groups' asset side, by evaluating credit risk and making recommendations, so that borrower's credit exposure is acceptable and within the approved Risk Appetite Framework. GC is headed by the Group Chief Credit Officer (GCCO) with direct reporting to the GCRO.

GC operations are comprised of two functions, i.e. the Corporate Credit, including both the domestic and the foreign underwriting activities (the latter only for material exposures of International Subsidiaries), and Retail Credit respectively, covering the underwriting needs of the SBB portfolio and Individuals Lending (mortgage, consumer loans, auto-moto loans and credit cards).

### Corporate Credit

(a) Domestic and Greek related portfolio: the underwriting function includes the review of credit requests originating from Corporate Units handling large and medium scale corporate entities of every risk category and specialised lending units such as Shipping and Structured Finance (Commercial Real Estate, Hotel & Leisure, Project Finance, M&A Financing) and Private Banking. Major tasks of the respective workstream and involved credit units pertain to the following:

- Evaluation of credit applications and issuance of an independent Risk Opinion when required according to internal procedures, which includes:
  - (i) assessment of the customer credit profile based on qualitative and quantitative risk factors (market, operational, structural and financial);
  - (ii) recommendations for the formulation of bankable, well-secured and well-controlled transactions (credit facility); as well as
  - (iii) review and confirmation of the ratings of each borrower to reflect the risks acknowledged;
- Participation with voting right in all credit committees as per the Credit Approval procedures;
- Active participation in the regulatory audits and major internal projects of the Bank, providing at the same time credit related knowledge, expertise and support to other units;
- Preparation of specialised reports to Management on a regular basis, with regards to the Top 25 largest, in terms of total exposure, borrower Groups, statistics on the new approved financings and leveraged transactions.

(b) International Subsidiaries' portfolio: The GC through its specialized International Corporate Credit (ICC) is responsible to actively participate in the evaluation of credit applications that exceed a certain threshold for the wholesale portfolio of the International Subsidiaries covering Bulgaria, Cyprus and portion of the loan portfolio of Luxemburg (and London). Moreover, the respective unit's tasks and responsibilities are highlighted below:

## Credit Risk

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- Participation with voting right in all International Credit Committees (Regional and Special Handling) and Country Risk Committees (CRCs);
- Participation in the sessions of Special Handling Monitoring Committees for Bulgaria which monitor and decide on the strategy of problematic corporate relationships with loan outstanding exceeding a certain threshold, that is jointly set by ICC and Country TAG;
- Advice on best practices to the Credit Risk Units of International Subsidiaries.

GC is also responsible for the preparation of all credit committees' agendas, distribution of the respective material and maintenance of the respective Credit Committees' minutes.

### Retail Credit

The scope of the Retail Credit is the assessment of credit applications submitted by Retail Business Units in relation to Borrowers of the performing retail credit portfolio (SBB loans and Individual banking). Such applications refer to new loans, review / renewal of existing lines and after sales requests.

The main tasks of the Retail Credit function are outlined below:

- Assess credit requests in alignment with the credit risk assessment criteria and methodology provided in the appropriate Credit Policy Manual, in accordance with the defined approval levels;
- Analyse and evaluate risk factors depending on the type of credit request based on both financial and qualitative information;
- Prepare an independent Credit Opinion ensuring that the risks identified are fully reflected in the Borrower's Rating;
- Participate with voting rights in the credit committees as per the credit approval process, according to the Approval Levels defined in the CPM;
- Active participation in the regulatory audits and major internal projects of the Bank, providing at the same time credit related knowledge, expertise and support to other units.

### 4.2.3 Credit risk monitoring

#### Group Credit Control

The Group Credit Control (GCC) monitors and assesses the quality of the Group's loan portfolio, operates independently from the business units of the Bank. The GCC reports directly to the GCRO.

The main responsibilities of GCC are:

- supervise, support and maintain the credit rating and impairment systems used to assess the wholesale and Large SB lending customers;
- monitor and review the performance of all of the Group's loan portfolios;
- supervise and control the foreign subsidiaries' credit risk management units;
- monitor on a regular basis and report on a quarterly basis to the BoD and the BRC of risk exposures, along with accompanying analyses;
- monitor and evaluate the efficiency of adopted strategies and proposed solutions in terms of dealing with Non Performing Exposures (NPEs) and the achievement of targets for NPEs reduction, as communicated and agreed with the Supervisory Authorities;
- conduct field reviews and prepare written reports to the Management on the quality of all of the Group's loan portfolios and adherence with EBA prevailing regulations;
- monitor the proper EBA classifications in accordance with the relevant provisions and guidelines;
- participate in the approval of new credit policies and new loan products;
- participate in the Troubled Asset Committee;
- attend meetings of Credit Committees and Special Handling Committees, without voting right;

## Credit Risk

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- formulate the Group's credit impairment policy and measure the provisions of the Greek loan portfolios along with the relevant reporting to Management;
- regularly review the adequacy of provisions of all of the Group's loan portfolios;
- formulate, in collaboration with the responsible lending Units the credit policy manuals for performing borrowers;
- provide guidance and monitor the process of designing and reviewing credit policies before approved by Management;
- through field / thematic reviews on a sample basis monitor the proper application of Real Estate collaterals' valuation, as per the Banks' Collateral Valuation policy and procedures;
- monitor the supervisory, regulatory developments, emerging trends and best practices within its purview in order to keep Management abreast and propose required actions;
- lead or participate in various risk related projects including but not limited to supervisory investigations, stress tests, Asset Quality Reviews, process improvement projects etc.;
- contribute to the overall credit risk management strategy of the Group, ensuring alignment with business objectives and regulatory requirements.

### Group Credit Risk Capital Adequacy Control

The Group Credit Risk Capital Adequacy Control (GCRCAC) develops and maintains the credit risk assessment models for the loan portfolio and securitized exposures of the Group performs capital adequacy calculations and assessment for the loan portfolios of the group, conducts internal & external stress test exercises as well as forecasting of risk parameters, impairments in the context of IFRS9 and RWEAs and the three year business plan. In addition, prepares Pillar 2 assessment for Credit risk, foreign exchange risk, concentration risk and securitization risk. The Unit reports directly to GCRO.

Specifically, the main activities of Group Credit Risk Capital Adequacy Control are:

- control, measure and monitor the capital requirements arising from the Group's loan portfolio along with the relevant reporting to Management and regulators (ECB/SSM);
- perform significant Risk Transfer (SRT) tests and monitor independently traditional and synthetic securitisations;
- manage the models development, implementation and monitoring of the internal models and IFRS9 models of Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) for evaluating credit risk;
- measure and monitor the risk parameters (PD, LGD, EAD) for the purposes of internal capital adequacy assessment, as well as the estimation of risk related parameters (such as forecast 12-m PD, forecast lifetime PD) for IFRS 9 impairment calculation purposes;
- review the grouping of lending exposures and ensuring their homogeneity in accordance with the Group's IFRS accounting policies;
- development and monitoring of the significant increase in credit risk (SICR) threshold under the IFRS9 standard;
- prepare monthly capital adequacy calculations (Pillar I) and relevant management, as well as regulatory reports (COREPs, SREP) on a quarterly basis;
- projection of asset quality and capital requirements for the loan book (projected impairments and RWEAs), in the context of the business plan, ICAAP and recovery plan and participation in the relevant committees;
- perform stress tests, both internal and external (EBA/SSM), and maintain the credit risk stress testing infrastructure;
- coordinate the stress testing exercises for the loan portfolios at Group Level;
- prepare of credit risk analyses for Internal Capital Adequacy Assessment (ICAAP)/ Pillar II purposes;
- prepare of Basel Pillar 3 disclosures and relevant IFRS9 disclosures for credit risk;
- regularly report to the GCRO, to the Management Risk Committee and to the Board Risk Committee on: risk models performance, risk parameters (PD, LGD, EAD), forbearance reporting, vintage analysis and default / redefault statistics portfolios forward looking analysis and new disbursements quality.

## Credit Risk

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- guide, monitor and supervise the Credit Risk divisions of the subsidiaries on modelling, credit stress testing and other credit risk related regulatory issues;
- monitor and guide Group's International subsidiaries on credit risk related ICAAP, stress testing and other regulatory credit risk related issues, based on Group standards. Review of local credit risk stress test exercises;
- support the Business Units in the use of credit risk models in business decisions for funding purposes in the capital impact assessment of strategic initiatives and the development and usage of risk related metrics such as Risk Adjusted Pricing, Risk Adjusted Return on Capital (RAROC) etc.; and
- assist Remedial Servicing Strategy in the risk assessment and risk impact of various programs and products;

### Group Model & Data Validation

The Group Model & Data Validation was set up with key mandates:

- the establishment of a comprehensive model validation and governance framework, and
- the independent validation of the significant models (credit risk, pricing, profitability etc.) used by the Group, in order to ensure that the results produced are correct, cover fully business needs, as well as that the methodologies and tools applied are in alignment with industry standards and the corresponding regulatory requirements.

In more detail, the tasks of the Unit are outlined as follows:

- Prepare and update the Group's Models Framework (to include model definition, roles involved per model, model classification principles and methodology, model validation principles, materiality classifications and thresholds, models' registry governance, etc.);
- Establish and update the Group's Models Registry;
- Review models' classification, in accordance with the methodology provided in the Group Models Framework;
- Support and advise Group subsidiaries in the implementation of the Group Models Framework;
- Prepare and update the Group Models Validation Framework;
- Design and update the methodologies and procedures used for model validation tests, as defined in the Models Validation Framework;
- Prepare annual models' validation/revalidation plan;
- Propose and escalate for approval the quantitative thresholds, in order to assess the results of the validation tests;
- Conduct model validation tests in alignment with the Group Model Validation Framework and regulatory requirements;
- Prepare detailed reports with the model valuation results according to the specific requirements of the model validated, if any;
- Support and advise Group subsidiaries with regards to the preparation and implementation of their model validation framework;
- Disseminate models' validation results within the Group, as appropriate;
- Prepare action plan for remediation actions, if any, as a result of the model validation tests implemented, and escalate the plan for its approval by the appropriate Management Authority;
- Participate in the sign-off of new models for assessing ratings' system accuracy and suitability;
- Monitor industry practices on the development and use of models as well as related ECB guidelines and restrictions;
- Monitor changes in ECB guidelines on models' validation.

As of September 2024, the Unit has additionally assumed responsibility for the validation of Eurobank's compliance to the requirements of BCBS 239 (Risk Data Aggregation and Risk Reporting framework). In this context, the relevant tasks of the unit are outlined as follows:

- Design and maintain an effective RDARR Validation Framework describing the relevant methodologies and processes based on most recent relevant regulatory guidelines and other requirements;

## Credit Risk

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- Prepare annual RDARR compliance validation plan;
- Perform Periodic validations of level of compliance with regards to the implementation of the BCBS 239 Principles in the Group's RDARR processes and systems, in a timely manner, in line with the RDARR Validation Framework;
- Perform periodic reviews of the validation activities carried out by material subsidiaries;
- Report the Group's level of compliance with the BCBS 239 Principles in the annual validation report, in the form of an overall compliance score, reflecting the overall results derived following the completion of all its annual validation activities, as described in the RDARR Validation Framework;
- Disseminate validation results within the Group, as appropriate;
- Prepare action plan for remediation actions, if any, as a result of the validation tests implemented, and escalate the plan for its approval by the appropriate Management Authority;
- Supervise and review of changes in the BCBS 239 Overarching Framework, in order to proceed with the necessary amendments (if any) in the RDARR Validation Framework.

### Risk Analytics

The scope of the Risk Analytics (RA) is to develop and deploy advanced analytics solutions through utilising 'big-data' sources and innovative modelling techniques such as 'Machine Learning'. The underpinning objective of these solutions is to deliver risk – reward improvements across the Credit cycle: from credit origination through to account management and collections. The Risk Analytics also aims to improve the operational efficiency of the Credit origination process through enabling automation and digital transformation. Furthermore, the advanced analytics solutions aim to optimise Business decisions and the Product pricing.

The main functions and activities of RA are to:

- Develop, maintain and excel a best-in-class Decision Science platform and the related modelling tools that can be leveraged by multiple units of the Bank to perform advanced analytics activities;
- Develop and maintain a set of libraries and data models to perform advanced analytics modelling;
- Provide expert support to Bank-wise projects through delivering ad hoc analytics and bespoke models;
- Develop and maintain the Bank's Early Warning System (EWS) for the respective segments (Corporate, SME/SB and Retail); and
- Develop and maintain the Bank's Cash Flow engine based on bank account transactional data and advanced analytics modelling.

#### 4.2.4 Remedial Management

The Group, following the strategic partnership with doValue S.p.A. and the successful transition to the new operating model for the management of NPEs, realizes the NPE Strategy Plan through its implementation by doValue Greece (dVG) for the assigned portfolio and the successful securitization transactions under HAPS protection.

The Governance Framework between ERB and doValue is composed of the Oversight Mechanism and the Collaboration Framework, which are aiming to ensure a smooth cooperation between the two parties, efficient servicing of the assigned portfolios and relevant compliance with the SSM targets.

The Oversight Mechanism is consisted of the Strategic Alignment Group ('SAG') and the Portfolio Review Working Group ('PRWG'), aiming at:

- Achieving strategic alignment against targets and service levels;
- Resolving any potential issue related to the servicing of the Reference Portfolio; and
- Ensuring effective liaison and coordination between the two entities.

These bodies make non-credit decisions and all final decisions remain subject to the internal approval/ decision process of each entity.

## Credit Risk

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The Troubled Assets Committee (TAC) is established according to the regulatory provisions. The main purpose is to act as an independent body, closely monitoring the Bank's troubled assets portfolio and the execution of its NPE Management Strategy.

The Committee meets at least once per month and/or whenever required if the majority of the members, including the Chairperson, are present. Decisions are taken by majority, are minuted and circulated as appropriate. The Chairman has a casting vote.

TAC cooperates with Group Risk Management to reach a mutual understanding and develop an appropriate methodology for the evaluation of the risks inherent in the portfolio management. TAC's propositions regarding NPE policy updates are submitted to the BRC. In exceptional circumstances, decisions may be taken by circulation.

TAC's main responsibilities are to:

- Review internal reports regarding troubled assets management under the regulatory provisions;
- Approve the available forbearance, resolution and closure solutions by loan sub-portfolio, and monitor their performance through Key Performance Indicators (KPIs);
- Define criteria to assess the sustainability of credit and collateral workout solutions through the design and use of "decision trees";
- Approve, monitor and assess pilot modification programs; and
- Supervise and provide guidance and know-how to the respective troubled assets units of the Bank's subsidiaries abroad.

By the date of issuance of the 2025 Corporate Governance Statement, Committee's self-evaluation for 2025 was in progress. For 2024 the evaluation concluded that the committee operates effectively, in the areas of Profile and Composition, Organization & Administration as well as regarding the Key Tasks and Responsibilities. However the evaluation also identified that while the overall quality and quantity of information submitted related to the proposals for assessment by the TAC members is adequate, there is room for further enhancement on providing more details on the quantification of the impact through monitoring (i.e. through KPIs) of implemented solutions, products and targets set as well as indicating the monitoring frequency of all new remedial/work-out proposals. Such enhancements will benefit TAC members make more informed decisions.

### Remedial Servicing Strategy (RSS)

The Remedial Servicing and Strategy (RSS) is responsible for: a) the management of the non-performing and early arrears loans of the Bank and the relevant communication with the regulator, b) structured transactions which create capital (such as Synthetic SRT STS securitizations) and/or offer credit protection c) cooperation with the other units of Group Strategy for other transactions and initiatives and (d) communication cooperation with the regulators on all relevant matters always in conjunction with the other relevant units of the Bank such as Group Risk and Group Finance.

RSS is closely monitoring the overall performance of the NPE portfolio as well as the relationship of the Bank with doValue Greece. Furthermore, following Bank's commitments to preserve the significant risk transfer (SRT) through the monitoring regulatory requirements pertaining to Bank's concluded transactions, RSS has a pivotal role in ensuring that relevant process is performed smoothly and in a timely manner and that any shortcomings are appropriately resolved, while providing any required clarifications or additional material required by the regulatory authorities.

The Head of RSS reports to the General Manager of Group Strategy. In this context, RSS has been assigned inter alia with the following responsibilities:

- Sourcing new transactions and performing the execution of any transaction processes, by also establishing negotiation of Commercial / Legal Terms as well monitoring of these transactions;
- Develop and actively monitor the NPE targets and reduction plan;

## Credit Risk

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- Set the strategic principles, priorities, policy framework and KPI's under which doValue Greece is servicing the portfolio;
- Closely monitor the execution of the approved strategies, as well as all contractual provisions under the relevant contractual agreements for Bank's portfolio assigned to doValue Greece including the securitized portfolio of ERB Recovery DAC;
- Monitor the performance of the senior notes of the securitizations in collaboration with Group Risk so as to ensure compliance to Significant Risk Transfer (SRT) and to the Hellenic Asset Protection Scheme (HAPS);
- Budget and monitor the Bank's expenses and revenues associated with the assigned portfolio;
- Cooperate closely with doValue Greece on a daily basis in achieving the Group's objectives; and
- Maintain supervisory dialogue.

### 4.2.5 Recent developments of the Greek economy, outlook and risks

According to Hellenic Statistical Authority (ELSTAT), the real GDP growth rate in 2025 stood at 2.1% on an annual basis, compared with 2.1%, 2.1%, 5.5%, 8.7%, -9.2% and 2.3% in 2024, 2023, 2022, 2021, 2020 and 2019 respectively, reflecting, to a degree, the shift back to a reduced growth path of the economy after the post-pandemic boom. The European Commission's (EC) Autumn 2025 projected growth of 2.1% for 2025, supported by private consumption, tourism and investments funded via EU's Recovery and Resilience Facility (RRF), with subsequent years 2026 and 2027 expected to see a consistent growth rate of 2.2% and 1.7% respectively. According to the 2026 General Government (GG) Budget (November 2025), the real GDP growth rate for 2025 and 2026 was expected at 2.2% and 2.4% on an annual basis. The respective EC real GDP forecasts for the EA were estimated at 1.3% in 2025 from 0.9% in 2024 and expected at 1.2% and 1.4% for 2026 and 2027 respectively. Overall, the ELSTAT outturn for 2025 was broadly in line with the EC Autumn 2025 forecast, while it came marginally below the 2026 GG Budget projection. In this context, tourism and investment momentum supported by the National Recovery and Resilience Plan (NRRP) "Greece 2.0" and EU funds under the Multiannual Financial Framework (MFF 2021-2027) – remain key factors underpinning growth in 2025.

According to ELSTAT, the unemployment rate averaged 8.9% in 2025, down from 10.1% in 2024 and 11.1%, 12.4%, 14.7%, 16.3% and 17.3% in 2023, 2022, 2021, 2020 and 2019 respectively, confirming the steady improvement in labour market conditions following the pandemic shock. Note that the unemployment rate was at 27.5% in 2013. The EC Autumn 2025 forecasts put Greece's unemployment rate at 9.3% in 2025 (from 10.1% in 2024) and projected a further decline to 8.6% in 2026 and 8.2% in 2027. According to the 2026 GG Budget, the unemployment rate in 2025 and 2026 was expected at 9.1% and 8.6% respectively. Overall, the ELSTAT outturn for 2025 (8.9%) came in below both the EC Autumn 2025 estimate (9.3%) and the GG Budget assumption (9.1%), reflecting a somewhat stronger-than-anticipated improvement in the labour market; remaining differences across sources typically reflect varying methodological assumptions, cut-off dates and update calendars.

According to ELSTAT, the Harmonized Index of Consumer Prices (HICP) rate Greece at the end of December 2025 was at 2.6% on an annual basis. The 12-month average HICP rate for 2025 was at 2.5% from 2.7%, 3.5%, 9.6% 1.2%, -1.2% and 0.3% in 2024, 2023, 2022, 2021, 2020 and 2019 respectively. According to the EC forecasts, the annual inflation rate in was estimated at 2.8% for 2025, from 3.0% in 2024 and 4.1% in 2023, and expected at 2.3% and 2.4% for 2026 and 2027. Overall, the 2025 HICP outturn (12-month average: 2.5%) came in slightly below the EC's Autumn 2025 projection for Greece (2.8%), pointing to a somewhat faster-than-expected disinflation. The HICP rate for the EA was estimated at 2.1% for 2025 from 2.4% in 2024 and is expected at 1.9% and 2.0% in 2026 and 2027. According to the ECB's December 2025 Eurosystem staff projections, reaffirmed in January 2026, euro area inflation is expected to decline to 1.9% in 2026 from 2.1% in 2025, before easing further to 1.8% in 2027 and returning to 2.0% in 2028. The disinflation reflects moderating labour cost pressures and the fading impact of past energy shocks, supply bottlenecks and post-pandemic reopening effects, while the rebound in 2028 mainly reflects the introduction of the new EU Emissions Trading System (ETS2). Over the medium term, inflation is projected to remain close to the ECB's 2% target, amid easing cost pressures and the lingering effects of past monetary tightening, although geopolitical and global trade-related risks remain.

## Credit Risk

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On the fiscal front, according to the 2026 GG Budget, the GG balance was to post a primary surplus of 3.7% of GDP in 2025, from a primary surplus of 4.7% in 2024. The primary balance is expected to post a surplus, at 2.8% in 2026. The gross public debt-to-GDP ratio is projected to decline to 145.9% in 2025 and 138.2% in 2026, from 154.2% in 2024, driven by strong economic expansion, the impact of higher price levels on nominal GDP and the early repayment of GLF loans (€ 5.3 billion in December 2025). According to the EC forecasts, the primary balance is estimated to post a surplus of 4.3% of GDP in 2025. The forecasts for 2026 and 2027 are for a continuation of the surpluses at 3.4% and 3.2% of GDP respectively. The EC forecasts for the gross public debt were estimated at 147.6% for 2025 and estimated at 142.1% and 138.0% of GDP for 2026 and 2027 respectively. Finally, according to the Greek Public Debt Management Agency (PDMA), the cash buffer of the general government was at € 39.0 billion, at the end of December 2025 which corresponds to more than 3 years of gross financing needs. The primary balance was at 2.0%, -0.1%, -4.8%, -6.6%, 3.8% of GDP in 2023, 2022, 2021, 2020 and 2019 respectively.

On the external front, the current account deficit is projected to remain elevated, at 6.0% of GDP in 2025 and 6.2% of GDP in 2026, according to the EC Autumn 2025 forecasts, before narrowing moderately to 5.8% in 2027. The persistent deficit reflects structural weaknesses in the goods balance, partly offset by a strong surplus in services, supported by robust tourism and shipping receipts. While export performance remains resilient, the high import content of domestic demand continues to weigh on the external position.

According to the Bank of Greece, private sector deposits increased to € 213.2 billion at the end of December 2025, up from around € 203 billion at the end of December 2024, registering an adjusted annual growth rate of 5.1%. Deposit growth accelerated during 2025, supported by robust economic activity and strong corporate credit expansion. Corporate deposits expanded at a double-digit pace, while household deposit growth remained more moderate, reflecting the continued shift of household savings toward alternative financial assets offering higher returns amid relatively low deposit rates. On the other hand, total credit to the private sector increased to € 123.7 billion at the end of December 2025, up from around € 122.7 billion at the end of December 2024, registering an adjusted annual growth rate of 7.9%. This growth was primarily driven by robust corporate lending, with credit to non-financial corporations expanding by 11.3% on an annual basis, reflecting solid economic activity and improved financing conditions. Lending to households strengthened further, as housing loans turned positive for the first time in many years, increasing by 0.7% on an annual basis, in December 2025, while consumer credit continued to expand at a strong annual pace of 7.0%. According to SSM, the Non-performing loans (NPLs) ratio of the significant institutions in Greece continued to decline markedly in 2025, falling to 3.1% in September 2025, compared with 3.3% at end-2024. According to SSM the NPLs ratio for euro-area significant institutions was at 2.2% in September 2025 and 2.3% in December 2024. These figures underscore the substantial improvement in banks' asset quality and the near completion of the post-crisis balance sheet clean-up. Note that according to BoG data NPLs ratio reached 49.1% in March 2017.

Under the EC's Next Generation EU framework, a € 750 billion recovery package was approved on 21/7/2020, allocating approximately € 36.0 billion to Greece (€ 17.7 billion in grants and € 18.3 billion in loans) until 2026 for the NRRP, alongside roughly € 40 billion through the MFF 2021-27, with nearly € 25 billion earmarked for investments under the new Partnership Agreement for the Development Framework (ESPA 2021–2027). In November 2025, Greece submitted a revised Recovery and RRF plan, which has already received a positive assessment from the EC. As of February 2026, Greece has received nearly € 23.4 billion from the RRF, including pre-financing and regular payments post-successful milestone implementations. The seventh payment request for € 1.2 billion in RRF funds was submitted in December 2025. Notably, the NRRP is expected to mobilize additional private sector investments of approximately € 30 billion.

In March 2020, the ECB introduced the Pandemic Emergency Purchase Programme (PEPP) as a temporary non-standard monetary policy measure, with an overall envelope later increased to € 1,850 billion (December 2020). Greece became eligible under the PEPP, with approximately € 46 billion available for purchases of Greek public and private sector securities. The programme complemented the ECB's liquidity measures announced on 12 March 2020, including additional LTROs, more favourable TLTRO terms and an expanded Asset Purchase Programme. Net PEPP purchases ended in March 2022, while flexible reinvestments of Greek government bonds continued until end-2024. As part of monetary policy normalisation, the ECB confirmed in December 2024 that PEPP reinvestments would be fully discontinued.

## Credit Risk

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According to ECB data, PEPP holdings of Greek government bonds stood at € 34.6 billion in February 2026, with a weighted average maturity of about 8.1 years.

As of March 2026, Greece is rated at investment grade by the major credit rating agencies. Fitch and S&P both rate the Hellenic Republic at BBB with a stable outlook (Fitch upgraded to BBB on 14 November 2025), Morningstar DBRS upgraded to BBB in March 2025 and assigns a stable trend, Moody's upgraded Greece to Baa3 (investment grade) on 14 March 2025 and has since maintained that rating, and Scope currently rates Greece BBB with a positive outlook.

The progress made since 2018 – including Greece's inclusion in the ECB's Pandemic Emergency Purchase Programme (PEPP), the ECB's commitment to reinvest principal from Greek bonds purchased under the PEPP until end-2024, and the achievement of investment-grade status across major rating agencies – has contributed to a substantial tightening of the 10-year Greek government bond yield spread relative to the respective German bond.

As of 18 March 2026, the Greek 10-year government bond spread stood at approximately 79.8 bps, supported by resilient economic performance, sustained investor confidence in Greek assets, an improved fiscal position and strengthened creditworthiness, despite heightened global uncertainty stemming from persistent geopolitical tensions, the ongoing war in Ukraine, the US–Iran conflict, trade frictions, supply-chain disruptions and energy security risks. The US-Iran conflict, which escalated at the end of February 2026, is estimated to have added around 19 bps to the GGB 10-year spread relative to end-February levels. This movement does not appear to be Greece-specific, but rather part of a broader repricing across euro area peripheral sovereign spreads following the escalation of geopolitical tensions. The Greek spread was at 62 bps at the end of 2025, having narrowed from substantially higher levels in prior years, consistent with the longer-term downward trend seen since the post-crisis period. The respective Greek spread was at 88 bps at the end of 2024, 104 bps at the end of 2023, 205 bps in 2022, 152 bps in 2021, and 120 bps in 2020 (and 165 bps and 416 bps at the end of 2019 and 2018, respectively).

On the back of this environment, in 2025, the PDMA raised € 7.7 billion with bonds of various maturities (5- to 10- year). The financing needs for 2026 were estimated at € 24.7 billion or 9.5% of GDP below the respective 15% DSA threshold, out of which € 8.9 billion are expected to be financed by new medium and long term issuances during the year. As of 4 March 2026, almost 53.8% of the annual issuance has been covered, excluding potential green bond issuance in the said year (PDMA, December 2025). As already mentioned above, the gross public debt was estimated at 145.9% of GDP at the end of 2025; according to the PDMA, 69% of the debt stock was held by official sector creditors and the average maturity of the debt stock was at 19 years compared with 7.5 years in the EA periphery (EA periphery countries: Cyprus, Ireland, Italy, Spain, Portugal).

The Greek economy continues to demonstrate resilience, supported by its investment-grade status, EU-funded investment and a favourable fiscal trajectory. Nevertheless, downside risks remain primarily exogenous and could weigh on growth, inflation and financial stability, while domestic execution risks may affect the medium-term outlook.

Externally, weaker growth in key euro area partners and heightened global policy uncertainty may dampen exports and tourism, while ongoing geopolitical tensions – notably the war in Ukraine and instability in the Middle East, including the recent US-Iran conflict – raise risks related to energy price volatility, trade and shipping disruptions, and tourism confidence. At the same time, escalating trade frictions and potential financial market repricing could adversely affect funding conditions and risk premia.

Inflation risks remain tilted to the upside, particularly following the escalation of the US–Iran conflict at the end of February 2026, as higher energy prices, transport costs and broader supply-side disruptions could slow the disinflation process. At the same time, the conflict has increased uncertainty over the monetary policy path, as renewed energy-driven price pressures may keep borrowing costs higher for longer relative to the pre-2022 period.

On the fiscal front, despite the declining debt trajectory, potential fiscal slippages or contingent liabilities could undermine debt dynamics, making the maintenance of primary surpluses essential for preserving market confidence.

External imbalances also remain a concern, with a persistently large current account deficit increasing vulnerability to shocks in energy prices, tourism flows and external financing conditions. Looking ahead, growth is expected to moderate after 2026 as EU funding wanes, increasing reliance on timely reform implementation, productivity gains and private investment.

## Credit Risk

Structural challenges – including productivity gaps, adverse demographics and labour market mismatches – continue to constrain potential growth, while any reform fatigue could weaken investor sentiment. In the banking sector, although asset quality has improved, vulnerabilities persist due to the high share of deferred tax credits in capital and emerging cyclical risks in corporate credit, real estate and external balances.

Finally, climate-related risks and rising cybersecurity threats add further layers of uncertainty, with potential implications for economic volatility, fiscal pressures and financial system resilience

### 4.3 Credit risk reporting

Group Credit Control, Group Credit Risk Capital Adequacy and Group Model Validation & Governance regularly prepare a detailed analysis of information to quantify, monitor and evaluate risks, as well as provide support to implement the BRC risk management decisions. It has a fixed reporting cycle to ensure that the relevant management bodies and the BRC, are updated on an ongoing basis on the developments in the credit portfolio.

The principal risk reports submitted to the relevant management bodies, on a quarterly basis, deal with the following topics:

The quality of the Group's portfolio:	Analysis of provisions for impairment and losses by business unit. Portfolio breakdowns and evolution by rating category, size, delinquency, industry, tenor, vintage and collateralization etc.
Large exposures:	- An overview of the twenty five (25) Greek largest exposures.
New disbursements performance	Analysis of new disbursements by risk characteristic and evolution of performance on a vintage basis.
Forborne loans evolution	Analysis by portfolio, delinquency status; re-default statistics on a vintage basis; impairment levels and evolution over time.
The Bank's risk management models and evolution of risk parameters:	Update on the evolution of risk parameters applied (PD, LGD), default rates per product and the key results of the models' validation.
	Update on capital adequacy.
	Monitoring of Expected losses compared to approved limits.

In addition, there are reports which are prepared on a monthly basis, in order to inform the relevant management bodies on the evolution of each business area's balances, delinquencies and provisions (impairment charges).

**Credit Risk**

**4.4 Credit exposures**

**4.4.1 Maturity analysis**

The following table presents a breakdown of net exposures by residual maturity and exposure classes as at 31 December 2025 and 30 June 2025.

**Table 17: EU CR1-A - Maturity analysis of exposures**

	a	b	c	d	e	f
	<b>31 December 2025</b>					
	Net exposure value					
	On demand	≤ 1 year	> 1 year ≤ 5 years	> 5 years	No stated maturity	Total
	€ million	€ million	€ million	€ million	€ million	€ million
1 Loans and advances <sup>(1) &amp; (2)</sup>	-	19,808	17,669	31,844	7,409	76,730
2 Debt securities <sup>(3)</sup>	-	1,483	8,464	13,945	-	23,892
3 Total	-	<b>21,291</b>	<b>26,133</b>	<b>45,789</b>	<b>7,409</b>	<b>100,622</b>
	<b>30 June 2025</b>					
	Net exposure value					
	On demand	≤ 1 year	> 1 year ≤ 5 years	> 5 years	No stated maturity	Total
	€ million	€ million	€ million	€ million	€ million	€ million
1 Loans and advances	-	16,881	12,681	34,716	7,713	71,991
2 Debt securities	-	1,707	8,652	11,573	-	21,932
3 Total	-	<b>18,588</b>	<b>21,333</b>	<b>46,289</b>	<b>7,713</b>	<b>93,923</b>

<sup>(1)</sup> The table above includes off-balance sheet items.

<sup>(2)</sup> The increase in line Loans and advances is due to the new production of loans.

<sup>(3)</sup> The increase in debt securities is mainly due to increased position in Sovereign and International Organization bonds.

**4.5 Credit quality of financial assets**

The Group recognizes allowance for expected credit losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at Amortised Cost (AC) and Fair Value through Other Comprehensive Income (FVOCI), including loans, securitisation notes issued by special purpose entities established by the Group, lease receivables, debt securities, as well as financial guarantee contracts and loan commitments.

**a. Definitions**

Loans and advances to customers, including securitisation notes issued by special purpose entities established by the Group, that are 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' (stage 1 loans) is recognised as they exhibit no significant increase in credit risk since initial recognition and loans for which a 'Lifetime ECL allowance' is recognised (stage 2 loans) 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 (stage 3 loans) and loans classified as 'Purchased or originated credit impaired' (POCI) which are always measured on the basis of lifetime ECL.

## Credit Risk

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### Regulatory definitions

From 1 January 2021 onwards, the Group applies 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 the EBA Guidelines (EBA/GL/2016/07). Accordingly, the perimeters of the credit impaired loans under IFRS 9, the non-performing exposures under EBA guidelines and defaulted exposures for regulatory purposes have been aligned.

### *b. Impairment indicators*

To determine the risk of default, the Group applies a default definition for accounting purposes, which is consistent with the EBA definition for non-performing exposure and regulatory definition of default as mentioned above. 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 90 consecutive days;
- The Group, for economic or contractual reasons relating to the borrower's financial difficulty, has granted to the borrower a concession(s) that the Group would not otherwise consider;
- There is a probability that the borrower will enter bankruptcy or other financial re-organization; and
- For POCL financial assets, a purchase or origination at a deep discount that reflects incurred credit losses is considered a detrimental event. The Group 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 Group determines the risk of default using an internal credit rating scale. The Group 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.

For further details, please refer to Consolidated 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 Group 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. Furthermore, regardless of the outcome of the SICR assessment based on the above triggers, the credit risk of a financial asset is deemed to have increased significantly when contractual payments are more than 30 days past due.

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 Group applies the same principles for assessing SICR since initial recognition when estimating ECL on a collective or on an individual basis.

## Credit Risk

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The Group 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.

The Group 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 securitisation notes issued by special purpose entities established by the Group, 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 Group in accordance with the contractual terms of the instrument and the cash flows that the Group 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 cash flows expected to be received, while for financial guarantees ECLs are measured as the expected payments to reimburse the holder less any amounts that the Group expects to receive.

The Group 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 Group is exposed to credit risk, which is determined based on the substantive terms of the instrument, or in case of revolving credit facilities and credit cards,, by taking into consideration factors such as the Group's expected credit risk management actions to mitigate credit risk and past practice.

Receivables from customers arising from the Group'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 Group derives these parameters from internally developed statistical models and observed point-in-time and historical data, leveraging the existing infrastructure development for the regulatory framework and risk management practices.

**Credit Risk**

The following table presents an overview of the quality forborne exposures as at 31 December 2025 and 30 June 2025.

**Table 18: EU CQ1 - Credit quality of forborne exposures**

	a	b	c	d	e	f	g	h
31 December 2025								
	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		
	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures	Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures		
Performing forborne	Of which defaulted	Of which impaired	Performing forborne exposures			Of which defaulted	Of which impaired	Collateral and financial guarantees received on non-performing exposures with forbearance measures
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits	-	-	-	-	-	-	-	-
010 Loans and advances	720	656	653	656	(42)	(228)	941	392
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	10	12	12	12	-	(8)	14	4
060 Non-financial corporations	405	269	269	269	(14)	(105)	477	155
070 Households	305	375	372	375	(28)	(115)	450	233
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	720	656	653	656	(42)	(228)	941	392

	a	b	c	d	e	f	g	h
30 June 2025								
	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		
	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures	Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures		
Performing forborne	Of which defaulted	Of which impaired	Performing forborne exposures			Of which defaulted	Of which impaired	Collateral and financial guarantees received on non-performing exposures with forbearance measures
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits	-	-	-	-	-	-	-	-
010 Loans and advances	828	625	622	625	(47)	(224)	1,007	370
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	17	12	12	12	-	(9)	20	4
060 Non-financial corporations	447	300	300	300	(16)	(127)	519	165
070 Households	364	313	310	313	(31)	(88)	468	201
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	828	625	622	625	(47)	(224)	1,007	370

**Credit Risk**

The following template provides an overview of credit quality of non-performing exposures as at 31 December 2025 and 31 December 2024.

**Table 19: EU CQ3 - Credit quality of performing and non-performing exposures by past due days**

	a	b	c	d	e	f	g	h	i	j	k	l
31 December 2025												
Gross carrying amount/nominal amount												
	Performing exposures			Non-performing exposures								
	Not past due or Past due <= 30 days	Past due >30 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
005 Cash balances at central banks and other demand deposits	14,740	14,740	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	56,896	56,710	185	1,434	751	120	139	129	130	104	63	1,431
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	250	250	-	-	-	-	-	-	-	-	-	-
040 Credit institutions	2,173	2,173	-	-	-	-	-	-	-	-	-	-
050 Other financial corporations	6,019	6,019	-	22	3	-	-	-	7	12	-	22
060 Non-financial corporations <sup>(1)</sup>	30,300	30,255	45	597	324	26	42	43	65	74	21	597
070 of which SMEs	10,495	10,462	33	482	232	26	34	42	59	69	21	482
080 Households <sup>(2)</sup>	18,154	18,013	140	815	424	94	97	86	58	18	42	812
090 Debt Securities	23,717	23,717	-	27	27	-	-	-	-	-	-	27
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	15,177	15,177	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	4,694	4,694	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	1,938	1,938	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	1,908	1,908	-	27	27	-	-	-	-	-	-	27
150 Off-balance sheet exposures <sup>(3)</sup>	19,937			71								71
160 Central banks	-			-								-
170 General governments	299			2								2
180 Credit institutions	395			-								-
190 Other financial corporations	1,691			2								2
200 Non-financial corporations	14,298			61								61
210 Households	3,254			6								6
220 Total	115,290	95,167	185	1,532	778	120	139	129	130	104	63	1,529

	a	b	c	d	e	f	g	h	i	j	k	l
31 December 2024												
Gross carrying amount/nominal amount												
	Performing exposures			Non-performing exposures								
	Not past due or Past due <= 30 days	Past due >30 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	15,514	15,514	-	-	-	-	-	-	-	-	-	-
Loans and advances	52,740	52,522	218	1,719	770	103	194	264	172	138	79	1,716
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	31	31	-	-	-	-	-	-	-	-	-	-
Credit institutions	2,026	2,026	-	-	-	-	-	-	-	-	-	-
Other financial corporations	6,281	6,281	-	35	11	-	9	-	8	6	-	35
Non-financial corporations	26,890	26,850	40	828	429	16	39	163	84	72	24	828
of which SMEs	9,444	9,405	38	593	307	16	38	62	77	69	23	593
Households	17,512	17,334	178	856	330	87	155	92	80	60	55	853
Debt Securities	21,738	21,738	-	36	36	-	-	-	-	-	-	36
Central banks	-	-	-	-	-	-	-	-	-	-	-	-
General governments	13,296	13,296	-	-	-	-	-	-	-	-	-	-
Credit institutions	4,745	4,745	-	-	-	-	-	-	-	-	-	-
Other financial corporations	2,112	2,112	-	-	-	-	-	-	-	-	-	-
Non-financial corporations	1,585	1,585	-	36	36	-	-	-	-	-	-	36
Off-balance sheet exposures	14,150			97								97
Central banks	-			-								-
General governments	300			20								20
Credit institutions	189			-								-
Other financial corporations	912			1								1
Non-financial corporations	9,688			71								71
Households	3,061			5								5
Total	104,142	89,774	218	1,852	806	103	194	264	172	138	79	1,849

<sup>(1)</sup> The increase in Non-Financial Corporations is mainly due to new corporate loans.

<sup>(2)</sup> The increase in Households is mainly due to new loans in Bulgaria.

<sup>(3)</sup> The increase in Off-balance sheet exposures is mainly due to loan commitments and other commitments in corporate loans.

**Credit Risk**

The following templates provide an overview of the credit quality of performing and non-performing exposures and related impairments, provisions and valuation adjustments by portfolio and exposure class, by geography and industry as at 31 December 2025 and 30 June 2025.

**Table 20: EU CR1 - Performing and non-performing exposures and related provisions**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	31 December 2025														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures <sup>(4)</sup>			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
	of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits	14,740	14,740	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	56,896	51,886	4,858	1,434	-	1,363	(678)	(184)	(493)	(632)	-	(622)	(665)	35,022	699
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	250	249	-	-	-	-	-	-	-	-	-	-	-	38	-
040 Credit institutions	2,173	2,173	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
050 Other financial corporations	6,019	5,967	29	22	-	21	(6)	(5)	(1)	(16)	-	(16)	(59)	5,065	6
060 Non-financial corporations <sup>(1)</sup>	30,300	28,772	1,502	597	-	571	(144)	(68)	(75)	(293)	-	(291)	(215)	16,677	282
070 Of which: SMEs	10,495	9,490	984	482	-	456	(80)	(32)	(48)	(239)	-	(237)	(178)	7,552	222
080 Households	18,154	14,725	3,327	815	-	771	(527)	(110)	(417)	(323)	-	(315)	(391)	13,242	411
090 Debt Securities <sup>(2)</sup>	23,717	23,674	43	27	-	27	(24)	(21)	(2)	(10)	-	(10)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	15,177	15,178	-	-	-	-	(8)	(8)	-	-	-	-	-	-	-
120 Credit institutions	4,694	4,694	-	-	-	-	(7)	(7)	-	-	-	-	-	-	-
130 Other financial corporations	1,938	1,938	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
140 Non-financial corporations	1,908	1,864	43	27	-	27	(8)	(5)	(2)	(10)	-	(10)	-	-	-
150 Off-balance sheet exposures <sup>(3)</sup>	19,937	19,167	524	71	-	63	(53)	(24)	(2)	(30)	-	(28)	-	2,754	19
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	299	58	-	2	-	2	(26)	-	-	(1)	-	(1)	-	3	-
180 Credit institutions	395	395	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	1,691	1,683	8	2	-	2	-	-	-	-	-	-	-	206	1
200 Non-financial corporations	14,298	13,887	408	61	-	55	(12)	(10)	(1)	(28)	-	(27)	-	2,177	17
210 Households	3,254	3,144	108	6	-	4	(15)	(14)	(1)	(1)	-	-	-	368	1
220 Total	115,290	109,467	5,425	1,532	-	1,453	(755)	(229)	(497)	(672)	-	(660)	(665)	37,776	718

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
	30 June 2025														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral 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
	of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits	14,237	14,237	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	54,129	48,919	5,036	1,675	-	1,426	(640)	(201)	(438)	(719)	-	(679)	(841)	34,330	846
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	115	112	2	-	-	-	-	-	-	-	-	-	-	18	-
040 Credit institutions	2,043	2,043	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
050 Other financial corporations	6,067	6,004	39	27	-	26	(5)	(5)	-	(19)	-	(19)	(63)	5,102	7
060 Non-financial corporations	27,984	26,428	1,526	752	-	696	(135)	(68)	(67)	(350)	-	(337)	(277)	16,006	363
070 Of which: SMEs	9,733	8,673	1,037	546	-	499	(75)	(30)	(44)	(269)	-	(262)	(179)	7,350	258
080 Households	17,920	14,332	3,469	896	-	704	(499)	(127)	(371)	(350)	-	(323)	(501)	13,204	476
090 Debt Securities	21,734	21,616	118	33	-	33	(24)	(21)	(3)	(9)	-	(9)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	13,429	13,368	61	-	-	-	(9)	(9)	(1)	-	-	-	-	-	-
120 Credit institutions	4,608	4,608	-	-	-	-	(7)	(7)	-	-	-	-	-	-	-
130 Other financial corporations	1,993	1,993	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
140 Non-financial corporations	1,704	1,647	57	33	-	33	(7)	(4)	(2)	(9)	-	(9)	-	-	-
150 Off-balance sheet exposures	17,755	17,027	486	84	-	76	(51)	(21)	(2)	(29)	-	(27)	-	2,701	25
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	296	54	-	19	-	19	(28)	-	-	(18)	-	(19)	-	42	-
180 Credit institutions	265	265	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	1,253	1,242	11	1	-	1	(1)	-	-	-	-	-	-	179	1
200 Non-financial corporations	12,824	12,474	350	59	-	53	(10)	(9)	(1)	(10)	-	(8)	-	2,132	23
210 Households	3,117	2,992	125	5	-	3	(12)	(12)	(1)	(1)	-	-	-	348	1
220 Total	107,855	101,799	5,640	1,792	-	1,535	(715)	(243)	(443)	(757)	-	(715)	(841)	37,031	871

<sup>(1)</sup> The increase in Non-Financial Corporations is mainly due to new corporate loans.

<sup>(2)</sup> The increase in debt securities is mainly due to increased position in Sovereign and International Organization bonds

<sup>(3)</sup> The increase in Off-balance sheet exposures is mainly due to loan commitments and other commitments in corporate loans

<sup>(4)</sup> The decrease in Non-performing exposures is mainly due to Held For Sale classification of the former KEDIPES (co-operative Cyprus Bank), Project "Moon" and write-offs.

**Credit Risk**

**Table 21: EU CQ4 - Quality of non-performing exposures by geography**

	a	b	c	d	e	f	g
31 December 2025							
	Gross carrying/nominal amount				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: non-performing		of which: subject to impairment				
	€ million	€ million	€ million	€ million			
010 On balance sheet exposures	82,074	1,461	1,458	82,051	(1,343)		-
020 Greece <sup>(1)</sup>	36,228	1,048	1,048	36,227	(989)		-
030 Romania	357	8	5	357	(15)		-
040 Bulgaria <sup>(2)</sup>	9,766	209	209	9,766	(198)		-
050 United Kingdom	1,848	11	11	1,848	(12)		-
060 Cyprus	8,531	155	155	8,531	(101)		-
070 Other countries	25,344	30	30	25,322	(28)		-
080 Off balance sheet exposures <sup>(3)</sup>	20,008	71	71			(82)	
090 Greece	13,515	44	44			(72)	
100 Romania	1	-	-			-	
110 Bulgaria	1,819	8	8			-	
120 United Kingdom	214	-	-			-	
130 Cyprus	2,374	18	18			(10)	
140 Other countries	2,085	1	1			-	
150 Total	102,082	1,532	1,529	82,051	(1,343)	(82)	-

	a	b	c	d	e	f	g
30 June 2025							
	Gross carrying/nominal amount				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: non-performing		of which: subject to impairment				
	€ million	€ million	€ million	€ million			
010 On balance sheet exposures	77,571	1,708	1,705	77,547	(1,392)		-
020 Greece	35,421	1,112	1,112	35,420	(1,013)		-
030 Romania	307	8	5	307	(16)		-
040 Bulgaria	9,244	197	197	9,244	(204)		-
050 United Kingdom	1,663	11	11	1,663	(3)		-
060 Cyprus	8,828	346	346	8,828	(127)		-
070 Other countries	22,108	34	34	22,085	(29)		-
080 Off balance sheet exposures	17,839	84	84			(79)	
090 Greece	12,274	47	47			(70)	
100 Romania	-	-	-			-	
110 Bulgaria	1,763	16	16			(1)	
120 United Kingdom	73	-	-			-	
130 Cyprus	2,272	19	19			(8)	
140 Other countries	1,457	2	2			-	
150 Total	95,410	1,792	1,789	77,547	(1,392)	(79)	-

<sup>(1)</sup> The increase in Greece gross amount is mainly due to corporate loans.

<sup>(2)</sup> The increase in Bulgaria is mainly due to new loans to Households.

<sup>(3)</sup> The increase in Off-balance sheet exposures is mainly due to loan commitments and other commitments in corporate loans.

**Credit Risk**

The table below presents an overview of the credit quality of loans and advances to non-financial corporations as at 31 December 2025 and 30 June 2025.

**Table 22: EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry**

	a	b	c	d	e	f
	31 December 2025					
	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 defaulted	of which loans and advances subject to impairment	€ million		
	€ million	€ million	€ million	€ million	€ million	€ million
010 Agriculture, forestry and fishing	229	20	20	229	(15)	-
020 Mining and quarrying	25	3	3	25	(2)	-
030 Manufacturing	4,776	99	99	4,776	(89)	-
040 Electricity, gas, steam and air conditioning supply <sup>(1)</sup>	3,807	4	4	3,807	(11)	-
050 Water supply	80	1	1	80	(1)	-
060 Construction	1,241	46	46	1,241	(25)	-
070 Wholesale and retail trade	4,644	198	198	4,644	(135)	-
080 Transport and storage <sup>(2)</sup>	6,171	15	15	6,171	(17)	-
090 Accommodation and food service activities <sup>(3)</sup>	3,339	71	71	3,339	(37)	-
100 Information and communication	710	15	15	710	(20)	-
110 Financial and insurance activities	128	-	-	128	-	-
120 Real estate activities	3,105	35	35	3,105	(26)	-
130 Professional, scientific and technical activities	534	46	46	534	(38)	-
140 Administrative and support service activities	593	4	4	593	(4)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	38	3	3	38	(2)	-
170 Human health services and social work activities	676	26	26	676	(8)	-
180 Arts, entertainment and recreation	702	1	1	702	(1)	-
190 Other services	98	10	10	98	(6)	-
200 Total	30,897	597	597	30,897	(437)	-

	a	b	c	d	e	f
	30 June 2025					
	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 defaulted	of which loans and advances subject to impairment	€ million		
	€ million	€ million	€ million	€ million	€ million	€ million
010 Agriculture, forestry and fishing	293	92	92	293	(39)	-
020 Mining and quarrying	23	3	3	23	(2)	-
030 Manufacturing	4,769	119	119	4,769	(92)	-
040 Electricity, gas, steam and air conditioning supply	3,395	5	5	3,395	(12)	-
050 Water supply	85	1	1	85	(1)	-
060 Construction	1,123	47	47	1,123	(29)	-
070 Wholesale and retail trade	4,767	238	238	4,767	(149)	-
080 Transport and storage	5,344	18	18	5,344	(18)	-
090 Accommodation and food service activities	3,082	78	78	3,082	(39)	-
100 Information and communication	639	16	16	639	(20)	-
110 Financial and insurance activities	76	-	-	76	(1)	-
120 Real estate activities	2,941	53	53	2,941	(25)	-
130 Professional, scientific and technical activities	439	32	32	439	(33)	-
140 Administrative and support service activities	478	9	9	478	(6)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	38	3	3	38	(2)	-
170 Human health services and social work activities	644	26	26	644	(9)	-
180 Arts, entertainment and recreation	512	2	2	512	(2)	-
190 Other services	90	10	10	90	(6)	-
200 Total	28,739	752	752	28,739	(485)	-

<sup>(1)</sup> The increase in sector Electricity, gas, steam and air conditioning supply is mainly due the productions of new loans in Greece.

<sup>(2)</sup> The increase in sector "Transport and storage" is mainly due the productions of new loans in Greece

<sup>(3)</sup> The increase in sector "Accommodation and food service activities" is mainly due the productions of new loans in Greece.

**Credit Risk**

The following table presents an overview of the movements (inflows and outflows) of non performing loans and advances as at 31 December 2025.

**Table 23: EU CR2 - Changes in the stock of non-performing loans and advances**

	a
	<b>31 December 2025</b>
	<b>Gross carrying amount € million</b>
<b>010 Initial stock of non-performing loans and advances</b>	<b>1,719</b>
020 Inflows to non-performing portfolios	993
030 Outflows from non-performing portfolios	(1,278)
040 Outflows due to write-offs	(156)
050 Outflow due to other situations <sup>(1)</sup>	(1,122)
<b>060 Final stock of non-performing loans and advances</b>	<b>1,434</b>

<sup>(1)</sup> It represents mainly the outflow: i) to performing portfolio, mainly retail ii) due to loan repayment, partial or total iii) of loans that have been reclassified as HFS.

The following table presents an overview of collateral obtained by taking possession by type, by time since date of foreclosure as at 31 December 2025 and 30 June 2025.

**Table 24: EU CQ7 - Collateral obtained by taking possession and execution processes**

	a		b	
	<b>31 December 2025</b>		<b>30 June 2025</b>	
	<b>Collateral obtained by taking possession</b>		<b>Collateral obtained by taking possession</b>	
	<b>Value at initial recognition € million</b>	<b>Accumulated negative changes € million</b>	<b>Value at initial recognition € million</b>	<b>Accumulated negative changes € million</b>
010 Property Plant and Equipment (PP&E)	-	-	-	-
020 Other than PP&E	605	(124)	648	(128)
030 Residential immovable property	202	(38)	225	(42)
040 Commercial Immovable property	394	(85)	411	(86)
050 Movable property (auto, shipping, etc.)	2	-	2	-
060 Equity and debt instruments	7	-	7	-
070 Other collateral	-	-	3	-
<b>080 Total</b>	<b>605</b>	<b>(124)</b>	<b>648</b>	<b>(128)</b>

**4.6 Standardised approach**

The Group is applying since Q1 2023 the Common Reports requirements of EU Regulation 575/2013 ('CRR') under Title II, Chapter 2 ('Standardised approach') and its subsequent amendments and has aligned respectively the Pillar 3 disclosures.

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

The Group continues utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring.

**Credit Risk**

The following table presents Standardised exposures on two different basis (before Credit Conversion Factor (CCF) and Credit Risk Mitigation (CRM) and after CCF and CRM) as at 31 December 2025 and 30 June 2025.

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

Exposure classes	31 December 2025					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density
	€ million	€ million	€ million	€ million	€ million	%
1 Central governments or central banks <sup>(1)</sup>	32,740	-	36,418	1	5,096	14%
2 Non-central government public sector entities	309	30	487	10	74	15%
EU 2a Regional government or local authorities	25	11	10	-	2	20%
EU 2b Public sector entities	284	19	477	10	72	15%
3 Multilateral development banks	481	-	1,106	11	-	0%
EU 3a International organisations <sup>(2)</sup>	727	-	727	-	-	0%
4 Institutions	3,695	402	3,726	174	1,234	32%
5 Covered bonds	2,258	-	2,258	-	304	13%
6 Corporates	20,022	12,389	18,889	2,215	15,925	75%
6.1 Of which: Specialised Lending	8,720	3,479	8,437	133	6,127	71%
7 Subordinated debt exposures and equity	1,179	-	1,179	-	2,213	188%
EU 7a Subordinated debt exposures	436	-	436	-	654	150%
EU 7b Equity	743	-	743	-	1,559	210%
8 Retail	6,245	3,847	5,117	148	3,738	71%
9 Secured by mortgages on immovable property and ADC exposures	22,619	2,997	21,990	808	11,536	51%
9.1 Secured by mortgages on residential immovable property - non IPRE	12,533	556	12,167	163	4,007	32%
9.2 Secured by mortgages on residential immovable property - IPRE	483	33	466	7	251	53%
9.3 Secured by mortgages on commercial immovable property - non IPRE	6,543	1,385	6,349	220	3,972	60%
9.4 Secured by mortgages on commercial immovable property - IPRE	2,290	282	2,273	23	1,820	79%
9.5 Acquisition, Development and Construction (ADC)	770	741	735	395	1,486	132%
10 Exposures in default	988	38	886	14	971	108%
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	4	-	1	1	100%
EU 10b Collective investment undertakings (CIU)	96	-	96	-	96	100%
EU 10c Other items	5,066	-	5,066	-	3,888	77%
<b>12 Total</b>	<b>96,425</b>	<b>19,707</b>	<b>97,945</b>	<b>3,382</b>	<b>45,076</b>	<b>44%</b>

Exposure classes	30 June 2025					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On Balance sheet amount	Off Balance sheet amount	On Balance sheet amount	Off Balance sheet amount	RWAs	RWAs density
	€ million	€ million	€ million	€ million	€ million	%
1 Central governments or central banks	31,028	-	34,944	2	5,079	15%
2 Non-central government public sector entities	336	10	567	9	75	13%
EU 2a Regional government or local authorities	29	10	12	-	2	17%
EU 2b Public sector entities	307	-	555	9	73	13%
3 Multilateral development banks	489	-	1,119	9	-	0%
EU 3a International organisations	145	-	145	-	-	0%
4 Institutions	3,721	285	3,764	171	1,480	38%
5 Covered bonds	2,347	-	2,347	-	318	14%
6 Corporates	17,471	10,446	16,345	1,954	13,606	74%
6.1 Of which: Specialised Lending	7,067	2,589	6,825	147	4,601	66%
7 Subordinated debt exposures and equity	1,178	-	1,178	-	2,204	187%
EU 7a Subordinated debt exposures	449	-	449	-	674	150%
EU 7b Equity	729	-	729	-	1,530	210%
8 Retail	6,221	3,746	5,110	145	3,715	71%
9 Secured by mortgages on immovable property and ADC exposures	22,185	3,002	21,486	848	11,326	51%
9.1 Secured by mortgages on residential immovable property - non IPRE	12,445	475	12,024	135	3,940	32%
9.2 Secured by mortgages on residential immovable property - IPRE	422	28	408	6	205	50%
9.3 Secured by mortgages on commercial immovable property - non IPRE	6,441	1,507	6,213	277	3,980	61%
9.4 Secured by mortgages on commercial immovable property - IPRE	2,190	167	2,174	24	1,802	82%
9.5 Acquisition, Development and Construction (ADC)	687	825	667	406	1,399	130%
10 Exposures in default	932	54	773	20	844	106%
EU 10a Claims on Institutions and corporates with a short-term credit	-	-	-	-	-	0%
EU 10b Collective investment undertakings (CIU)	94	-	94	-	94	100%
EU 10c Other items	4,766	-	4,766	-	3,838	81%
<b>12 Total</b>	<b>90,913</b>	<b>17,543</b>	<b>92,638</b>	<b>3,158</b>	<b>42,579</b>	<b>44%</b>

<sup>(1)</sup> The increase of the exposures to Central Government or Central Bank is mainly due to the increased position of debt securities and the liquidity received from Eurosystem Funding.

<sup>(2)</sup> The increase of the exposures to International Organization is mainly due to the increased position of debt securities.

**Notes:**

(a) Exposures subject to counterparty credit risk are not included in the table

(b) The table above does not include securitisations.

**Credit Risk**

The following table presents the credit exposures post conversion factor and post risk mitigation techniques (i.e. collaterals), broken down to different credit quality steps as at 31 December 2025 and 30 June 2025.

**Table 26: EU CR5 – Standardised approach**

Exposure classes	a	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	y	z	aa
	Risk weightings- 31 December 2025																						
	0%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%	Others	Total	Of which unrated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Central governments or central banks	30,369	352	1,349	466	-	-	-	-	263	-	-	-	-	-	2,804	-	-	-	-	736	-	36,419	3,687
2 Non-central government public sector entities	414	-	-	10	-	-	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	497	72
EU 2a Regional governments or local authorities	-	-	-	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10	10
EU 2b Public sector entities	414	-	-	-	-	-	-	-	-	-	-	-	-	-	73	-	-	-	-	-	-	497	303
3 Multilateral development banks	1,117	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,117	-
EU 3a International organisations	727	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	727	-
4 Institutions	419	-	-	1,719	457	-	101	-	1,091	-	-	-	-	-	-	-	-	-	113	-	-	3,900	469
5 Covered bonds	-	-	1,473	785	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,258	-
6 Corporates	-	-	-	2,512	-	-	-	-	3,927	-	2	2,946	1,738	-	9,016	-	-	289	674	-	-	21,104	8,953
6.1 Of which: Specialised Lending	-	-	-	1,031	-	-	-	-	1,953	-	-	1,064	1,738	-	2,477	-	-	289	18	-	-	8,570	4,461
7 Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	174	-	-	-	473	532	-	1,179	-
EU 7a Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	436	-	-	436	-
EU 7b Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	174	-	-	-	37	532	-	743	532
8 Retail exposures	-	-	-	-	-	-	-	157	-	1	5,005	-	-	102	-	-	-	-	-	-	-	5,265	5,265
9 Secured by mortgages on immovable property and ADC exposures	-	-	-	10,565	186	55	-	57	334	3,467	-	2,441	4	795	2,437	12	261	5	1,213	-	966	22,798	20,440
9.1 Secured by mortgages on residential immovable property - non IPRE	-	-	-	9,884	-	-	-	-	-	-	1,953	-	-	492	-	-	-	1	-	-	-	12,330	12,327
9.1.1 No loan splitting applied	-	-	-	-	-	-	-	-	-	-	-	704	-	329	-	-	-	1	-	-	-	1,034	1,033
9.1.2 loan splitting applied (secured)	-	-	-	9,884	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9,884	9,882
9.1.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	-	1,249	-	163	-	-	-	-	-	-	-	1,412	1,411
9.2 Secured by mortgages on residential immovable property - IPRE	-	-	-	38	186	55	-	57	-	4	-	5	-	2	12	-	-	114	-	-	-	473	472
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	642	-	-	-	-	334	3,459	-	483	4	-	1,535	-	-	5	117	-	-	6,569	4,643
9.3.1 No loan splitting applied	-	-	-	562	-	-	-	-	280	-	-	234	3	-	945	-	-	5	90	-	-	2,119	1,017
9.3.2 loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	3,459	-	-	-	-	7	-	-	-	-	-	-	3,466	2,945
9.3.3 loan splitting applied (unsecured)	-	-	-	80	-	-	-	-	54	-	-	249	1	-	573	-	-	27	-	-	-	984	681
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	1	-	-	-	-	4	-	-	-	-	795	-	-	261	-	269	-	966	2,296	1,874
9.5 Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	418	-	-	-	712	-	-	1,130	1,123
10 Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	760	-	-	-	140	-	-	900	899
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-	-	-	1	-
EU 10b Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	96	-	-	-	-	-	-	96	-
EU 10c Other items	1,137	-	-	52	-	-	-	-	-	-	-	-	-	-	3,877	-	-	-	-	-	-	5,066	5,066
<b>EU 11c Total</b>	<b>34,183</b>	<b>352</b>	<b>2,822</b>	<b>16,109</b>	<b>643</b>	<b>55</b>	<b>101</b>	<b>214</b>	<b>5,615</b>	<b>3,467</b>	<b>3</b>	<b>10,392</b>	<b>1,742</b>	<b>795</b>	<b>19,420</b>	<b>12</b>	<b>261</b>	<b>294</b>	<b>2,613</b>	<b>1,268</b>	<b>966</b>	<b>101,327</b>	<b>87,565</b>

**Credit Risk**

Exposure classes	Risk weightings - 30 June 2025																				Of which unrat		
	0%	4%	10%	20%	30%	35%	40%	45%	50%	60%	70%	75%	80%	90%	100%	105%	110%	130%	150%	250%		Others	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		€ million	€ million
1 Central governments or central banks	28,865	272	1,520	377	-	-	-	-	236	-	-	-	-	-	2,977	-	-	-	-	699	-	34,946	3,796
2 Non-central government public sector entities	490	-	-	12	-	-	-	-	-	-	-	-	-	-	74	-	-	-	-	-	-	576	71
EU 2a Regional governments or local authorities	-	-	-	12	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	12	12
EU 2b Public sector entities	490	-	-	-	-	-	-	-	-	-	-	-	-	-	74	-	-	-	-	-	-	564	326
3 Multilateral development banks	1,128	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,128	-
EU 3a International organisations	145	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	145	-
4 Institutions	343	(16)	1,938	426	-	118	-	489	-	-	-	-	-	-	558	-	-	-	79	-	-	3,935	422
5 Covered bonds	-	-	1,517	830	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,347	-
6 Corporates	-	-	-	3,059	-	-	-	-	3,122	-	-	1,759	1,161	-	8,122	-	-	288	782	-	6	18,299	7,092
6.1 Of which: Specialised Lending	-	-	-	1,280	-	-	-	-	1,849	-	-	660	1,161	-	1,716	-	-	288	18	-	-	6,972	2,351
7 Subordinated debt exposures and equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	175	-	-	-	479	524	-	1,178	-
EU 7a Subordinated debt exposures	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	449	-	-	449	-
EU 7b Equity	-	-	-	-	-	-	-	-	-	-	-	-	-	-	175	-	-	-	30	524	-	729	524
8 Retail exposures	-	-	-	-	-	-	-	148	-	-	-	5,007	-	-	100	-	-	-	-	-	-	5,255	5,255
9 Secured by mortgages on immovable property and ADC exposures	-	-	-	10,303	194	57	-	61	362	3,499	-	2,443	-	539	2,349	6	322	-	1,175	-	1,024	22,334	19,659
9.1 Secured by mortgages on residential immovable property - non IPRE	-	-	-	9,819	-	-	-	-	-	-	-	1,875	-	-	461	-	-	-	4	-	-	12,159	12,150
9.1.1 No loan splitting applied	-	-	-	1	-	-	-	-	-	-	-	713	-	-	308	-	-	-	3	-	-	1,025	1,021
9.1.2 loan splitting applied (secured)	-	-	-	9,818	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9,818	9,815
9.1.3 loan splitting applied (unsecured)	-	-	-	-	-	-	-	-	-	-	1,162	-	-	-	153	-	-	-	1	-	-	1,316	1,314
9.2 Secured by mortgages on residential immovable property - IPRE	-	-	-	-	194	57	-	61	-	4	-	6	-	-	-	6	-	-	86	-	-	414	412
9.3 Secured by mortgages on commercial immovable property - non IPRE	-	-	-	484	-	-	-	-	362	3,495	-	562	-	-	1,467	-	-	-	120	-	-	6,490	4,684
9.3.1 No loan splitting applied	-	-	-	393	-	-	-	-	301	-	-	352	-	-	862	-	-	-	72	-	-	1,980	954
9.3.2 loan splitting applied (secured)	-	-	-	-	-	-	-	-	-	3,495	-	-	-	-	-	-	-	-	-	-	-	3,495	2,998
9.3.3 loan splitting applied (unsecured)	-	-	-	91	-	-	-	-	61	-	-	210	-	-	605	-	-	-	48	-	-	1,015	732
9.4 Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-	-	-	-	-	-	539	-	-	322	-	313	-	1,024	2,198	1,675
95 Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	421	-	-	-	652	-	-	1,073	737
10 Exposures in default	-	-	-	-	-	-	-	-	-	-	-	-	-	-	692	-	-	-	101	-	-	793	777
EU 10a Claims on Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
EU 10b Collective investment undertakings (CIU)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	94	-	-	-	-	-	-	94	-
EU 10c Other items	872	-	-	72	-	-	-	-	-	-	-	-	-	-	3,822	-	-	-	-	-	-	4,766	4,766
EU 11c Total	31,843	256	3,037	16,591	620	57	118	209	4,209	3,499	-	9,209	1,161	539	18,963	6	322	288	2,616	1,223	1,030	95,796	76,777

**Notes**

(a) Exposures subject to counterparty credit risk are not included in the table.

(b) Credit exposures shown in the above table do not include goodwill, intangible assets and deferred tax, which are deducted from own funds.

## Credit Risk

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### 4.7 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 master netting arrangements.

#### 4.7.1 Types of collateral commonly accepted by the Bank

The Group has internal policies in place which set out the following types of collateral are usually accepted in a credit relationship:

- Residential real estate, commercial real estate (offices, shopping malls, etc.), industrial buildings and land);
- Receivables (trade debtors) and post-dated cheques;
- Securities, including listed shares, and bonds;
- Deposits;
- Guarantees and letters of support;
- Insurance contracts; and
- Equipment, mainly vehicles and vessels.

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

For exposures other than loans to customers (i.e. reverse repos, derivatives, etc.) the Bank accepts as collateral only cash or liquid bonds.

#### 4.7.2 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 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 or a reliance letter from the valuator signed off from the Legal (applicable mainly in specialized lending).

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 and movable collateral should be valued on the basis of market value. Market value is the estimated amount for which an asset 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). The same applies after three sequential individual valuations for vessels & / yachts.

The above provision for valuator's rotation may not apply for properties under construction and other investment projects where the same valuator can perform more than two sequential consecutive valuations / progress reports until the completion of the construction/project.

## Credit Risk

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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; and
- 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 the Bank is not the arranger;
- Specialized cases, which they cannot be performed by any of the approved valuers; and
- 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.); and
- Commercial Real Estates (e.g., office buildings, shopping centers, shops, logistics centers, industrial structures, factories, hotels, camping sites, theaters, educational facilities, hospitals, land plots 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, 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.

## Credit Risk

### 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 is using the Residential Property Index of the Bank of Greece to revalue residential real estate properties over the loan's lifetime. The index has been created by the Real Estate Market Analysis Section of BoG using detailed information collected from all Credit Institutions and Real Estate Investment Companies (REIC) operating in Greece. It is 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 basis (or earlier so as to more accurately and timely depict any interim high market fluctuations).

### 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 (or earlier so as to more accurately and timely depict any interim high market fluctuations). 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 (Individual Banking and Small RBB).

EBA Status	Immovable Assets		
Performing (PE, PF & CPF)	Exposure (in € '000)		
	<= 300	> 300 & <=1,000	> 1,000
	Index, Annually	Index, Annually	Physical inspection, Annually
	Special Types <sup>(1)</sup> : Desktop annually and every two years with Physical Inspection		
Performing to Non-Performing (including denounced)	Exposure (in € '000)		
	<=300	> 300 & <= 1,000	> 1,000
	Index Special Types <sup>(1)</sup> : Desktop valuation is requires to take place within max three (3) months from EBA reclassification unless a valuation has taken place during the last 6 months	Desktop valuation is required to take place within max three (3) months from EBA 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 EBA reclassification unless a valuation has taken place during the last 6 months.
Non-Performing (NPE & NPF)	Exposure (in € '000)		
	<= 300	>300 & <= 1,000	> 1,000
	Index, Annually	Desktop, Annually and for as long as the exposure is classified as non-performing.	Physical inspection, Annually
	Special Types <sup>(1)</sup> : Desktop annually and every two years with Physical Inspection		

<sup>(1)</sup> Special Types: Hotels, shopping centers (malls), refineries, quarries, marinas, clinics/hospitals/diagnostic centers, schools.

**Credit Risk**

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

EBA Status	Immovable Assets				
Performing (PE, PF & CPF)	Exposure (in € '000)				
	<= 300	> 300 & <= 1.000		> 1.000	
	All types	Residential Real Estate	Commercial Real Estate	Residential Real Estate	Commercial Real Estate
	<ul style="list-style-type: none"> <li>• Every year with Index</li> <li>• For special types<sup>(1)</sup> with Desktop annually</li> </ul>	<ul style="list-style-type: none"> <li>• Physical inspection every 3 years</li> <li>• In between years with Index</li> </ul>	<ul style="list-style-type: none"> <li>• Physical inspection every 2 years</li> <li>• In between years Index or Desktop for special types<sup>(1)</sup></li> </ul>	<ul style="list-style-type: none"> <li>• Physical inspection every 3 years</li> <li>• In between years with desktop</li> </ul>	<ul style="list-style-type: none"> <li>• Physical inspection every 2 years</li> <li>• In between years with desktop</li> </ul>
Performing to Non-Performing (including denounced)	Exposure (in € '000) - All types of Immovable Assets				
	<= 300	> 300 & <= 1,000		> 1,000	
	Index For special types <sup>(1)</sup> a Desktop valuation is required to take place within max three (3) months from EBA reclassification unless a valuation has taken place during the last 6 months	Desktop valuation is required to take place within max three (3) months from EBA 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 EBA reclassification unless a valuation has taken place during the last 6 months	
Non-Performing (NPE & NPF)	Exposure (in € '000) - All types of Immovable Assets				
	<= 300			> 300	
	<ul style="list-style-type: none"> <li>• Every Year with Index</li> <li>• For Special types<sup>(1)</sup> with Desktop Annually</li> </ul>			<ul style="list-style-type: none"> <li>• Physical inspection every 2 years</li> <li>• In between years with Desktop</li> </ul>	

<sup>(1)</sup> Special Types: Hotels, shopping centers (malls), refineries, quarries, marinas, clinics/hospitals/diagnostic centers, schools.

**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 regularly monitored through the use of advanced statistical reports and 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.

**4.7.3 Collateral policy and documentation**

For loan products, Group instructions emphasize that practices followed are timely and prudent in order to ensure that collateral items are controlled by the Group's entities and that the loan and pledge agreement, as well as the collateral is legally enforceable. Therefore, the Group's entities hold the right to liquidate collateral in the event of the obligor's financial distress and can claim and control cash proceeds from a liquidation process.

The Group uses to a large extent standard loan and pledge agreements, ensuring legal enforceability.

The application of CSA (Credit Support Annex) and GMRA (Global Master Repurchase Agreements) contracts determines the cash that should be paid or received in case of derivatives and repos contracts.

**4.7.4 Guarantees and credit derivatives**

The guarantees used as credit risk mitigation by the Group are largely issued by central and regional governments in the countries in which it operates. The Hellenic Development Bank (HDB - EAT) and other similar institutions, 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 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 presents guarantees received broken down by primary type of guarantee as at 31 December 2025 and 31 December 2024.

**Table 27:** Guarantee and credit derivatives

	<b>31 December 2025 € million</b>	<b>31 December 2024 € million</b>
Guarantees issued by Central Banks or Central Governments	3,723	3,810
Guarantees issued by Banks	49	38
<b>Total</b>	<b>3,772</b>	<b>3,848</b>

### 4.7.5 Netting agreements

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.

The Bank already implements the framework for clearing transactions through central counterparty (CCP). Additionally, the Bank is in a position to apply the regulatory framework for transactions not cleared through central counterparty.

### 4.7.6 Concentration risk on collaterals

For credit exposures, the most commonly accepted collaterals for credit risk mitigation purposes are real estate assets. Consumer loans are not collateralised, except for car loans where the Bank retains ownership until full loan repayment. Mortgage loans are fully collateralised with residential real estate properties.

The Bank does not undertake significant market or credit risk on collaterals of Treasury transactions. In case of cash collateral in foreign currency transactions, the Bank manages the respective foreign exchange exposure accordingly.

Furthermore, since the Bank uses GMRAs for the risk mitigation of repos and reverse repos, the market risk exposure is minimal. In case of reverse repo transactions, the Bank generally accepts high quality government issues as collaterals. The collateral amount on corporate bonds is immaterial.

## Credit Risk

### 4.7.7 Analysis of collaterals

The following table shows 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.

**Table 28: EU CR3 - CRM techniques – Overview: Disclosure of the use of credit risk mitigation techniques**

	a	b	c	d	e
	<b>31 December 2025</b>				
	<b>Unsecured carrying amount</b>	<b>Secured carrying amount</b>			
			<b>Of which secured by collateral</b>	<b>Of which secured by financial guarantees</b>	<b>Of which secured by credit derivatives</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Loans and advances	36,039	35,721	31,846	3,875	-
2 Debt securities <sup>(1)</sup>	23,745	-	-	-	-
<b>3 Total</b>	<b>59,784</b>	<b>35,721</b>	<b>31,846</b>	<b>3,875</b>	<b>-</b>
4 <i>Of which non-performing exposures</i>	762	699	674	25	-
EU-5 <i>Of which defaulted</i>	759	699			

	a	b	c	d	e
	<b>30 June 2025</b>				
	<b>Unsecured carrying amount</b>	<b>Secured carrying amount</b>			
			<b>Of which secured by collateral</b>	<b>Of which secured by financial guarantees</b>	<b>Of which secured by credit derivatives</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Loans and advances	33,505	35,177	31,124	4,053	-
2 Debt securities	21,767	-	-	-	-
<b>3 Total</b>	<b>55,272</b>	<b>35,177</b>	<b>31,124</b>	<b>4,053</b>	<b>-</b>
4 <i>Of which non-performing exposures</i>	861	846	796	50	-
EU-5 <i>Of which defaulted</i>	858	846			

<sup>(1)</sup> The increase in debt securities is mainly due to increased position in Sovereign and International Organizations bonds.

**Notes:**

- (a) The value of collaterals and the amount of financial guarantees shown above are the allocated values after regulatory haircuts.
- (b) For real estate properties the lower between the market value and the pledged amount is considered.

## 4.8 Asset Backed Securities

### 4.8.1 Bank's objectives and role

The Group, as part of its funding activity, enters into securitisation transactions of various classes of loans (corporate, small and medium enterprise, mortgage, consumer loans, credit card and bond loans), which generally result in the transfer of the above assets to structured entities (securitisation vehicles), which, in turn issue debt securities held by investors and the Group's entities. The Group monitors the credit quality of the securitisations' underlying loans, as well as the credit ratings of the debt instruments issued, when applicable, and provides either credit enhancements to the securitisation vehicles and/or transfers new loans to the pool of their underlying assets, whenever necessary, in accordance with the terms of the relevant contractual arrangements in force.

Moreover, the Group in the context of its non-performing loans (NPEs) reduction acceleration plan entered into the securitisation of various classes of NPEs through the issue of senior, mezzanine and junior notes.

### 4.8.2 Methodology for risk weightings

The framework concerning the Capital Adequacy calculations for securitizations that institution acts as investor or originator was amended by the Regulation 2017/2401. Following the hierarchy of these methods, the Bank has adopted the SEC-ERBA method for the calculations of the risk – weighted exposure amounts for positions acting as investor and

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the SEC-SA for positions acting as originator. According to the aforementioned methodologies the STS/non STS status, rating, maturity and seniority of the security as well as the underlying portfolio characteristics for the SEC-SA specifically are taken into account in determining the appropriate risk weight factor.

### 4.8.3 Accounting policies

#### Consolidation of Structured Entities

The Group is involved in various types of structured entities, such as securitization vehicles, mutual funds and private equity funds.

A structured entity is an entity that has been designed so that voting or similar rights are not the dominant factor in deciding who controls the entity, such as when any voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual arrangements. A structured entity often has restricted activities, a narrow well-defined objective, insufficient equity to permit it to finance its activities without subordinated financial support and financing in the form of multiple contractually linked instruments to investors that create concentrations of credit or other risks.

An interest in a structured entity refers to contractual and non-contractual involvement that exposes the Group to variability of returns from the performance of the structured entity. Examples of interest in structured entities include the holding of debt and equity instruments, contractual arrangements, liquidity support, credit enhancement, residual value.

Structured entities may be established by the Group or by a third party and are consolidated when the substance of the relationship is such that the structured entities are controlled by the Group. In determining whether the Group has control over such structured entities, it considers the following factors:

- The purpose and design of the entity;
- Whether the Group has certain rights that give it the ability to direct the relevant activities of the entity unilaterally, as a result of existing contractual arrangements that give it the power to govern the entity and direct its activities;
- In case another entity is granted decision making rights, the Group assesses whether this entity acts as an agent of the Group or another investor;
- The existence of any special relationships with the entity; and
- The extent of the Group's exposure to variability of returns from its involvement with the entity, including its exposure in the most subordinated securitization notes issued by the entity as well as subordinated loans or other credit enhancements that may be granted to the entity, and if the Group has the power to affect such variability.

As a result of the consolidation assessment performed, the Group has involvement with both consolidated and unconsolidated structured entities.

#### Derecognition of financial assets

The Group derecognizes a financial asset when its contractual cash flows expire, or the rights to receive those cash flows are transferred in an outright sale in which substantially all risks and rewards of ownership have been transferred. In addition, a financial asset is derecognized even if rights to receive cash flows are retained but at the same time the Group assumes an obligation to pay the received cash flows without a material delay (pass through agreement) or when substantially all the risks and rewards are neither transferred nor retained but the Group has transferred control of the asset. Control is transferred if, and only if, the transferee has the practical ability to sell the asset in its entirety to unrelated third party and is able to exercise that ability unilaterally and without imposing additional restrictions on the transfer.

In the case of securitisation transactions, in order to assess the application of the above mentioned de-recognition principles, the Group considers the structure of each securitisation transaction including its exposure to the more

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subordinated tranches of the notes issued and/or credit enhancements provided to the special purpose entities, as well as the securitisation’s contractual terms that may indicate that the Group retains control of the underlying assets.

For more information about asset backed securities refer to Consolidated Financial Statements Notes 2.2.9 and 25.

**4.8.4 Securitised exposures**

The following table presents the risk weights of the purchased securitised exposures of the Group, as at 31 December 2025 and 30 June 2025.

**Table 29: EU SEC1 - Securitisation exposures in the non-trading book**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o				
31 December 2025																			
	Institution acts as originator						Institution acts as sponsor				Institution acts as investor								
	Traditional			Synthetic			Traditional		Synthetic		Sub-total		Traditional			Synthetic		Sub-total	
	STS		Non-STS	STS		Non-STS	Sub-total		STS	Non-STS	Sub-total	STS	Non-STS	Sub-total		STS	Non-STS	Sub-total	
	of which SRT		of which SRT	of which SRT		of which SRT	of which SRT		STS	Non-STS	Sub-total	STS	Non-STS	Sub-total		STS	Non-STS	Sub-total	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	-	-	922	922	2,346	2,346	3,268	-	-	-	-	100	1,761	-	1,861				
2 Retail (total)	-	-	904	904	-	-	904	-	-	-	-	-	20	-	20				
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	20	-	20				
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
5 other retail exposures	-	-	904	904	-	-	904	-	-	-	-	-	-	-	-				
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
7 Wholesale (total)	-	-	18	18	2,346	2,346	2,364	-	-	-	-	100	1,741	-	1,841				
8 loans to corporates	-	-	18	18	2,346	2,346	2,364	-	-	-	-	-	1,741	-	1,741				
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	100	-	-	100				
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o				
30 June 2025																			
	Institution acts as originator						Institution acts as sponsor				Institution acts as investor								
	Traditional			Synthetic			Traditional		Synthetic		Sub-total		Traditional			Synthetic		Sub-total	
	STS		Non-STS	STS		Non-STS	Sub-total		STS	Non-STS	Sub-total	STS	Non-STS	Sub-total		STS	Non-STS	Sub-total	
	of which SRT		of which SRT	of which SRT		of which SRT	of which SRT		STS	Non-STS	Sub-total	STS	Non-STS	Sub-total		STS	Non-STS	Sub-total	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	-	-	984	984	2,440	2,440	3,424	-	-	-	-	4	1,874	-	1,878				
2 Retail (total)	-	-	936	936	-	-	936	-	-	-	-	4	22	-	26				
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	4	22	-	26				
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
5 other retail exposures	-	-	936	936	-	-	936	-	-	-	-	-	-	-	-				
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
7 Wholesale (total)	-	-	48	48	2,440	2,440	2,488	-	-	-	-	-	1,852	-	1,852				
8 loans to corporates	-	-	48	48	2,440	2,440	2,488	-	-	-	-	-	1,852	-	1,852				
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-				

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**Table 30: EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as originator or as sponsor**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	31 December 2025																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	<=20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	2,345	-	899	24	-	-	-	3,268	-	-	-	1,336	-	-	-	107	-
2 Traditional transactions	-	-	899	23	-	-	-	922	-	-	-	1,004	-	-	-	80	-
3 Securitisation	-	-	899	23	-	-	-	922	-	-	-	1,004	-	-	-	80	-
4 Retail	-	-	899	5	-	-	-	904	-	-	-	886	-	-	-	71	-
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Wholesale	-	-	-	18	-	-	-	18	-	-	-	118	-	-	-	9	-
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Synthetic transactions	2,345	-	-	1	-	-	-	2,346	-	-	-	332	-	-	-	27	-
10 Securitisation	2,345	-	-	1	-	-	-	2,346	-	-	-	332	-	-	-	27	-
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Wholesale	2,345	-	-	1	-	-	-	2,346	-	-	-	332	-	-	-	27	-
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	30 June 2025																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	<=20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	2,438	-	956	30	-	-	-	3,424	-	-	-	1,363	-	-	-	109	-
2 Traditional transactions	-	-	956	28	-	-	-	984	-	-	-	1,097	-	-	-	88	-
3 Securitisation	-	-	956	28	-	-	-	984	-	-	-	1,097	-	-	-	88	-
4 Retail	-	-	931	5	-	-	-	936	-	-	-	921	-	-	-	74	-
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Wholesale	-	-	25	23	-	-	-	48	-	-	-	176	-	-	-	14	-
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Synthetic transactions	2,438	-	-	2	-	-	-	2,440	-	-	-	266	-	-	-	21	-
10 Securitisation	2,438	-	-	2	-	-	-	2,440	-	-	-	266	-	-	-	21	-
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 Wholesale	2,438	-	-	2	-	-	-	2,440	-	-	-	266	-	-	-	21	-
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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**Table 31: EU SEC4 - Securitisation exposures in the non-trading book and associated capital requirements - institution acting as investor**

	31 December 2025																	EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap					
	>20% to ≤20% RW		>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-ERBA		1250% RW/ deductions	SEC-ERBA		1250% RW/ deductions	SEC-ERBA		1250% RW/ deductions	SEC-ERBA				
	€ million	€ million	€ million	€ million	€ million	SEC-IRBA (including IAA)	SEC-SA	€ million	€ million	SEC-IRBA (including IAA)	SEC-SA	€ million	€ million	SEC-IRBA (including IAA)	SEC-SA	€ million	€ million		
1 Total exposures	1,813	10	3	35	-	-	1,826	35	-	-	367	41	-	-	29	3	-		
2 Traditional securitisation	1,813	10	3	35	-	-	1,826	35	-	-	367	41	-	-	29	3	-		
3 Securitisation	1,813	10	3	35	-	-	1,826	35	-	-	367	41	-	-	29	3	-		
4 Retail underlying	7	10	3	-	-	-	20	-	-	-	11	-	-	-	1	-	-		
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
6 Wholesale	1,806	-	-	35	-	-	1,806	35	-	-	356	41	-	-	28	3	-		
7 Of which STS	100	-	-	-	-	-	100	-	-	-	15	-	-	-	1	-	-		
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9 Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

	30 June 2025																	EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap					
	>20% to ≤20% RW		>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-ERBA		1250% RW/ deductions	SEC-ERBA		1250% RW/ deductions	SEC-ERBA		1250% RW/ deductions	SEC-ERBA				
	€ million	€ million	€ million	€ million	€ million	SEC-IRBA (including IAA)	SEC-SA	€ million	€ million	SEC-IRBA (including IAA)	SEC-SA	€ million	€ million	SEC-IRBA (including IAA)	SEC-SA	€ million	€ million		
1 Total exposures	1,816	15	3	44	-	-	1,834	44	-	-	373	52	-	-	30	4	-		
2 Traditional securitisation	1,816	15	3	44	-	-	1,834	44	-	-	373	52	-	-	30	4	-		
3 Securitisation	1,816	15	3	44	-	-	1,834	44	-	-	373	52	-	-	30	4	-		
4 Retail underlying	8	15	3	-	-	-	26	-	-	-	11	-	-	-	1	-	-		
5 Of which STS	4	-	-	-	-	-	4	-	-	-	-	-	-	-	-	-	-		
6 Wholesale	1,808	-	-	44	-	-	1,808	44	-	-	362	52	-	-	29	4	-		
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
9 Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

## Credit Risk

**Table 32: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments**

	31 December 2025			30 June 2025		
	a	b	c	a	b	c
	Exposures securitised by the institution - Institution acts as originator or as sponsor			Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period	Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures <sup>(1)</sup>	11,917	7,711	4,934	12,953	8,517	5,545
2 Retail (total)	7,719	6,140	3,695	7,826	6,207	3,815
3 residential mortgage	5,506	4,695	2,490	5,592	4,765	2,587
4 credit card	-	-	-	-	-	-
5 other retail exposures	2,213	1,445	1,205	2,234	1,442	1,228
6 re-securitisation	-	-	-	-	-	-
7 Wholesale (total)	4,198	1,571	1,239	5,127	2,310	1,730
8 loans to corporates	4,198	1,571	1,239	5,127	2,310	1,730
9 commercial mortgage	-	-	-	-	-	-
10 lease and receivables	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-

<sup>(1)</sup> The overall decrease of € 1 billion was driven by both traditional and synthetic securitisations. Traditional securitisations decrease was mainly due to the termination of the ex Hellenic Bank's Starlight transaction. Synthetic securitisations decrease was mainly due to the termination of two transactions ("Wave I" and "Wave III"), partly offset by the onboarding of a new transaction ("Wave VI").

For securitization exposures the Group uses one or more of the following external rating agencies: Moody's, Standard & Poor's and Fitch.

## Market Risk

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### 5. Market Risk

#### 5.1 Definition and policies

##### 5.1.1 Risk strategy

##### ***Objectives for market and counterparty risk control and supervision***

Risk is at the core of the Eurobank's business. The objectives for the Bank's market and counterparty risk control and supervision are to:

- protect the Bank against unforeseen market and counterparty related losses and contribute to earnings stability through the independent identification, assessment and understanding of the market risks inherent in the business;
- align the Bank organisational structure and management processes with regulatory requirements and international best practices;
- set minimum standards for controlling market and counterparty risks;
- develop transparent, objective and consistent market and counterparty risk information as the basis for sound decision-making;
- establish a structure that will allow the Bank to link business strategy and operations with the objectives for risk control and supervision;
- safeguard adherence to the Group's Risk Appetite limits.

The Bank is developing processes to measure performance on a risk-adjusted basis and allocate capital accordingly with the objectives to maximise earnings potential.

##### ***Risk Definitions***

##### ***Sources of market and counterparty risks***

Market risk is the risk of potential financial loss due to an adverse change in market variables. As noted elsewhere in the document, the Bank is exposed to five types of market risk:

- Interest-rate and credit spread risk;
- Equity price risk;
- Foreign exchange risk;
- Commodities price risk; and
- Implied Volatilities of the above.

Counterparty risk is the risk of potential financial loss stemming from a counterparty's inability to meet his financial obligations in the context of a market instrument. It includes:

- Issuer risk for debt securities traded in the financial markets;
- Counterparty credit risk for derivatives (interbank and corporate);
- Counterparty credit risk for on balance sheet interbank activities (placings, repos, etc.).

##### ***Effects of market and counterparty Risks***

The Bank is potentially exposed to market risks through all of its assets, liabilities and off-balance sheet positions, in both Treasury and all other portfolios.

Changes in market variables can affect the ERB financial condition in three ways:

## Market Risk

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- the earnings effect - the impact of changes in market rates on cash flow;
- the economic value, or net worth, of ERB, which is equal to the present value of all of its expected net future cash flows discounted to their present value to reflect market rates. Changes in market variables will impact the economic value of ERB assets, liabilities and off-balance sheet positions and therefore its economic value;
- the Potential Future Exposure (PFE) effect – the impact of changes in market risk variables to counterparty exposure and subsequent increase of counterparty credit risk faced by the Bank.

The purpose of the Bank's market risk control and supervision structure is to control and monitor the effect of market risks on earnings, economic value and potential future exposure.

Similarly, the Bank is potentially exposed to counterparty risks through all of its assets and off-balance sheet positions, in both Treasury and all other portfolios. Counterparty credit-worthiness affects the economic value, or net worth, of ERB, which is equal to the present value of all of its expected net future cash flows discounted to their present value to reflect market rates.

### 5.1.2 Market and Counterparty Risk Governance Structure

#### Board Risk Committee (BRC)

The BRC of Eurobank S.A. and its subsidiaries (the Group) is a committee of the BoD and its purpose is to assist the BoD in discharging its oversight responsibility relating Credit, Market, Operational and other non-financial risks.

In the context of market and counterparty Risks, the BRC:

- Ensures that the Group has a well-defined market and counterparty Risk strategy and risk appetite in line with its business/restructuring plan and that the risk appetite in question is articulated in a set of qualitative and quantitative statements, limits and an appropriate measurement methodology;
- Ensures that the Group has developed an appropriate market and counterparty Risk management framework which is embedded in the decision making process (e.g. new products introduction, risk adjusted pricing, risk adjusted performance measures and capital allocation) throughout the organization and its subsidiaries;
- Reviews relevant policies and procedures;
- Ensures that the Group has the appropriate modeling tools, data sources and sufficient and competent staff needed to identify, assess, monitor and mitigate risks;
- Reviews on a regular basis the adequacy of relevant measures and controls;
- Reviews and assesses, through regular reporting by the Group Market and Counterparty Risk (GMCR), the Bank's and Group's risk profile and effectiveness of its risk management policies;
- Monitor Business Units' implementation of and compliance with Group market and counterparty Risk Policies and Procedures;
- Ensures that appropriate stress tests are performed, at least on an annual basis, in relation to all major Group risks;
- Provides a point of escalation in case of relevant limit breaches.

#### Group Market and Counterparty Risk (GMCR)

GMCR is an independent unit of the Bank under the Group Chief Risk Officer. In the context of market and counterparty risks, the GMCR performs two key functions within the Group:

- The sole, independent valuation of all derivatives and debt securities held in Eurobank S.A. and its subsidiary Banks;
- The identification, measurement and reporting of all market and counterparty risks within the Group.

In the context of market and counterparty risks, the Bank's GMCR is responsible for:

## Market Risk

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- Maintaining market and counterparty Risk policies (including policies for the management and monitoring of the Interest Rate Risk in the Banking Book and Credit Spread Risk in the Banking Book) and procedures appropriate to the chosen business and risk profile;
- Identifying and assessing all market and counterparty Risks on the ERB Group balance sheet;
- Monitoring Global Markets and other key Business unit activities from a market risk perspective;
- Evaluating all Treasury securities and derivatives;
- Ensuring compliance with regulatory requirements as they relate to market and counterparty risk;
- Calculating Capital Adequacy requirements for market and counterparty risk (following the approval of the internal model from BoG in July 2005) and conducting regular reporting to the SSM;
- Ensuring compliance with the risk limits and appetite set by the Management;
- Monitoring and reporting the limit utilization to the Management and the BRC. This includes escalation of limit breaches or significant market risk issues;
- Reviewing new products (Loans, Deposits and investment products) from a market and counterparty risk perspective;
- Expanding market and counterparty risk infrastructure and processes to conform to international best practices;
- Reviewing market and counterparty risk policies, at least on an annual basis.

### Country Risk Committees (CRCs)

Country Risk Committees are risk committees held individually for each of our subsidiary banks in Bulgaria, Cyprus and Luxemburg. Participation includes both local bank and Head Office representation, including the GCRO; the committees are chaired by senior staff of the Head Office Risk Management.

In the context of market risks, the committees examine limit utilizations and grant approvals for limit modifications relevant to market and counterparty risk exposure.

### Global Markets Credit Committee (GMCC)

The Global Markets Credit Committee, jointly held by Group Risk and Global Markets, is the body responsible for the review of the Group's debt securities positions.

The Committee examines all debt securities, regardless of issuer, held in any Business Unit within the ERB Group and proceeds to decide on the following matters:

- To retain or discard corporate debt securities rated below investment grade;
- To place debt securities on watch list, classified by currency of denomination, country, ownership, tenor, degree of liquidity, sector, issuer, issuer type (Corporate or State), rating or any combination chosen. Criteria for this action may include, but are not limited to, sudden or significant economic, political, structural force major changes or increasing price volatility and credit rating changes.

### 5.1.3 Risk Measurement and Reporting

#### Market and counterparty risk measurement

This section defines the scope of the risk measurement system, in terms of positions and risk factors and sets out the standards by which market and counterparty risks are measured.

#### *Scope of risk measurement system*

All positions within the Group that are exposed to market and counterparty risks must be included within the risk measurement system. The scope of the application encompasses all units of the Group with significant market risk exposure. This includes, but is not limited to:

- ERB Athens and its subsidiaries (e.g., ERB Equities etc.);

## Market Risk

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- All banking businesses of our international operations;
- Associated SPVs;

Regarding market risk, the risk measurement system measures risk in the valuation of all Group's positions (securities, derivatives, core banking items) regardless of accounting treatment, arising from exposure to the following market risk factors:

- FX rates;
- interest rates, including credit spreads;
- equity prices;
- commodity prices;
- market implied volatilities of the above.

Regarding counterparty risk, the risk measurement system compares notional amounts for each counterparty classification with the established limits and aggregation rules.

### Risk measures

The Bank

- uses risk measures that enable them to monitor compliance with limits agreed at Group level;
- assesses the validity of assumptions used and exactness of the underlying methodologies in terms of the usefulness of the resulting risk measures for risk control and ultimately performance measurement;
- documents the methodologies and assumptions used.

The Bank has in place a number of market and counterparty risk measures, to ensure that it is protected in both "normal" and "stressed" market conditions. These measures are monitored by GMCR.

The list of applicable risk measures, monitored by GMCR is as follows:

- Value at Risk (VaR) and Expected Shortfall;
- Stress testing, historical and sensitivity analysis;
- Net Interest Income (NII) and EVE sensitivity and other IRRBB and CSRBB related metrics;
- Foreign Exchange equivalent positions;
- Potential Future Exposure;
- Exposure to the Greek Sovereign State;
- Total Country exposure;
- Exposure to Financial Institutions;
- Exposure to non-financial corporates (international) and ABSs;
- Exposure to non-financial corporates (domestic).

### 5.2 Internal model - Value at Risk (VaR) model & Credit Risk (IRC)

Since 2005 the Bank is validated by the Competent Authorities to employ the internal model approach (IMA) in the calculation of regulatory capital for the trading positions of its activities in Greece. As a general rule, the trading book definition for regulatory purposes follows the respective positions' accounting treatment – i.e. the booking of a position with a Fair Value through P&L (FVPL) accounting treatment automatically signifies that the position is included in the trading book. It should be noted that all FX exposure, whether it resides in the Bank's trading or banking book or is associated with the Bank's participations in its international subsidiaries (strategic FX position), is also treated under the internal model framework.

The validation extends to the following risk types:

## Market Risk

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- General market risk (i.e., the risk associated with the movements of FX rates, interest rates, equity indices and implied volatilities);
- Specific market risk (i.e., the risk associated with the movements of credit spreads & individual equities); and
- Credit migration and default event risk; the capital associated with this type of risk in the trading book is called “Incremental Risk Charge” (IRC).

The key metric monitored by the Bank’s internal models of market risk is that of Value at Risk (VaR). VaR is a statistical risk measure of the maximum loss that the Bank may, under normal market conditions, incur over a certain period of time with a certain confidence level. For example, a 99% 1 day VaR of € 1 million means that there is a 99% probability that the Bank will not lose more than € 1 million within the next day.

VaR calculation is carried out via Monte Carlo simulation, centered around the Bank’s core risk engine (MSCI Risk Manager). On a daily basis, through an automated and closely monitored process, the risk engine retrieves both the Bank’s positions and the relevant market data. Volatilities and correlations are estimated from historical data time series, using an Exponentially Weighted Moving Average (EWMA) methodology. The key parameters of the EWMA (i.e., the length of observation period and the value of the decay constant  $\lambda$ ) are specified by the user. The Monte Carlo run produces simulated scenarios of market parameters with the desired statistical properties. For each scenario, each position is fully repriced, enabling the simulation to cover all types of nonlinear and option risks. The pricing model diversifies general and specific risk and each separate risk type is being estimated on a standalone basis; however, the total VaR figure equals their diversified aggregate. As described above, the internal model covers the following risk types:

- Interest rate risk and credit spread risk: the risk of losses because of changes in interest rates and credit spreads;
- Foreign exchange risk: the risk of losses on foreign currency positions because of changes in exchange rates;
- Equity risk: the risk of losses because of changes in equity prices, equity indices and mutual funds;
- Commodity risk: the risk of losses because of changes in commodity prices;
- Volatility risk: the risk of losses on option positions because of changes in implied volatility levels;
- Inflation risk: the risk of losses of inflation linked positions because of changes in the break-even inflation levels.

The Bank employs internal models both for regulatory reporting and capital requirement calculation and for internal monitoring and management reporting of market risks. The principles underlying the two applications are similar; however, differences in the implementation exist, as shown by the summary table below:

### Internal Model implementation for regulatory purposes:

Scope:	Greece, Trading book & FX
Metric monitored:	Value at Risk (VaR)
Confidence level:	99%
Holding period:	10 days (scaled up by the square root of 10 from 1 day primary VaR calculation)
Methodology:	Monte Carlo
Observation parameters:	1 year, unweighted observations
Number of scenarios:	5000

### Internal Model implementation for Management reporting purposes:

Scope:	Group, Portfolios including fair valued positions
Metric monitored:	Value at Risk (VaR)
Confidence level:	99%

**Market Risk**

Holding period: 10 days (scaled up by the square root of 10 at the risk factor level)

Methodology: Monte Carlo

Observation parameters: 6 months, EWMA, decay factor  $\lambda = 0.94$

Number of scenarios: 2000

Since VaR constitutes an integral part of the Group's market risk control regime, VaR limits have been established for all (trading and investment portfolios, including fair valued positions) operations and actual exposure is reviewed daily by management.

Since 31.12.2011 the Bank has additionally implemented the Stressed VaR (SVaR) and Incremental Risk Charge (IRC), using the internal model as requested by Basel 2.5 framework.

Stressed VaR (SVaR) is calculated under the same assumptions as VaR (same positions / portfolios, same pricing functions, same methodology, same number of MC scenarios (5,000), same decay factor for the volatility estimate) with the only difference being the time window ("stressed period") that is used to provide the relevant volatilities. The stressed period is defined as the period for which the total VaR of the portfolio is being maximized; it should be noted that this does not mean that the stressed period also maximizes each separate risk type. The stressed period is re-estimated on an annual basis, but also further reviewed on a quarterly basis.

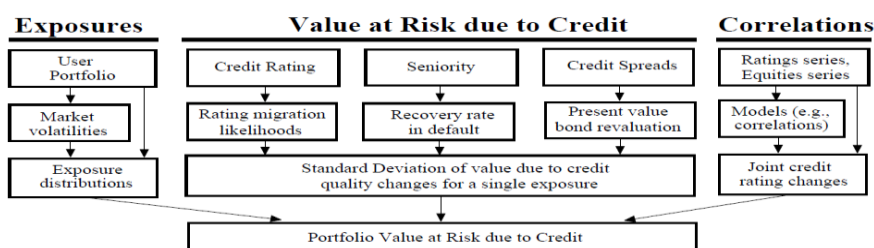
The Bank's exposure to implied volatilities is limited. Furthermore, the bank does not hold material open proprietary positions on commodities. Moreover, the Group does not hold any positions in cryptocurrencies, as trading activity in such assets is not permitted under the Group's policy.

IRC is computed on all fixed income positions in Bank's trading activities in Greece, including CDS and bond futures. It estimates the default & migration risk of the trading book portfolio, using Monte Carlo simulation, to a 99.9% confidence level over a one year holding period. The model was approved by BoG on 17.5.2012.

For the calculation of IRC the Bank uses the CreditMetrics (MSCI) methodology. CreditMetrics is a methodology for assessing portfolio risk due to changes in market value caused by changes in obligor credit quality (rating migrations) or default. The methodology provides the framework for the calculation of expected losses and unexpected losses (the economic capital) which is the capital charge for credit risk in the trading book (or the incremental risk charge, IRC). CreditMetrics assesses risk within the full context of a portfolio. It addresses the correlation between default and migration events across obligors. This allows to directly calculate the diversification benefits and the effect of over-concentrations across the portfolio.

CreditMetrics looks at an horizon which is user defined and constructs a distribution of the portfolio values which are based on a user defined number of simulated credit outcomes (rating migrations and defaults). Each credit quality migration is weighted by its likelihood (which is derived from a transition matrix). Each outcome has an estimate of change in value (given by either credit spreads in case of migrations or assumptions which are based on historical studies for the recovery rates in case of default).

The framework can be summarised in the diagram below:



## Market Risk

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The modelling approach is based on a transition matrix based model.

Transition matrices are downloaded into Credit Metrics automatically and consist of the matrices as provided by Moody's, S&P & Fitch.

The Gaussian copula distribution is used as the model for the estimation of correlations between the obligors.

The Bank applies a 1 year Liquidity Horizon for IRC calculations.

This decision is based on the following criteria:

- the trading book portfolio remains limited in size during all the years after the approval of the IRC model;
- the trading book portfolio remains concentrated on GGBs and Greek / International corporates.

The Bank applies a validation procedure for the Market Risk Internal Models and the IRC.

The following list represents the main tasks of the established validation process for the Market Risk Internal Model:

- A1) general review of regulatory capital, positions and asset dynamics;
- A2) confirmation that the appropriate scaling laws are employed in the calculations;
- A3) confirmation that the correct models of asset dynamics are employed in the Interest Rate simulation;
- A4) qualitative analysis on backtesting results to confirm that number of exceptions is within the limits of statistical tolerance.

The following list represents the main tasks of the established validation process for the IRC model:

- A1) confirmation that the appropriate set of input market data is used;
- A2) confirmation that the input market data are correct, relevant and up to date;
- A3) confirmation that unrated obligors are handled correctly;
- A4) confirmation that the set of position data is correct and reconciled with other sources;
- A5) confirmation that the set of assumptions is reasonable and it is based on supportive analysis;
- A6) confirmation that the results are reasonable and can be approximated or be explained through reasonability tests;
- A7) confirmation of the PD assumptions;
- A8) confirmation of the RR assumptions;
- A9) review and confirmation of the approach that is used for risks not in the IRC model;
- A10) review of the results of the sensitivity analysis on critical variables (PD, RR, R2, correlation).

**Market Risk**

The following two tables summarize the components of the capital requirement, under the IMA approach applied by the Bank as at 31 December 2025 and 30 June 2025.

**Table 33: EU MR2-A - Market risk under IMA**

	31 December 2025		30 June 2025	
	RWEAs € million	Own funds requirements € million	RWEAs € million	Own funds requirements € million
1 VaR (higher of values a and b)	117	9	153	12
(a) Previous day's VaR (VaRt-1)		2		2
(b) Multiplication factor (mc) x average of previous 60 working days (VaRavg)		9		12
2 SVaR (higher of values a and b)	260	21	326	26
(a) Latest available SVaR (SVaRt-1)		5		7
(b) Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		21		26
3 IRC (higher of values a and b)	213	17	287	23
(a) Most recent IRC measure		16		23
(b) 12 weeks average IRC measure		17		20
4 Comprehensive risk measure (higher of values a, b and c)	-	-	-	-
(a) Most recent risk measure of comprehensive risk measure		-		-
(b) 12 weeks average of comprehensive risk measure		-		-
(c) Comprehensive risk measure - Floor		-		-
5 Other	-	-	-	-
6 Total <sup>(1)</sup>	589	47	766	61

<sup>(1)</sup> The observed decrease in the 2H 2025 RWEAs is attributed to the decreased trading activity, combined with the relatively stable volatility at low levels observed in the markets during the past six months also affecting the regulatory multiplier (decreased number of backtesting overshootings).

**Table 34: EU MR2-B - RWEAs flow of market risk exposures under IMA**

	31 December 2025						
	VaR € million	SVaR € million	IRC € million	Comprehensive risk measure € million	Other € million	Total RWEAs € million	Total own funds requirements € million
1 RWEAs at 1 October 2025 <sup>(1)</sup>	111	295	189	-	-	596	48
1a Regulatory adjustment <sup>(2)</sup>	(92)	(236)	(30)	-	-	(359)	(29)
1b RWEAs at the previous quarter-end (end of the day) <sup>(3)</sup>	19	59	159	-	-	237	19
2 Movement in risk levels	5	(36)	24	-	-	(7)	(1)
3 Model updates/changes	-	-	-	-	-	-	-
4 Methodology and policy	-	-	-	-	-	-	-
5 Acquisitions and disposals	-	-	-	-	-	-	-
6 Foreign exchange movements	-	-	-	-	-	-	-
7 Other	-	-	-	-	-	-	-
8a RWEAs at the end of the reporting period (end of the day) <sup>3</sup>	28	67	195	-	-	289	23
8b Regulatory adjustment <sup>(2)</sup>	89	193	18	-	-	300	24
8 RWEAs at 31 December 2025 <sup>(1)</sup>	117	260	213	-	-	589	47

<sup>(1)</sup> RWEAs at previous and current reporting period (quarter end).

<sup>(2)</sup> Regulatory Adjustment indicates the difference between RWEAs and RWEAs (end of day) at previous and current reporting period.

<sup>(3)</sup> RWEAs 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).

**Market Risk**

The following table shows the values resulting from the different types of internal models approved to use for computing the regulatory capital charge as at 31 December 2025 and 30 June 2025.

**Table 35: EU MR3 – IMA values for trading portfolios**

		a	a
		31 December 2025	30 June 2025
		€ million	€ million
<b>VaR (10 day 99%)</b>			
1	Maximum value	4	4
2	Average value	2	2
3	Minimum value	2	1
4	Period end	2	2
<b>SVaR (10 day 99%)</b>			
5	Maximum value	8	9
6	Average value	6	7
7	Minimum value	4	5
8	Period end	5	7
<b>IRC (99.9%)</b>			
9	Maximum value	25	38
10	Average value	16	22
11	Minimum value	11	12
12	Period end	16	23
<b>Comprehensive risk measure (99.9%)</b>			
13	Maximum value	-	-
14	Average value	-	-
15	Minimum value	-	-
16	Period end	-	-

**5.2.1 Stress testing**

VaR models are designed to measure market risk under normal market environment. It is assumed that any changes in the risk factors follow a normal distribution. Given that the VaR approach does not cover extreme market conditions, the Group has been applying stress tests, to simulate the effect of many standard deviation movements of risk factors and the breakdown of historical correlations.

The main types of stress tests performed are historical stress tests and subjective stress tests, where the portfolios are exposed to scenarios for risk factors that are deemed particularly relevant, focusing on sudden movements in interest rates, credit spreads, implied volatilities, fx rates, etc.

Stress tests that are applied to the IRC modelling parameters consist of:

- Sensitivity on the percentage on systematic factor;
- Sensitivity on pair-wise obligor correlation;
- Sensitivity on PDs;
- Sensitivity on LGDs.

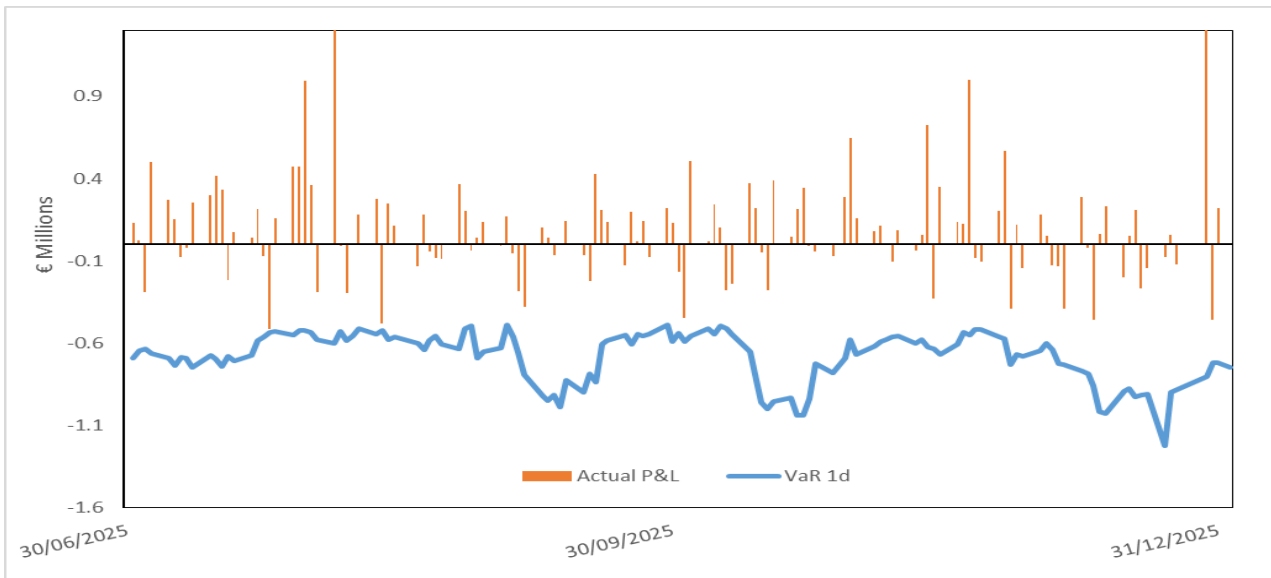
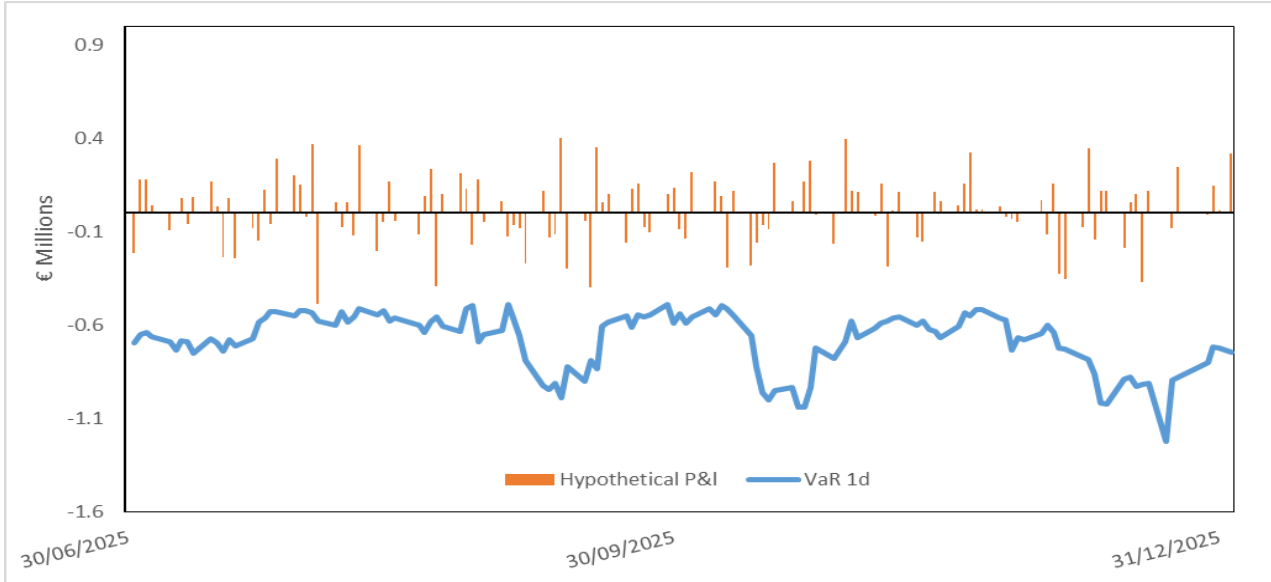
**5.2.2 Back testing**

Back testing for H2 2025 has revealed, as shown in the graphs below, no overshootings out of a total of 128 working days, when comparing the VaR forecast both to the Hypothetical P&L and Actual P&L. According to the regulatory framework, which takes into account a 250 working days period, the multiplier is equal to 3.50 (currently in the yellow zone, with six (6) overshootings when comparing the VaR forecast to Hypothetical P&L and four (4) overshootings when comparing to Actual P&L), regarding capital adequacy calculations for market risk. The calculation for RWEAs (VaR, SVaR) takes into account the amended multiplication factor (3.75), following the ECB’s Decision on the additional supervisory measures, regarding the use of the internal models approach for calculating OFR for market risk. The aforementioned absence of

**Market Risk**

new overshootings observed in H2 2025, was due to relatively stable volatility at low levels observed in the markets during the past six months.

**Table 36: EU MR4 – Comparison of VaR estimates with gains/losses**



**5.3 Standardised approach for market risk**

The Bank uses the STD for the measurement of market risk exposure and capital requirements of its subsidiaries in Greece and in International operations.

## Market Risk

The following table summarises the capital requirements for market risk per risk factor, based on the STD, as at 31 December 2025 and 30 June 2025.

**Table 37: EU MR1 – Market risk under the standardised approach**

	a	a
	31 December 2025	30 June 2025
	RWEAs € million	RWEAs € million
<b>Outright products</b>		
1 Interest rate risk (general and specific)	28	88
2 Equity risk (general and specific)	29	7
3 Foreign exchange risk	81	57
4 Commodity risk	-	-
<b>Options</b>		
5 Simplified approach	-	-
6 Delta-plus approach	-	-
7 Scenario approach	-	-
8 Securitisation (specific risk)	-	-
<b>9 Total</b>	<b>138</b>	<b>152</b>

### 5.4 Equity exposures not included in the trading book

The Group may make an irrevocable election to designate an equity instrument at fair value through other comprehensive income (FVOCI). This designation, if elected, is made at initial recognition and on an instrument by instrument basis. Gains and losses on these instruments, including when de-recognised, are recorded in other comprehensive income (OCI) and are not subsequently reclassified to the income statement. Dividends received are recorded in the income statement.

Equity instruments measured at fair value through profit or loss (FVTPL) are initially recorded at fair value and any unrealized gains or losses arising due to changes in fair value are included in the income statement.

The following table presents equity holdings of non trading book portfolio and included in regulatory exposures as at 31 December 2025 and 31 December 2024:

**Table 38: Equity exposures not included in the trading book**

	31 December 2025	31 December 2024
	€ million	€ million
Held for:		
Strategic investments	31	59
Equity investments for capital appreciation	283	270
<b>Total</b>	<b>314</b>	<b>329</b>
Equities (Listed/Non-Listed)	182	212
Other (MF & other type of funds)	132	117
<b>Total</b>	<b>314</b>	<b>329</b>

### 5.5 Interest rate risk in the Banking Book (IRRBB)

With regards to the estimation of the IRRBB, the Bank uses methodologies for the estimation of risk from positions at fair value (VaR approach), along with methodologies for the estimation of risk on Economic Value of Equity (EVE) and on Net Interest Income (NII), taking into account Banking Book positions (including portfolios measured at amortised cost).

**Market Risk**

Regarding positions at fair value, the Bank calculates and monitors the interest rate risk for the Bank's operations in Greece, and for its Subsidiary Banks on a daily basis, using the internal VaR model. The perimeter of the calculation includes the FVOCI portfolio; VaR provides an estimation of the potential losses from FVOCI positions measured at fair value, that will directly affect the Bank's Capital (income statement or equity).

The VaR that the Group measures for positions measured at fair value is based on a 99% confidence level and a holding period of 1 day. The methodology used for the calculation is Monte Carlo simulation (full re-pricing approach).

**Table 39:** Interest Rate VaR (FVOCI)

	<b>2025 (Average) € million</b>	<b>2025 € million</b>	<b>2024 (Average) € million</b>	<b>2024 € million</b>
Interest Rate Risk	6	4	6	6

*Note: Includes FVOCI portfolio measured at fair value.*

The largest portion of the Group's Interest Rate VaR is attributable to the risk associated with interest rate and credit spread sensitive debt securities and derivatives. The average VaR in 2025 remained broadly stable compared with 2024, reflecting the low and generally stable market volatility observed for most of the year.

In addition to the VaR estimation, the Bank uses internal reports for the monitoring of the IRRBB taking into account FVOCI and AC portfolios (loans, deposits, debt securities and derivatives used for hedging etc.), including: Interest rate repricing analysis, sensitivity of NII and sensitivity of Bank's EVE on multiple scenarios of interest rates. For the calculation of these sensitivities, specific assumptions are made regarding the applicable duration (for EVE delta calculations) and pass-through rate (for NII delta calculations) on specific parts of the Group's Balance Sheet (for example Non-Maturing Deposits). These assumptions are based on historical observations processed using statistical analysis.

The disclosure has been prepared using the information referred to in Article 448(1), points (a) and (b), of Regulation (EU) No 575/2013 by using template EU IRRBB1 set out in Annex XXXVII of Regulation (EU) No 631/2022 of 13 April 2022 and by following the instructions set out in Annex XXXVIII to the same Regulation.

The analysis takes into account all assets, liabilities and off-balance sheet items, which are sensitive to interest rates.

The following table summarizes the most important metrics that are used internally by the Group for the monitoring of IRRBB.

**Table 40:** NII Sensitivity impact (± 200 bps)

	<b>31 December 2025 € million</b>	<b>31 December 2024 € million</b>
<b>NII sensitivity Scenario</b>		
Parallel Up	<b>86</b>	<b>101</b>
Parallel Down	<b>(266)</b>	<b>(358)</b>
	<b>1 year impact</b>	<b>1 year impact</b>

The impact on NII is calculated under the scenario of an instantaneous parallel shift of all interest rates.

**Market Risk**

**Table 41: EU IRRBB1 - Interest rate risks of non-trading book activities**

Supervisory shock scenarios	a	b	c	d
	31 December 2025			
	Changes of the economic value of equity		Changes of the net interest income	
	Current period € million	Last period € million	Current period € million	Last period € million
1 Parallel up	(346)	(200)	86	79
2 Parallel down	187	113	(266)	(266)
3 Steepener	130	137		
4 Flattener	(348)	(345)		
5 Short rates up	(439)	(394)		
6 Short rates down	196	181		

Supervisory shock scenarios	a	b	c	d
	30 June 2025			
	Changes of the economic value of equity		Changes of the net interest income	
	Current period € million	Last period € million	Current period € million	Last period € million
1 Parallel up	(200)	(403)	79	101
2 Parallel down	113	240	(266)	(358)
3 Steepener	137	69		
4 Flattener	(345)	(223)		
5 Short rates up	(394)	(349)		
6 Short rates down	181	144		

The sensitivities to the Supervisory Shock scenarios are calculated as defined in EBA/GL/2022/14 which came into force on the 30<sup>th</sup> of June 2023.

The specification of supervisory scenarios and the measurement of Economic value of Equity and of Net Interest Income is based on the Commission Delegated Regulation (EU) 2024/856. The application of Article 3 paragraph 8 of the Commission Delegated Regulation (EU) 2024/856 contributes to the asymmetry of the results. The change in the Interest Rate Risk profile between the reporting periods is mainly attributed to adjustments of the hedging strategy, changes on rates and on the balance sheet structure of the Group. It is worth noting that the Bank in response to the regulatory developments and requirements (EBA/GL/2022/14), has further enhanced its infrastructure, governance and limit structure accordingly, so as to measure and monitor its Credit Spread Risk in the Banking Book.

**Market Risk**
**Table 42: EU IRRBBA - Qualitative information on interest rate risks of non-trading book activities**

Row number	Qualitative information - free format		Legal basis
(a)	A description of how the institution defines IRRBB for purposes of risk control and measurement	The definition of IRRBB that the Bank uses is in line with the EBA's definition. IRRBB is the current and future risk to both the earnings and the economic value of an institution arising from adverse movements in interest rates that affect interest rate sensitive instruments. For the Bank these risks include: gap, option and basis risk taking into account always the material exposure. The Bank also monitors the Credit spread risk from non-trading book activities.	Article 448(1), point (e)
(b)	A description of the institution's overall IRRBB management and mitigation strategies	For the management of IRRBB the Bank uses the following principles:  -Maintains a well-structured framework for the management of IRRBB with clear roles and responsibilities for the IRRBB management unit (Treasury), the monitoring and control units (Risk Unit and Internal Audit) and for the Management Committees (BoD, BRC and G-ALCO) -Establishes policies, guidelines and internal framework for the monitoring, measurement and management of IRRBB including the interplay with the hedging framework -Measures the IRRBB exposure, the utilization of limits and monitors the exposure for any excess on limits -Establishes and maintains appropriate tools for IRRBB measurement and reporting -Identifies and sets the appropriate stress testing framework for the assessment of IRRBB -Conducts modelling with the required supporting analysis regarding assumptions that are essential for the measurement and management of IRRBB (i.e. behavioral assumptions etc.). -Monitors the regulatory environment and potential changes in order to be consistently up to date on the methodologies and reporting	Article 448(1), point (f)
(c)	The periodicity of the calculation of the institution's IRRBB measures, and a description of the specific measures that the institution uses to gauge its sensitivity to IRRBB	The Bank calculates IRRBB measures at least on a monthly basis. The main measures used are the sensitivity on NII, market value changes and EVE. This sensitivity is calculated by applying specific scenarios on the relevant portfolio or on part of Bank's balance sheet. Furthermore the Bank monitors on a daily basis through sensitivity analysis and VaR measures the interest rate and spread risks from its positions booked in OCI that affect equity.	Article 448(1), points (e) (i) and (v); Article 448(2)
(d)	A description of the interest rate shock and stress scenarios that the institution uses to estimate changes in the economic value and in net interest income (if applicable)	For EVE sensitivity, in addition to the supervisory shock scenarios as defined in EBA/RTS/2022/10, the Bank uses a number of internal scenarios. For NII sensitivity, the Bank uses the supervisory shock scenarios (+200 bps / - 200 bps) as defined in EBA/RTS/2022/10.	Article 448(1), point (e) (iii); Article 448(2)
(e)	A description of the key modelling and parametric assumptions different from those used for disclosure of template EU IRRBB1 (if applicable)	The modelling and parametric assumptions that the Bank uses to calculate the EVE and NII are specified in EBA/RTS/2022/10.	Article 448(1), point (e) (ii); Article 448(2)
(f)	A high-level description of how the bank hedges its IRRBB, as well as the associated accounting treatment (if applicable)	The bank enters in hedging positions in order to mitigate the sensitivity of Economic Value of Equity (EVE) and Net Interest Income (NII). These positions are either derivatives transactions approved in the Bank's Accounting Hedging Policy (i.e. fair value hedge or cash flow hedge), or economic hedge position without necessarily applying hedge accounting.	Article 448(1), point (e) (iv); Article 448(2)
(g)	A description of key modelling and parametric assumptions used for the IRRBB measures in template EU IRRBB1 (if applicable)	The key modeling assumption the Bank uses in template EU IRRBB1 is mainly related to the NMDs. Specifically, the Bank uses a combination of behavioural models that capture the sensitivity of interest rates and maturity profile.	Article 448(1), point (c); Article 448(2)
(h)	Explanation of the significance of the IRRBB measures and of their significant variations since previous disclosures	The changes in the IRRBB measures since the previous disclosure were mainly driven by different levels of hedging activity, together with changes in the Group's balance sheet structure.	Article 448(1), point (d)
(i)	Any other relevant information regarding the IRRBB measures disclosed in template EU IRRBB1 (optional)		
(1) (2)	Disclosure of the average and longest repricing maturity assigned to non-maturity deposits	The average maturity of NMDs is 3.1 years. The longest repricing maturity assigned to NMDs is 10 years.	Article 448(1), point (g)

## Counterparty Risk

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### 6. Counterparty risk

#### 6.1 Definition

Counterparty credit risk (CCR) 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).

#### 6.2 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 International Swaps and Derivatives Association - 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 Global Master Repurchase Agreement (GMRA) contracts.

#### 6.3 Counterparty risk monitoring

The Bank monitors the counterparty risk arising from derivatives and secured financing transactions and assess the impact of netting and collateral on current exposures and own funds requirements. Monitoring includes, among other things, breakdown of exposures per counterparty type and exposure class, analysis of collateral quality and composition and review of counterparty credit-worthiness. Additionally, to the netting agreements, the Bank uses clearing through CCPs and other forms of mitigation, including CDS, to reduce, or eliminate, the counterparty risk.

The Group sets credit limits in order to control its credit risk exposure. The limits are set per counterparty group, per counterparty and per product. Credit limits are approved as per the Group's Credit Approval Policy. The counterparty credit risk and its utilization is monitored on a daily basis.

#### 6.4 Wrong way risk

Wrong-way risk in a derivative or a secured funding transaction (SFT) exposure arises when there is significant correlation between the underlying asset and the counterparty, which in the event of default would lead to a significant MTM loss to the counterparty. The Bank avoids the initiation of derivative transactions or SFTs in cases that the value of the underlying instrument is highly correlated with the credit quality of the counterparty. However, in case of any transactions entailing wrong way risk, the additional risk is reflected in the exposure to the counterparty and it is monitored.

#### 6.5 Implications under rating downgrade

The Bank's financial collateral agreements (CSAs covering derivative transactions) with other banks contain in some cases rating triggers. For these agreements, the minimum exposure level (threshold amount) for further posting of collateral will be lowered in case of a downgrading. Given the Bank's current rating, the additional effect is immaterial.

#### 6.6 Credit derivatives

As of 31 December 2025, the Group held a number of positions mainly on CDS Indices (protection bought € 375 million) and single name CDS (protection bought € 5 million).

As of 30 June 2025, the Group held a number of positions on CDS Indices (protection bought € 681 million) and single name CDS (protection bought € 5 million).

The Bank does not have any brokerage activity in this market. Furthermore, the Bank does not hedge its loan portfolio with CDSs as this market in Greece is not developed.

Counterparty Risk

Table 43: EU CCR6 – Credit derivatives exposures

	31 December 2025		30 June 2025	
	Protection bought € million	Protection sold € million	Protection bought € million	Protection sold € million
<b>Notionals</b>				
1 Single-name credit default swaps	5	-	5	-
2 Index credit default swaps	375	-	681	-
3 Total return swaps	-	-	-	-
4 Credit options	-	-	-	-
5 Other credit derivatives	-	-	-	-
<b>6 Total notionals</b>	<b>380</b>	<b>-</b>	<b>686</b>	<b>-</b>
<b>Fair values</b>				
7 Positive fair value (asset)	-	-	-	-
8 Negative fair value (liability)	(9)	-	(16)	-

6.7 Counterparty risk based on the calculation methodology employed

The following table shows the exposure to counterparty credit risk based on the calculation methodology employed as at 31 December 2025 and 30 June 2025.

Table 44: EU CCR1 – Analysis of CCR exposure by approach

	a	b	c	d	e	f	g	h
	Replacement cost (RC) € million	Potential future exposure (PFE) € million	EEPE € million	Alpha used for computing regulatory exposure value € million	Exposure value pre-CRM € million	Exposure value post-CRM € million	Exposure value € million	RWEA € million
31 December 2025								
EU-1 EU - Original Exposure Method (for derivatives)	-	-	-	1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-	-	1.4	-	-	-	-
1 SA-CCR (for derivatives)	191	282	-	1.4	927	663	662	273
2 IMM (for derivatives and SFTs)	-	-	-	-	-	-	-	-
2a Of which securities financing transactions netting sets	-	-	-	-	-	-	-	-
2b Of which derivatives and long settlement transactions netting sets	-	-	-	-	-	-	-	-
2c Of which from contractual cross-product netting sets	-	-	-	-	-	-	-	-
3 Financial collateral simple method (for SFTs)	-	-	-	-	-	-	-	-
4 Financial collateral comprehensive method (for SFTs)	-	-	-	-	3,099	1,464	1,464	175
5 VaR for SFTs	-	-	-	-	-	-	-	-
<b>6 Total</b>					<b>4,026</b>	<b>2,127</b>	<b>2,126</b>	<b>448</b>
30 June 2025								
EU-1 EU - Original Exposure Method (for derivatives)	-	-	-	1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-	-	1.4	-	-	-	-
1 SA-CCR (for derivatives)	244	258	-	1.4	936	703	702	283
2 IMM (for derivatives and SFTs)	-	-	-	-	-	-	-	-
2a Of which securities financing transactions netting sets	-	-	-	-	-	-	-	-
2b Of which derivatives and long settlement transactions netting sets	-	-	-	-	-	-	-	-
2c Of which from contractual cross-product netting sets	-	-	-	-	-	-	-	-
3 Financial collateral simple method (for SFTs)	-	-	-	-	-	-	-	-
4 Financial collateral comprehensive method (for SFTs)	-	-	-	-	1,929	825	825	195
5 VaR for SFTs	-	-	-	-	-	-	-	-
<b>6 Total</b>					<b>2,865</b>	<b>1,528</b>	<b>1,527</b>	<b>478</b>

Note: The increase of the exposures in the SFTs is mainly due to the funding through Eurosystem.

**Counterparty Risk**

**6.8 CVA capital charge**

The following table shows the CVA capital charge, which is calculated through the Basic Approach (BA-CVA) as at 31 December 2025.

**Table 45: EU CVA 1 – Credit valuation adjustment risk under the Reduced Basic Approach (R-BA)**

	a	b
	31 December 2025	
	Components of Own Funds Requirements	Own Funds Requirements
	€ million	€ million
1 Aggregation of systematic components of CVA risk	33	
2 Aggregation of idiosyncratic components of CVA risk <sup>(1)</sup>	173,959,808	
3 <b>Total</b>		13

<sup>(1)</sup> This figure is calculated based on the BA-CVA formula, part of the CVA capital charge regulatory formula.

**6.9 Exposures to CCPs**

The following table shows the exposures to Central Counterparties (CCPs) and the corresponding RWEAs as at 31 December 2025 and 30 June 2025.

**Table 46: EU CCR8 – Exposures to CCPs**

	a	b	a	b
	31 December 2025		30 June 2025	
	Exposure value	RWEA	Exposure value	RWEA
	€ million	€ million	€ million	€ million
1 <b>Exposures to QCCPs (total)</b>		11		7
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	161	3	97	2
3 (i) OTC derivatives	161	3	97	2
4 (ii) Exchange-traded derivatives	-	-	-	-
5 (iii) SFTs	-	-	-	-
6 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
7 Segregated initial margin	-		-	
8 Non-segregated initial margin	394	8	235	5
9 Prefunded default fund contributions	-	-	-	-
10 Unfunded default fund contributions	-	-	-	-
11 <b>Exposures to non-QCCPs (total)</b>		-		-
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-	-	-
13 (i) OTC derivatives	-	-	-	-
14 (ii) Exchange-traded derivatives	-	-	-	-
15 (iii) SFTs	-	-	-	-
16 (iv) Netting sets where cross-product netting has been approved	-	-	-	-
17 Segregated initial margin	-		-	
18 Non-segregated initial margin	-	-	-	-
19 Prefunded default fund contributions	-	-	-	-
20 Unfunded default fund contributions	-	-	-	-

**Counterparty Risk**

**6.10 Standardised approach – CCR exposures by regulatory portfolio and risk**

The following table shows the CCR exposures by regulatory portfolio and risk as at 31 December 2025 and 30 June 2025.

**Table 47: EU CCR3 - Standardised approach – CCR exposures by regulatory exposure class and risk weights**

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
	31 December 2025											
	Risk weight											Total exposure value
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	€ million
1 Central governments or central banks <sup>(1)</sup>	722	-	-	-	-	-	-	-	-	-	-	722
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	29	-	-	-	-	-	-	-	-	-	-	29
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	580	10	-	824	19	-	-	-	-	204	1,637
7 Corporates	-	-	-	-	62	106	-	73	69	15	-	325
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	2	-	-	-	-	-	-	2
<b>11 Total exposure value</b>	<b>751</b>	<b>580</b>	<b>10</b>	<b>-</b>	<b>888</b>	<b>125</b>	<b>-</b>	<b>73</b>	<b>69</b>	<b>15</b>	<b>204</b>	<b>2,715</b>

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
	30 June 2025											
	Risk weight											Total exposure value
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	€ million
1 Central governments or central banks	38	-	-	-	-	-	-	-	-	-	-	38
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	71	-	-	-	-	-	-	-	-	-	-	71
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	312	36	-	892	135	-	-	3	-	-	1,376
7 Corporates	-	-	-	-	96	136	-	30	95	15	-	372
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	2	-	-	-	-	-	-	2
<b>11 Total exposure value</b>	<b>109</b>	<b>312</b>	<b>36</b>	<b>-</b>	<b>990</b>	<b>271</b>	<b>-</b>	<b>30</b>	<b>98</b>	<b>15</b>	<b>-</b>	<b>1,859</b>

<sup>(1)</sup> The increase of the Central Government or Central Bank is mainly due to the funding through Eurosystem.

**Counterparty Risk**

**6.11 RWEAs flow statements of CCR exposures under IMM**

**Table 48: EU CCR7** - RWEAs 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 RWEAs of CCR exposures.

**6.12 Composition of collateral for exposures to CCR**

The following table shows the composition of collateral for exposures to CCR, as at 31 December 2025 and 30 June 2025.

**Table 49: EU CCR5** - Composition of collateral for CCR exposures

Collateral type	a	b	c	d	e	f	g	h
	31 December 2025							
	Collateral used in derivative transactions				Collateral used in SFTs <sup>(1)</sup>			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Cash – domestic currency	14	733	3	486	-	21	-	41
2 Cash – other currencies	-	3	1	8	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	11	-	74
4 Other sovereign debt	-	-	-	-	-	639	-	34
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	1,188	-	3,421
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	1,588
<b>9 Total</b>	<b>14</b>	<b>736</b>	<b>4</b>	<b>494</b>	<b>-</b>	<b>1,859</b>	<b>-</b>	<b>5,158</b>

Collateral type	a	b	c	d	e	f	g	h
	30 June 2025							
	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Cash – domestic currency	-	615	-	383	-	6	-	35
2 Cash – other currencies	-	3	-	9	-	-	-	-
3 Domestic sovereign debt	-	-	-	-	-	79	-	120
4 Other sovereign debt	-	-	-	-	-	138	-	175
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	1,013	-	3,265
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	-
<b>9 Total</b>	<b>-</b>	<b>617</b>	<b>-</b>	<b>391</b>	<b>-</b>	<b>1,236</b>	<b>-</b>	<b>3,595</b>

<sup>(1)</sup> The increase of the collaterals posted in Securities Financing Transactions (SFTs) is mainly due to the pledged collateral in Eurosystem Funding.

## Operational Risk

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### 7. Operational Risk

#### 7.1 Risk management objectives and policies

Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people and systems or from external events. It includes legal risk and excludes strategic and reputational risk and constitutes a subset of the Group's non-financial risks.

Operational risk is embedded in all business activities. The objective of operational risk management is to support the achievement of business objectives, protect customers and stakeholders, strengthen operational resilience and maintain exposures within approved risk appetite.

The Group has established a Non-Financial Risk Management Framework which sets out the principles, policies and processes for managing non-financial risks (including operational risks) across their lifecycle. The Group's strategy for managing operational risk is based on a structured approach to identifying, assessing, monitoring and reporting risks, complemented by maintaining a sound control environment, integrating risk considerations into decision-making and managing exposures within the defined risk appetite. This approach is complemented by a comprehensive set of policies and guidelines, including those covering risk governance, risk appetite, risk culture, operational resilience and outsourcing. The Group promotes a strong risk culture emphasising accountability, transparency and timely escalation of risks.

#### 7.2 Structure and organisation of the operational risk management function

Governance responsibility for operational risk management originates from the Board of Directors and is cascaded through the Executive Board and Senior Management. The Board approves the framework, while the Board Risk Committee and the Audit Committee oversee the operational risk profile and internal control environment.

Operational risk management is implemented through the Three Lines of Defence model. The first line of defence owns and manages risks and controls within business and support units. The second line of defence, including risk management, compliance and other control functions, establishes policies, performs oversight and independent challenge, and monitors adherence to risk appetite. Internal Audit, as the third line of defence, provides independent assurance.

Within the second line of defence, the operational risk management function is established under the Group Chief Risk Officer. Group Operational and Non-Financial Risks (GONFR) constitutes the core operational risk management function at Group level, responsible for maintaining the framework, issuing Group-wide standards and methodologies, providing independent oversight and challenge, monitoring the operational risk profile and reporting to senior management and the Board. GONFR also acts as an overlaying coordinator across second line functions.

Operational and Non-Financial Risk Units are set-up in international banking subsidiaries which operate under the oversight of GONFR. They oversee local implementation of the framework and escalate material issues to Group level.

Within the first line of defence, Operational Risk Partners and Operational Risk Management Units support business units in implementing the framework and act as liaison points with GONFR and other second line functions.

## Operational Risk

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### 7.3 Scope and nature of the measurement system

Under the revised CRR3, the calculation of own funds requirements for operational risk is based on a single, non model based approach, namely the Business Indicator Component (BIC). The BIC is derived from the Business Indicator (BI), which constitutes a financial statement based proxy for operational risk and reflects the size and complexity of an institution's activities. The BI is calculated using items sourced from the financial statements, which are mapped to the corresponding supervisory reporting references under the FINREP framework, ensuring consistency with accounting data and enhanced comparability across institutions. In line with this revised prudential framework, the qualitative and quantitative disclosures on operational risk have been adapted accordingly to reflect the updated methodology and reporting requirements. Moreover, the Group uses an internal economic capital model for Pillar 2 purposes.

A combination of qualitative and quantitative methodologies is applied to identify, assess and monitor operational risk exposures, including internal loss data, risk assessments, Key Risk Indicators and scenario analysis. These methodologies are supported by dedicated systems and are applied consistently across the Group, providing a centralised source of operational risk information and supporting the assessment of exposures and the estimation of regulatory capital requirements.

### 7.4 Scope and nature of the operational risk reporting framework

The Group has established a framework to ensure timely, accurate and comprehensive communication of operational risk information to executive management and the Board. This information is provided on a regular basis to the Executive Board, senior management, the Operational & Non-Financial Risks Committee, the Board Risk Committee and the Audit Committee, and is supplemented by ad hoc reporting where required.

Reporting is prepared on a consolidated basis at Group level and provides an aggregated view of operational risk exposures, supporting effective monitoring, escalation and decision-making. It includes, at a minimum, material operational risk events and losses, significant risk exposures and concentrations, risk assessment results including emerging risks, and key risk indicators and threshold breaches.

### 7.5 Policies and strategies of operational risk mitigation

The Group's approach to operational risk mitigation is based on a sound control environment supported by a comprehensive policy framework. Mitigation is achieved through embedded controls within business processes, supported by ongoing monitoring and independent challenge.

Where appropriate, part of the operational risk exposure is transferred through insurance, which constitutes the Group's primary risk transfer mechanism. Insurance is used as a complementary measure and does not replace effective internal controls.

Residual operational risk exposures remain with the Group and are absorbed through its control environment, management actions and capital resources, and are monitored against risk appetite. Where exposures exceed acceptable levels, additional mitigation measures are implemented or the relevant activities are adjusted, restricted or discontinued.

## Operational Risk

### 7.6 Operational Risk – Capital requirements

**Table 50: EU OR1 Operational risk own funds requirements and risk-weighted exposure amounts**

	a	b	c	d	e	f	g	h	i	j	k
	T	T-1	T-2	T-3	T-4	T-5	T-6	T-7	T-8	T-9	Ten-year average
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
<b>Using €20,000 threshold</b>											
1 Total amount of operational risk losses net of recoveries (no exclusions)	11	12	29	13	11	15	6	5	5	6	11
2 Total number of operational risk losses	160	149	165	144	162	133	109	114	115	110	136
3 Total amount of excluded operational risk losses	-	-	-	-	-	-	-	-	-	-	-
4 Total number of excluded operational risk events	-	-	-	-	-	-	-	-	-	-	-
5 Total amount of operational risk losses net of recoveries and net of excluded losses	11	12	29	13	11	15	6	5	5	6	11
<b>Using €100,000 threshold</b>											
6 Total amount of operational risk losses net of recoveries (no exclusions)	8	9	26	10	8	13	4	3	3	4	9
7 Total number of operational risk losses	47	49	57	34	43	32	22	29	21	14	35
8 Total amount of excluded operational risk losses	-	-	-	-	-	-	-	-	-	-	-
9 Total number of excluded operational risk events	-	-	-	-	-	-	-	-	-	-	-
10 Total amount of operational risk losses net of recoveries and net of excluded losses	8	9	26	10	8	13	4	3	3	4	9

**Table 51: EU OR2 - Business Indicator, components and subcomponents**

	a	b	c	d
	31 December 2025	31 December 2024	31 December 2023	Average value
	€ million	€ million	€ million	€ million
BI and its subcomponents				
1 Interest, lease and dividend component (ILDC)				2,161
EU 1 ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3))				2,161
1a Interest and lease income	4,940	5,582	5,233	5,252
1b Interest and lease expense	2,302	2,675	2,424	2,467
1c Total assets/Asset component	99,146	94,185	92,185	95,172
1d Dividend income/dividend component	33	8	17	19
2 Services component (SC)				853
2a Fee and commission income	799	749	657	735
2b Fee and commission expense	194	170	148	171
2c Other operating income	56	54	39	50
2d Other operating expense	95	144	115	118
3 Financial component (FC)				107
3a Net profit or loss applicable to trading book (TB)	(11)	99	69	60
3b Net profit or loss applicable to banking book (BB)	54	13	74	47
EU 3c Approach followed to determine the TB/BB boundary (PBA or accounting approach)				Accounting approach
4 Business Indicator (BI)				3,121
5 Business indicator component (BIC)				438

## Operational Risk

### Disclosure on the BI:

	a
	31 December 2025
	€ million
6a BI gross of excluded divested activities	3,121
6b Reduction in BI due to excluded divested activities	-
<b>EU 6c Impact in BI of mergers/acquisitions</b>	<b>509</b>

**Table 52: EU OR3 - Operational risk own funds requirements and risk exposure amounts**

	a
	31 December 2025
	€ million
1 Business Indicator Component (BIC)	438
EU1 Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4)	-
3 Minimum Required Operational Risk Own Funds Requirements (OROF)	438
4 Operational Risk Exposure Amounts (REA)	5,477

**Asset Encumbrance**

**8. Asset Encumbrance**

**8.1 Information on importance of encumbrance**

The Bank uses the following main types of encumbrance:

- i) secured funding through Eurosystem (ECB’s Main Refinancing Operations (MRO)/Targeted Long Term Refinancing Operations (TLTRO)), for this funding the Bank mainly uses as collateral: own issued retained Covered Bonds, eligible loans and other eligible debt securities;
- ii) secured funding with interbank counterparties backed with retained own covered bonds, GGBs, Greek Corporate & foreign sovereign bonds and own securitisations (the senior tranches);
- iii) covered bonds issuance backed with mortgage loans, sold to international and domestic investors; and
- iv) securitisations issuance backed with loans sold to international and domestic investors.

As at end of year 2025 the Group's secured funding from Eurosystem sources (ECB’s MRO/TLTRO) was € 1 billion (in December 2024 there was no funding from Eurosystem sources).

The encumbrance of assets and the encumbrance of assets received by the group as collateral is a centralised function and it is implemented by Eurobank, Greece.

The level of secured funding (repos with foreign counterparties) in subsidiaries is immaterial.

As of end of year 2025 the over-collateralization (market value over funding value) in case of secured funding through Eurosystem facilities was 41% and in case of repos was 6%.

For the interbank secured funding (repos), the Bank uses the standard terms of the GMRA (Global Master Repurchase Agreement). According to this contract, the exposure between the Bank and its counterparty is calculated on a daily basis and collateral is posted to or received by the counterparty so that the exposure remains almost zero.

**8.2 Assets**

**Table 53: EU AE1 – Encumbered and unencumbered assets**

	010	030	040	050	060	080	090	100
31 December 2025								
	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
	of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Assets of the reporting institution	6,270	1,103			95,602	27,951		
030 Equity instruments	-	-	-	-	467	17	467	17
040 Debt securities	1,975	1,103	1,963	1,057	20,749	15,598	20,533	15,827
050 of which: covered bonds	-	-	-	-	2,305	2,169	2,342	2,202
060 of which: securitisations	334	-	335	-	938	-	942	-
070 of which: issued by general governments	1,103	1,098	1,058	1,052	13,241	12,505	12,920	12,690
080 of which: issued by financial corporations	851	-	884	-	5,748	2,601	5,836	2,637
090 of which: issued by non-financial corporations	17	5	17	5	1,842	518	1,862	522
120 Other assets	4,352	-			74,577	12,811		

## Asset Encumbrance

	010	030	040	050	060	080	090	100
31 December 2024								
	Carrying amount of encumbered assets		Fair value of encumbered assets		Carrying amount of unencumbered assets		Fair value of unencumbered assets	
		of which notionally eligible EHQLA and HQLA		of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA		of which EHQLA and HQLA
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Assets of the reporting institution	11,537	1,030			78,828	23,833		
030 Equity instruments	-	-	-	-	406	17	383	17
040 Debt securities	1,691	974	1,657	893	16,366	11,671	15,952	11,503
050 of which: covered bonds	-	-	-	-	1,408	1,346	1,421	1,357
060 of which: securitisations	179	-	179	-	1,256	68	1,261	68
070 of which: issued by general governments	1,008	970	949	889	10,425	9,729	10,057	9,212
080 of which: issued by financial corporations	659	-	680	-	6,368	2,762	6,348	2,745
090 of which: issued by non-financial corporations	153	4	155	4	1,550	436	1,571	440
120 Other assets	6,661	-			62,079	11,756		

Note: The values in these tables are the median of quarterly data points in the year.

### 8.3 Collateral received

Table 54: EU AE2 - Collateral received and own debt securities issued

	010	030	040	060
31 December 2025				
	Fair value of encumbered collateral received or own debt securities issued		Unencumbered	
		of which notionally eligible EHQLA and HQLA	Fair value of collateral received or own debt securities issued available for encumbrance	
	€ million	€ million	€ million	€ million
			of which EHQLA and HQLA	
130 Collateral received by the disclosing institution	-	-	1,095	730
140 Loans on demand	-	-	-	-
150 Equity instruments	-	-	-	-
160 Debt securities	-	-	1,095	730
170 of which: covered bonds	-	-	457	457
180 of which: securitisations	-	-	-	-
190 of which: issued by general governments	-	-	173	173
200 of which: issued by financial corporations	-	-	788	457
210 of which: issued by non-financial corporations	-	-	38	-
220 Loans and advances other than loans on demand	-	-	-	-
230 Other collateral received	-	-	-	-
Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
240 Own covered bonds and securitisation issued and not yet pledged			-	-
241 TOTAL COLLATERAL RECEIVED AND OWN DEBT				
250 SECURITIES ISSUED		6,271	1,103	

**Asset Encumbrance**

	010	030	040	060
31 December 2024				
	Fair value of encumbered collateral received or own debt securities issued		Unencumbered Fair value of collateral received or own debt securities issued available for encumbrance	
	of which notionally eligible EHQLA and HQLA		of which EHQLA and HQLA	
	€ million	€ million	€ million	€ million
130 Collateral received by the disclosing institution	101	1	1.324	788
140 Loans on demand	-	-	-	-
150 Equity instruments	-	-	-	-
160 Debt securities	101	1	1.324	788
170 of which: covered bonds	100	-	591	294
180 of which: securitisations	-	-	-	-
190 of which: issued by general governments	1	1	651	491
200 of which: issued by financial corporations	100	-	641	294
210 of which: issued by non-financial corporations	-	-	33	-
220 Loans and advances other than loans on demand	-	-	-	-
230 Other collateral received	-	-	-	-
240 Own debt securities issued other than own covered bonds or securitisations	-	-	-	-
241 Own covered bonds and securitisation issued and not yet pledged	-	-	-	-
<b>250 TOTAL COLLATERAL RECEIVED AND OWN DEBT SECURITIES ISSUED</b>	<b>11.741</b>	<b>1.030</b>		

Note: The values in these tables are the median of quarterly data points in the year.

**8.4 Encumbered assets/collateral received and associated liabilities**

**Table 55: EU AE3 - Sources of encumbrance**

	010	030
31 December 2025		
	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	€ million	€ million
010 Carrying amount of selected financial liabilities	4,269	6,271

	010	030
31 December 2024		
	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
	€ million	€ million
010 Carrying amount of selected financial liabilities	7,532	11,111

Note: The values in these tables are the median of quarterly data points in the year.

## Leverage Ratio

### 9. Leverage Ratio

The 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 of the ratio and the factors that affect it.

The level of the leverage ratio with reference date 31 December 2025 was at 8.1% (30 June 2025: 7.9%), significantly over the proposed minimum threshold of 3%. In addition, based on the latest SREP Decision, the Group is not subject to a P2R or P2G in relation to the leverage ratio.

The following table includes the summary of the Group's leverage ratio with reference dates 31 December 2025 and 30 June 2025.

**Table 56: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures**

	a	
	31 December 2025 <sup>(1)</sup>	30 June 2025 <sup>(1)</sup>
	€ million	€ million
<b>1 Total assets as per published financial statements</b>	<b>107,976</b>	<b>102,228</b>
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-	-
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4 (Adjustment for temporary exemption of exposures to central bank (if applicable))	-	-
5 (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)	-	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-
7 Adjustment for eligible cash pooling transactions	-	-
8 Adjustments for derivative financial instruments	6	(95)
9 Adjustment for securities financing transactions (SFTs)	1,876	1,633
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	4,937	4,581
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12 Other adjustments	(1,272)	(1,247)
<b>13 Total exposure measure</b>	<b>113,523</b>	<b>107,100</b>

<sup>(1)</sup> Figures and ratios include profits for the financial year 2025 and 6M 2025 accordingly, less the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' and AGM approval.

## Leverage Ratio

**Table 57: EU LR2 - LRCom: Leverage ratio common disclosure**

	a	
	31 December 2025 <sup>(1)</sup>	30 June 2025 <sup>(1)</sup>
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
<b>On - balance sheet exposures (excluding derivatives and SFT's)</b>		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	105,940	100,630
2 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(121)	(124)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(399)	(402)
<b>7 Total on-balance sheet exposures (excluding derivatives and SFTs)</b>	<b>105,419</b>	<b>100,104</b>
<b>Derivative exposures</b>		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	141	186
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	645	536
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	-	-
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
<b>13 Total derivatives exposures</b>	<b>786</b>	<b>723</b>
<b>Securities financing transaction exposures</b>		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1,785	1,067
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	9	-
16 Counterparty credit risk exposure for SFT assets	586	626
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17 Agent transaction exposures	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-
<b>18 Total securities financing transaction exposures</b>	<b>2,380</b>	<b>1,692</b>
<b>Other off-balance sheet exposures</b>		
19 Off-balance sheet exposures of gross notional amount	19,767	17,600
20 (Adjustments for conversion to credit equivalent amounts)	(14,830)	(13,019)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
<b>22 Off-balance sheet exposures</b>	<b>4,937</b>	<b>4,581</b>
<b>Excluded exposures</b>		
EU-22k (Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l (Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m (Total exempted exposures)	-	-
<b>Capital and total exposure measure</b>		
<b>23 Tier 1 capital</b>	<b>9,224</b>	<b>8,427</b>
<b>24 Total exposure measure</b>	<b>113,523</b>	<b>107,100</b>
<b>Leverage ratio</b>		
<b>25 Leverage ratio %</b>	<b>8.1%</b>	<b>7.9%</b>
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8.1%	7.9%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	8.1%	7.9%
26 Regulatory minimum leverage ratio requirement (%)	3.0%	3.00%
EU-26a <b>Additional own funds requirements to address the risk of excessive leverage (%)</b>	<b>0.0%</b>	<b>0.00%</b>
EU-26b <b>of which: to be made up of CET1 capital</b>	<b>0.0%</b>	<b>0.00%</b>
27 <b>Leverage ratio buffer requirement (%)</b>	<b>0.0%</b>	<b>0.00%</b>
EU-27a <b>Overall leverage ratio requirement (%)</b>	<b>3.0%</b>	<b>3.00%</b>
<b>Choice on transitional arrangements and relevant exposures</b>		
EU-27b <b>Choice on transitional arrangements for the definition of capital measure</b>	<b>Transitional</b>	<b>Transitional</b>

<sup>(1)</sup> Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

**Notes:**

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

(b) The increase in the Leverage ratio is mainly due to the increase in Tier 1 capital.

## Leverage Ratio

**Table 58: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)**

	a	
	31 December 2025 <sup>(1)</sup>	30 June 2025 <sup>(1)</sup>
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	105,819	100,506
EU-2 Trading book exposures	516	309
EU-3 Banking book exposures, of which:	105,303	100,197
EU-4 Covered bonds	2,258	2,347
EU-5 Exposures treated as sovereigns	34,219	31,949
EU-6 Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	97	101
EU-7 Institutions	3,574	3,597
EU-8 Secured by mortgages of immovable properties	22,620	22,186
EU-9 Retail exposures	6,243	6,219
EU-10 Corporates	20,022	17,471
EU-11 Exposures in default	988	932
EU-12 Other exposures (eg equity, securitisations, and other non-credit obligation assets)	15,282	15,395

<sup>(1)</sup> Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

## Liquidity Risk

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### 10. Liquidity Risk

The Group is exposed on a daily basis to liquidity risk arising from potential deposits withdrawals, maturity of medium or long-term notes, maturity of secured or unsecured funding (interbank repos and money market takings), collateral revaluation as a result of market movements, loan drawdowns and forfeiture of guarantees. Furthermore, margin calls on secured funding transactions (with ECB and the market) and on risk mitigation contracts (Credit Support Annex - CSAs, GMRAs) and on centrally cleared transactions with CCPs result in liquidity exposure. The Group 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 Group. 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 Group.

#### 10.1 Liquidity Risk Management Framework

The Group's Liquidity Risk Policy defines the following supervisory and control structure:

- BoD has the ultimate supervision / oversight of the liquidity risk management framework;
- BRC's role is to approve all strategic liquidity risk management decisions and monitor the quantitative and qualitative aspects of liquidity risk;
- Group Assets and Liabilities Committee has the mandate to form and implement the liquidity policies and guidelines in conformity with Group's risk appetite and to review at least monthly the overall liquidity position of the Group;
- Group Treasury is responsible for the implementation of the Group's liquidity strategy, taking into account the latest funding plan and for the daily management of the Group's liquidity;
- Group Market and Counterparty Risk is responsible for the measuring, controlling, monitoring and reporting the liquidity risk of the Group.

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 risk 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.

#### 10.2 Liquidity Buffer

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

- Cash and balances with central banks;
- Eligible bonds and other financial assets that can be used for collateral in secured funding transactions;

**Liquidity Risk**

- Current accounts with banks and Interbank placings maturing within one month.

The unutilized assets, containing highly liquid and central banks eligible assets, provide a contingent liquidity reserve of € 41.1 billion as of 31 December 2025 (2024: € 40.2 billion). In addition, the Group holds other types of highly liquid assets, as defined by the regulator, amounting to € 7.5 billion (cash value) (2024: € 6.6 billion). It should be noted that a part of ECB’s available collateral of € 21.3 billion (cash value) (2024: € 19.5 billion) is held by Group’s subsidiaries for which local regulatory restrictions are applied and currently limit the level of its transferability between group entities.

The Group’s liquidity adequacy and funding structure remained solid throughout 2025. Liquidity inflows from customer deposits (+€ 4.1 billion at Group level YoY), along with the successful issuance of MREL-eligible securities and AT1 instruments, maintained a significantly strong level of High-Quality Liquid Assets (HQLAs) buffer and a high level of the Liquidity Coverage Ratio (LCR) for both the solo and the group perimeter.

**10.3 Liquidity Coverage Ratio (LCR) calculations**

LCR as of 31 December 2025 is equal to 172.2% (30 September 2025: 180.4%). The corresponding High Quality Liquid Assets (HQLA) as of 31 December 2025, as these are defined by the regulation for the calculation of LCR, are € 24,182 million (30 September 2025: € 22,556 million).

The next table presents the key components of Group’s LCR, as per the respective guidelines on LCR disclosure (EBA/GL/2017/01). According to the guideline, 12 monthly data points are used in the calculations below.

The following table shows the level and components of the LCR.

**Table 59: LIQ1 - Quantitative information of LCR**

	a				b				c				d				e				f				g				h			
	Total unweighted value (average)																Total weighted value (average)															
	31 December 2025				30 September 2025				30 June 2025				31 March 2025				31 December 2025				30 September 2025				30 June 2025				31 March 2025			
	€ million				€ million				€ million				€ million				€ million				€ million				€ million							
EU 1a	Quarter ending on																															
EU 1b	Number of data points used in the calculation of averages																															
<b>HIGH-QUALITY LIQUID ASSETS</b>																																
<b>1 Total high-quality liquid assets (HQLA)</b>																																
<b>CASH-OUTFLOWS</b>																																
2 Retail deposits and deposits from small business customers, of which:																																
3 Stable deposits																																
4 Less stable deposits																																
5 Unsecured wholesale funding																																
6 Operational deposits (all counterparties) and deposits in networks of cooperative banks																																
7 Non-operational deposits (all counterparties)																																
8 Unsecured debt																																
9 Secured wholesale funding																																
10 Additional requirements																																
11 Outflows related to derivative exposures and other collateral requirements																																
12 Outflows related to loss of funding on debt products																																
13 Credit and liquidity facilities																																
14 Other contractual funding obligations																																
15 Other contingent funding obligations																																
16 TOTAL CASH OUTFLOWS																																
<b>CASH-INFLOWS</b>																																
17 Secured lending (eg reverse repos)																																
18 Inflows from fully performing exposures																																
19 Other cash inflows																																
(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)																																
EU-19a																																
EU-19b (Excess inflows from a related specialised credit institution)																																
20 TOTAL CASH INFLOWS																																
EU-20a Fully exempt inflows																																
EU-20b Inflows Subject to 90% Cap																																
EU-20c Inflows Subject to 75% Cap																																
<b>TOTAL ADJUSTED VALUE</b>																																
EU-21 LIQUIDITY BUFFER																																
22 TOTAL NET CASH OUTFLOWS																																
23 LIQUIDITY COVERAGE RATIO (%)																																

**Liquidity Risk**

**10.4 Net Stable Funding Ratio (NSFR) calculations**

NSFR as of 31 December 2025 is equal to 144.2% (30 September 2025: 142.7%). The minimum regulatory threshold for NSFR is set at 100%.

**Table 60: LIQ2 - Net Stable Funding Ratio**

		a	b	c	d	e
		31 December 2025				
		Unweighted value by residual maturity				Weighted value
<b>Available stable funding (ASF) Items</b>		No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	€ million
1	Capital items and instruments	10,623	-	-	1,220	11,842
2	Own funds	10,623	-	-	1,220	11,842
3	Other capital instruments		-	-	-	-
4	Retail deposits		52,453	3,428	1,189	53,348
5	Stable deposits		35,405	1,913	873	36,325
6	Less stable deposits		17,048	1,515	316	17,023
7	Wholesale funding:		26,792	937	1,266	11,837
8	Operational deposits		707	-	-	353
9	Other wholesale funding		26,086	937	1,266	11,484
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	35	2,498	40	6,088	6,108
12	NSFR derivative liabilities	35				
13	All other liabilities and capital instruments not included in the above categories		2,498	40	6,088	6,108
14	<b>Total available stable funding (ASF)</b>					<b>83,136</b>
		a	b	c	d	e
		31 December 2025				
		Unweighted value by residual maturity				Weighted value
<b>Required stable funding (RSF) Items</b>		No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	€ million
15	Total high-quality liquid assets (HQLA)					635
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		121	118	3,433	3,122
16	Deposits held at other financial institutions for operational purposes		334	-	47	214
17	Performing loans and securities:		5,246	2,923	47,131	42,952
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		67	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,063	141	1,406	1,581
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,486	2,399	31,643	36,064
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		196	74	741	3,616
22	Performing residential mortgages, of which:		237	244	8,068	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		107	116	4,443	-
24	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		392	140	6,014	5,307
25	Interdependent assets		-	-	-	-
26	Other assets:		2,624	-	10,013	10,093
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	377	320
29	NSFR derivative assets		-			-
30	NSFR derivative liabilities before deduction of variation margin posted		513			26
31	All other assets not included in the above categories		2,111	-	9,636	9,746
32	<b>Off-balance sheet items</b>		<b>10,587</b>	<b>519</b>	<b>999</b>	<b>636</b>
33	<b>Total RSF</b>					<b>57,650</b>
		31 December 2025				
NSFR						
34	<b>Net Stable Funding Ratio (%)</b>					<b>144.2%</b>

**Liquidity Risk**

		a	b	c	d	e
		30 September 2025				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
<b>Available stable funding (ASF) Items</b>						
1	Capital items and instruments	9,908	-	-	1,235	11,143
2	Own funds	9,908	-	-	1,235	11,143
3	Other capital instruments		-	-	-	-
4	Retail deposits		50,926	3,495	945	51,757
5	Stable deposits		34,905	1,757	692	35,521
6	Less stable deposits		16,021	1,738	253	16,236
7	Wholesale funding:		24,454	778	1,294	11,003
8	Operational deposits		495	0	-	248
9	Other wholesale funding		23,959	778	1,294	10,755
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	2,647	32	6,102	6,118
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		2,647	32	6,102	6,118
14	Total available stable funding (ASF)					80,021
		a	b	c	d	e
		30 September 2025				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
<b>Required stable funding (RSF) Items</b>						
15	Total high-quality liquid assets (HQLA)					635
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		123	106	3,619	3,271
16	Deposits held at other financial institutions for operational purposes		303	-	47	198
17	Performing loans and securities:		5,841	2,547	45,162	41,267
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,353	138	1,090	1,293
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,915	1,985	30,433	34,945
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		75	37	770	3,471
22	Performing residential mortgages, of which:		241	205	7,960	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		103	102	4,326	-
24	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		332	218	5,678	5,030
25	Interdependent assets		-	-	-	-
26	Other assets:		2,509	-	9,980	10,111
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	403	343
29	NSFR derivative assets		9			9
30	NSFR derivative liabilities before deduction of variation margin posted		451			23
31	All other assets not included in the above categories		2,049	-	9,577	9,737
32	Off-balance sheet items		9,647	537	831	585
33	Total RSF					56,067
		30 September 2025				
34	Net Stable Funding Ratio (%)					142.7%

**Liquidity Risk**

		a	b	c	d	e
		30 June 2025				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
<b>Available stable funding (ASF) Items</b>						
1	Capital items and instruments	9,643	-	-	2,185	11,828
2	Own funds	9,643	-	-	2,185	11,828
3	Other capital instruments		-	-	-	-
4	Retail deposits		49,817	3,773	920	50,973
5	Stable deposits		34,562	1,889	690	35,319
6	Less stable deposits		15,255	1,884	230	15,655
7	Wholesale funding:		24,494	811	1,255	11,116
8	Operational deposits		1,336	-	-	668
9	Other wholesale funding		23,158	811	1,255	10,448
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	261	2,562	11	5,442	5,448
12	NSFR derivative liabilities	261				
13	All other liabilities and capital instruments not included in the above categories		2,562	11	5,442	5,448
14	Total available stable funding (ASF)					79,366
		a	b	c	d	e
		30 June 2025				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
<b>Required stable funding (RSF) Items</b>						
15	Total high-quality liquid assets (HQLA)					580
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		116	104	3,614	3,259
16	Deposits held at other financial institutions for operational purposes		331	-	47	212
17	Performing loans and securities:		5,564	2,689	44,520	40,718
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,352	42	1,393	1,547
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,631	2,194	29,542	34,012
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		79	29	747	3,440
22	Performing residential mortgages, of which:		237	187	7,785	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		102	101	4,307	-
24	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		345	266	5,799	5,158
25	Interdependent assets		-	-	-	-
26	Other assets:		2,437	-	9,850	9,954
27	Physical traded commodities					-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	281	239
29	NSFR derivative assets		-			-
30	NSFR derivative liabilities before deduction of variation margin posted		487			24
31	All other assets not included in the above categories		1,950	-	9,569	9,691
32	Off-balance sheet items		9,270	600	837	577
33	Total RSF					55,301
		30 June 2025				
NSFR						
34	Net Stable Funding Ratio (%)					143.5%

**Liquidity Risk**

	a	b	c	d	e
	31 March 2025				
	Unweighted value by residual maturity				Weighted value
	No maturity <sup>[1]</sup>	< 6 months	6 months to < 1yr	≥ 1yr	
	€ million	€ million	€ million	€ million	€ million
<b>Available stable funding (ASF) Items</b>					
1 Capital items and instruments	9,199	-	-	2,200	11,399
2 <i>Own funds</i>	9,199	-	-	2,200	11,399
3 <i>Other capital instruments</i>	-	-	-	-	-
4 Retail deposits	-	49,117	3,423	955	50,020
5 <i>Stable deposits</i>	-	33,729	1,854	669	34,472
6 <i>Less stable deposits</i>	-	15,388	1,569	286	15,548
7 Wholesale funding:	-	24,070	1,342	1,156	10,963
8 <i>Operational deposits</i>	-	1,269	0	-	635
9 <i>Other wholesale funding</i>	-	22,800	1,342	1,156	10,329
10 Interdependent liabilities	-	-	-	-	-
11 Other liabilities:	-	2,168	59	5,385	5,414
12 <i>NSFR derivative liabilities</i>	-	-	-	-	-
13 <i>All other liabilities and capital instruments not included in the above categories</i>	-	2,168	59	5,385	5,414
14 Total available stable funding (ASF)					77,797
<b>Required stable funding (RSF) Items</b>					
15 Total high-quality liquid assets (HQLA)					582
EU-15a Assets encumbered for a residual maturity of one year or more in a cover pool		117	103	3,750	3,374
16 Deposits held at other financial institutions for operational purposes		354	-	51	228
17 Performing loans and securities:		5,630	2,806	43,460	39,926
18 <i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		-	-	-	-
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		1,475	41	1,302	1,468
20 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3,514	2,399	29,089	33,325
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		31	73	759	3,188
22 <i>Performing residential mortgages, of which:</i>		219	184	7,314	-
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		92	86	3,930	-
24 <i>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</i>		421	182	5,754	5,132
25 Interdependent assets		-	-	-	-
26 Other assets:		2,318	-	9,697	9,815
27 <i>Physical traded commodities</i>		-	-	-	-
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	225	191
29 <i>NSFR derivative assets</i>		7	-	-	7
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		489	-	-	24
31 <i>All other assets not included in the above categories</i>		1,821	-	9,473	9,592
32 Off-balance sheet items		8,786	460	845	527
33 Total RSF					54,452
<b>NSFR</b>					
31 March 2025					
34 Net Stable Funding Ratio (%)					142.9%

## Environmental, Social and Governance (ESG) Risks

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### 11. Environmental, Social and Governance (ESG) Risks

#### 11.1 Qualitative Information on Environmental Risks

##### 11.1.1 Business Strategy and Processes

###### 11.1.1.1 Alignment of Our Business Strategy with Environmental Risk Management Expectations

###### Business Strategy & Business Model

The Group supports the transition towards a sustainable economy and considers sustainability and addressing climate change as an opportunity. A key strategic objective is to adapt the Group's business and operations in a way that addresses climate change challenges, accommodates social needs within its business model, and safeguards prudent governance for itself and its counterparties, in accordance with supervisory initiatives and following international standards and leading market practices.

To this end, Eurobank has designed, approved and is currently implementing its Group Sustainability Strategy, including targets and commitments along two key pillars:

- **Operational Impact Strategy:** Impact arising from Eurobank's operational activities and footprint;
- **Financed Impact Strategy:** Impact arising from Eurobank's lending and investing activities to specific sectors and clients.

###### A. Operational Impact Strategy

The Operational Impact Strategy (OIS) focuses on minimising the operational environmental footprint, ensuring that its own activities are sustainable, and aligning its operations with climate and sustainability goals. The key elements of this strategy are:

- **Environmental Impact:** Minimising the negative impact of Eurobank's operations, to promote environmental stewardship with a clear goal of achieving climate neutrality.
- **Societal Impact:** Providing a diverse and inclusive environment for Eurobank's people and clients, while fostering sustainable development and prosperity for the benefit of society.
- **Governance and Business Impact:** Focusing on building sustainability awareness, internally and across its value chain, while intensifying Eurobank's efforts for ethics and transparency.

The OIS is supported by a governance structure of multiple project streams (one per each commitment) and the supervisory Sustainability/OIS Committee. Progress is regularly reviewed by the Sustainability Management Committee.

Each project stream is planned with milestones, KPIs, annual targets and long-term interim targets, serving the declared commitments. Links are established with Transformation streams, as well as corresponding ISO Management System standards, to ensure substantiation and certification of activities, validate target setting and measured performance, and systematically monitor progress through internal reviews and external assurance

###### B. Financed Impact Strategy

The Financed Impact Strategy (FIS) focuses on fostering favorable economic, social, and environmental outcomes across all aspects of its financing activities, with a commitment to sustainability and responsible stewardship. To achieve this objective, the Financed Impact Strategy (FIS) is structured around the following 4 strategic pillars:

- **Client Engagement and Awareness:** Helping clients transition to more sustainable business models by raising awareness of climate change challenges and opportunities.

## Environmental, Social and Governance (ESG) Risks

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- **Supporting Clients in Transition:** Facilitating the transition of clients towards sustainable practices by offering financing solutions, that are guided by the financing approaches and the eligible activities of the Sustainable Finance Framework (SFF) goals and ambitions.
- **Enablers and Tools for Sustainable Financing:** Providing frameworks, tools, and products to underpin sustainable financing.
- **Assessment and Management of Sustainability-related Risks:** Identifying and managing the sustainability-related risks within the Group's loan and investment portfolios, including assessing exposure to transition and physical risks linked to climate change.

The Financed Impact Strategy supports Eurobank's commitment to sustainable financing, ensuring that the Group's financial activities align with sustainability goals, such as reducing the carbon footprint of financed projects.

While the Sustainability Strategy described above remains the formally approved and applicable strategic framework during the 2025 reporting period, Eurobank has, in parallel, initiated a structured process to review and update its Group Sustainability Strategy. The objective of this process is to build on the existing strategy, further strengthen its effectiveness and embed sustainability more deeply across the Group's operations, decision making and business activities. In this context, the update of the Group Sustainability Strategy has been developed through a structured and comprehensive, Group wide process, aimed at strengthening the contribution of sustainability to long term value creation. This process includes research, benchmarking, and re-alignment on sustainability mega-trends and regulatory developments to redefine the key sustainability topics based on assessment of the Group's strategic priorities and performance, and consideration of stakeholder expectations and leading market practices.

This work enables a more focused articulation of the Group's sustainability strategic direction and leads to the identification and prioritisation of strategic drivers and focus areas designed to enhance value creation, notably through supporting business growth, strengthening risk management and improving operational efficiency across the Group.

Subsequent phases will focus on translating this strategic direction into defined targets, KPIs and detailed action plans, supported by appropriate governance and monitoring frameworks, following formal approval of the updated Group Sustainability Strategy.

### The Pathway to Net-Zero

In line with its commitment to address climate change, Eurobank joined in 2024 the Net-Zero Banking Alliance (NZBA), reinforcing its dedication to aligning its lending and investment portfolios with net-zero emissions by 2050 or sooner, in line with the most ambitious targets set by the Paris Climate Agreement.

The Group has developed sectoral, financed emissions reduction targets based on the NZBA framework, for some of the most carbon-intensive and, therefore, most relevant and impactful sectors and portfolios. The Group applies established industry standards (e.g. NZBA, PCAF) and accredited science-based decarbonisation scenarios, in line with a 1.5-degree Celsius objective by 2050.

## Environmental, Social and Governance (ESG) Risks

The following table presents key information regarding the emission reduction targets for the first 4 carbon-intensive sectors:

Sector	Boundaries	Scopes covered	Target Metric	Scenario / Pathway	Base year	Baseline value	Eurobank's emission reduction targets			
							2030 target	2030 reduction	2025 Performance	2024 Performance
<b>Power generation</b>	Fossil and RES electricity generators	1, 2	Intensity tCO <sub>2</sub> e / MWh	IEA NZE 2050 (2023 Update)	2023	244	220	-10%	199 (-18% vs baseline)	193 (-22% vs baseline)
<b>Oil and gas</b>	Mid / Downstream activities	1, 2	Absolute tCO <sub>2</sub> e	IEA NZE 2050 (2023 Update)	2024	558 (100 indexed)	530 (95 indexed)	-5%	636 (+14% vs baseline)	n/a (base year)
<b>Iron and steel</b>	Up / Mid / Downstream manufacturer	1, 2	Intensity tCO <sub>2</sub> e / t steel	IEA Net Zero by 2050 (2021)	2023	0.37	0.33	-11%	0.30 (-19% vs baseline)	0.42 (+14% vs baseline)
<b>Cement</b>	Cement and concrete manufacturers	1, 2	Intensity tCO <sub>2</sub> e / t cement	IEA NZE 2050 (2023 Update)	2023	0.67	0.59	-12%	0.63 (-6% vs baseline)	0.66 (-1% vs baseline)

For more details, please refer to section “The pathway to net zero” of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

### Business Environment

Eurobank's strategy as regards sustainability risk management is regularly updated, considering, inter alia, market, regulatory, as well as technological developments. In particular, the Bank's approach with respect to the financing of its clients' green transition considers the changing regulatory environment and the transition risk that borrowers are subject to.

In this context, the applicable provisions defined by the Bank in this respect, as well as its relevant documents/ policies/ frameworks are updated periodically, accounting for emerging best market practices in sustainability risk management. In addition, stakeholders' (e.g. consumers, borrowers, investors and issuers) sustainability priorities are accounted for in the Group's Sustainable Finance Framework (SFF), the Green Bond Framework and the Sustainable Investment Framework, allowing the Bank to conduct its relevant financing/ investment/ funding activities, while ensuring compliance with regulatory requirements and supervisory expectations.

The Bank continuously monitors the implications from changes in the physical environment and is prepared to adjust its business strategy through the establishment of additional safeguards to mitigate potential threats deriving from physical risk events. Recognising that climate change presents new challenges and unique opportunities, we strive to be at the forefront of enabling our clients to develop and reap these opportunities as a means of supporting their low carbon transition.

## Environmental, Social and Governance (ESG) Risks

### Financed Impact Strategy - Commitments & Targets

The Group recognises that the most significant part of its impact on climate arises from the financing it extends to its clients. Therefore, the second pillar of its Sustainability Strategy, Financed Impact Strategy, evolves around the following key components:

- Sustainable Financing: Development of strategies that will promote the green transition of the Group's clients through sustainable financing.
- Portfolio Alignment: Gradual alignment of the Group's portfolio with sectoral transition pathways that are aligned with the 1.5°C climate transition scenario.
- Net-Zero Strategy: Sectoral decarbonisation targets covering the Group's lending portfolios, with phased target-setting up to 2050.

#### Quantitative Targets

Portfolio Targets	As of 31/12/2025
2 billion in new green disbursements to corporates by 2025 (for 2023-2025)	> € 3.3 billion
20% of annual new corporate disbursements to be classified as Green/Environmentally Sustainable	c. 20%
20% stock of green exposures by 2027 for the corporate portfolio	c. 19%
Mobilise €2.25 billion total green RRF funds in the Greek economy by 2026	c. € 2.1 billion
No new investments in fixed income securities (excluding exposures in sustainability/green bonds) towards the top 20 most carbon-intensive corporates worldwide	€ 0
€200 million annual disbursements of Sustainability-Linked Loans for the CIB portfolio	€ 449 million

Sectoral Targets	As of 31/12/2025
35% of new disbursements in the energy sector to be directed to Renewable Energy Sources (RES) financing	> 49%
80% of disbursements related to the construction of new buildings to be allocated to green buildings	100%
20% of new disbursements related to mortgage loans (excluding "Spiti mou" (I + II)) to be allocated with EPC B+ and above	23%

Retail Banking Targets	As of 31/12/2025
€ 150 million new Retail green disbursements by 2026	> € 100 million

#### 11.1.1.2 Green Financing

##### Objectives

The Group acknowledges that sustainable development is a key driver of long-term prosperity and resilience. Supporting the transition to a low carbon and inclusive economy through financing advisory and capital-raising solutions is central to Eurobank's business model and is embedded in its Financed Impact Strategy. Through this strategy, the Group aims to generate measurable positive environmental and social outcomes by directing capital towards activities that support the green transition and social investments, while also incentivising clients to improve their sustainability performance.

## Environmental, Social and Governance (ESG) Risks

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Eurobank's sustainable finance approach is underpinned by dedicated frameworks and tools, including the Sustainable Finance Framework. In parallel, the Group is in the process of finalising its holistic Transition Plan, aligned with regulatory requirements and international best practices.

Eurobank is currently advancing the development of its Transition Finance Framework, which will serve as a core tool for facilitating both client level and portfolio level transitions. By providing clear eligibility criteria and guidance for financing transitional activities, the Framework will strengthen the Group's ability to support counterparties in decarbonising their operations and align the overall portfolio with credible transition pathways.

### Sustainable financing and investments for corporate clients

Eurobank finances robust business plans, growth strategies, investment programmes and export activities in strategic sectors. The Bank provides financing for landmark initiatives in the areas, among others, of renewable energy sources (RES), sustainable infrastructure and environmentally friendly solutions.

### Sustainable financing for individuals and businesses

The Bank offers a range of financing solutions for consumers and small businesses that support inclusive and sustainable growth, including financing SMEs through Action Finance Initiative (AFI) to promote social and economic inclusion, employment generation and access to financing. Additionally, the Recovery and Resilience Facility (RRF) loans are available for investments that demonstrate a positive net present value and repayment capacity. Furthermore, financing programmes offered by supranational institutions, such as the European Investment Fund (EIF), European Investment Bank (EIB) and Hellenic Development Bank (HDB), are assessed based on their purpose against the respective eligibility criteria and are classified as Sustainable Finance Framework (SFF)-aligned.

### Asset and wealth management products with ESG criteria

Currently, the Group manages three UCITS and one Discretionary Portfolio Management strategy, all of which qualify as "financial products that promote, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices," in accordance with Article 8 of the Sustainable Finance Disclosure Regulation (SFDR). Furthermore, the Group ensures that these products remain fully compliant with all regulatory requirements on pre-contractual and periodic disclosures, thereby providing investors with transparent, consistent, and up-to-date information on the promoted sustainability characteristics. Beyond regulatory obligations, Eurobank is committed to integrating ESG considerations across its investment processes, aiming to deliver long-term value to clients while contributing positively to society and the environment.

### Deposit solutions with ESG criteria

Eurobank was the first Greek bank to offer ESG Deposits to its corporate clientele, and continues to offer this product, allowing its clients to contribute to sustainable development projects. The amount raised by ESG Deposits is allocated to financing green and sustainability linked loans, in agreement with Eurobank's SFF.

For more details, please refer to section "Actions on sustainable financing and investment offerings" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

## Guiding Frameworks

Committed to being transparent about its approach and to ensure that decision-making is in line with best practices in environmental protection and sustainability, Eurobank has developed guiding frameworks, defining the approach and criteria for classifying its financing and investing activities as sustainable.

## Environmental, Social and Governance (ESG) Risks

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### Sustainable Finance Framework (SFF)

Through its Sustainable Finance Framework (SFF), the Group is able to classify sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing in line with the Financed Impact Strategy. Eurobank has drawn on internationally recognized industry guidelines and principles for the development of the SFF and is fully committed to being transparent about its Sustainability approach. It is noted that Eurobank remains vigilant about the latest developments in guiding frameworks and market practices and will continuously update its SFF in response to these advancements.

Specifically, the SFF has been developed based on the following standards and principles:

- Green Bond Principles, International Capital Market Association (ICMA), June 2021 (with June 2022 Appendix I)
- Social Bond Principles, ICMA, June 2023
- Sustainability-Linked Bond Principles, ICMA, June 2024
- Green Loan Principles, Loan Market Association (LMA), March 2025
- Sustainability-Linked Loan Principles, LMA, March 2025
- Climate Bonds Standard, Climate Bonds Initiative, June 2024 (v4.2)
- EU Taxonomy regulation and Climate delegated act published in April 2021 and formally adopted on 4 June 2021

The SFF defines two levels of transaction alignment:

- SFF alignment – Fulfilment of criteria dictated by established market practice
- EU Taxonomy alignment – Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, Do No Significant Harm (DNSH), minimum social safeguards).

The SFF defines four classification approaches for classifying its financing and investing activities as sustainable:

#### 1. Dedicated-purpose – Green/ Social Loans

Project-specific loans or financing instruments whose use of proceeds is 100% directed towards eligible green/ social activities. The SFF defines the eligible activities (for the Wholesale and Retail portfolios) along with the applicable eligibility and exclusionary criteria that need to be fulfilled. The eligible areas and activities include energy efficiency, renewable energy, clean transportation, shipping, green buildings, pollution prevention and control, circular economy, Carbon Capture, Utilisation and Storage (CCUS), green hydrogen, water and wastewater management, information and communication, climate change adaptation, economic inclusion, affordable basic infrastructure, access to essential services, and affordable housing.

#### 2. Dedicated-purpose – Recovery and Resilience Facility-based Approach

Activities approved through the Greek Recovery and Resilience Facility, contributing to the Green pillar.

#### 3. General-purpose – Company Business Mix

Financing to companies that fulfil the eligibility green/ social criteria and derive their revenue from eligible activities. Specifically, companies are eligible under the business mix category when:

- They derive a minimum predefined percentage of their total revenue from eligible activities.
- None of their activities are among the excluded ones (as described in Eurobank's Exclusion List).

#### 4. General-purpose – Sustainability-Linked Loans/ Facilities

The second type of general-purpose lending adopted relates to Sustainability Linked Loans (SLL). The purpose of SLLs is to enable and accelerate the sustainability transition of clients. Through SLLs, Eurobank provides sustainability - related incentives to its clients, by offering products (loans, bond loans, etc.) with terms linked to ambitious and predefined Sustainability Performance Targets (SPTs). The SPTs are specific targets that aim to improve the

## Environmental, Social and Governance (ESG) Risks

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sustainability performance of the client. The SFF outlines the methodology for defining SPTs and proposes overarching, as well as industry-specific targets.

The client commits to achieve them during the loan repayment period and as such, the SPTs are also included in the loan agreement (i.e. in the form of non-financial covenants). The accomplishment of the relevant targets is monitored using specific KPIs according to the client's activity sector/ industry. SLLs are linked to specific incentives provided by Eurobank, including, but not limited, to reduced interest rate or longer repayment period.

In addition, cases that do not strictly fulfill the characteristics of the key financing approaches, dedicated / general purpose, but have a sustainable aspect to them can be assessed for their alignment with the SFF on a standalone basis. Such cases could include, among others, financing related to capital share increases and /or acquisitions of companies with sustainable activity or financing that will be directed to various SFF-aligned purposes.

For further details, please refer to section "The Sustainable Finance Framework" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

### Green Bond Framework (GBF)

Eurobank's Green Bond Framework assists the Bank in meeting its environmental/ sustainability commitments and finance projects that will deliver environmental benefits to the economy and support its business strategy and vision.

The Green Bond Framework has been developed in accordance with global best practices and standards, and considers EU Taxonomy eligibility criteria to classify potential investments as green. The Framework defines the eligible assets and associated criteria, the use of proceeds, the process for project evaluation and selection, the management of proceeds, as well as the relevant reporting obligations. The eligible green projects contribute to the UN SDGs, the EU environmental objectives and the eligibility criteria align, on a best effort basis, with the Technical Screening Criteria of the EU Taxonomy Climate Delegated Act. In addition, EU Taxonomy DNSH principles and minimum social safeguards are considered for specific projects where relevant information can be provided by the clients. The Green Bond Framework has obtained a Second Party Opinion ([Green Bond Framework- Second Party Opinion](#)) for its alignment with the ICMA Green Bond Principles (GBP) and the EU Green Bond Standard (GBS).

For further details, please refer to Eurobank's Green Bond Framework: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/pistotikoi-titloi/green-bond-framework/green-bond-framework.pdf>.

### Sustainable Investment Framework (SIF)

The Bank has developed its Sustainable Investment Framework (SIF) for the assessment and classification of investments as sustainable based on criteria observed in international market practices, frameworks and guidelines. Eurobank's SIF outlines the Bank's potential sustainable investment approaches/ strategies, the process for selecting eligible investments, as well as the monitoring frequency regarding the sustainable portfolio. It is noted that the sustainability assessment based on the criteria of the SIF, irrespective of the eligibility outcome, does not prevent the Bank from including non-eligible sustainable investments in its investment portfolio.

The classification approaches used by the Bank in the context of its SIF are presented below:

- Value-based exclusions and AML: Exclusion of companies, sectors, or countries whose behaviors do not align with basic societal values and the Bank's Risk Appetite.
- Norm-based exclusions: Exclusion of issuers who do not comply with basic standards of business and international norms.
- Avoid harm: A combination of value-based and norm-based exclusions, with additional activities with negative impacts excluded.

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- Sustainable bonds: Selection of bonds that follow sustainable, green or social standards (i.e. selection of bonds that have been labelled as Green, Social or Sustainable and Sustainability-linked labeled (SLB) bonds).

### Engagement with Our Counterparties for Environmental Risk Mitigation

Aiming to facilitate the green transition of its clients, Eurobank has developed a dedicated approach to increase client engagement and awareness regarding sustainability risks. Besides the initiatives aiming to build sustainability literacy and capacity among its clients (e.g. online events, articles and webinars, digital academy for businesses), the Bank also uses tools to engage with its counterparties in the context of its credit granting and asset management activities, so as to understand their strategies and mitigate the sustainability risks exposures.

#### Engagement in the context of Credit Granting Activities

Eurobank has implemented a range of tools to identify, measure and manage sustainability risks, which are integrated into the credit granting and monitoring processes. These tools are used by various units across the Group, ensuring that relevant tasks are carried out collaboratively and efficiently:

- Moody's Risk Analyst (MRA) Model
- Exclusion List
- Climate Risk Scorecard
- Interbank ESG Questionnaire
- ESG Risk Assessment
- Sustainable Finance Framework Tool
- Collateral Valuation

For more details, please refer to the "Sustainability Risk Management Tools & Processes" in the Qualitative Information on Environmental Risks, Risk Management section, as well as the section "Actions related to the integration of sustainability in risk management" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

#### Engagement in the context of Asset Management Activities

For Eurobank Asset Management M.F.M.C., engagement and dialogue represent an integral and crucial part of responsible investment. In this context, as per its Responsible Investment Policy, Eurobank Asset Management M.F.M.C. is committed at two levels, as regards the environmental risk assessment of the Greek investee companies in which the Company's Funds and Portfolios invest:

**Company engagement:** The aim is to encourage companies to achieve the highest possible standards in terms of environmental responsibility and to support them in this process.

**Voting engagement:** The use of voting rights at general meetings is one of the cornerstones of the strategy of continuous dialogue with the companies concerned implemented by Eurobank Asset Management M.F.M.C. and also an integral part of its investment process.

### 11.1.2 Governance

#### 11.1.2.1 Sustainability Risks Management Framework

Eurobank has incorporated sustainability risks aspects across all pillars of its Risk Management Framework, through the establishment of comprehensive policies and processes. It is among the Group's priorities to identify, assess, manage and mitigate relevant risks, with a view towards ensuring alignment with its business strategy, as well as regulatory and industry developments.

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In addition, Eurobank’s Sustainability Governance structure defines specific roles and responsibilities to support the roll-out of the Sustainability Strategy and the integration of sustainability risks, through the involvement of various key stakeholders (e.g. Business & Risk Units, Committees etc.) across the three Lines of defense, embedding regulatory guidelines and market practices.

In this context and considering the significant impact of sustainability risks both on financial institutions and on the global economy, Eurobank developed a Sustainability Risk Management Policy which aims at fostering a holistic understanding of the effects of sustainability risks on its business model, as well as support decision-making regarding these matters and provide a robust governance under its Risk Management Framework.

The Sustainability Risk Management Policy encompasses, among others, information on the following areas:

- Sustainability Risks Governance: Definition of the Group’s main sustainability risks management pillars and summary of the responsibilities of the Group’s Management/ Board Committees and the three Lines of Defense regarding the management of sustainability risks.
- Sustainability Risks Definitions, Drivers & Transmission Channels: Detailed presentation of the sustainability risks definitions and drivers identified by the Group, including the transmission channels through which these risks impact Group’s traditional risk types.
- Sustainability Risks Management Tools: Indication of the main tools utilised by the Group for the identification, measurement and management of sustainability risks.

### 11.1.2.2 Overview of governance structure for the oversight and management of sustainability matters

Sustainability at Eurobank is deployed across a Governance structure that addresses both regulatory requirements and voluntary commitments. Board oversight with respect to the Sustainability Strategy is addressed through the inclusion of sustainability items in the Board Meetings agenda, as per international best practice.

The Group applies the Three Lines of Defense model for the management of climate-related, environmental and sustainability risks. This model, through structured policies, further delineates duties across each line, ensuring that each body and individual within the organisation has a defined responsibility for managing sustainability impacts, mitigating risks and leveraging opportunities within their operational scope.

Eurobank’s Sustainability Governance structure aims to enhance the effective oversight of sustainability matters at Management/ Board level with direct reporting lines as described below.



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### Governance Structure and Committees

- Oversight of sustainability risks at management body level through allocation of responsibilities to Board and management committees. Specifically, Chairman of the Sustainability Management Committee (SMC) is the General Manager, Group Strategy.
- Appointment of an executive member by the Board, who is responsible for climate-related and environmental risks. This member updates the Board Risk Committees (BRC) at least semi-annually.
- Establishment of two Committees that supplement the governance arrangements in sustainability risks (i.e. Sustainability Management Committee and Climate Risk Stress Test Committee).
- Appointment of Group Senior Sustainability Officer (GSSO) to lead the Group's sustainability initiatives.

### Integration of Sustainability Risk Management across the Three Lines of Defense.

- Dedicated teams within CIB and Retail Banking units for overseeing sustainability and sustainable financing activities.
- Automated process established to assess and classify sustainable financing opportunities.
- Group Sustainability Unit, responsible for managing and coordinating sustainability strategy related issues, developing action plans for the Group's Net Zero portfolio strategies, as well as monitoring sustainability performance and coordinating sustainability-linked activities that enhance the Group's Impact. In this context, the Unit is responsible for facilitating the development of the sustainability data framework to coordinate and prepare external and internal sustainability-related reports.
- Group Sustainability Risk, responsible for overseeing, monitoring and managing sustainability risks, and preparing and maintaining the Bank's sustainability risk management policies, processes and methodologies, in collaboration with the Group Sustainability Unit, Business and other Risk Units.
- Training on sustainability, sustainable finance and sustainability risk topics to Group personnel.
- The Group Internal Audit (Group IA) independently reviews the adequacy and effectiveness of the internal control framework in place regarding Sustainability risk management on a regular basis, following a risk-based approach in line with its Annual Risk Assessment and Audit Planning Methodology.

#### **11.1.2.3 Role of Board, Board Risk Committee, Management committees and GSSO on the supervision of sustainability and climate related & environmental matters**

The Group's Sustainability Governance structure has been updated to ensure that Sustainability risks, including CR&E risks, are appropriately monitored and managed, aiming to further enhance their effective oversight at management/ Board level, as follows:

#### Eurobank Holding (up to 12.12.2025) and Eurobank Board of Directors (Boards or BoDs)

The Eurobank Boards' role is to offer entrepreneurial leadership to the Group in the context of prudent and effective controls facilitating the assessment and management of risks. The Boards establish the Group's strategic objectives, ensure the availability of essential financial and human resources for the Group to fulfill its purpose and evaluate management performance. The Boards define the Group's values and standards, ensuring that their responsibilities to shareholders and other stakeholders are acknowledged and fulfilled. All members of the Boards are required to act in the best interests of the Group, aligning with their legal duties. The Boards have designated an executive member as the Board Member responsible for climate-related and environmental risks. This designated Board Member updates, at least on a semi-annual basis, the Board Risk Committees (BRC), which, in accordance with their Terms of Reference, are responsible for overseeing (among others) the climate-related and environmental risks. As per international best practices, effective Board oversight with respect to the Group's Sustainability Strategy is also safeguarded through the regular inclusion of Sustainability items in the agendas of Board Meetings.

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### Eurobank Board Risk Committee (BRC)

The Eurobank Board Risk Committee, among others, oversees the implementation of the strategies for capital and liquidity management, as well as for all material risks of the Group, including climate-related and environmental risks, as identified through the Risk Identification and Materiality Assessment (RIMA) process and listed in the relevant RIMA report, to assess their adequacy against the approved risk appetite and strategy. In addition, the BRC determines, among others, the principles which govern risk management (including climate-related and environmental risks) across the Group in terms of identifying, measuring, monitoring, controlling, and mitigating risks. To this end, the BRC approves risk principles, risk policies, risk procedures and risk methodologies and the specific Risk Management Frameworks and Policies (e.g. Sustainability Risk Management Policy). It is noted that the Boards have designated an executive member of the Boards as the Board Member responsible for climate-related and environmental risks, who updates the Board Risk Committees (BRC) at least on a semi-annual basis.

### Eurobank Management Risk Committee (MRC)

The Eurobank Management Risk Committee (MRC) is responsible for overseeing the risk management framework of Eurobank. As part of its responsibilities, the MRC facilitates reporting to the BRC on a wide range of risk-related topics under its purview, including CR&E risks. The MRC ensures that material risks are identified and promptly escalated to the BRC and that the necessary policies and procedures are in place to prudently manage risk and comply with regulatory requirements.

### Eurobank Sustainability Management Committee (Sustainability ManCo - SMC)

The Eurobank Sustainability Management Committee (Sustainability ManCo - SMC) provides strategic direction on sustainability initiatives, reviews the Sustainability Strategy, Net Zero targets and transition plans prior to approval, ensures that the elements of the Sustainability Strategy and the Net Zero commitments are integrated into the Group's business model and operations, approves changes in eligible assets of Green Bond and Sustainable Finance Frameworks, regularly measures and analyses the progress of the Sustainability Strategy goals and performance targets and ensures the proper implementation of sustainability-related policies and procedures, in accordance with supervisory requirements and voluntary commitments.

### Eurobank Climate Risk Stress Test Committee (CRSTC)

The Eurobank Climate Risk Stress Test Committee (CRSTC) is responsible for designing and executing the Group's CRST Programme, as well as for coordinating all activities relating to Climate Risk Stress Testing, including risk identification, scenario design and stress test execution and reviewing and challenging the output at each stage of the process prior to escalating to the Executive Board.

### Products & Services Committee

The Products & Services Committee is responsible for creating and supervising the governance framework for the products and services offered to Eurobank's clients in Greece through the physical and alternative channels, in accordance with the supervisory and regulatory requirements. As part of this process, products and services are assessed for potential adverse impacts on the Group arising from climate-related and environmental risks, as well as from any misalignment with sustainable finance principles. This assessment includes a review of their sustainability risks to determine their eligibility for green or social classification, ensuring alignment with the Group's Sustainable Finance Framework.

### Green Bond Working Group (GBWG)

The Eurobank Green Bond Working Group (GBWG) is mainly responsible to review the proposed eligible assets (based on the eligible categories and criteria as defined in the Green Bond Framework), to propose the loans to be excluded in case they no longer meet the eligibility criteria (including the qualifying substitution assets), as well as to review the annual Green Bond Report.

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### Group Senior Sustainability Officer (GSSO)

The Group Senior Sustainability Officer (GSSO) is responsible for leading and coordinating the Group's sustainability initiatives, for both Operational and Financed impact. GSSO manages the Group Sustainability Unit, co-manages, as a secondary reporting line, along with the Group Chief Risk Officer the Group Sustainability Risk, coordinates the Sustainability Center of Excellence of CIB and Retail and oversees the sustainability programs of international subsidiaries.

The role of the GSSO is to foster a deep understanding of sustainability principles and practices across the organisation by building a culture of sustainability and collaborating with senior management to embed sustainability into the Group's strategic decision-making processes. GSSO secures and allocates resources effectively to support the Group's sustainability initiatives and advocates for necessary investments in sustainability projects and technologies. GSSO serves as the liaison between the Group and Market/ External Stakeholders, closely monitoring industry trends, regulatory changes and best practices in sustainability and ensuring that the Group remains at the forefront of sustainability innovation and compliance.

#### **11.1.2.4 Dedicated functions for integrating sustainability matters into the operating model**

##### **Integration of Sustainability Risk Management across the three lines of defense**

Eurobank addresses short-term, medium-term and long-term effects of sustainability risks for the purposes of risk management by integrating them into its business environment and strategy. In this context, the Bank has defined the following time horizons as follows:

- Short term: <3 years aligned with budget - The Bank conducts a materiality assessment of all identified risk drivers and key risks. This assessment considers the Bank's operating environment, business model and emphasises the achievement of its short-term strategic goals with regards to the budget.
- Medium term: 3-10 years aligned with business planning - To assess medium term risks, the Bank has defined a longer period to understand sustainability risks and evaluate how its business model can handle different future scenarios.
- Long term: >10 years aligned with strategic planning - The Bank has defined a longer horizon, to conduct long term assessments. Additionally, the Bank aims to include the impact of climate change and environmental factors in its strategic targets and decision-making processes, as these risks are expected to have a greater impact in the long term.

The Group applies a model of defined roles and responsibilities regarding the management of sustainability risks across the 3 Lines of Defense, considering all relevant guidelines and regulatory requirements:

#### 1st Line of Defense

Dedicated functions, namely the Sustainability Centers of Excellence (CoE), within the Business Units (Corporate & Investment Banking - CIB and Retail Banking) are responsible for assessing, managing and monitoring risk levels in all risk categories, including sustainability risks. The Head of CIB Sustainability CoE is responsible for overseeing sustainable financing activities, while two Retail Banking Sustainability Coordinators (for Business and Individual clients respectively) are responsible for organising and supporting sustainable-related product financing activities. In addition, the role of the Group Sustainability Unit in the 1st line includes the responsibility for managing and coordinating sustainability strategy related issues, the development of action plans for the Group's Net Zero portfolio strategies, the facilitation of the Sustainability data framework development, as well as Sustainability Reporting, Environmental & Energy Reporting (EMAS Report, Greenhouse Gases Emissions Report per ISO14064) and Sustainability ratings. The 1st Line of Defense, in coordination with other Units, execute and monitor financed and specific operational sustainable goals and performance targets based on the Group's Sustainability Strategy and in line with the Net Zero Strategy.

#### 2nd Line of Defense

Group Risk Management (GRM) is independent from the Business Units and has full responsibility in setting the Risk Strategy and Risk Appetite Framework, including sustainability risks. Within GRM, the dedicated Group Sustainability Risk

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(GSR) Unit has the overall responsibility for overseeing, monitoring and managing sustainability risks in cooperation with the other GRM Units, as well as with Group Compliance. In addition, the Group Compliance's mission is to promote within the Group, a compliance culture and a commitment to compliance with the applicable regulatory framework. Group Compliance's key roles and responsibilities include regulatory capturing and analysis, compliance risk assessment, compliance monitoring and control testing, provision of advisory and maintenance of compliance policies. Group Compliance also provides advice and recommends appropriate controls for the Bank's product offerings through its participation in the Products and Services Committee and related governance processes.

### 3rd Line of Defense

The Group Internal Audit (Group IA) independently reviews the adequacy and effectiveness of the internal control framework in place regarding Sustainability risk management on a regular basis, following a risk-based approach in line with its Annual Risk Assessment and Audit Planning Methodology.

### **Dedicated roles in existing Units on sustainability matters**

#### **Business Units**

The Business Units – CIB and Retail Banking – are primarily involved in executing all portfolio-related sustainable activities, including the implementation of the Net Zero and Financed Impact Strategies. Key responsibilities are classified, inter alia, under the following three main categories:

#### 1. Sustainability Strategy

- Executing and monitoring financed and specific operational sustainable goals and performance targets in line with the Net Zero Strategy.

#### 2. Sustainable Financing/ Funding and Investments

- Identifying sustainable financing opportunities and designing relevant solutions and sustainable products.
- Performing the sustainable financing assessment, in line with the Sustainable Finance Framework.
- Implementing and monitoring the Sustainable Investment and Green Bond Frameworks.

#### 3. Sustainability Risk Management

- Performing the clients' ESG Risk Assessment, where applicable.
- Identifying and implementing mitigation action plans for sustainability risks.

### **Group Sustainability Unit**

The Group Sustainability Unit acts as a custodian of Sustainability Principles and Culture to enhance the Group's Impact, and as a cross-functional coordinator to ensure alignment on sustainability issues and interdependencies, as well as compliance with relevant existing and upcoming regulations. Specifically, the Group Sustainability Unit is responsible for managing and coordinating sustainability strategy related issues, ensuring alignment of subsidiaries' programs with the Group's overall sustainability strategy and goals, supporting their implementation efforts. The Group Sustainability Unit coordinates the development of action plans for the Group's Net Zero portfolio strategies and ensures the aligned development of corresponding plans for subsidiaries. It directs the actions of the Bank's units and subsidiaries on sustainable financing matters and provides advisory support on broader sustainability issues. The Unit facilitates the development of the Sustainability data framework and promotes sustainability knowledge and culture. Furthermore, it coordinates and prepares external and internal sustainability-related reports in line with applicable standards/ regulations, in cooperation with involved subject-matter responsible Units, while it is responsible for the UNEP FI PRB implementation. Being responsible for the oversight of the Bank's overall sustainability performance, its key roles include the centralised management of Sustainability Ratings, seeking continuous improvement in related scores. The Group Sustainability Unit also manages the ISO Management Systems under the related provisions of equivalent policies and the Sustainability Strategy, supporting also the development and maintenance of ISO Management Systems at Group level, where applicable. It collects, calculates and reviews data, in line with the associated certified ISO Management

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Systems, while it also ensures implementation of corresponding initiatives (e.g. operational net zero transition, energy self-production, energy and emission monitoring, green building certifications, recycling and circular economy management). To further strengthen the Group's sustainability oversight and to support the consistent implementation of sustainability-related requirements across all entities, the Group introduced in 2025 the Group Sustainability Integration & Data function. This new role enhances coordination between central units and international subsidiaries, coordinates the implementation of sustainability-related actions across the Group, oversees and harmonises the Group-wide data collection processes, and ensures the integration of sustainability data into common systems and central data management structures.

### **Group Sustainability Risk (GSR)**

The GSR has the overall responsibility for overseeing, monitoring and managing sustainability risks. More specifically, the GSR prepares and maintains the Bank's Sustainability risk management policies, processes and methodologies, in collaboration with the Group Sustainability Unit, Business and other Risk Units. In addition, it leads the development and implementation of the sustainability risk related framework, policies and processes, in coordination with other units, monitors the progress of the Climate Risk Action Plan and reports on its implementation to the Group Senior Sustainability Officer (GSSO), while also reporting on sustainability risk matters to the Board of Directors.

The GSR monitors and challenges the involved stakeholders in setting Net Zero targets, the Financed Impact Strategy, and the development of the Transition Plan and reports financial targets and KPIs. The GSR also leads the 2nd line of defense independent sustainable lending re-assessment process against the Sustainable Finance criteria, including the characterisation of Retail Portfolio products as sustainable. Additionally, the Unit reviews and confirms the outcomes of the ESG Risk Assessment, evaluates their consistency and completeness and formally challenges the adequacy of the proposed mitigating actions. Furthermore, the GSR develops and maintains the Climate Risk Stress Testing Framework, as well as the Scenario Analysis and Stress Testing methodologies, and coordinates the performance of sustainability risk scenario analysis and relevant stress test exercises at Group level.

### **Group Compliance**

Group Compliance is an independent function reporting to the Board of Directors through the Audit Committee and its mission is to promote, within the Group, a robust compliance culture that encourages ethical conduct through integrity and a commitment to compliance with laws and regulations, as well as the application of international governance standards.

Group Compliance's key roles and responsibilities on sustainability matters include:

- Cooperating and exchanging information with GRM units;
- Ensuring that an effective compliance monitoring program for the relevant activities is in place by developing a robust compliance risk identification and assessment framework in cooperation with the GRM Units;
- Maintaining an overlay on risk assessment methodologies jointly with the competent Sustainability Units;
- Identifying and monitoring on an ongoing basis the regulatory environment and emerging trends;
- Providing advice to the Board of Directors and Senior Management on the Bank's compliance with applicable laws, rules and standards and keeping them informed of relevant developments;
- Providing guidance on the proper implementation of applicable laws, rules and standards. Group Compliance actively supports the upskilling of staff in key sustainability-related regulatory areas. Dedicated training—such as on Compliance tools and methodologies—ensures that Compliance Officers remain equipped to meet evolving supervisory expectations and to effectively advise the business on sustainability-linked regulatory requirements;
- Providing support and challenging the relevant business units to identify obligations stemming from the regulatory framework and assessing impact on their activities;
- Monitoring and testing whether staff effectively apply the internal processes and procedures;
- Fulfilling statutory responsibilities and liaising with regulators and external bodies;

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- Maintaining and obtaining ISO certifications that promote sustainable compliance culture;
- Providing advice and recommending controls over product and service offerings through its participation in the Products and Services Committee.

Within Group Sustainability, two FTEs maintain a secondary reporting line to the Group Chief Compliance Officer, supporting the Group Compliance function on matters related to monitoring and analysing regulatory developments in sustainability, assessing associated risks, providing supplementary advisory services and conducting controls, with an emphasis on identifying and preventing greenwashing. It is also noted that the personnel of Group Compliance include executives who hold recognized professional certifications in sustainability-related areas.

### **Group Internal Audit (Group IA)**

The role of the 3rd Line of Defense within Eurobank's governance and organisational structure is allocated to the Group IA for the independent review of the adequacy and effectiveness of the internal control framework. The Group IA mandate covers all processes, risks, and mechanisms for all business lines and internal units. In recent years, the Group IA has recognised sustainability internal controls and risk management framework as areas of focus and has taken several initiatives and actions within its strategy. These aim to ensure adequate coverage of the area, in line with the Bank's strategy, as well as industry and regulatory developments.

Specifically, the Group IA strategically focuses on the Sustainability risks, building on the following pillars:

- **Methodology/ Infrastructure:** The Management of Sustainability risks and the Bank's initiatives are recognised as a separate auditable area, subject to risk assessment. Furthermore, climate-related & environmental risk is recognised as a separate risk category, assessed in all relevant areas of the audit universe, in line with the Bank's risk taxonomy. This category will be extended to cover the entire spectrum of sustainability risks, in line with respective developments in the Bank's risk definitions.
- **Resources:** The Group IA has extended its pool of professional qualifications/ certifications to the area of sustainability, with two staff members certified in Sustainability/ ESG and Climate Risk through different professional bodies to diversify relevant expertise, and with additional auditors planned to pursue relevant industry-recognised professional body certifications in the future. This comes simultaneously with other initiatives in place, aimed at further upskilling through dedicated training sessions, on-the-job upskilling (participation in and consultation on the Bank's projects and initiatives around sustainability) and increased awareness (e.g. Group IA ESG Focus Group focused at sharing knowledge on sustainable practices and regulatory initiatives). At this stage, the Group IA has opted to embed the right mix of skills and knowledge within its existing organisational structure, given the multifaceted nature of Sustainability risks, affecting all businesses and operations of the Bank, to a siloed approach, aiming at a holistic consideration of the Bank's Sustainability risks.
- **Sustainability / Audit Universe Coverage and Audit Planning:** Following the infrastructure steps described above, since 2021, the Group IA has been carrying out several assignments around sustainability, along with monitoring the Bank's initiatives in this area on a risk-based approach. Key areas of focus include risk materiality, governance and strategy, sustainability risk management framework, product design and offering, reporting disclosures, etc..

Overall Group IA follows a risk-based approach to independently review and provide objective assurance, advice and insight, having in scope all activities, operations and units of the organisation. The Group IA's multi-year audit plan ensures that all of the Group's activities/operations are subject to review, in compliance, inter alia, with EU laws and regulations and supervisory expectations, as well as the Global Internal Audit Standards.

- The Group IA documents the outcome of audits in audit deliverables that are used to provide information to several recipients (e.g. AC, Board Committee, Senior Management, external auditors). The Group IA attends the Audit Committee meetings to present a summary of its activity and highlight key issues, at least on a quarterly basis.

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### 11.1.2.5 ESG awareness and capacity building

Eurobank places great emphasis on building capacity among its employees, so they are able to support its clients on their sustainability journey and their green transition. To this end, in addition to launching sustainability initiatives for its clients, Eurobank implements an ESG upskilling plan for its employees. Eurobank's ESG awareness programme regarding sustainability matters, is directed to all of the Group's personnel – employees and management. Additionally, the Group has offered trainings to stakeholders from all 3 Lines of Defense (i.e. Business Units, Risk Management Units) regarding the SFF, to enhance their understanding. Finally, the Group conducts training sessions/ seminars tailored to its supervisory and management bodies, tailored to their specific areas of interest/ expertise.

For further details, please refer to section "ESG awareness and capacity building" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

### 11.1.2.6 Lines of Reporting and Frequency of Reporting relating to Sustainability Risks

The Bank has adequate monitoring and reporting mechanisms in place to ensure appropriate management of the Sustainability risks generated by its business activities. For this purpose, the Bank has developed appropriate Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) that are reported to the senior management and management body in order to effectively oversee Sustainability risks across the Bank, leveraging on the insights gained from the 2022 ECB Climate Risk Stress Test, ECB's Report on CR&E Risk Good Practices, the Group's internal exercises (e.g. scenario analysis/ materiality assessment processes for transition and physical risk), as well as taking into account best market practices.

In this context, the Bank has established a Climate & Environmental Risks Monitoring Dashboard with appropriate KPIs/ KRIs, including Group-wide metrics, that are reported to the senior management and management body on a semi-annual basis, while RAS and Sustainability Strategy targets are reported quarterly, to enable the efficient oversight of Sustainability risks through selected metrics. For the selection and the definition of the climate risk monitoring indicators, the following were also taken into account: (a) Guidelines on non-financial reporting: Supplement on reporting climate-related information (2019/C 209/01), (b) Task Force on Climate-related Financial Disclosures – Guidance on Metrics, Targets, and Transition Plans, and (c) Development of Tools and Mechanisms for the Integration of ESG Factors into the EU Banking Prudential Framework and into Banks' Business Strategies and Investment Policies.

Additionally, the Bank's Business Units maintain and update appropriate templates and mechanisms to monitor respective sustainable financing disbursements (e.g. Green and Social Loans), in line with the provisions of the Group's SFF. The ongoing and timely monitoring of sustainable loans allows senior management to assess the evolution of sustainable financing volumes and trends, considering Bank's relevant targets and facilitates internal reporting.

Selected KPIs/ KRIs are also monitored and reported at Group level to provide clear insights into the Group's exposure to sustainability risks, facilitating their effective management.

Going forward, Eurobank aims to implement further systemic enhancements in its IT and data infrastructure, support the standardisation of the monitoring of pertinent information, as well as safeguard data availability and accuracy.

The following table describes indicative KRIs/ KPIs included in the Bank's Sustainability Risks Monitoring Dashboard:

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	Area	Indicator Category	Sustainability Risks Monitoring Indicator
1	Transition Risk	Credit Risk Indicators – Sectors Subject to Transition Risk (Corporate & Retail Portfolios)	Concentration of exposures to sectors with high transition risk in Group's portfolios
2	Sustainable Financing	Credit Risk Indicators – Exposures (Corporate Portfolio)	New CIB disbursements in Green / Environmentally sustainable loans over total new CIB disbursements
3	Physical Risk	Credit Risk Indicators – Sectors Subject to Physical Risk (Corporate & Retail Portfolios)	Concentration of exposures to sectors subject to physical risk in Group's portfolios
4	Physical Risk	Credit Risk Indicators – Collateral Subject to Physical Risk (Corporate & Retail Portfolios)	Concentration of exposures collateralized with immovable property located in areas subject to physical risks in Group's real estate secured portfolio
5	Transition Risk	Market Risk Indicators – Exposures (Corporate Portfolio)	Exposures towards the top 20 most carbon intensive counterparties globally in Group's trading and banking portfolios
6	Real Estate Energy Performance Certificate (EPC) & Energy Consumption	Credit Risk Indicators – Energy Performance Certificate (EPC) and Energy Consumption (Corporate & Retail Portfolios)	Concentration of real estate collateral in Energy Performance Certificate (EPC) and Energy Consumption Bands in Group's portfolios
7	Green Asset Ratio	Green Asset Ratio Stock	Green Asset Ratio Stock
8	Green Asset Ratio	Taxonomy-aligned Exposure	Taxonomy-aligned Exposure
9	Sustainable Financing	Credit Risk Indicators – Exposures (Corporate & Retail Portfolios)	% of SFF financing over Bank's portfolios

### 11.1.2.7 Alignment of the Remuneration Policy with the Bank's CR&E risks objectives

Eurobank has established a Remuneration Policy that is applicable to all employees and covers their total remuneration. The Remuneration Policy forms an integral part of the Bank's corporate governance practice and is developed in accordance with its operational model, business strategy, objectives, long-term interests of the Bank and incorporates measures to avoid conflict of interest. The Remuneration Policy promotes sound and effective risk management. It is consistent with the objectives of the Bank's business and risk strategy, corporate culture, values and risk culture. It also considers sustainability risk factors, as well as the long-term interests of the Bank and the measures used to avoid conflicts of interest and should not encourage excessive risk-taking on behalf of the Bank. The Bank ensures that remuneration practices are aligned with the overall risk appetite, taking into account all risks, including sustainability risks, reputational risks, as well as risks resulting from the mis-selling of products or services.

The Remuneration Policy has been designed to (i) be consistent with and to promote sound and effective risk management, (ii) stimulate behavior consistent with sustainability risks approach, as well as (iii) comply with Bank's voluntary commitments. Its basic principles are to (a) be gender neutral and non-discriminatory in any aspect of its implementation, (b) safeguard that remuneration is sufficient to retain and attract executives with appropriate skill and experience, (c) monitor that internal equity between all units is applied, (d) avoid excessive risk-taking with respect to direct or indirect sustainability risks and (e) link remuneration with long-term performance.

In addition, the Remuneration Policy has been enhanced with the establishment of Variable Remuneration Framework, Key Performance Indicators (to balance employees' performance and encourage proper conduct) and Key Risk Indicators (to promote sound and effective risk management including sustainability risks) at Group/ Unit/ Individual level, as appropriate. The Variable Remuneration Framework aims at providing (i) an appropriate balance of variable remuneration elements, aligning the interests of employees, shareholders and other stakeholders, strengthening the Bank's position as a leading European bank and (ii) effective remuneration practices in compliance with the applicable regulatory environment. In this context, Eurobank has set specific sustainability KRIs/ KPIs in the Variable Remuneration Framework in line with the Risk Appetite Framework. Based on the above, a KRI of at least 60% coverage of the Group's NFC and RRE

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portfolios should be achieved by the end of 2026. On top of that, Eurobank has also set a specific KRI considering also its Operational Impact Strategy.

The Remuneration Committee approves any incentive scheme both at Bank and Group level, while the Non-Executive Members of the BoD approve and periodically review the Remuneration Policy and are responsible for overseeing its implementation.

### 11.1.2.8 Sustainability Ratings

Eurobank actively participates in internationally renowned sustainability ratings to showcase its continuous improvement in environmental, social and governance performance, enhance disclosures, and boost investor confidence. In 2024, Eurobank achieved significant advancements in key sustainability ratings, including Sustainalytics, MSCI, S&P Global, and FTSE4Good, continuing its successful performance into 2025. Following its strong performance in 2024, when Sustainalytics ranked Eurobank in the highest risk category “Negligible”, making it the first Greek bank to receive this top rating, Eurobank achieved the important ESG Regional Top Rated 2025 and ESG Industry Top Rated 2025 distinctions, placing it among the top 4% of banks worldwide (30<sup>th</sup> out of 1,015 banks).

In 2025, Eurobank demonstrated significant improvements in the following key sustainability ratings:

- **MSCI** – Eurobank has improved its sustainability rating to “**AA**” from “**A**” in the previous year
  - **S&P Global** – Eurobank’s Global ESG Score showed a notable increase to **63/100** from 56 with data availability “High”
  - **CDP** – Eurobank has successfully upheld its strong rating from the previous year at “**B**”
  - **FTSE4Good** – For yet another year, Eurobank was included in the Index with significantly improved sustainability performance (4.2/5 from 3.6)
- Athex** – Eurobank, with a transparency score of 99%, ranked **1<sup>st</sup> among the 11 Greek banks** and **2<sup>nd</sup> among 93 Greek companies**.

### 11.1.3 Risk Management

#### 11.1.3.1 Integration of Environmental Factors in Our Risk Management Framework

Eurobank has incorporated Sustainability risks (including CR&E risks) aspects across all pillars of its Risk Management Framework, through the establishment of comprehensive policies and processes. It is among the Group’s priorities to identify, assess, manage and mitigate relevant risks, with a view to ensuring alignment with its business strategy, as well as regulatory and industry developments.

#### Group Risk Management Framework and Sustainability Risk Management Framework

The Group Risk Management Framework defines the roles and responsibilities of the Group Risk Management (GRM), which is independent from the Business Units as a 2<sup>nd</sup> Line of Defense, having full responsibility for the establishment of the Group’s Risk Strategy and Risk Appetite Framework, as well as for monitoring all risks assessed as material through the Risk Identification & Materiality Assessment (RIMA) process, including sustainability risks undertaken by the Group.

In accordance with relevant supervisory expectations and the Group’s enhanced Sustainability Governance operating model for the incorporation of sustainability risks across the three lines of defense (described in the Sustainability Governance section), new roles and responsibilities regarding sustainability risk management have been embedded into the Group Risk Management Framework. In addition, Eurobank has developed its Sustainability Risk Management Policy which aims at fostering a holistic understanding of the effects of sustainability risks on its business model, as well as support decision making regarding these matters and providing robust governance under its Risk Management Framework.

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### Risk Appetite

The Group articulates its Risk Appetite through a set of qualitative and quantitative statements with respect to, inter alia, solvency, liquidity, profitability, asset quality and other areas related to material risks. The purpose of these indicators and thresholds is to support the assessment of whether the Group operates within its defined risk appetite levels. The outcome of this process is the Risk Appetite Statements (RAS) document, whereas the principles, process and governance aspects related to the RAS are outlined in the Risk Appetite Framework (RAF). The RAS are complemented by a set of Business Line Statements (BLS) which constitute operational metrics (and limits) at business level where the risks are undertaken.

Based on the above, the Bank has established relevant Risk Appetite Statements, both quantitative and qualitative, related to Sustainability Risks to effectively manage these risks, in line with the Bank's monitoring and escalation processes. Within this framework, Eurobank has achieved its key Risk Appetite Statement (RAS) for at least 20% of the annual new CIB disbursements to be classified as green/ environmentally sustainable loans, by applying the methodology and criteria set in the Group's Sustainable Finance Framework, thereby demonstrating the Bank's commitment towards green transition. In addition, Eurobank has set a RAS connected with specific EPC targets based on new disbursements on its Retail Mortgage portfolio. Furthermore, the Bank has also developed a new RAS, within Q4 2025, to monitor the portfolio's composite emissions-intensity index versus the expected Net Zero 2030 pathway.

Finally, the Bank maintains a qualitative RAS in relation to the environmental risk posed to biodiversity. Based on its exclusion list, the Bank shall refrain from financing activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources.

### Risk Identification & Materiality Assessment

The Risk Identification & Materiality Assessment (RIMA) process sets the appropriate mechanisms to identify, measure and monitor risks at an early stage, as well as to manage their potential impact on the achievement of the Group's objectives. In this context, RIMA is an essential part of the overall risk appetite process, enabling the Group to build its risk inventory, identify the risks that the Group is or might be exposed to, assess their relevance and materiality and define appropriate risk appetite metrics for the monitoring of the material risks. Eurobank has established respective definitions of climate-related risks and has performed materiality assessment exercises regarding the impacts arising from these risks, the results of which are included in the Group's RIMA Report, Risk Library and Risk Inventory.

#### **11.1.3.2 Sustainability Risks Definitions**

Eurobank considers sustainability risks as drivers of existing risk types, undertaking a holistic and systemic approach when examining the complex links between sustainability risks and both financial and non-financial risks. Eurobank has integrated sustainability risks elements into its existing risk management processes, creating additional procedures, policies and tools so that these risks can be properly identified and measured.

In this context, Eurobank has defined Sustainability Risks, leveraging on key regulatory requirements and market guidelines (e.g. ECB Guide on Climate-related and Environmental Risks, EBA implementing technical standards on prudential disclosures on ESG risks, Task Force on Climate related Financial Disclosures, CRR Regulation (EU) No 575/2013), as well as on related internal exercises (e.g. scenario analysis/ materiality assessment processes for transition and physical risks).

**Sustainability risks:** Sustainability risks are defined as potential losses arising from any negative financial impact for the Group, stemming from the current or prospective impacts of any climate-related & environmental, social or governance factors on the Group's counterparties or invested assets.

**Climate-related and Environmental risks:** Climate-related and environmental risks are defined as the risks deriving from potential loss or negative impact to the Group, including loss/ damage to physical assets, disruption of business or system

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failures, transition expenditures and reputational effects from the adverse consequences of climate change and environmental degradation.

**Climate risk includes the following risks:**

**Climate-related physical risk:** Physical risk refers to the financial impact of climate change, including more frequent extreme weather events and gradual changes in climate, as well as the impact of environmental degradation, such as air, water and land pollution, water stress, biodiversity loss and deforestation.

**Climate-related transition risk:** Transition risk refers to financial loss that can result, directly or indirectly, from the process of adjustment towards a lower- carbon and more environmentally sustainable economy.

**Environmental risk:** Risk of actual or potential threat associated with the dependency on nature and nature impacts and/or the misalignment between the Group’s strategy and the changing regulatory, policy, or societal landscape in which it operates, with regards to environmental risks management. Environmental risk excludes the impacts from climate change.

### 11.1.3.3 Climate-related & Environmental Risk Drivers and Transmission Channels

The Group identifies and assesses CR&E risks within the context of the Risk Identification and Materiality Assessment (RIMA) process, which is performed at least on an annual basis, or ad-hoc, if necessary. Through the RIMA process, the Group identifies material risks that could potentially have a significant adverse impact on its financials, capital base, liquidity position or business model. In this context, the Group considers several different sources to identify new risks, such as the SSM’s Supervisory Priorities, the European Union and national legislation changes, developments in the regulatory landscape in general, along with EBA or BCBS reports.

As CR&E risks interact with other risks and result in direct distributional impacts and indirect macroeconomic impacts, the Group understands that careful consideration of their cross-cutting nature is necessary to ensure the effective implementation of risk management activities. Thus, the Group considers CR&E risks as drivers of existing risk types, undertaking a holistic and systemic approach when examining the complex links between CR&E risks and both financial and non-financial risks. Eurobank has integrated CR&E risks elements into its existing risk management processes, creating additional procedures, policies and tools so that these risks can be properly identified and measured. In this context, the Group has identified the risk drivers related to climate change and environmental degradation that are most relevant for the business environment in which it operates. In parallel, the Group considers various external sources of information, including, inter alia, cooperation with external advisors and the consultation of public sources (e.g. ThinkHazard!, ENCORE, World Resources Institute etc.) to determine the key risk drivers that could potentially have a significant adverse impact on its operations.

In this context, the Group has identified the following list of CR&E risk drivers:

Climate-Related Risk		Environmental Risk
Transition Risk	Physical Risk	
Behavioural Changes	Acute Hazards (floods, wildfires)	Water Scarcity
Policy & Regulatory Changes	Chronic Hazards (droughts, heat waves)	Biodiversity Loss
Technological Changes		

### Sectoral Analysis

To inform the materiality assessment process, the Group performed a heat-mapping exercise to determine how CR&E risks affect certain sectors that the Group is exposed to, and subsequently to interpret the impact on the overall Bank’s risk profile and operations in terms of financial losses, business disruptions, legal claims and/or reputational damages.

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Traditional economic variables such as demand, prices, and productivity may be impacted by CR&E risks. With this exercise, the Group considered the unique characteristics of each sector, while also leveraging on the pertinent analysis for the transmission channels through which CR&E risks may manifest for the Group. For the sectoral analysis, the Group integrated both qualitative and quantitative aspects. Under climate-related transition risk and environmental risk, all identified CR&E risk drivers were assessed, namely Behavioural Changes, Policy & Regulatory Changes, Technological Changes for the former, as well as Water Scarcity and Biodiversity Loss for the latter, while under climate-related physical risk the following risk drivers were selected due to their relevance to the Greek geographical area (where the core operations of the Group are located), as well as pertinent data availability:

- Acute Hazards: Floods, wildfires
- Chronic Hazards: Droughts, heat waves

In this context, the sectors that were designated for the assessment are considered to significantly contribute to climate change and environmental degradation. Each sector received a severity score for each of the determined risk drivers. The scores had the following dimensions: 1-Minor Impact, 2-Low Impact, 3-Medium Impact, 4-High Impact.

For more details, please refer to section “Description of the processes to identify and assess material climate-related impacts, risks and opportunities” of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>

### Materiality Assessment per Risk

The Group has carried out several actions to ensure that there is a concrete process via which CR&E risks are fully considered and evaluated to conduct a robust materiality assessment. A proportionate approach was used in the evaluation of the materiality of the CR&E risks, focusing on those that can have the most detrimental effects. It is noted that the materiality assessment process follows the “gross approach” without considering specific mitigation techniques of the underlying risks. In this year’s RIMA, the Bank further enhanced its CR&E materiality assessment by incorporating the risk of biodiversity loss. In this context, the Bank conducted a thorough loan portfolio analysis to determine the sectors most vulnerable to biodiversity loss by analysing sector-specific dependencies and impacts based on the ENCORE tool. Importantly, the materiality assessment was not limited to CR&E aspects but also encompassed Social and Governance factors, which are presented in the respective sections of this Report. The results of the materiality assessment exercise are included in the Group’s RIMA Report, Risk Library and Risk Inventory. The risks identified as material form the basis for the Internal Capital Adequacy Assessment Process (ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP) exercises, in the context of which the Group identifies mitigating actions to ensure that it remains adequately capitalised and maintains sufficient liquidity buffers to support its business strategy.

### Materiality Assessment Results

The aggregated results of the CR&E Materiality Assessment are shown in the table below along with the approach and criteria that were used to assess each risk type:

**Environmental, Social and Governance (ESG) Risks**

		<b>Risk</b>	<b>Approach</b>	<b>Materiality Result</b>
<b>Climate Risk</b>	<b>Physical Risk</b>	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	<b>Material</b>
		Liquidity Risk	Scenario analysis	<b>Non-Material</b>
		Operational Risk	Scenario analysis / Historical analysis	<b>Non-Material</b>
	<b>Transition Risk</b>	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	<b>Material</b>
		Market Risk	Concentration (trading exposures) / Heatmapping analysis	<b>Non-Material</b>
		Liquidity Risk	Scenario analysis / Heatmapping analysis	<b>Non-Material</b>
		Business Risk and Strategic Risk	Concentration (gross interest income) / Heatmapping analysis	<b>Material</b>
		Reputational Risk	Qualitative assessment	<b>Non-Material</b>
	<b>Environmental Risk</b>	<b>Water Scarcity</b>	Credit Risk	Concentration (credit exposures) / Heatmapping analysis
<b>Biodiversity Loss</b>		Credit Risk	Concentration (credit exposures) / Heatmapping analysis	<b>Material</b>

**CR&E Risks Scenario Analysis**

The Bank provides an in-depth analysis regarding climate change transition and physical risks within the context of the Task Force on Climate-related Financial Disclosures (TCFD) recommendations. The Bank considers scenario analysis as an important tool to use in its strategic planning process. The methodological approach adopted allows the measurement of impacts, based on different scenarios and time horizons (2030, 2040 and 2050). The multiple scenarios utilised enable the Bank to explore and understand how different combinations of climate-related risks, both transition & physical risks, might impact its businesses, strategies and financial performance over the short, medium and long term.

Based on the above, the Bank uses scenario analysis for developing its strategic plan, business model and adjusting its risk management framework as it assesses business implications. This integration is crucial for identifying potential opportunities and risks posed by climate-related & environmental factors, particularly for the sectors that are considered as high transition and physical risk sensitive. More specifically, based on the scenario analysis’ results, the Bank assessed the potential range of plausible business, strategic and financial impacts from climate change and the relevant management actions that may be considered during the strategic and financial plans. In this context, the Bank informed its strategic planning by considering how different climate scenarios might affect its business model and leverage on sustainable strategies to mitigate risks and capitalise on opportunities. In addition, the Bank developed new sustainable services and products supporting the transition to a sustainable and low-carbon economy. On the other hand, by evaluating the risks associated with the climate-related physical & transitions risks, the Bank enhanced its overall risk management framework including specific climate-related risk appetite and limits to better address these emerging challenges.

Scenario analysis is an ongoing process that plays a vital role in understanding and managing climate-related risks and opportunities. By analysing the evolving developments of climate change and its impacts, the Bank will continue refining its scenario analysis approach. The scenario analysis process considers current economic national & global developments and market practices to provide relevant and reliable insights. As a result, the Bank can better align its strategies and risk management practices with emerging trends and stakeholder expectations. This process not only enhances the Bank’s resilience to climate-related challenges but also positions it to capitalise on opportunities within a transitioning economy.

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The results of the scenario analysis, which provide a comparison of economic and financial evolutions by sectors and geographies over a range of scenarios and time horizons, indicate that Bank's strategy remains resilient and adaptive. The Network for Greening the Financial System (NGFS) scenarios that the Bank has adopted, provides a common starting point for analysing climate risks to the economy and financial system. The set of scenarios that are utilised by the Bank, include four representative scenarios that cover different dimensions.

More specifically, the NGFS scenarios are:

1. Orderly: Net Zero 2050, where climate policies involve early, ambitious action and the impacts are low for both physical and transition risks.
2. Disorderly: Delayed transition, in which climate policies are not introduced until 2030 and the outcome has a higher impact on transition risk.
3. Hot House World: Current Policies, with limited climate policies and severe physical risks and irreversible changes, including higher sea level.
4. Too-little-too-late: Fragmented World, in which delayed and divergent climate policy ambition globally, leads to elevated transition risks due to the overall ineffectiveness of the transition.

The table below illustrates the impact (transition risk) in terms of sectoral production, comparing Orderly - Net Zero 2050 to Hot House World - Current Policies:

Sector	2030	2040	2050
Agriculture	Moderate Negative	Moderate Negative	Moderate Negative
Mining and Quarrying	Strong Negative	Strong Negative	Strong Negative
Other Manufacturing	Moderate Negative	Moderate Negative	Negative
Electricity Supply	Moderate Positive	Positive	Positive
Water Supply	Same Level	Same Level	Same Level
Construction	Moderate Positive	Positive	Positive
Wholesale & Retail Trade	Same Level	Same Level	Same Level
Transporting and Storage	Negative	Negative	Strong Negative
Real Estate Activities	Same Level	Same Level	Same Level
Oil and Gas	Strong Negative	Strong Negative	Strong Negative
Renewable Energy Sources	Strong Positive	Strong Positive	Strong Positive
Basic Metals	Negative	Negative	Negative
Non-Metallic Minerals	Moderate Negative	Moderate Negative	Negative
Chemicals	Negative	Negative	Strong Negative
Consumer Goods industries	Moderate Negative	Moderate Negative	Moderate Negative
Accommodation	Same Level	Same Level	Same Level
Shipping	Negative	Negative	Strong Negative

Additionally, the Bank assessed the physical impacts on its strategy utilising two RCPs (Representative Concentration Pathways) scenarios:

1. RCP2.6: that incorporates strong climate policies and limit the increase in average global temperature to below 2°C.
2. RCP8.5: implying strong climate changes and the necessity of strong adaptation to the new conditions.

The following table illustrates the impact of sectoral production under RCP2.6:

## Environmental, Social and Governance (ESG) Risks

Sector	2030	2040	2050
Agriculture	High	High	High
Mining and Quarrying	Low	Low	Medium
Other Manufacturing	Low	Low	Low
Electricity Supply	Medium	Medium	Medium
Water Supply	Low	Low	Low
Construction	Low	Low	Low
Wholesale & Retail Trade	Minor	Low	Low
Transporting and Storage	Low	Medium	Medium
Real Estate Activities	Minor	Minor	Minor
Oil and Gas	Minor	Minor	Minor
Renewable Energy Sources	Minor	Minor	Minor
Basic Metals	Minor	Low	Low
Non-Metallic Minerals	Low	Low	Low
Chemicals	Low	Low	Low
Consumer Goods industries	Low	Low	Medium
Accommodation	Low	Medium	Medium
Shipping	Minor	Minor	Minor

For more details, please refer to \_section “Description of the processes to identify and assess material climate-related impacts, risks and opportunities” of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

### 11.1.3.4 Sustainability Risk Management Tools & Processes

Eurobank has put in place a set of tools for identifying, measuring and managing Sustainability risks, including the credit granting and monitoring processes across the Group’s both 1st and 2nd Lines of Defense.

#### A) Collateral Insurance Requirements

At the point of loan origination, the Bank requires that borrowers provide insurance policies for real estate properties accepted as collateral, excluding plots of land. Compulsory coverage includes protection against physical risks such as fire, earthquake and flood for both corporate and retail borrowers. Desirable coverages vary based on real estate type and circumstances, such as properties under construction or proximity to protected areas. These coverages encompass, among others, damages from smoke, vehicle collision and civil liability. In cases of Real Estate construction financing, the Bank requires from its clients an insurance contract against every risk during the construction phase, which indicatively should cover physical risks such as fire, earthquake, flood etc.

#### B) Incorporation of Environmental Risk Factors into the Creditworthiness Assessment

##### Moody’s Risk Analyst (MRA) models

The Group’s MRA Models assess the CIB borrowers’ credit profile based on qualitative and quantitative criteria. Specifically, the “Risk of Adverse Events” criterion assesses a client’s vulnerability to adverse developments or business interruptions, fines, litigation and negative publicity, stemming among others, from environmental, social and governance parameters (including health and safety of employees).

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### Exclusion List

Eurobank maintains a list of activities that are excluded from financing. For all financing transactions, the Group ensures that its clients demonstrate an organised and systematic approach to E&S risk management that complies with applicable local, national and international environmental, health and safety, and labour legislation and standards, relevant permits, as well as public disclosure requirements.

### Climate Risk Scorecard

In line with leading market practices, as well as considering supervisory requirements/ expectations regarding the establishment of an approach for further assessing clients with high climate risk exposure, the Bank has developed a Climate Risk Scorecard for the consideration of CR&E risks. In this context, an assessment process based on the Climate Risk Scorecard is performed for all new financing transactions, limit increases and limit renewals (existing and new clients based on the climate risk scorecard's applicability), initially for the Bank's CIB portfolio. The Climate Risk Scorecard comprises a modular questionnaire which includes targeted climate risk and sustainable financing related questions, both qualitative and quantitative, capturing the following key dimensions: Transition risk, Taxonomy Aligned Activities, Physical risk, Sustainable financing, Emissions, Strategy, Climate & environmental incidents, Transition - Green technology. In addition, the questions of the Climate Risk Scorecard have been developed to examine climate risk and sustainable financing aspects both at client and at transaction level. The output of the Climate Risk Scorecard is one of the following three scores: (a) High Risk, (b) Medium Risk and (c) Low Risk.

### Interbank ESG Questionnaire

In recent years, the banking sector has faced increased regulatory focus on ESG matters. Banks are now required to improve their credit risk assessment processes to better identify and evaluate climate-related and environmental risks. In response, an interbank initiative in the Greek banking market was jointly launched, by the Hellenic Bank Association (HBA) and the major Greek Banks, to design a common Interbank ESG Questionnaire for their clients. The objective is to develop a comprehensive ESG Questionnaire to be used by the Greek Banks, ensuring a harmonised assessment approach and a level-playing field, to incorporate a holistic assessment of client ESG factors. The ESG Questionnaire ensures the alignment with supervisory expectations/ requirements (e.g. meeting obligations regarding the EBA Guidelines on Loan Origination and Monitoring, the ECB Guide on Climate-Related and Environmental Risks and the recent EBA Guidelines on the management of ESG risks), the applicable international standards/ guidelines (e.g. Task Force on Climate-related Financial Disclosures), as well as the Banks' operational needs, and leading market practices.

### ESG Risk Assessment

Eurobank has developed an ESG Risk Assessment by combining its Climate Risk Scorecard with the Interbank ESG Questionnaire. This comprehensive approach helps assess and classify the Group's clients based on ESG criteria, in line with regulatory requirements. More specifically, Eurobank's ESG Risk Assessment assesses its CIB clients both at obligor, as well as at transaction level, along with the Sustainable Finance Framework classification. In this context, Eurobank has developed an internal ESG Risk Scoring methodological approach for the ESG Risk Assessment to facilitate the final ESG Risk scoring assessment and classification of the client. The output of the ESG Risk Assessment is one of the following three scores: (a) High ESG Risk, (b) Medium ESG Risk and (c) Low ESG Risk.

During the credit decision/ granting process, Eurobank uses the ESG Risk Assessment to consider the client's ESG risk scoring and profile, as well as possible mitigating actions depending on the outcome of the assessment. In this context, the Bank maintains a comprehensive list of specific mitigating actions to address the environmental dimension of sustainability risks, ensuring broad applicability. Based on each client's ESG score and profile, as well as the unique characteristics of each transaction, customised mitigating actions can be proposed to meet the specific needs of each client. Examples may include the development of a specific policy/ process or the acquisition of an ISO certificate in relation to environmental aspects, as well as a set of specific qualitative/ quantitative targets (e.g. reduction of GHG

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emissions). These mitigating actions are included in the final credit proposal and submitted for approval to the relevant Bank's Committee.

Overall, the ESG Risk Assessment aligns with Eurobank's business strategy, enhances ESG risk awareness, promotes sustainable financing and enables the adherence to the Group's risk appetite and credit policies.

### Sustainable Finance Framework Assessment Tool

The Group's Sustainable Finance Framework (SFF) provides a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financial products. If a potentially eligible financing fulfils the criteria outlined for each classification category, then, upon following the necessary evaluation and approval verification process, it can be classified as sustainable financing. In this context, the Group has developed and integrated into its system the Sustainable Finance Framework (SFF) Assessment Tool for the CIB portfolio to underpin the classification and evaluation of sustainable/ green financing opportunities in a structural manner, as part of the loan origination process. The SFF Assessment Tool automates the process of assessing the Group's financing solutions against the criteria defined in the SFF. In addition, the SFF Tool assists the Business Units in identifying and mitigating potential greenwashing risks based on the Group's SFF criteria, thereby ensuring the integrity and credibility of the sustainable financing solutions provided. This process is further supported by the CIB Sustainability CoE which reviews and assesses the proposed sustainable financings to ensure alignment with the criteria and guidelines of the Group's SFF. Also, the Group Sustainability Risk, acting as a second line of defense, conducts independent assessments of selected cases to ensure that sustainable financing solutions are in alignment with the Group's SFF.

### Collateral Valuation

The Bank acknowledges that collateral valuation should account for climate risk, as it may affect the value of collateral (e.g. increased flood risks). Recognizing the potential impact of climate risk on collateral value, the Bank has incorporated climate-related factors into its Collateral Valuation Policy and procedures, aiming to mitigate risks associated with properties vulnerable to environmental hazards, in alignment with the regulatory standards.

In this context, the Bank updated its Collateral Valuation Policy (CVP) to specify accepted collateral types and valuation procedures, as well as integrated assessments of CR&E risks. This involves collecting pertinent information such as Energy Performance Certificates (EPCs) and incorporating forward-looking estimates of natural hazards. The updated Policy also considers broader CR&E factors, such as waste management and accessibility, enhancing valuation accuracy and risk management.

Where Energy Performance Certificates (EPCs) or actual energy consumption data are not available for a specific collateral, Eurobank applies a structured fallback mechanism to ensure valuation records remain complete and usable for risk monitoring. In such cases, the Bank estimates energy consumption (kWh/m<sup>2</sup>) in collaboration with a specialized external provider, using property specific characteristics (e.g., building type, year of construction, location) rather than generic averages. This model-based estimation primarily supports coverage of legacy collateral and portfolio level reporting where data gaps may persist.

### **11.1.3.5 Asset Management Activities**

The Bank has outsourced portfolio management services to Eurobank Asset Management M.F.M.C., which is the investment arm of the Group. Thus, due diligence, research and investment decision processes when selecting or recommending financial instruments are conducted based on the applicable policies of Eurobank Asset Management M.F.M.C. Eurobank Asset Management M.F.M.C. was the first asset management company in Greece to join the global Principles for Responsible Investment (PRI) initiative.

The Responsible Investment Policy specifies Eurobank Asset Management MFMC efforts to integrate Environmental, Social & Governance (ESG) information/ criteria into the investment processes, and outlines the foundation, ownership, and oversight mechanisms that support Eurobank Asset Management MFMC's approach. ESG integration is the practice

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of incorporating material ESG information/ criteria into the investment process in order to mitigate risks over the long-term for UCITS, AIFs, and portfolios under management.

The Responsible Investment Policy of the Company is also in line with the requirements set by Regulations (EU) 2019/2088 and (EU) 2020/852 on sustainability-related disclosures in the financial services sector and on the establishment of a framework to facilitate sustainable investment.

### Overview of Approaches & Processes

As per the Responsible Investment Policy document of Eurobank Asset Management M.F.M.C., the Company integrates ESG factors into the investment process. In particular, the ESG analysis includes the assessment of environmental criteria (e.g. emissions of greenhouse gases, exposure to fossil fuel) and social (e.g. violations of UN Global Compact principles) at the level of the companies in which the Funds and Portfolios invest. The specific sustainability factors considered may vary, as they depend on the specific investment strategy followed by each Fund/ Portfolio.

The Investments & Corporate Strategy division of the Company pays close attention to investments in sensitive sectors. The sectors concerned include, but are not limited to, thermal coal exposure, thermal coal power generation, oil & gas production, oil sands extraction, shale-energy extraction, off-shore Arctic Oil & Gas Exploration, exposure to weapons (meaning: Anti-personnel mines, chemical and biological weapons, cluster weapons, and nuclear weapons with the exception of government controlled nuclear weapon programs in NATO countries under the Nuclear Non-Proliferation Treaty) and exposure to cultivation and manufacturing tobacco products. Companies from these sensitive sectors may be excluded from the investment. The effect of ESG factors on the investments of a Fund/ Portfolio is considered throughout the whole investment lifecycle. In accordance with Principle 2 of the PRI, the Company aims via active ownership to reduce risks and encourage improvement in ESG practices and performance where they are material to long-term shareholder value creation.

Eurobank Asset Management uses the Sustainable Investment Strategies described below:

1. ESG Integrated: Integration of ESG metrics in the analysis, selection, and composition of managed portfolios. Securities of issuers with high sustainability risks and/ or principal adverse impacts may be purchased and retained in the portfolio.
2. Best in Class: Preferences towards securities with low or medium sustainability risks and/ or decreases the weight of securities with high sustainability risks, as defined by ESG scores, without excluding entire industries.
3. Best in Class Plus: Seeks to invest in securities of issuers with low sustainability risks compared to their peers within the respective industry/ sector, while: a) Excluding those with high sustainability risks (ESG risk classified as “severe”), b) In addition, a negative screen is used to exclude the 20% worst ESG scoring stocks from the investable universe.
4. Transition Investing: Seeks to invest in securities of issuers that are on a credible transition path or have commitments to future improvements.
5. Sustainable Investing: Seeks to invest mainly in issuers that contribute to sustainability objectives, including environmental and social objectives. In addition, the Best in Class Plus process as above is applied in this strategy.

The Responsible Investment Policy also presents the applicable Investee company exclusions based on Controversial Activities and Revenue Thresholds. Also, the Policy sets out Investee company exclusions based on breaches of International Norms Companies in severe breach of OECD Guidelines for Multinational Enterprises, and UN Global Compact Principles on human rights, labor standards, environment and anti-corruption.

For more details on the Responsible Investment Policy please refer to: <https://www.eurobankam.gr/en/politikes>.

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### 11.1.3.6 Scenario Analysis & Stress Testing

#### A) Climate Stress Test Scenario Analysis in the 2026 ICAAP

As part of ICAAP 2026, the Group introduced a short-term climate transition risk scenario and a scenario for acute physical risk in the Normative Perspective, while a long-term climate risk scenario embedding both transition and chronic physical risk was used in the Economic Perspective. In this context, the following applies:

Economic Perspective: The Group assessed forward-looking climate risk using targeted Climate Stress Test scenarios to quantify the impacts of climate-related risks on its credit risk exposures. These impacts were integrated into the economic perspective as an indicative internal capital requirement. More specifically, Eurobank utilised a long-term climate scenario to assess sectoral Gross Value Added (GVA) impact, considering both transition and chronic risks. The scenario is based on the Network for Greening the Financial System (NGFS) 'Orderly Scenario', which aligns with EU and Greece's Net Zero 2050 targets, anticipating that climate policies are introduced early and become gradually more stringent precise. The scenario provides GDP, GVA and unemployment projections extending up to 2050, which incorporate the impact from both the transition and physical chronic risk affecting the PD models. The additional impact, primarily driven by SICR was quantified based on top-down analysis. Specifically, for counterparties operating in the sectors that are adversely affected under the scenario, deterioration in their credit rating has been considered.

Normative Perspective: The Group assessed its vulnerabilities to climate-related risks and their transmission channels to credit risk through targeted scenario analyses capturing both transition risks and physical risks. The analysis quantified the credit risk impact on the Group's loan portfolios by examining two sensitivity scenarios:

- **Transition Risk:** The Group conducted a counterparty-level assessment of the Top 30 Clients operating in sectors identified as most sensitive to transition dynamics. The analysis incorporated an idiosyncratic evaluation of each counterparty under a short-term disorderly climate scenario ("Sudden Wake-Up Call") aligned with NGFS assumptions.
- **Physical Risk:** The Group applied a sensitivity shock on the CRE and RRE prices, in line with the dedicated climate scenario, which examines acute risks under the RCP8.5, resulting from a flood event. This approach aligns with the ECB's flood risk scenario examined, as part of 2022 Climate Risk Stress Test.

#### B) Group Climate Risk Stress Test (CRST) Framework

The Group Climate Risk Stress Test (CRST) Framework accommodates a dedicated governance structure and defines the minimum requirements for designing, executing, approving, and applying the climate risk stress test. The Framework provides a transparent and repeatable process for designing and executing the climate risk stress test, as well as for reporting and evaluating stress test outcomes and determining management actions.

The CRST Framework has been developed as per the overall Stress Testing Policy of the Group, also considering the provisions of the ECB Guide on CR&E risks and the requirements of the 2022 ECB Climate Risk Stress Test. Additionally, the Framework complies with other best practices and supervisory requirements, such as the EBA Guidelines on institutions' stress testing (EBA/GL/2018/04).

### 11.1.3.7 Non-Financial Risk Management Policies & Processes

The Bank has established policies and processes to assess and manage its exposure to operational and other non-financial risks stemming from sustainability-related risk events. In particular, the Bank evaluates the potential impact of such risk events on business continuity, as well as the possibility of reputational harm or liability – such as through association with counterparties involved in environmental controversies or through engagement in inappropriate business practices such as "greenwashing".

The Bank is committed to safeguarding business continuity and assessing risks associated with outsourced services and IT operations (e.g. those arising from environmental vulnerabilities affecting service providers).

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To integrate sustainability considerations into its non-financial risk management framework, the following practices are applied at Group level:

- **Operational Risk Management**

The Bank has assessed the potential impact of climate-related risk drivers - both physical risks and transition risks - across all Operational Risk Themes. These Risk Themes constitute the Bank's tailored operational risk taxonomy and provide a structured, thematic classification of operational risk sub-types. In this context, climate-related drivers have been mapped to each Risk Theme to ensure comprehensive identification and monitoring of sustainability-related operational risk exposures.

Operational risk events are categorised in accordance with the Risk Themes defined in the Operational Risk Taxonomy. To support consistent identification and recording, detailed guidance has been issued to relevant staff, clarifying the scope, definitions and criteria for capturing sustainability-driven operational risk events. Furthermore, the Group's Operational Risk Events Management Guideline sets out the end-to-end methodology for the classification, analysis, management and closure of operational risk events, including those arising from sustainability drivers, as well as the implementation of corrective actions where required.

Such events may originate from both physical and transition risk drivers and may include, inter alia, damage to the Bank's premises, system failures or disruptions, utility outages, conduct-related matters (e.g. alleged greenwashing), regulatory non-compliance, material deterioration in services provided by third-party vendors, and similar incidents. The impact of these events is assessed across multiple dimensions, including financial loss (e.g. asset damage, compensation or restitution), operational disruption (e.g. business interruption) and reputational impact.

For risk measurement purposes, selected climate-related and environmental drivers are embedded within the Bank's operational risk scenarios. Within the ICAAP framework, climate-related and environmental drivers are incorporated into the scenario assessment process to ensure forward-looking risk evaluation, where such risks are assessed as material.

From a risk identification and mitigation perspective, operational risks associated with sustainability drivers are assessed through the Risk & Control Self-Assessment (RCSA) process. Where relevant, mitigation measures and corrective action plans are defined and monitored to address identified exposures.

In the event of severe disruptions - including environmental incidents - the Bank activates its Business Continuity Plan (BCP). The BCP framework ensures preparedness and operational resilience during serious incidents or disasters and supports the timely restoration of normal business activities. It addresses a broad spectrum of potential disruption scenarios, including natural disasters (e.g. fires, floods), accidents, IT system failures, cyber incidents (e.g. virus infections), key supplier insolvency, adverse media events, market disruptions and other material events. The framework incorporates both organisational and technical measures to safeguard the continuity of critical operations and, progressively, all business activities.

The Bank continues to enhance its management reporting framework to further integrate sustainability-driven operational risks and other non-financial risk considerations, ensuring comprehensive monitoring and informed decision-making.

- **Reputational Risk Management**

The Group's Reputational Risk Management Policy outlines the governance framework and approach for the identification, assessment, proactive mitigation, avoidance, management and reporting of the key sources and causes of reputational risk. In this context, the Group identifies various sources of reputational risk, including those arising from environmental and social issues. When a reputational crisis is identified, it is escalated in accordance with the Group's Crisis Management Policy.

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### 11.1.3.8 Sustainability Risk Data

The Group manages sustainability risk data through dedicated infrastructure operating within the Group's overarching data governance framework. Sustainability risk data management is embedded in the Bank's established data control environment (including ownership, quality controls and monitoring), ensuring consistency with broader governance standards. In parallel, the Bank is developing sustainability specific capabilities to address the distinct characteristics of sustainability data, such as diverse external sources, evolving methodologies, and increased granularity required for risk measurement and reporting.

Having already performed an assessment of sustainability data availability in its internal systems against regulatory requirements/expectations, the Group continues to enhance its sustainability risk data aggregation capabilities and IT infrastructure accordingly, while also using appropriate controls and safeguards to ensure the accuracy and completeness of the compiled information. The Group seeks to further improve sustainability risk data granularity through allocating detailed roles and responsibilities as part of the bank-wide data governance framework, for the purposes of sustainability data management and implementing approaches for addressing data needs (i.e. engaging with external data providers, developing methodological approaches for estimating required information).

## 11.2 Qualitative Information on Social Risks

### 11.2.1 Business strategy and processes

#### 11.2.1.1 Adjustment of Our Business Strategy to Integrate Social Factors and Risks

Eurobank recognises that social risk management is essential for a sustainable business model and has taken actions to adjust its business model, strategy and financial planning to address risks arising from social matters, planning to further enhance such activities in the foreseeable future.

The Bank recognises the importance of managing social risks and has ensured that its lending and investing activities do not support activities that harm society. In parallel, through the implementation of existing policies (e.g. Group Environmental and Social Policy) and the establishment of new processes and tools (e.g. ESG Risk Assessment), the Bank continues to strengthen its capacity to identify and manage social risk stemming from client operations, also determining relevant mitigating actions where it is deemed necessary.

### Sustainable Finance Framework (SFF)

The Group has developed the SFF, which defines the eligible activities to access sustainable financing (green and social assets).

Social risk considerations are integrated into the SFF as follows:

- **Corporate Portfolio:** Dedicated-purpose – Social Loans

Eligible social activities aim to promote positive social outcomes and are classified as follows: Employment generation and access to financing, Equitable access to and control over assets, services, resources, and opportunities, Road Networks, Transportation Infrastructure, Community inclusion, Energy, Healthcare and Education.

- **Corporate Portfolio:** General-purpose – Sustainability-Linked Loans & Facilities

For Social Risk, overarching Sustainability Performance Targets (SPTs) aim to promote positive performance on material social areas, inter alia, to:

- (i) Diversity: Promotion of gender diversity throughout the organisation
- (ii) Link of ESG target to compensation: Incorporation of ESG targets in performance management/ LTIP (Long Term Incentive Program)
- (iii) Community support: Reinforcement of local community through Corporate Social Responsibility initiatives

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In addition, the SFF specifies industry-specific SPTs which target sector-specific areas, inter alia, to: Health & Safety, Labor Management, Privacy & Data Security, Access to communications, Product Safety & Quality and Supply Chain Labor Standards.

- Retail Portfolio: Dedicated-purpose –Social Loans:

i) The Framework specifies activities that promote positive social outcomes for small businesses and individuals, with a focus, among others, on the following areas:

- Access to essential services (Education)
- Affordable housing

ii) Small Business:

Eligible social assets are organised per eligible area:

- Employment generation & Access to financing
- Agricultural productivity and promote sustainable land use

It is noted that the Bank's approach towards addressing borrowers' compliance with social risk mitigation requirements for loans that integrate social factors, is aligned with the process followed as regards green lending.

### Product Governance

Eurobank has established and operates a robust governance framework for all products and services, throughout their lifecycle, where material financial and non-financial risks are assessed by the related Group Risk Management Units and other 2<sup>nd</sup> Line of Defence Units. As part of this process products and services are also assessed for alignment with the Sustainable Finance Framework.

The Bank offers products and services tailored to specific sectors and client segments, promoting sustainable practices among its clients, aiming to alleviate the social risk stemming from their operations. The products/ initiatives demonstrate that the Bank has effectively integrated social risk considerations in its practices in different stages of the credit granting and monitoring process. Furthermore, investment products/ services that do not meet the Group's sustainability standards are not offered to clients.

For further details, please refer to section "Supporting small businesses and social finance" of the Annual Financial Report 2025: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/oikonomika-apotelesmata/2026/fy-2025/en-annual-report-eurobank-2025.pdf>.

#### 11.2.1.2 Objectives, Targets and Limits to Assess and Address Social Risk

##### Bank's approach towards Sustainable Development

Committed to actively contributing to the achievement of the United Nations SDGs and the 2030 Agenda goals, the Bank has been a signatory of the UN Global Compact since 2008. In September 2019, Eurobank signed the UNEP FI Principles for Responsible Banking (PRB), affirming its commitment to play an active role in implementing the SDGs and the Paris Agreement on Climate Change. In full compliance with its obligations relating to implementing the Principles, the Bank issued its 5<sup>th</sup> PRB Progress Statement as part of the Annual Report 2024 – Business and Sustainability. In this context, in line with UNEP FI requirements, Eurobank engaged an external third party to perform independent limited assurance of the UNEP FI 5<sup>th</sup> PRB Progress Statement in accordance with International Standard on Assurance Engagements (ISAE 3000).

The Bank has identified social impact financing as a focus area. This Social Impact financing relates to activities such as education, upskilling health care, financial inclusion, social cohesion and gender equality.

Recognising the importance of social risk management, the Bank has taken steps to adapt its business model, strategy and processes, as well as its financial planning, to address risks arising from social factors. In this context, Eurobank focuses

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on the development of a range of sustainable products (e.g. student loans) and the adoption of socially responsible practices.

### 11.2.1.3 Engagement with Our counterparties on Social Risk Mitigation

The following policies and processes facilitate the Bank's engagement with its clients, with a view to mitigating their social risks:

#### 1. Engagement with our Clients

Eurobank actively engages with its clients to mitigate social risks during the credit granting process, in line with regulatory expectations and leading practices. Through a structured dialogue process, Eurobank seeks to identify and address social risk factors that may have a negative impact on its clients' business and by extension on the Bank. By fostering open communication, Eurobank not only supports its clients in achieving sustainable business practices but also ensures that its lending activities contribute to positive social outcomes. This proactive approach to client engagement is integral to Eurobank's broader sustainability risk management, reinforcing its commitment to responsible banking and sustainable development. In addition, through the ESG Risk Assessment, the Bank assesses the client's ESG risk scoring and profile; a process which facilitates setting clear expectations on social risk management by providing tailored guidance and mitigating actions to enhance clients' social risk profiles.

#### 2. Sustainable Finance Framework

Eurobank plays a key role in the financing of landmark projects that are necessary for pursuing economic growth in line with sustainability criteria. The SFF encompasses a wide range of sustainable lending activities, including social financing. The operationalisation of the SFF assessment for the CIB Portfolio has been implemented and integrated into the Bank's systems.

The Bank leverages on the results of the above evaluation process to determine the integration of sustainability considerations in the business model and strategy of its clients, aiming to identify social financing opportunities.

#### 3. Interbank ESG Questionnaire

An Interbank initiative in the Greek Banking market was jointly launched, by the Hellenic Bank Association (HBA) and the major Greek Banks, in order to design a common Interbank ESG Questionnaire for their clients. The objective was to develop a comprehensive ESG Questionnaire to be used by the Greek Banks, ensuring a harmonised assessment approach and a level-playing field, in order to incorporate a holistic assessment of client ESG factors. The Interbank ESG Questionnaire includes a variety of environmental, social and governance questions to facilitate the assessment of the overall ESG profile of the Banks' clients.

### 11.2.2 Governance

Eurobank has given priority to managing and mitigating any underlying social risks arising as an integral part of developing and offering products and services, while complying with the applicable regulatory framework. Furthermore, it develops and improves mechanisms to identify, measure and communicate impact, across the entire range of its activities. In this context, the assessment of counterparties' social risk is embedded in the risk management process as described in the next section, "Risk Management".

The BoD and the relevant Board Committees are responsible for the approval of the Group policies and strategies and the supervision of their application, including strategy and policies on social matters and corporate sustainability policies.

For more details on governance arrangements, please refer to the Governance section of the Qualitative Information on Environmental Risks.

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### 11.2.3 Risk Management

#### 11.2.3.1 Integration of Social Risk in Our Risk Management Framework

Eurobank has defined social risk leveraging on key regulatory requirements and market guidelines. In this context, social risk refers to potential losses arising from any negative financial impact on the Group stemming from the current or prospective impacts of social factors (such as human rights violation, income inequality, customer safety & protection and consumers' changing preferences) on the Group's counterparties or invested assets.

In addition, the Bank maintains a list of activities that are excluded from financing. Through this exclusion list, the Bank ensures that activities associated with a high degree of social risk are not supported, thereby promoting positive social outcomes and mitigating potential social risks. For all financing transactions, the Bank ensures that its clients demonstrate an organised and systematic approach to ESMS that complies with applicable local, national and international environmental, health and safety and labour legislation and standards, relevant permits, as well as public disclosure requirements.

More specifically, social matters have been integrated in the Bank's risk management framework through the following policies and processes:

##### 1. ESG Risk Assessment

Eurobank's ESG Risk Assessment assesses its CIB clients both at obligor, as well as at transaction level. The Interbank ESG Questionnaire is part of the ESG Risk Assessment, forming a robust assessment of client's overall ESG profile by incorporating specific social aspects through social-related questions, capturing among others: Occupational Health & Safety, Community Relations, and Diversity & Inclusion. Through this process the social risk assessment is enhanced aiming to establish the client's sustainability performance and determine potential social risks.

Eurobank uses the ESG Risk Assessment during the credit decision/ granting process and proposes possible mitigating actions depending on the outcome of the assessment. In this context, the Bank maintains a comprehensive list of specific mitigating actions to address the social dimension of sustainability risks, ensuring broad applicability. However, based on each client's ESG score and profile, as well as the unique characteristics of each transaction, customised mitigating actions can also be proposed. Examples of these mitigating actions may include the development of a specific policy/ process or the acquisition of an ISO certificate in relation to social aspects, as well as the measurement of core social KPIs (e.g. diversity metrics). These mitigating actions are included in the final credit proposal and submitted for approval to the relevant Bank's Committee.

##### 2. Materiality Assessment

The Bank has considered social aspects as part of its risk identification and materiality assessment process to effectively identify and manage associated risks linked to its counterparties' activities. To this end, social risk has been recognised as material. The approach implemented for the assessment of social risk involved the utilisation of publicly available sources and the use of the results of the Interbank ESG questionnaire for the identification, and in turn, risk classification of specific business sectors that are either associated with a high degree of social risk or likely to be negatively affected by social risk hazards. Following the risk classification assessment, the Bank also analysed the exposure to sectors that are classified as high risk within its loan portfolio as a means of establishing their potential impact.

##### 3. Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) Policies & Processes

Eurobank has established comprehensive Know-Your-Customer (KYC) and Anti-Money Laundering/Counter-Terrorist Financing (AML/CTF) policies, procedures, and guidelines aimed at mitigating risks associated with financial crime. These safeguards help prevent cooperation with clients who pose an elevated risk of involvement in money laundering or terrorist financing. As part of its KYC profiling, Eurobank applies Enhanced Due Diligence (EDD) measures when initiating business relationships or during clients lifecycle with individuals or entities classified as High Risk, in accordance with the

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Bank's internal policies and criteria. Furthermore, Eurobank has implemented monitoring systems to detect potential adverse media coverage related to its customers, including aspects linked to sustainability.

### 4 MRA models

The Bank uses the MRA Borrower Rating System where clients' risks that arise from social matters are evaluated in terms of the following:

- Risk of Adverse Events including social issues (health and safety of customers)
- Reputation: The Bank assesses the client's reputation with customers, employees, vendors.

### **11.2.3.2 Lines of Reporting relating to Social Risks**

The Bank has in place monitoring and internal reporting mechanisms to ensure appropriate oversight and management of the social risks generated by its business activities. To this end, the Bank has developed a monitoring dashboard that facilitates the regular monitoring and reporting of the ESG Risk Assessment at Management level. The monitoring dashboard provides a comprehensive overview of the results generated by the ESG Risk Assessment including the client's ESG risk score and classification. In addition, it tracks specific qualitative and quantitative information/ metrics as derived from client's responses on the Interbank ESG Questionnaire. These cover various social factors, enabling the Bank to maintain a thorough understanding of each client's ESG profile and its overall portfolio.

## **11.3 Qualitative Information on Governance Risks**

### **Integration of Governance Factors in Our Governance and Risk Management Framework**

Eurobank assesses its exposure to governance risk on an ongoing basis, given that unsuitable governance practices of its counterparties could have adverse impacts. The Bank has established effective internal governance arrangements and processes to manage such risks and better evaluate the governance performance of its clients.

Eurobank has defined governance risk leveraging on key regulatory requirements and market guidelines. In this context, governance risk refers to potential losses arising from any negative financial impact on the Group stemming from the current or prospective impacts of governance factors (such as anti-financial crime, non-compliance with policies or regulations and governance practices) on the Group's counterparties or invested assets.

The Bank monitors and reports governance risk through a dedicated monitoring dashboard which tracks qualitative and quantitative information from the clients' responses on the Interbank ESG Questionnaire. This process enables the Bank to maintain a comprehensive understanding of the governance risk associated with its clients.

For more details on governance arrangements, please refer to the Governance section of the Qualitative Information on Environmental Risks.

### **Materiality Assessment**

The assessment of governance risk was included in the Bank's risk identification and materiality assessment exercise, and this risk category was recognised as material for the Bank. The results of the Interbank ESG Questionnaire were utilised to establish the business sectors associated with high risk in relation to governance aspects.

The Bank has placed great emphasis on strengthening its risk management processes to evaluate its clients' ESG performance. Specifically, the exposure to governance risks is assessed as follows:

### **Engagement with our Clients**

The Bank actively engages with its clients to manage sustainability risks, including governance risks, during the credit granting process. Through structured dialogue, Eurobank enables its clients to identify and address governance issues

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that could negatively impact their operations. As part of its sustainability risk management, Eurobank uses the ESG Risk Assessments to evaluate the clients' governance profiles, providing guidance to improve their practices.

### Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) Policies & Processes

Eurobank has established Know-Your-Customer (KYC) and Anti-Money Laundering/Counter-Terrorist Financing (AML/CTF) policies and guidelines designed to safeguard against, among other risks, engaging with clients who pose an elevated financial crime risk, such as potential involvement in money laundering or terrorist financing.

### Sustainable Finance Framework (SFF) – Sustainability Performance Targets (SPTs)

In the context of the Group's SFF, for Sustainability-Linked Loans, the Group provides specific incentives to counterparties to achieve defined measurable ESG targets, which address inter-alia governance aspects, based on specific SPTs. SPTs constitute ESG targets which the clients aim to meet by utilising respective KPIs to quantify their performance.

### Interbank ESG Questionnaire

The Interbank ESG Questionnaire includes a variety of ESG questions to facilitate the assessment of the overall ESG profile of the Banks' clients. In relation to the Governance aspect, the following indicative topics are captured: (i) Business Ethics and Anti-corruption, (ii) ESG Governance and Policies, (iii) Corporate Governance and Incidents, and (iv) Governance Targets. The Interbank ESG Questionnaire is used under the ESG Risk Assessment.

### ESG Risk Assessment

The governance risk assessment has been further enhanced following the roll out of the ESG Risk Assessment process which includes governance-related questions, address among others aspects such as: Policies, Sustainability Governance (incl. allocation of oversight for sustainability matters to the highest governance body or individual), Accountability, Reporting & Transparency, Corporate Governance, Remuneration, Business Ethics & Anti-corruption, and Sustainable Procurement. During the credit decision/ granting process, Eurobank may propose possible mitigating actions related to governance risk, depending on each client's ESG score and profile. These mitigating actions are included in the final credit proposal and submitted for approval to the relevant Bank's Committee.

### MRA Models

The Bank's credit rating models for Corporate clients consider borrowers' management quality and governance, which are evaluated in terms of the following:

- Management character: The Bank assesses the integrity of the senior management of the client.
- Management organisation: The Bank evaluates elements including information quality, leadership, planning and structure.
- Management skill: The Bank examines the financial, marketing and operations skills of the client's management.
- Management succession: The Bank considers the clients' succession plan and the preparation of successors.

For more details, please refer to the Qualitative Information on Environmental Risks section.

## 11.4 Quantitative Information on ESG Risks

The Group fully consolidated Hellenic Bank from the third quarter of 2024 onwards. The disclosures presented herein as of 31 December 2025 incorporate the corresponding consolidated information.

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### 11.4.1 Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

The objective of this template is to present information about the Group's banking book exposure towards non-financial corporates operating in carbon-related sectors, and on the quality of those exposures including non-performing status, stage 2 classification, the corresponding provisions, and exposures' maturity.

Regarding the disclosures in column b ("of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation"), as per Article 12.1 and Article 12.2 of Commission Delegated Regulation (EU) 2020/1818 the counterparties are identified based on the following criteria:

- companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10% or more of their revenues from exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels; and
- companies that derive 50% or more of their revenues from electricity generation with a Greenhouse Gas (GHG) intensity of more than 100g CO<sub>2</sub> e/kWh.

The identification of counterparties subject to the exclusion criteria was conducted by mapping the relevant counterparties' activities based on NACE and other internally available information.

Concerning column c ("of which environmentally sustainable (CCM)"), the disclosure was in line with the Taxonomy-aligned exposures that contribute to Climate Change Mitigation (CCM), as also reported in Template 7.

The financed GHG emissions attributed to the Group have been estimated based on the the Partnership for Carbon Accounting Financials (PCAF) Financed Emissions Standard. Specifically, the following approaches were applied to calculate the counterparties' emissions, which are then used as a basis for calculating the financed emissions attributed to the Group:

- a. GHG emissions published by the counterparty are collected through multiple sources including inter alia counterparties' sustainability reports, Interbank ESG Questionnaire and Carbon Disclosure Project data;
- b. GHG emissions were calculated based on physical activity data collected from the counterparty when emissions information was not published by the counterparties;
- c. GHG emissions were calculated based on the economic activity data by applying appropriate emission factors per economic activity. The emission factors per economic activity were derived based on a multiregional input-output analysis that relied on the Input-Output tables of the Organisation for Economic Cooperation and Development (OECD).

For the calculation of GHG emissions the Group follows a waterfall approach, prioritizing approaches (a) and (b) where possible.

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**Table 61: Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity**

Sector/subsector	31 December 2025							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation					Of which Stage 2 exposures		Of which non-performing exposures
	€ million	€ million	Of which environmentally sustainable (CCM) € million	Of which stage 2 exposures € million	Of which non-performing exposures € million	€ million	Of which Stage 2 exposures € million	Of which non-performing exposures € million
1 Exposures towards sectors that highly contribute to climate change <sup>(1)</sup>	29,023	2,913	2,668	1,348	520	(373)	(58)	(253)
2 A - Agriculture, forestry and fishing	237	-	-	49	20	(15)	(1)	(13)
3 B - Mining and quarrying	84	27	-	2	25	(10)	-	(10)
4 B.05 - Mining of coal and lignite	-	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	27	27	-	-	22	(8)	-	(8)
6 B.07 - Mining of metal ores	34	-	-	-	1	(1)	-	(1)
7 B.08 - Other mining and quarrying	23	-	-	2	2	(1)	-	(1)
8 B.09 - Mining support service activities	0	-	-	-	-	-	-	-
9 C - Manufacturing	5,537	1,032	233	357	104	(93)	(22)	(56)
10 C.10 - Manufacture of food products	1,283	-	1	126	28	(24)	(10)	(12)
11 C.11 - Manufacture of beverages	132	-	-	11	7	(4)	-	(3)
12 C.12 - Manufacture of tobacco products	35	-	-	1	-	-	-	-
13 C.13 - Manufacture of textiles	164	-	1	1	1	(1)	-	(1)
14 C.14 - Manufacture of wearing apparel	65	-	-	8	5	(4)	-	(4)
15 C.15 - Manufacture of leather and related products	17	-	-	-	1	(1)	-	(1)
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	46	-	-	3	6	(3)	-	(3)
17 C.17 - Manufacture of pulp, paper and paperboard	218	-	-	4	7	(3)	-	(3)
18 C.18 - Printing and service activities related to printing	38	-	-	8	4	(3)	-	(2)
19 C.19 - Manufacture of coke oven products	1,066	984	10	10	-	(1)	-	-
20 C.20 - Production of chemicals	170	48	1	18	7	(5)	(1)	(3)
21 C.21 - Manufacture of pharmaceutical preparations	282	-	-	10	-	(1)	-	-
22 C.22 - Manufacture of rubber products	209	-	-	10	1	(2)	(1)	(1)
23 C.23 - Manufacture of other non-metallic mineral products	259	-	11	28	3	(6)	(3)	(2)
24 C.24 - Manufacture of basic metals	407	-	90	34	-	(2)	(1)	-
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	140	-	1	9	16	(14)	(1)	(13)
26 C.26 - Manufacture of computer, electronic and optical products	81	-	-	6	1	(1)	-	(1)
27 C.27 - Manufacture of electrical equipment	426	-	106	27	6	(8)	(1)	(3)
28 C.28 - Manufacture of machinery and equipment n.e.c.	111	-	-	22	8	(5)	(1)	(4)
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	256	-	12	10	1	(2)	-	(1)
30 C.30 - Manufacture of other transport equipment	24	-	-	2	-	-	-	-
31 C.31 - Manufacture of furniture	49	-	-	5	2	(2)	(1)	(1)
32 C.32 - Other manufacturing	15	-	-	1	-	-	-	-
33 C.33 - Repair and installation of machinery and equipment	44	-	-	1	-	-	-	-
34 D - Electricity, gas, steam and air conditioning supply	4,192	303	1,948	45	4	(11)	(1)	(2)
35 D35.1 - Electric power generation, transmission and distribution	3,890	-	1,865	44	4	(10)	(1)	(2)
36 D35.11 - Production of electricity	1,912	-	1,511	40	4	(8)	-	(2)
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	303	303	83	-	-	(1)	-	-
38 D35.3 - Steam and air conditioning supply	-	-	-	-	-	-	-	-
39 E - Water supply; sewerage, waste management and remediation activities	98	-	1	7	1	(1)	(1)	(1)
40 F - Construction	1,295	-	211	62	46	(25)	(4)	(17)
41 F.41 - Construction of buildings	547	-	-	33	31	(14)	(2)	(11)
42 F.42 - Civil engineering	559	-	208	17	12	(7)	(2)	(5)
43 F.43 - Specialised construction activities	190	-	3	12	4	(4)	(1)	(2)
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4,747	-	84	323	198	(135)	(16)	(105)
45 H - Transportation and storage	6,285	1,551	135	53	15	(19)	(3)	(8)
46 H.49 - Land transport and transport via pipelines	267	108	1	12	9	(8)	(2)	(6)
47 H.50 - Water transport	3,895	1,442	-	18	2	(4)	(1)	(1)
48 H.51 - Air transport	69	-	-	3	-	-	-	-
49 H.52 - Warehousing and support activities for transportation	2,020	2	131	15	4	(6)	(1)	(1)
50 H.53 - Postal and courier activities	35	-	2	5	-	(1)	-	-
51 I - Accommodation and food service activities	3,364	-	-	286	71	(37)	(6)	(25)
52 L - Real estate activities	3,184	-	56	166	35	(26)	(3)	(17)
53 Exposures towards sectors other than those that highly contribute to climate change <sup>(1)</sup>	3,889	1	34	224	104	(80)	(20)	(49)
54 K - Financial and insurance activities	210	-	7	8	-	(1)	-	-
55 Exposures to other sectors (NACE codes J, M - U)	3,679	1	27	216	104	(79)	(20)	(49)
56 TOTAL	32,912	2,914	2,702	1,572	624	(453)	(78)	(303)

<sup>(1)</sup> In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks -Climate Benchmark Standards Regulation – Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

**Environmental, Social and Governance (ESG) Risks**

Sector/subsector	31 December 2025								
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting				Average weighted maturity	
	Of which Scope 3 financed emissions	%		€ million	€ million	€ million	€ million		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years			
1 Exposures towards sectors that highly contribute to climate change <sup>(1)</sup>	29,260,727	19,578,643	25.7%	15,544	8,293	4,028	1,159	6	
2 A - Agriculture, forestry and fishing	491,020	220,432	0.0%	180	54	3	-	3	
3 B - Mining and quarrying	816,218	494,142	0.1%	63	20	-	1	4	
4 B.05 - Mining of coal and lignite	-	-	0.0%	-	-	-	-	-	
5 B.06 - Extraction of crude petroleum and natural gas	724,242	413,433	0.0%	27	-	-	-	3	
6 B.07 - Mining of metal ores	84,085	77,196	0.1%	18	16	-	-	4	
7 B.08 - Other mining and quarrying	7,519	3,349	0.0%	18	3	-	1	4	
8 B.09 - Mining support service activities	372	164	0.0%	-	-	-	-	1	
9 C - Manufacturing	15,386,164	13,038,111	9.2%	3,932	1,294	280	32	4	
10 C.10 - Manufacture of food products	1,750,381	1,280,989	1.0%	880	350	50	3	4	
11 C.11 - Manufacture of beverages	103,259	76,085	0.0%	85	31	16	-	5	
12 C.12 - Manufacture of tobacco products	18,798	18,587	0.1%	34	-	1	-	1	
13 C.13 - Manufacture of textiles	48,359	39,453	0.0%	36	9	119	-	10	
14 C.14 - Manufacture of wearing apparel	26,260	21,266	0.1%	27	35	2	1	6	
15 C.15 - Manufacture of leather and related products	3,701	2,987	0.0%	6	10	1	-	6	
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	35,611	28,452	0.0%	22	8	3	14	10	
17 C.17 - Manufacture of pulp, paper and paperboard	218,397	173,540	0.2%	155	36	26	1	4	
18 C.18 - Printing and service activities related to printing	30,140	23,082	0.0%	29	7	1	1	4	
19 C.19 - Manufacture of coke oven products	8,824,870	8,204,416	3.6%	1,058	8	-	-	3	
20 C.20 - Production of chemicals	261,368	156,209	0.2%	121	49	-	-	4	
21 C.21 - Manufacture of pharmaceutical preparations	80,939	61,100	0.3%	170	109	2	-	4	
22 C.22 - Manufacture of rubber products	220,342	164,751	0.1%	116	87	5	-	4	
23 C.23 - Manufacture of other non-metallic mineral products	776,337	178,862	0.4%	172	85	1	2	4	
24 C.24 - Manufacture of basic metals	930,816	629,823	1.1%	353	53	1	-	2	
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	135,247	114,054	0.0%	107	25	6	2	4	
26 C.26 - Manufacture of computer, electronic and optical products	11,239	10,440	0.1%	75	5	1	1	3	
27 C.27 - Manufacture of electrical equipment	802,243	775,709	1.3%	223	175	28	-	4	
28 C.28 - Manufacture of machinery and equipment n.e.c.	43,981	34,546	0.1%	94	15	1	1	3	
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	990,007	977,389	0.6%	98	148	10	-	6	
30 C.30 - Manufacture of other transport equipment	17,503	17,007	0.0%	22	-	2	-	3	
31 C.31 - Manufacture of furniture	29,797	26,027	0.0%	24	18	2	5	7	
32 C.32 - Other manufacturing	7,626	6,730	0.0%	7	5	2	-	6	
33 C.33 - Repair and installation of machinery and equipment	18,943	16,607	0.0%	18	25	-	-	5	

Sector/subsector	31 December 2025								
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting				Average weighted maturity	
	Of which Scope 3 financed emissions	%		€ million	€ million	€ million	€ million		
			<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years			
34 D - Electricity, gas, steam and air conditioning supply	2,123,703	777,921	7.6%	1,248	1,283	1,602	59	9	
35 D35.1 - Electric power generation, transmission and distribution	2,046,891	749,903	6.8%	1,190	1,038	1,602	59	10	
36 D35.11 - Production of electricity	239,962	20,694	1.0%	211	392	1,250	59	13	
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	75,246	27,916	0.8%	58	245	-	-	7	
38 D35.3 - Steam and air conditioning supply	1,566	102	0.0%	-	-	-	-	5	
39 E - Water supply; sewerage, waste management and remediation activities	283,523	55,681	0.0%	51	45	1	-	4	
40 F - Construction	831,196	762,281	0.2%	910	204	75	106	5	
41 F.41 - Construction of buildings	324,639	297,596	0.0%	367	122	53	5	5	
42 F.42 - Civil engineering	345,623	316,389	0.2%	447	36	7	69	5	
43 F.43 - Specialised construction activities	160,934	148,296	0.0%	97	46	15	31	8	
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4,524,755	3,218,277	3.0%	3,742	830	135	39	3	
45 H - Transportation and storage	4,139,725	548,200	4.6%	2,576	1,991	823	895	8	
46 H.49 - Land transport and transport via pipelines	399,593	106,478	0.4%	131	79	54	3	6	
47 H.50 - Water transport	2,916,053	29,374	0.0%	2,108	1,784	2	-	5	
48 H.51 - Air transport	35,026	10,106	0.1%	37	3	29	-	9	
49 H.52 - Warehousing and support activities for transportation	777,082	395,576	4.0%	280	124	724	892	16	
50 H.53 - Postal and courier activities	11,971	6,666	0.0%	19	1	15	-	6	
51 I - Accommodation and food service activities	543,658	430,030	0.1%	995	1,602	746	21	8	
52 L - Real estate activities	120,765	33,568	0.9%	1,847	970	362	5	6	
53 Exposures towards sectors other than those that highly contribute to climate change <sup>(1)</sup>	-	-	-	2,633	1,017	209	30	4	
54 K - Financial and insurance activities	-	-	-	208	1	1	1	1	
55 Exposures to other sectors (NACE codes J, M - U)	-	-	-	2,425	1,017	209	29	4	
56 TOTAL	29,260,727	19,578,643	25.7%	18,176	9,310	4,238	1,189	6	

**Environmental, Social and Governance (ESG) Risks**

Sector/subsector	30 June 2025							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Exposures towards sectors that highly contribute to climate change	27.308	2.681	2.194	1.347	688	(420)	(49)	(307)
2 <b>A - Agriculture, forestry and fishing</b>	301	-	-	44	92	(39)	(2)	(37)
3 <b>B - Mining and quarrying</b>	81	26	-	2	24	(8)	-	(8)
4 <i>B.05 - Mining of coal and lignite</i>	0	-	-	-	-	-	-	-
5 <i>B.06 - Extraction of crude petroleum and natural gas</i>	26	26	-	-	21	(6)	-	(6)
6 <i>B.07 - Mining of metal ores</i>	34	-	-	-	1	(1)	-	(1)
7 <i>B.08 - Other mining and quarrying</i>	21	-	-	2	2	(2)	-	(1)
8 <i>B.09 - Mining support service activities</i>	0	-	-	0	-	-	-	-
9 <b>C - Manufacturing</b>	5.404	1146	215	346	132	(97)	(16)	(67)
10 <i>C.10 - Manufacture of food products</i>	1.131	-	-	159	33	(24)	(5)	(16)
11 <i>C.11 - Manufacture of beverages</i>	151	-	-	9	7	(4)	-	(3)
12 <i>C.12 - Manufacture of tobacco products</i>	53	-	-	1	-	-	-	-
13 <i>C.13 - Manufacture of textiles</i>	181	-	1	1	1	(1)	-	(1)
14 <i>C.14 - Manufacture of wearing apparel</i>	70	-	-	5	10	(5)	-	(5)
15 <i>C.15 - Manufacture of leather and related products</i>	6	-	-	1	1	(1)	-	(1)
16 <i>C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting</i>	39	-	-	4	5	(3)	-	(3)
17 <i>C.17 - Manufacture of pulp, paper and paperboard</i>	216	-	-	5	8	(3)	-	(3)
18 <i>C.18 - Printing and service activities related to printing</i>	38	-	-	2	4	(3)	-	(2)
19 <i>C.19 - Manufacture of machinery and equipment n.e.c.</i>	1106	1106	10	9	7	(2)	-	(2)
20 <i>C.20 - Production of chemicals</i>	194	40	5	19	7	(5)	(1)	(3)
21 <i>C.21 - Manufacture of pharmaceutical preparations</i>	286	-	-	10	1	(1)	-	-
22 <i>C.22 - Manufacture of rubber products</i>	211	-	-	6	1	(2)	-	(1)
23 <i>C.23 - Manufacture of other non-metallic mineral products</i>	228	-	4	24	5	(6)	(3)	(3)
24 <i>C.24 - Manufacture of basic metals</i>	469	-	103	4	1	(1)	-	-
25 <i>C.25 - Manufacture of fabricated metal products, except machinery and equipment</i>	123	-	-	8	18	(14)	(1)	(13)
26 <i>C.26 - Manufacture of computer, electronic and optical products</i>	78	-	-	6	2	(2)	-	(1)
27 <i>C.27 - Manufacture of electrical equipment</i>	341	-	74	30	6	(7)	(1)	(3)
28 <i>C.28 - Manufacture of machinery and equipment n.e.c.</i>	137	-	-	24	11	(7)	(1)	(6)
29 <i>C.29 - Manufacture of motor vehicles, trailers and semi-trailers</i>	226	-	9	11	1	(2)	-	(1)
30 <i>C.30 - Manufacture of other transport equipment</i>	20	-	-	2	1	(1)	-	-
31 <i>C.31 - Manufacture of furniture</i>	48	-	-	6	2	(1)	(1)	(1)
32 <i>C.32 - Other manufacturing</i>	15	-	-	1	1	-	-	-
33 <i>C.33 - Repair and installation of machinery and equipment</i>	38	-	9	0	0	-	-	-

Sector/subsector	30 June 2025							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
34 <b>D - Electricity, gas, steam and air conditioning supply</b>	3.836	267	1.641	9	5	(12)	-	(2)
35 <i>D35.1 - Electric power generation, transmission and distribution</i>	3.569	-	1.569	9	5	(11)	-	(2)
36 <i>D35.11 - Production of electricity</i>	1.792	-	1.317	7	4	(8)	-	(2)
37 <i>D35.2 - Manufacture of gas; distribution of gaseous fuels through mains</i>	267	267	72	-	1	(1)	-	-
38 <i>D35.3 - Steam and air conditioning supply</i>	1	-	-	-	-	-	-	-
39 <b>E - Water supply; sewerage, waste management and remediation activities</b>	97	-	1	7	1	(1)	-	-
40 <b>F - Construction</b>	1.157	-	197	66	47	(29)	(3)	(22)
41 <i>F.41 - Construction of buildings</i>	506	-	-	37	27	(16)	(1)	(13)
42 <i>F.42 - Civil engineering</i>	498	-	197	17	14	(8)	(1)	(6)
43 <i>F.43 - Specialised construction activities</i>	153	-	-	12	5	(4)	(1)	(3)
44 <b>G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	4.882	-	65	342	239	(148)	(17)	(117)
45 <b>H - Transportation and storage</b>	5.432	1.242	22	37	18	(20)	(2)	(10)
46 <i>H.49 - Land transport and transport via pipelines</i>	279	110	2	13	10	(9)	(1)	(7)
47 <i>H.50 - Water transport</i>	3.371	1.133	-	0	2	(3)	-	(1)
48 <i>H.51 - Air transport</i>	72	-	2	3	-	-	-	-
49 <i>H.52 - Warehousing and support activities for transportation</i>	1.689	-	16	16	5	(5)	-	(1)
50 <i>H.53 - Postal and courier activities</i>	21	-	3	4	1	(2)	-	(1)
51 <b>I - Accommodation and food service activities</b>	3.118	-	-	295	78	(39)	(6)	(26)
52 <b>L - Real estate activities</b>	3.000	-	53	199	53	(26)	(2)	(18)
53 Exposures towards sectors other than those that highly contribute to climate change	3.245	1	8	268	97	(81)	(20)	(53)
54 <b>K - Financial and insurance activities</b>	154	-	7	12	0	(1)	-	-
55 Exposures to other sectors (NACE codes J, M - U)	3.091	1	1	255	97	(81)	(20)	(53)
56 TOTAL	30.552	2.682	2.202	1.615	786	(501)	(69)	(360)

## Environmental, Social and Governance (ESG) Risks

Sector/subsector	i	j	k	l	m	n	o	p	
	30 June 2025								
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	GHG emissions (column i): gross carrying amount		percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
		Of which Scope 3 financed emissions	%						
1 Exposures towards sectors that highly contribute to climate change (1)	25,643,334	17,824,350	38.2%	15,854	7,013	3,642	798	6	
2 <b>A - Agriculture, forestry and fishing</b>	593,995	373,129	0.3%	245	53	3	-	3	
3 <b>B - Mining and quarrying</b>	169,738	156,572	0.1%	57	22	-	2	4	
4 B.05 - Mining of coal and lignite	-	-	0.0%	-	-	-	-	-	
5 B.06 - Extraction of crude petroleum and natural gas	43,165	41,781	0.0%	26	-	-	-	3	
6 B.07 - Mining of metal ores	122,607	113,396	0.1%	18	16	-	-	5	
7 B.08 - Other mining and quarrying	3,588	1,244	0.0%	14	6	-	2	5	
8 B.09 - Mining support service activities	378	151	0.0%	-	-	-	-	1	
9 <b>C - Manufacturing</b>	14,607,724	12,297,018	10.7%	4,056	1,107	218	22	4	
10 C.10 - Manufacture of food products	1,519,348	1,171,185	1.2%	820	288	20	3	3	
11 C.11 - Manufacture of beverages	107,092	80,627	0.1%	91	42	17	-	5	
12 C.12 - Manufacture of tobacco products	10,367	10,264	0.2%	52	-	1	-	1	
13 C.13 - Manufacture of textiles	50,566	41,264	0.0%	78	3	99	-	7	
14 C.14 - Manufacture of wearing apparel	10,803	8,726	0.1%	30	23	15	1	6	
15 C.15 - Manufacture of leather and related products	1,320	1,029	0.0%	5	-	1	-	5	
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	24,787	18,795	0.0%	25	9	3	3	6	
17 C.17 - Manufacture of pulp, paper and paperboard	181,960	134,606	0.3%	148	43	24	1	4	
18 C.18 - Printing and service activities related to printing	22,055	16,465	0.0%	25	12	1	1	4	
19 C.19 - Manufacture of coke oven products	9,053,383	8,424,955	3.8%	1,098	8	-	1	3	
20 C.20 - Production of chemicals	338,881	269,665	0.4%	150	43	-	-	3	
21 C.21 - Manufacture of pharmaceutical preparations	135,223	76,925	0.4%	197	77	12	-	4	
22 C.22 - Manufacture of rubber products	219,205	169,069	0.4%	165	40	5	-	3	
23 C.23 - Manufacture of other non-metallic mineral products	798,576	153,069	0.4%	173	52	1	2	4	
24 C.24 - Manufacture of basic metals	1,239,470	899,839	1.7%	368	101	1	-	2	
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	71,529	59,225	0.0%	91	23	7	2	4	
26 C.26 - Manufacture of computer, electronic and optical products	11,576	10,758	0.1%	68	8	1	1	4	
27 C.27 - Manufacture of electrical equipment	333,915	302,748	1.1%	169	169	3	-	4	
28 C.28 - Manufacture of machinery and equipment n.e.c.	50,115	35,811	0.1%	124	11	1	1	3	
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	378,645	367,458	0.5%	105	120	-	-	5	
30 C.30 - Manufacture of other transport equipment	13,982	13,621	0.0%	15	2	2	-	3	
31 C.31 - Manufacture of furniture	19,037	16,754	0.0%	24	16	3	5	7	
32 C.32 - Other manufacturing	4,958	4,371	0.0%	9	4	1	-	6	
33 C.33 - Repair and installation of machinery and equipment	10,931	9,789	0.0%	25	12	-	-	4	

Environmental, Social and Governance (ESG) Risks

	i	j	k	l	m	n	o	p
	30 June 2025							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
	Of which Scope 3 financed emissions		%	€ million	€ million	€ million	€ million	
34 D - Electricity, gas, steam and air conditioning supply	2,140,357	608,337	12.5%	1,401	1,012	1,399	24	9
35 D35.1 - Electric power generation, transmission and distribution	1,840,225	576,389	12.5%	1,343	804	1,398	24	9
36 D35.11 - Production of electricity	217,910	25,224	6.1%	219	306	1,246	21	13
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	299,114	31,878	0.0%	58	208	-	-	8
38 D35.3 - Steam and air conditioning supply	1,018	70	0.0%	-	-	-	-	3
39 E - Water supply; sewerage, waste management and remediation activities	238,899	59,542	0.1%	84	12	1	-	3
40 F - Construction	562,297	495,121	1.1%	865	178	61	53	5
41 F.41 - Construction of buildings	180,559	165,318	0.0%	353	104	43	6	4
42 F.42 - Civil engineering	311,802	265,214	1.1%	424	24	8	43	5
43 F.43 - Specialised construction activities	69,936	64,589	0.0%	88	51	9	4	6
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4,004,075	2,783,195	4.8%	3,811	896	131	44	3
45 H - Transportation and storage	2,840,241	722,546	4.9%	2,475	1,544	800	613	8
46 H.49 - Land transport and transport via pipelines	246,035	73,770	0.4%	162	79	35	3	6
47 H.50 - Water transport	1,586,015	29,238	0.0%	1,983	1,388	1	-	4
48 H.51 - Air transport	70,550	19,450	0.1%	40	2	29	-	9
49 H.52 - Warehousing and support activities for transportation	921,835	587,967	4.4%	270	74	735	610	15
50 H.53 - Postal and courier activities	15,806	12,121	0.0%	20	1	-	-	2
51 I - Accommodation and food service activities	396,343	309,676	2.7%	1,006	1,366	722	24	7
52 L - Real estate activities	89,665	19,214	1.0%	1,853	824	306	16	5
Exposures towards sectors other than those that highly contribute to climate change (1)				1,835	1,164	150	95	5
54 K - Financial and insurance activities				92	1	1	60	11
55 Exposures to other sectors (NACE codes J, M - U)				1,743	1,164	150	35	4
56 TOTAL	25,643,334	17,824,350	38.2%	17,689	8,178	3,793	893	6

11.4.2 Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

This template reports the gross carrying amount of loans collateralised by immovable property and of collaterals obtained by taking possession along with information about the energy efficiency of the immovable property in terms of kWh/m2 energy consumption and Energy Performance Certificate (EPC).

The reporting perimeter is in line with other regulatory reporting of the Group and includes collaterals that are eligible for EPC, while a breakdown between EU area and non-EU area based on collateral’s location is presented. The Group’s immovable property collaterals are located mainly in the EU and more specifically Greece, Cyprus and Bulgaria, while a relatively smaller proportion is located in the United Kingdom.

As per the Directive 2010/31/EU, energy performance certificate is defined as a certificate recognised by a Member State or by a legal person designated by it, which indicates the energy performance of a building or building unit, calculated according to a methodology adopted in accordance with Article 3 of the Directive.

For the purposes of this template, the Group considered only actual EPC labels based on internally available information, while for energy consumption (kWh/m2) both actual and estimated consumption are reported. For collaterals that actual consumption information was not available, the Group proceeded with the estimation of consumption in collaboration with a specialized external provider. The methodological approach that was followed is a model-based estimation of consumption based on collateral characteristics.

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The gross carrying amount of exposures that are linked to more than one collateral is allocated and disclosed separately under energy efficiency levels based on the collateral value.

**Table 62:** Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

Counterparty sector	31 December 2025																
	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral		
	Total gross carrying amount amount							Total gross carrying amount amount							Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated		
	0; <= 100	>100; <= 200	>200; <= 300	>300; <= 400	>400; <= 500	>500	A	B	C	D	E	F	G	€ million	€ million	€ million	%
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total EU area	20,949	3,296	6,785	2,440	1,482	1,631	2,591	736	630	627	376	188	129	225	18,037		85%
2 Of which Loans collateralised by commercial immovable property	7,502	108	95	622	653	1,395	2,474	418	565	457	157	21	17	7	5,859		63%
3 Of which Loans collateralised by residential immovable property	12,851	3,174	6,579	1,739	727	169	72	317	57	125	157	110	86	186	11,812		97%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	596	14	110	79	102	67	45	1	8	45	62	57	26	31	366		51%
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	17,906	3,268	6,698	2,336	1,431	1,608	2,565								15,314		100%
6 Total non-EU area	476	2	32	44	27	6	301	20	50	63	54	28	3	-	257		75%
7 Of which Loans collateralised by commercial immovable property	451	2	20	37	27	6	301	20	50	60	54	27	3	-	237		75%
8 Of which Loans collateralised by residential immovable property	24	-	12	7	-	-	1	-	-	3	1	1	-	-	20		77%
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		100%
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	369	-	29	42	-	-	298								193		100%

Counterparty sector	30 June 2025																
	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)							Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral		
	Total gross carrying amount amount							Total gross carrying amount amount							Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated		
	0; <= 100	>100; <= 200	>200; <= 300	>300; <= 400	>400; <= 500	>500	A	B	C	D	E	F	G	€ million	€ million	€ million	€ million
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total EU area	20,684	2,294	7,677	2,674	1,557	1,495	2,358	766	550	512	349	175	100	156	18,076		85%
2 Of which Loans collateralised by commercial immovable property	7,429	159	234	657	783	1,325	2,173	530	510	400	176	21	16	3	5,771		64%
3 Of which Loans collateralised by residential immovable property	12,619	2,104	7,314	1,939	634	132	134	236	35	82	104	72	53	116	11,921		97%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	636	31	129	77	139	38	52	-	4	30	69	82	31	36	384		56%
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	17,729	2,223	7,611	2,582	1,503	1,479	2,331								15,447		100%
6 Total non-EU area	485	3	33	54	27	11	310	15	39	41	60	29	1	-	300		85%
7 Of which Loans collateralised by commercial immovable property	456	2	20	47	27	7	309	15	39	39	55	28	1	-	280		84%
8 Of which Loans collateralised by residential immovable property	28	1	13	7	-	5	1	-	-	2	5	1	-	-	20		92%
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		100%
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	379	1	30	42	-	1	306								254		100%

**11.4.3 Template 3: Banking book – Climate change transition risk: Alignment metrics**

This template provides information on alignment metrics related to the Paris Agreement, focusing on key carbon-intensive sectors. Eurobank has committed to aligning its portfolios with the objective of limiting global warming to 1.5°C and supports the transition to a net-zero economy by 2050, following the guidance set by the Net-Zero Banking Alliance (NZBA) framework. The Bank's approach is based on disclosures published by counterparties and is guided by industry standards such as PCAF and other accredited science-based decarbonisation scenarios.

As also noted in section 11.1.1.1, to achieve these commitments, Eurobank joined in March 2024 the NZBA and started developing sector-specific targets for financed emissions and emission intensity reductions, with a focus on sectors that

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have the highest carbon impact. The pathways to decarbonisation follow the International Energy Agency’s (IEA) Net Zero Emissions by 2050 Scenario (NZE2050).

An integral component in setting sectoral targets is the determination of portfolio emissions intensity, defined as financed emissions per unit of activity data (e.g., kgCO<sub>2</sub>e/m<sup>2</sup>, kgCO<sub>2</sub>e/kWh, kgCO<sub>2</sub>e/ton of cement). The process consists of three main steps:

- Measuring the absolute GHG emissions of each investment or loan within a specific asset class.
- Calculating the share of the counterparties' emissions attributed to the Group (i.e., financed emissions).
- Dividing the total financed emissions by the total attributed activity data of all investments or loans in the specific sector.

The resulting emission intensity metrics include data from counterparties that account for most sectoral financed emissions and exposures in the prioritised sectors.

In relation to the NACE sectors presented in the table below, there are instances where the primary NACE sector of certain counterparties differs from the ones proposed in the template. For example, in the Power Sector, there are counterparties whose NACE Code is not within the provided codes for the Power Sector, yet they are actively engaged in electricity generation.

**Table 63:** Banking book – Climate change transition risk: Alignment metrics

a	b	c	d				g
			31 December 2025				
Sector	NACE Sectors (a minima)	Portfolio gross carrying amount € million	Alignment metric	Year of reference	Distance to IEA NZE2050 in % *	Target (year of reference + 3 years)	
Power	D.35.1	3,450	199.3 kgCO <sub>2</sub> /Mwh	2025	7%	220	
	D.35.1.1						
	D.35.1.4						
Fossil fuel combustion	B.06	1,598	636.2 ktCO <sub>2</sub> e	2025	103%	530 (95 indexed)	
	B.09.1						
	C.19.2						
	D.35.2						
	D.35.2.2						
	G.46.7.1						
Automotive Aviation Maritime transport							
Cement, clinker and lime production	C.23.5	130	0.63 tCO <sub>2</sub> e/t cement	2025	34%	59%	
	C.23.5.1						
	C.23.6						
	C.23.6.1						
	C.23.6.3						
	C.23.6.4						
Iron and steel, coke, and metal ore production	C.24	500	0.30 tCO <sub>2</sub> e/ t steel	2025	-18%	33%	
	C.24.1						
	C.24.2						
	C.24.4						
	C.24.4.2						
	C.24.4.4						
	C.24.5						
	C.24.5.1						
	C.24.5.2						
	C.24.3.4						
	C.24.5						
	C.24.5.2						
	C.25						
C.25.1							
C.25.1.1							
G.46.7.2							

Chemicals  
... potential additions relevant to the business model of the institution

\* PIT distance to 2030 NZE2050 scenario in % (for each metric)

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a	b	c	30 June 2025			g
			d	e	f	
Sector	NACE Sectors (a minima)	Portfolio gross carrying amount € million	Alignment metric	Year of reference	Distance to IEA NZE2050 in % *	Target (year of reference + 3 years)
Power	D.35.1	3,189	193.5 kgCO2/Mwh	2024	4%	220
	D.35.1.1					
	D.35.1.4					
Fossil fuel combustion	B.06	1,532	558.5 ktCO2e	2024	78%	530 (95 indexed)
	B.09.1					
	C.19.2					
	C.20.1.4					
	D.35.2					
	D.35.2.2					
Automotive	G.46.7.1					
Aviation						
Maritime transport						
Cement, clinker and lime production	C.23.5	135	0.66 tCO2e/t cement	2024	40%	0.59
	C.23.5.1					
	C.23.6					
	C.23.6.1					
	C.23.6.3					
	C.23.6.4					
Iron and steel, coke, and metal ore production	C.24	629	0.42 tCO2e / t steel	2024	14%	0.33
	C.24.1					
	C.24.2					
	C.24.4.2					
	C.24.4.4					
	C.24.5					
	C.24.5.1					
	C.24.5.2					
	C.25					
	C.25.1					
	C.25.1.1					
G.46.7.2						

Chemicals  
... potential additions relevant to the business model of the institution

\* PIT distance to 2030 NZE2050 scenario in % (for each metric)

#### 11.4.4 Template 4: Banking book – Climate change transition risk: Exposure to top 20 carbon-intensive firms

The template includes aggregated and anonymized information on the Group’s exposure towards the top 20 most carbon-intensive counterparties globally. The identification of the top 20 most carbon-intensive corporates in the world is based on the list of the top 20 carbon emitting companies published in 2021 by Carbon Majors Database.

Column c (“of which environmentally sustainable (CCM)”) is in line with the Taxonomy-aligned exposures that contribute to Climate Change Mitigation (CCM), as also reported in Template 7.

**Table 64:** Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

a	b	c	d	e	
					31 December 2025
1	Gross carrying amount (aggregate) € million	Gross carrying amount compared to total gross carrying amount (aggregate) <sup>(1)</sup> %	Of which environmentally sustainable (CCM) <sup>(2)</sup> € million	Weighted average maturity	Number of top 20 polluting firms included
	1	25	0.03%	-	4

a	b	c	d	e	
					30 June 2025
1	Gross carrying amount (aggregate) € million	Gross carrying amount compared to total gross carrying amount (aggregate) %	Of which environmentally sustainable (CCM) € million	Weighted average maturity	Number of top 20 polluting firms included
	1	29	0.04%	-	4

<sup>(1)</sup> For counterparties among the top 20 carbon emitting companies in the world.

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### 11.4.5 Template 5: Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk

This template includes information on exposures in the banking book, including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale, towards non-financial corporates, on loans collateralized with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards.

The geographical breakdown of the template (Greece and Rest of the World) is in line with the Group's main activities' location. It should be noted that Group's exposure is mainly concentrated in counterparties operating/residing in Southeast Europe and more specifically Greece, Cyprus and Bulgaria.

The Group considers as chronic climate change events those that arise from a progressive shift in climate conditions and their effect is long lasting, while acute climate change events are defined as those that originate from extreme events in a short period of time.

The climate-related hazards were assessed based on physical risks scenarios developed by an external provider. The analysis was based on RCP 8.5 climate scenario and spanned from short to medium-term, in line with the average maturity of the Group's portfolio. Climate data and indices were derived from Copernicus Climate Data Store database and GFDRR – ThinkHazard!. Historical values were calculated by using ERA5 Reanalysis data, while future projections derived from climate model simulations with general circulation and regional climate model pairs under the EURO-CORDEX program. A total of 4 to 8 model combinations (depending on the climate index and variable) at a horizontal resolution of 0.11 x 0.11 degrees (approximately 11.5 x 11.5 km) were used. Multi-model mean values were used to minimize the range of uncertainty in climate model simulations while both historical data and future projections are bias-adjusted versus the ERA5 Reanalysis data.

The methodological approach developed was applied at the appropriate level of spatial analysis (i.e. at NUTS 2 level for chronic physical events and at Postal Code level in Greece, while for the other countries, it was conducted at the NUTS 3 level for acute effects). This approach also considered the varying levels of vulnerability across economic activities and real estate properties. While acute risks (e.g., storms, floods, wildfires) are highly localized, chronic risks (e.g., rising temperatures, prolonged droughts) tend to have broader, long-term impacts. The analysis was performed at NACE code 2- digits level for economic activities and based on property characteristics for real estate assets. The results were then categorized on a 5-point RAG scale, indicating from negligible to very high sensitivity.

#### Chronic Climate Change Events

The Group identified as chronic climate change events those that arise from a progressive shift in climate conditions and which affect counterparties' revenue or operating costs. The analysis utilized climate indicators source from European and International databases (e.g., Copernicus) and results of European programs (e.g., COACCH project, CLIMPACT I and JRC studies). More specifically, the Group utilized:

- The outcomes of research projects as regards the impact of climate change on the yield / revenue of the primary sector (i.e., agriculture, fishery, and forestry);
- The outcomes of research projects as regards the impact of climate change on the productivity of the mining, manufacturing, and construction sectors;
- The outcomes of research projects as regards the impact of climate change on the productivity of different power generation technologies (both renewables and fossil-fueled);
- The number of heating and cooling degree days attributed to various climatic scenarios i to assess the changes in heating and cooling needs of the non-residential buildings, which usually affect the operating costs of the companies of the services sector;

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- The changes on the Tourism Climate Index associated with the different climatic scenarios that affect tourism activity and associated companies.

The above-mentioned climate indicators are considered as the drivers of the potential chronic impacts of climate change on the companies of the respective economic sectors, affecting either their operating costs or their revenues. In the context of the analysis, these effects either directly (due to the structure of the climate indicators used) or indirectly (through the input-output tables of the respective economies or other econometric models) were expressed as percentage changes in the turnover of the respective businesses.

### Acute Climate Change Events

For the analysis of acute climate change events the Group took into consideration several extreme phenomena such as:

- fluvial floods (high-water levels in river channels, causing dike breach);
- pluvial floods (rainfall intensity exceeding infiltration capacity);
- coastal floods;
- extreme heat;
- wildfires;
- water scarcity;
- landslides.

The analysis was performed at Postal Code area level in Greece and at NUTS 3 region level for the other countries as well as at NACE code 2- digits level and considered the following three main dimensions:

1. **Climate Hazards:** Utilizing data and indicators from European databases (i.e., Copernicus and EPSON) the severity of the 7 extreme phenomena in each Postal Code area in Greece and in each NUTS 3 region for the other countries under consideration was assessed, assigning a risk score according to the 5-point RAG scale;
2. **Exposure:** Utilizing data and indicators (e.g., population in settlements exposed to coastal hazard) from European databases (i.e., RESIN, EPSON, and the Hellenic Statistical Authority - ELSTAT) the exposure of the Postal Code area in Greece and of the NUTS 3 region for the other countries in question to the above hazards was assessed and categorized in the 5-point RAG scale;
3. **Vulnerability:** The vulnerability of the various economic activities to the extreme events in question was assessed. Specifically, the assessment was performed at sector level and separately for the buildings using a 4-point qualitative scale.

The product of these three dimensions formulated the sensitivity to each extreme event per economic activity / property type and geographical location. Following, the resulted score was categorized in the 5-point RAG scale. It should be noted that the reported gross carrying amount sensitive to climate-related hazards does not consider mitigating measures, such as insurance coverages, that are in place. A considerable proportion of the Group's collateralised exposures is secured by insurance contracts and as such it is expected that the impact of physical risk events on the Group's portfolio is reduced.

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**Table 65: Banking book - Climate change physical risk: Exposures subject to physical risk**

a	31 December 2025																
	Gross carrying amount																
	of which exposures sensitive to impact from climate change physical events																
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
<b>Greece</b>																	
1 A - Agriculture, forestry and fishing	112	96	15	1	-	2	43	-	69	34	16	(11)	(1)	(10)			
2 B - Mining and quarrying	28	-	-	-	-	-	-	-	-	-	-	-	-	-			
3 C - Manufacturing	3,757	137	203	1	13	6	-	355	-	27	17	(14)	(1)	(11)			
4 D - Electricity, gas, steam and air conditioning supply	3,447	133	933	1,391	59	12	1,698	818	-	1	4	(6)	-	(2)			
5 E - Water supply; sewerage, waste management and remediation activities	31	1	-	-	-	4	-	1	-	-	-	-	-	-			
6 F - Construction	713	3	-	1	17	13	-	21	-	1	1	(1)	-	(1)			
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,143	111	62	1	4	4	-	179	-	26	3	(3)	(2)	(1)			
8 H - Transportation and storage	2,038	12	-	127	-	10	-	140	-	-	-	-	-	-			
9 L - Real estate activities	960	2	-	1	-	4	-	4	-	-	-	-	-	-			
10 Loans collateralised by residential immovable property <sup>(1)</sup>	6,831	369	-	-	-	1	-	369	-	115	26	(20)	(12)	(6)			
11 Loans collateralised by commercial immovable property <sup>(1)</sup>	4,227	186	266	8	7	6	18	371	79	21	43	(10)	(2)	(7)			
12 Repossessed colaterals	489	-	-	-	32	-	-	32	-	-	-	(5)	-	-			
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
<b>Other Countries</b>																	
1 A - Agriculture, forestry and fishing	125	10	15	0	-	1	9	17	-	1	3	(3)	(0)	(3)			
2 B - Mining and quarrying	56	34	11	-	-	4	38	7	-	-	23	(9)	-	(9)			
3 C - Manufacturing	1,780	116	2	13	-	1	-	52	80	35	0	(7)	(7)	-			
4 D - Electricity, gas, steam and air conditioning supply	746	33	66	78	-	2	163	9	5	42	0	(2)	(0)	(0)			
5 E - Water supply; sewerage, waste management and remediation activities	66	4	0	0	-	4	-	2	3	-	-	(0)	-	-			
6 F - Construction	582	34	12	0	-	2	7	29	10	0	11	(1)	(0)	(1)			
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,603	68	17	12	-	2	-	88	8	6	3	(0)	(0)	(0)			
8 H - Transportation and storage	4,248	11	0	0	-	-	-	4	7	1	0	(0)	(0)	(0)			
9 L - Real estate activities	2,224	10	17	4	2	3	-	33	-	0	0	(0)	(0)	-			
10 Loans collateralised by residential immovable property <sup>(1)</sup>	6,045	20	55	226	109	14	-	411	-	25	12	(14)	(3)	(7)			
11 Loans collateralised by commercial immovable property <sup>(1)</sup>	3,726	138	64	52	1	5	-	255	-	54	15	(11)	(8)	(2)			
12 Repossessed colaterals	107	-	-	-	-	-	-	-	-	-	-	-	-	-			
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-			

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a	30 June 2025														m	n	o
	Gross carrying amount																
	of which exposures sensitive to impact from climate change physical events																
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact from both chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures				
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million			
1 A - Agriculture, forestry and fishing	147	142	5	-	-	2	77	-	70	26	86	(35)	(1)	(34)			
2 B - Mining and quarrying	22	-	-	-	-	-	-	-	-	-	-	-	-	-			
3 C - Manufacturing	3,487	141	141	-	-	4	-	282	-	6	16	(13)	(1)	(12)			
4 D - Electricity, gas, steam and air conditioning supply	3,264	273	841	1,186	21	12	1,612	709	-	-	4	(7)	-	(1)			
E - Water supply; sewerage, waste management and remediation activities	26	1	-	-	-	5	-	1	-	-	-	-	-	-			
6 F - Construction	472	1	-	-	-	1	-	1	-	-	1	(1)	-	(1)			
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	2,557	115	75	-	-	4	-	190	-	26	1	(2)	(1)	(1)			
8 H - Transportation and storage	1,725	13	-	129	-	11	-	142	-	-	-	-	-	-			
9 L - Real estate activities	812	-	-	-	-	-	-	-	-	-	-	-	-	-			
10 Loans collateralised by residential immovable property	6,890	229	24	62	66	8	-	381	-	126	22	(18)	(9)	(6)			
11 Loans collateralised by commercial immovable property	4,071	175	256	6	8	6	15	346	85	16	50	(33)	(1)	(31)			
12 Repossessed collateral	490	-	-	-	35	-	-	35	-	-	-	(5)	-	-			
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-			

a	30 June 2025														m	n	o
	Gross carrying amount																
	of which exposures sensitive to impact from climate change physical events																
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact from both chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity							of which Stage 2 exposures	Of which non-performing exposures				
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million			
1 A - Agriculture, forestry and fishing	154	9	14	-	-	4	9	14	-	1	3	(2)	(0)	(1)			
2 B - Mining and quarrying	59	41	3	-	-	3	37	7	-	-	23	(7)	-	(7)			
3 C - Manufacturing	1,917	44	6	13	2	14	-	64	-	39	3	(2)	(2)	(0)			
4 D - Electricity, gas, steam and air conditioning supply	572	10	35	53	-	11	94	4	-	5	-	(1)	(0)	-			
E - Water supply; sewerage, waste management and remediation activities	72	3	-	-	-	1	-	3	-	-	-	(0)	-	-			
6 F - Construction	685	25	10	3	-	5	5	34	0	3	9	(4)	(0)	(4)			
G - Wholesale and retail trade; repair of motor vehicles and motorcycles	2,325	45	48	21	4	17	-	117	-	9	5	(2)	(1)	(1)			
8 H - Transportation and storage	3,707	3	1	0	0	5	-	5	-	1	0	(0)	(0)	(0)			
9 L - Real estate activities	2,188	6	23	15	2	12	-	46	-	3	1	(0)	(0)	(0)			
10 Loans collateralised by residential immovable property	5,757	20	51	163	140	15	-	373	-	23	27	(13)	(2)	(8)			
11 Loans collateralised by commercial immovable property	3,814	135	104	72	1	3	6	307	0	54	25	(13)	(2)	(10)			
12 Repossessed collateral	146	-	-	-	11	-	-	11	-	-	-	(5)	-	-			
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-			

<sup>(1)</sup> The gross carrying amount of exposures that are collateralised by both residential and commercial immovable properties is disclosed proportionally in rows "Loans collateralised by residential immovable property" and "Loans collateralised by commercial immovable property" based on the collateral value.

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### 11.4.6 Template 6: Summary of GAR KPIs

#### Group's implementation of the EU Taxonomy Regulation

The EU Taxonomy (Regulation (EU) 2020/852 of the European Parliament and of the Council) represents an important step for the EU to achieve the Paris Agreement climate neutrality goals. It sets out the criteria to establish a common classification system for sustainable economic activities. The EU Taxonomy Regulation determines whether an economic activity is environmentally sustainable and obligates financial and non-financial entities subject to the Non-Financial Reporting Directive (NFRD) / Corporate Sustainability Reporting Directive (CSRD) to disclose the alignment of their activities.

Article 8 of the Taxonomy Regulation prescribes that undertakings subject to the NFRD/CSRD, including financial undertakings, publish to what extent their activities are associated with economic activities that qualify as environmentally sustainable under EU Taxonomy Regulation. Separate disclosures requirements and extensive criteria are in place for financial and non-financial undertakings under Article 8 of EU Taxonomy Regulation Delegated Act (Commission Delegated Regulation (EU) 2021/2178).

Credit institutions publish the Green Asset Ratio (GAR), which determines the extent to which the Group's assets finance and are invested in Taxonomy-aligned economic activities, that is the ratio of the Group's Taxonomy-aligned assets to covered assets. Moreover, as required by the EU Taxonomy Regulation, activities, to be taxonomy-aligned, must meet the specific taxonomy criteria and ensure that they cause no significant harm to any of the other environmental objectives (DNSH) and meet minimum social safeguards (MSS).

The following table provides an overview of the GAR KPIs calculated based on templates 7 and 8:

**Table 66:** Summary of GAR KPIs

	31 December 2025			
	KPI			
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
	%	%	%	%
GAR stock	3,8%	0,0%	3,8%	72,3%
GAR flow	4,5%	0,1%	4,6%	77,8%

\*% of assets covered by the KPI over banks' total assets

	30 June 2025			
	KPI			
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
	%	%	%	%
GAR stock	3,2%	0,0%	3,2%	73,1%
GAR flow	2,8%	0,2%	2,9%	89,9%

### 11.4.7 Template 7: Mitigating actions: Assets for the calculation of GAR

The perimeter of this template includes loans and advances, debt securities and equity instruments on the Banking Book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real estate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regards to the environmental objectives of climate change mitigation and climate change adaptation:

**Environmental, Social and Governance (ESG) Risks**

**Table 67: Mitigating actions: Assets for the calculation of GAR**

	31 December 2025																
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)						
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)						
	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million			
<b>GAR - Covered assets in both numerator and denominator</b>																	
1	Loans and advances, debt securities and equity instruments not HLT eligible for GAR calculation	32,558	18,823	2,969	1,944	14	372	116	30	-	-	1	18,940	2,999	1,944	14	373
2	Financial corporations	4,834	1,361	234	90	7	11	31	10	-	-	-	1,392	244	90	7	12
3	Credit institutions	4,410	1,116	116	-	7	11	25	10	-	-	-	1,141	125	-	7	11
4	Loans and advances	1,130	203	18	-	1	2	1	-	-	-	-	204	18	-	1	2
5	Debt securities, including UoP	3,280	914	98	-	5	9	24	10	-	-	-	938	107	-	5	9
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	425	244	119	90	-	1	6	1	-	-	-	251	119	90	-	1
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	11	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	11	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial corporations (subject to NFRD disclosure obligations)	8,755	3,467	2,702	1,821	8	361	85	20	-	-	-	3,552	2,722	1,821	8	361
21	Loans and advances	7,692	3,048	2,532	1,821	-	265	69	19	-	-	-	3,116	2,552	1,821	-	265
22	Debt securities, including UoP	1,047	415	168	-	7	96	17	1	-	-	-	431	168	-	7	96
23	Equity instruments	16	4	2	-	-	-	-	-	-	-	-	4	2	-	-	-
24	Households	18,968	13,996	33	33	-	-	-	-	-	-	-	13,996	33	33	-	-
25	of which loans collateralised by residential immovable property	12,876	12,876	28	28	-	-	-	-	-	-	-	12,876	28	28	-	-
26	of which building renovation loans	1,738	1,738	-	-	-	-	-	-	-	-	-	1,738	-	-	-	-
27	of which motor vehicle loans	574	574	5	5	-	-	-	-	-	-	-	574	5	5	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	596	596	-	-	-	-	-	-	-	-	-	596	-	-	-	-
32	<b>TOTAL GAR ASSETS</b>	<b>33,154</b>	<b>19,419</b>	<b>2,969</b>	<b>1,944</b>	<b>14</b>	<b>372</b>	<b>116</b>	<b>30</b>	<b>-</b>	<b>-</b>	<b>1</b>	<b>19,535</b>	<b>2,999</b>	<b>1,944</b>	<b>14</b>	<b>373</b>

	31 December 2025																
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)						
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)						
	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million			
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>																	
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)	18,626	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	Loans and advances	18,314	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Debt securities	249	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Equity instruments	63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	5,531	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	Loans and advances	4,892	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Debt securities	639	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41	Derivatives	752	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	On demand interbank loans	327	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Cash and cash-related assets	887	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Other assets (e.g. Goodwill, commodities etc.)	19,307	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>	<b>78,584</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Other assets excluded from both the numerator and denominator for GAR calculation</b>																	
46	Sovereigns	15,178	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Central banks exposure	14,413	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Trading book	516	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>	<b>30,107</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50	<b>TOTAL ASSETS</b>	<b>108,691</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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	30 June 2025																
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)						
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)						
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)						
	€ million	€ million	€ million	Of which specialised lending	Of which transitional	Of which enabling	€ million	€ million	Of which specialised lending	Of which adaptation	Of which enabling	€ million	€ million	Of which specialised lending	Of which transitional/adaptation	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>																	
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	31,129	19,285	2,403	1,496	20	458	51	19	-	-	4	19,336	2,422	1,496	20	462
2	Financial corporations	5,006	1,313	159	-	13	25	8	-	-	-	-	1,321	159	-	13	25
3	Credit institutions	4,566	1,173	138	-	5	22	5	-	-	-	-	1,178	138	-	5	22
4	Loans and advances	1,267	288	14	-	2	2	1	-	-	-	-	289	14	-	2	2
5	Debt securities, including UoP	3,299	884	124	-	4	20	5	-	-	-	-	889	124	-	4	20
6	Equity instruments	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	440	140	21	-	7	3	3	-	-	-	-	143	21	-	7	3
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	6	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	6	1	-	-	-	-	1	-	-	-	-	2	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial corporations (subject to NFRD disclosure obligations)	7,308	2,721	2,202	1,496	7	433	43	18	-	-	4	2,764	2,221	1,496	7	437
21	Loans and advances	6,323	2,389	2,037	1,496	-	316	41	17	-	-	-	2,430	2,055	1,496	-	316
22	Debt securities, including UoP	968	328	163	-	7	116	2	1	-	-	4	329	164	-	7	121
23	Equity instruments	17	4	2	-	-	-	-	-	-	-	-	4	2	-	-	-
24	Households	18,815	15,251	42	-	-	-	-	-	-	-	-	15,251	42	-	-	-
25	of which loans collateralised by residential immovable property	12,648	12,648	31	-	-	-	-	-	-	-	-	12,648	31	-	-	-
26	of which building renovation loans	2,046	2,046	-	-	-	-	-	-	-	-	-	2,046	-	-	-	-
27	of which motor vehicle loans	557	557	11	-	-	-	-	-	-	-	-	557	11	-	-	-
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	636	516	-	-	-	-	-	-	-	-	-	516	-	-	-	-
32	<b>TOTAL GAR ASSETS</b>	<b>31,766</b>	<b>19,800</b>	<b>2,403</b>	<b>1,496</b>	<b>20</b>	<b>458</b>	<b>51</b>	<b>19</b>	<b>-</b>	<b>-</b>	<b>4</b>	<b>19,851</b>	<b>2,422</b>	<b>1,496</b>	<b>20</b>	<b>462</b>

	30 June 2025															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
	€ million	€ million	€ million	Of which specialised lending	Of which transitional	Of which enabling	€ million	€ million	Of which specialised lending	Of which adaptation	Of which enabling	€ million	€ million	Of which specialised lending	Of which transitional/adaptation	Of which enabling
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>																
33	EU Non-financial corporations (not subject to NFRD disclosure obligations)	18,467	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34	Loans and advances	18,148	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35	Debt securities	258	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36	Equity instruments	60	-	-	-	-	-	-	-	-	-	-	-	-	-	-
37	Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	4,778	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38	Loans and advances	4,267	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39	Debt securities	511	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41	Derivatives	804	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42	On demand interbank loans	178	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43	Cash and cash-related assets	626	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44	Other assets (e.g. Goodwill, commodities etc.)	18,949	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>	<b>75,566</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Other assets excluded from both the numerator and denominator for GAR calculation</b>																
46	Sovereigns	13,428	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47	Central banks exposure	14,059	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48	Trading book	309	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>	<b>27,797</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50	<b>TOTAL ASSETS</b>	<b>103,363</b>	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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**11.4.8 Template 8: GAR (%)**

Template 8 presents the proportion of exposures related to Taxonomy-eligible and Taxonomy-aligned activities compared to the covered assets based on data disclosed in Template 7 as well as the GAR KPIs on flow of new Taxonomy eligible and aligned exposures:

**Table 68: GAR (%)**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	31 December 2025: KPIs on stock															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of total assets covered
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
Of which specialised lending					Of which specialised lending					Of which specialised lending						
Of which transitional					Of which transitional					Of which transitional						
Of which enabling					Of which enabling					Of which enabling						
% (compared to total covered assets in the denominator)																
1 <b>GAR</b>	24.7	3.8	2.5	-	0.5	0.1	-	-	-	-	24.9	3.8	2.5	-	0.5	72.3
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	57.8	9.1	6.0	-	1.1	0.4	0.1	-	-	-	58.2	9.2	6.0	-	1.1	30.0
3 Financial corporations	28.1	4.8	1.9	0.1	0.2	0.6	0.2	-	-	-	28.8	5.1	1.9	0.1	0.2	4.4
4 Credit institutions	25.3	2.6	-	0.1	0.2	0.6	0.2	-	-	-	25.9	2.8	-	0.1	0.2	4.1
5 Other financial corporations	57.6	27.9	21.2	-	0.1	1.5	0.1	-	-	0.1	59.0	28.1	21.2	-	0.2	0.4
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	10.7	0.9	-	0.1	0.3	10.7	2.1	-	-	-	21.4	3.0	-	0.1	0.3	-
9 Non-financial corporations subject to NFRD disclosure obligations	39.6	30.9	20.8	0.1	4.1	1.0	0.2	-	-	-	40.6	31.1	20.8	0.1	4.1	8.1
10 Households	73.8	0.2	0.2	-	-						73.8	0.2	0.2	-	-	17.5
11 of which loans collateralised by residential immovable property	100.0	0.2	0.2	-	-						100.0	0.2	0.2	-	-	11.8
12 of which building renovation loans	100.0	-	-	-	-						100.0	-	-	-	-	1.6
13 of which motor vehicle loans	100.0	0.9	0.9	-	-						100.0	0.9	0.9	-	-	0.5
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-						-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.0	-	-	-	-						100.0	-	-	-	-	0.5

	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	31 December 2025: KPIs on flows															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
Of which specialised lending					Of which specialised lending					Of which specialised lending						
Of which transitional					Of which transitional					Of which transitional						
Of which enabling					Of which enabling					Of which enabling						
% (compared to total covered assets in the denominator)																
1 <b>GAR</b>	17.5	4.5	2.4	-	0.9	0.2	0.1	-	-	-	17.7	4.6	2.4	-	0.9	77.8
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	53.0	13.8	7.4	0.1	2.8	0.7	0.2	-	-	-	53.7	14.0	7.4	0.1	2.8	25.6
3 Financial corporations	23.3	3.7	-	0.1	0.2	0.1	0.1	-	-	-	23.5	3.8	-	0.1	0.2	7.8
4 Credit institutions	21.8	2.4	-	0.1	0.2	0.1	-	-	-	-	22.0	2.5	-	0.1	0.2	7.4
5 Other financial corporations	53.0	30.5	-	-	0.2	0.7	0.6	-	-	-	53.7	31.0	-	-	0.2	0.4
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	4.0	1.4	-	0.1	0.6	4.0	3.4	-	-	-	8.1	4.8	-	0.1	0.6	0.1
9 Non-financial corporations subject to NFRD disclosure obligations	40.1	31.9	18.7	0.2	6.8	1.6	0.5	-	-	-	41.7	32.4	18.7	0.2	6.8	10.2
10 Households	100.0	-	-	-	-						100.0	-	-	-	-	7.7
11 of which loans collateralised by residential immovable property	100.0	-	-	-	-						100.0	-	-	-	-	6.6
12 of which building renovation loans	100.0	-	-	-	-						100.0	-	-	-	-	0.6
13 of which motor vehicle loans	100.0	-	-	-	-						100.0	-	-	-	-	0.4
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-						-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.0	-	-	-	-						100.0	-	-	-	-	-

**Environmental, Social and Governance (ESG) Risks**

	30 June 2025: KPIs on stock															Proportion of total assets covered
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling				
1 GAR	26.2	3.2	2.0	-	0.6	0.1	-	-	-	-	26.3	3.2	2.0	-	0.6	73.1
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	62.0	7.7	4.8	0.1	1.5	0.2	0.1	-	-	-	62.1	7.8	4.8	0.1	1.5	30.1
3 Financial corporations	26.2	3.2	-	0.2	0.5	0.2	-	-	-	-	26.4	3.2	-	0.2	0.5	4.8
4 Credit institutions	25.7	3.0	-	0.1	0.5	0.1	-	-	-	-	25.8	3.0	-	0.1	0.5	4.4
5 Other financial corporations	31.9	4.7	-	1.6	0.6	0.6	-	-	-	-	32.5	4.7	-	1.6	0.6	0.4
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	17.7	0.1	-	-	0.1	17.7	1.5	-	-	-	35.3	1.7	-	-	0.1	-
9 Non-financial corporations subject to NFRD disclosure obligations	37.2	30.1	20.5	0.1	5.9	0.6	0.3	-	-	0.1	37.8	30.4	20.5	0.1	6.0	7.1
10 Households	81.1	0.2	-	-	-	-	-	-	-	-	81.1	0.2	-	-	-	18.2
11 of which loans collateralised by residential immovable property	100.0	0.2	-	-	-	-	-	-	-	-	100.0	0.2	-	-	-	12.2
12 of which building renovation loans	100.0	-	-	-	-	-	-	-	-	-	100.0	-	-	-	-	2.0
13 of which motor vehicle loans	100.0	2.0	-	-	-	-	-	-	-	-	100.0	2.0	-	-	-	0.5
14 Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties	81.1	-	-	-	-	-	-	-	-	-	81.1	-	-	-	-	0.6

	30 June 2025: KPIs on flows															Proportion of total new assets covered
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling				
1 GAR	16.6	2.8	1.2	-	0.9	0.2	0.2	-	-	-	16.8	2.9	1.2	-	0.9	89.9
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	56.8	9.5	4.0	-	3.2	0.7	0.6	-	-	-	57.6	10.1	4.0	-	3.2	29.0
3 Financial corporations	25.5	2.0	-	0.1	0.1	0.1	-	-	-	-	25.6	2.0	-	0.1	0.1	7.5
4 Credit institutions	23.7	1.9	-	0.1	0.1	0.1	-	-	-	-	23.8	1.9	-	0.1	0.1	7.0
5 Other financial corporations	50.9	4.0	-	-	0.2	0.1	-	-	-	-	51.0	4.1	-	-	0.2	0.5
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	27.2	3.4	-	-	0.1	-	0.1	-	-	-	27.2	3.5	-	-	0.1	-
9 Non-financial corporations subject to NFRD disclosure obligations	29.3	26.9	12.3	-	9.7	2.2	1.9	-	-	-	31.4	28.8	12.3	-	9.7	9.5
10 Households	98.2	0.4	-	-	-	-	-	-	-	-	98.2	0.4	-	-	-	12.0
11 of which loans collateralised by residential immovable property	97.6	0.5	-	-	-	-	-	-	-	-	97.6	0.5	-	-	-	9.2
12 of which building renovation loans	100.0	-	-	-	-	-	-	-	-	-	100.0	-	-	-	-	1.6
13 of which motor vehicle loans	100.0	0.7	-	-	-	-	-	-	-	-	100.0	0.7	-	-	-	1.2
14 Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession: residential and commercial immovable properties	98.9	-	-	-	-	-	-	-	-	-	98.9	-	-	-	-	0.1

**11.4.9 Template 10: Other climate change mitigating actions that are not covered in the EU Taxonomy**

As described in detail in section 11.1.1.2 Green Financing, the Group through its SFF, classifies sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing in line with the financed impact strategy. The SFF has been drawn from international best practices and is based on two key guiding frameworks: The ICMA principles on sustainable financing (Green Bond Principles, Green Loan Principles and Sustainability linked Bond Principles) and the EU Taxonomy. The SFF defines two levels of transaction alignment:

## Environmental, Social and Governance (ESG) Risks

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- SFF alignment - Fulfilment of criteria dictated by established market practice
- EU Taxonomy alignment - Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, DNSH, minimum social safeguards)

For general purpose financing / transactions (i.e. where the use of proceeds is not known) the SFF defines two other approaches: a) Company Business mix - Financing to companies that fulfil the eligibility green/ social criteria and derive most of their revenues from eligible activities. b) Sustainability-linked loans - Financing linked to ambitious and predefined SPTs.

The purpose of this template is to report exposures that aim to support counterparties in the transition and adaptation process related to the objectives of climate change mitigation and climate change adaptation and which are not taxonomy-aligned as per EU Taxonomy Regulation.

**Environmental, Social and Governance (ESG) Risks**

**Table 69: Other climate change mitigating actions that are not covered in the EU Taxonomy**

a	b	c	d	e		f
				31 December 2025		
Type of financial instrument	Type of counterparty	Gross carrying amount € million	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions	
1	Financial corporations	735	Yes	No	Includes Green/Sustainable bonds	
2	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	378	Yes	Yes	Includes Green bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)	
3		Of which Loans collateralised by commercial immovable property				
4		Households				
5		Of which Loans collateralised by residential immovable property				
6		Of which building renovation loans				
7		Other counterparties	697	Yes	Yes	Includes Green/Sustainable bonds
8	Financial corporations	142	Yes	No	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
9	Non-financial corporations	2,306	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
10	Of which Loans collateralised by commercial immovable property	666	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
11	Households	980	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
12	Of which Loans collateralised by residential immovable property	935	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
13	Of which building renovation loans	44	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
14	Other counterparties	63	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	

a	b	c	d	e		f
				30 June 2025		
Type of financial instrument	Type of counterparty	Gross carrying amount € million	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions	
1	Financial corporations	694	Yes	No	Includes Green/Sustainable bonds	
2	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	397	Yes	Yes	Includes Green bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)	
3		Of which Loans collateralised by commercial immovable property				
4		Households				
5		Of which Loans collateralised by residential immovable property				
6		Of which building renovation loans				
7		Other counterparties	521	Yes	Yes	Includes Green/Sustainable bonds
8	Financial corporations	24	Yes	No	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
9	Non-financial corporations	1,999	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
10	Of which Loans collateralised by commercial immovable property	574	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
11	Households	812	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
12	Of which Loans collateralised by residential immovable property	719	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
13	Of which building renovation loans	37	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
14	Other counterparties	63	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	

## Appendix 1: Composition of regulatory own funds

### Appendix 1: EU CC1 - Composition of regulatory own funds

	a		b
	31 December 2025 <sup>(1)</sup>	30 June 2025 <sup>(1)</sup>	Source based on numbers/letters of the balance sheet under the regulatory scope of consolidation
	Current period	Current period	
	€ million	€ million	
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>			
1 Capital instruments and the related share premium accounts	1,939	1,954	<i>f &amp; g</i>
2 Retained earnings	2,914	3,034	
3 Accumulated other comprehensive income (and other reserves)	3,220	3,311	
5 Minority interests (amount allowed in consolidated CET1)	-	-	
EU-5a Independently reviewed interim profits net of any foreseeable charge or dividend	815	363	
6 <b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>8,888</b>	<b>8,662</b>	
<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>			
7 Additional value adjustments (negative amount)	(5)	(5)	
8 Intangible assets (net of related tax liability) (negative amount)	(350)	(353)	<i>b</i>
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)	(1)	-	<i>c</i>
11 Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	16	17	<i>i</i>
12 Negative amounts resulting from the calculation of expected loss amounts	-	-	
15 Defined-benefit pension fund assets (negative amount)	-	-	
16 Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	(25)	(69)	
18 Direct, indirect and synthetic holdings by the institution of the CET1 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 holdings by the institution of the CET1 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)	-	-	<i>a</i>
EU-20a Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(57)	(84)	
EU-20b of which: qualifying holdings outside the financial sector (negative amount)	-	-	
EU-20c of which: securitisation positions (negative amount)	(57)	(84)	
21 Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	-	<i>d</i>
22 Amount exceeding the 17.65% threshold (negative amount)	(13)	(13)	<i>a &amp; d</i>
23 of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	(6)	(6)	<i>a</i>
25 of which: deferred tax assets arising from temporary differences	(8)	(8)	<i>d</i>
EU-25a Losses for the current financial year (negative amount)	-	-	
27 Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a Other regulatory adjustments	(319)	(223)	
28 <b>Total regulatory adjustments to Common equity Tier 1 (CET1)</b>	<b>(754)</b>	<b>(730)</b>	
29 <b>Common Equity Tier 1 (CET1) capital</b>	<b>8,134</b>	<b>7,932</b>	
<b>Additional Tier 1 (AT1) capital: instruments</b>			
30 Capital instruments and the related share premium accounts <sup>(2)</sup>	1,090	495	<i>j</i>
33 Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-	-	
36 <b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>	<b>1,090</b>	<b>495</b>	
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>			
40 Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42 Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	-	
43 <b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	<b>-</b>	<b>-</b>	
44 <b>Additional Tier 1 (AT1) capital</b>	<b>1,090</b>	<b>495</b>	
45 <b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>9,224</b>	<b>8,427</b>	
<b>Tier 2 (T2) capital: instruments</b>			
46 Capital instruments and the related share premium accounts	1,215	1,705	
48 Qualifying own funds instruments included in consolidated T2 capital (including minority interests not included in row 5 or 34) issued by subsidiaries and held by third parties	-	-	
51 <b>Tier 2 (T2) capital before regulatory adjustments</b>	<b>1,215</b>	<b>1,705</b>	
<b>Tier 2 (T2) capital: regulatory adjustments</b>			
56b Other regulatory adjustments to T2 capital	-	-	
57 <b>Total regulatory adjustments to Tier 2 (T2) capital</b>	<b>-</b>	<b>-</b>	
58 <b>Tier 2 (T2) capital</b>	<b>1,215</b>	<b>1,705</b>	
59 <b>Total Capital (TC = T1 + T2)</b>	<b>10,439</b>	<b>10,132</b>	
60 <b>Total risk exposure amount</b>	<b>53,647</b>	<b>51,720</b>	

## Appendix 1: Composition of regulatory own funds

	a		b
	31 December 2025 <sup>(1)</sup>	30 June 2025 <sup>(1)</sup>	Source based on numbers/letters of the balance sheet under the regulatory scope of consolidation
	Current period	Current period	
	€ million	€ million	
<b>Capital ratios and requirements including buffers</b>			
61 Common Equity Tier 1	15.2%	15.3%	
62 Tier 1	17.2%	16.3%	
63 Total capital	19.5%	19.6%	
64 Institution CET1 overall capital requirements	10.53%	10.40%	
65 of which: capital conservation buffer requirement	2.50%	2.50%	
66 of which: countercyclical capital buffer requirement	0.68%	0.55%	
67 of which: systemic risk buffer requirement	0.00%	0.00%	
EU-67a of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.25%	1.25%	
68 Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	8.61%	8.15%	
<b>Amounts below the thresholds for deduction (before risk weighting)</b>			
72 Direct and indirect holdings of own funds and eligible liabilities 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)	630	554	
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 17.65% threshold and net of eligible short positions)	532	524	
75 Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in 38 (3) are met)	736	699	
<b>Applicable caps on the inclusion of provisions in Tier 2</b>			
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	671	647	
78 Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	-	
79 Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	

<sup>(1)</sup> Figures and ratios include profits for the financial year 2025 and 6M 2025 accordingly, less the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' and AGM approval.

<sup>(2)</sup> In the fourth quarter of 2025, the Company completed the issuance of € 600 million fixed rate reset Additional Tier 1 perpetual contingent temporary write-down notes.



Appendix 2: Capital instruments' main features disclosure

	a		b		c	
	Eurobank S.A.		Eurobank S.A.		Eurobank S.A.	
1	ISIN Code: XS2987292269		ISIN Code: XS3044351867		ISIN Code: XS224517410	
2	Public placement		Public placement		Public placement	
2a	Public or private placement		Public or private placement		Public or private placement	
3	The instruments and any non-contractual obligations arising out of or in connection with the instruments shall be governed by and construed in accordance with English law, save for Condition 3, Condition 4.7 and Condition 18 which shall be governed by and construed in accordance with the laws of the Hellenic Republic		The Notes and the Coupons and any non-contractual obligations arising out of or in connection with them are governed by, and will be construed in accordance with, English law, except the Conditions 3 (Status and Powers) and Condition 17 (Acknowledgement of Statutory Loss Absorption Powers) are governed by and construed in accordance with Greek law		The Notes and the Coupons and any non-contractual obligations arising out of or in connection with them are governed by, and will be construed in accordance with, English law, except the Conditions 2 (Status and Subordination) and Condition 17 (Acknowledgement of Statutory Loss Absorption Powers) are governed by and construed in accordance with Greek law	
3a	Yes		Yes		Yes	
4	Tier 2		Additional Tier 1		Additional Tier 1	
4a	Tier 2		Additional Tier 1		Additional Tier 1	
5	Solo & Consolidated		Solo & Consolidated		Solo & Consolidated	
6	Tier 2 Instrument (Art.63 of the CRR)		Additional Tier 1 Instruments (Art.52 of the CRR)		Additional Tier 1 Instruments (Art.52 of the CRR)	
7	€ 597 million		€ 495 million		€ 595 million	
8	€ 580 million		€ 500 million		€ 600 million	
9	99.433%		100%		100%	
EU-9a	Redemption at par (100 per cent of nominal amount) together with interest accrued up to (but excluding) the date of redemption		Redemption at the Current Nominal Amount plus (subject to Condition 3 - Cancellation of Interest) any accrued but unpaid interest thereon up to (but excluding) the relevant date of redemption, as provided in Condition 5.		Redemption at the Current Nominal Amount plus (subject to Condition 3 - Cancellation of Interest) any accrued but unpaid interest thereon up to (but excluding) the relevant date of redemption, as provided in Condition 5.	
EU-9b	Redemption price		Redemption price		Redemption price	
10	Liability - amortized cost		Equity		Equity	
11	30 January 2025		4 June 2025		10 November 2025	
12	Dated		Perpetual		Perpetual	
13	30 April 2035		N/A		N/A	
14	Yes		Yes		Yes	
15	Any date from (and including) 30 January 2030 (the anniversary of the Issue Date) to (and including) 30 April 2030.  The instruments have also a Tax, Capital Disqualification and MREL Disqualification Event call in addition there is a Clean-Up Call Option. The instruments may be redeemed in whole but not in part. Redemption at par together with interest accrued, subject to the prior permission of the Relevant Regulator (to the extent then required).		Subject to the conditions to redemption and compliance with the Solvency Condition, the instruments may be redeemed in whole or after the 4 June 2031.  Subject to the conditions to redemption and compliance with the Solvency Condition, the instruments may be redeemed in whole or after the 4 June 2031. In addition there is a Clean-Up Call Option. The instruments may be redeemed in whole but not in part. The instruments may be redeemed at their Current Nominal Amount together with interest accrued.		Subject to the conditions to redemption and compliance with the Solvency Condition, the issuer may elect to pay interest only to the extent that it has Available Distributable Items. In addition, the issuer shall cancel payment of any interest otherwise scheduled to be paid on an Interest Payment Date: (i) in the event of a Winding-Up; (ii) if and to the extent that payment of such interest would cause any Maximum Distributable Amount then applicable to the Group and/or the Issuer to be exceeded; or (iii) in the event the Supervisory Authority otherwise directs the issuer to exercise its discretion accordingly.  Payments of interest are also subject to the Solvency Condition. Following the occurrence of a Trigger Event, the issuer will also cancel all interest accrued up to (but excluding) the Write-Down Date.	
16	n/a		Any Interest Payment Date after the 4 June 2031		Any Interest Payment Date after the 10 November 2031	
17	Fixed rate of 4.250% p.a. payable until (but excluding) the 30th April 2030, reset from (and including) the 30th April 2030 to a fixed rate equal to the 5-year Mid-Swap rate prevailing at the Reset Determination Date plus 2 per cent per annum (no step-up). Subject to Benchmark Replacement provisions		Subject to conditions, the Notes will bear interest on their outstanding Current Nominal Amount: (a) from (and including) the 4 June 2025 to (but excluding) the 4 June 2031 at the rate of 6.025 per cent per annum; and (b) thereafter, at the rate per annum equal to the relevant Reset Rate of Interest (i.e. the aggregate of 3.70 per cent per annum plus the then 5-year Mid-Swap Rate, calculated on an annual basis and then converted to a semi-annual rate), subject to Benchmark Replacement provisions		Subject to conditions, the Notes will bear interest on their outstanding Current Nominal Amount: (a) from (and including) the Issue Date to (but excluding) the 10 November 2031 at the rate of 6.250 per cent per annum; and (b) thereafter, at the rate per annum equal to the relevant Reset Rate of Interest (i.e. the aggregate of 3.70 per cent per annum plus the then 5-year Mid-Swap Rate, calculated on an annual basis and then converted to a semi-annual rate), subject to Benchmark Replacement provisions	
18	Fixed rate of 4.250% p.a. payable until (but excluding) the 30th April 2030, reset from (and including) the 30th April 2030 to a fixed rate equal to the 5-year Mid-Swap rate prevailing at the Reset Determination Date plus 2 per cent per annum (no step-up). Subject to Benchmark Replacement provisions		Subject to conditions, the Notes will bear interest on their outstanding Current Nominal Amount: (a) from (and including) the 4 June 2025 to (but excluding) the 4 June 2031 at the rate of 6.025 per cent per annum; and (b) thereafter, at the rate per annum equal to the relevant Reset Rate of Interest (i.e. the aggregate of 3.70 per cent per annum plus the then 5-year Mid-Swap Rate, calculated on an annual basis and then converted to a semi-annual rate), subject to Benchmark Replacement provisions		Subject to conditions, the Notes will bear interest on their outstanding Current Nominal Amount: (a) from (and including) the Issue Date to (but excluding) the 10 November 2031 at the rate of 6.250 per cent per annum; and (b) thereafter, at the rate per annum equal to the relevant Reset Rate of Interest (i.e. the aggregate of 3.70 per cent per annum plus the then 5-year Mid-Swap Rate, calculated on an annual basis and then converted to a semi-annual rate), subject to Benchmark Replacement provisions	
19	No		No		No	
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)		Mandatory		Mandatory	
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)		Mandatory		Mandatory	
21	No		No		No	
22	Cumulative		Non-cumulative		Non-cumulative	
23	Non-convertible		Non-convertible		Non-convertible	
24	N/A		N/A		N/A	
25	N/A		N/A		N/A	
26	N/A		N/A		N/A	
27	N/A		N/A		N/A	
28	N/A		N/A		N/A	
29	N/A		N/A		N/A	
30	No		Yes		Yes	
31	N/A		"Trigger Event" if the Common Equity Tier 1 Ratio of the Group and/or (if the Issuer has a solo capital requirement at the relevant time) the Issuer, as of any date, has fallen below 5.125 per cent.		"Trigger Event" if the Common Equity Tier 1 Ratio of the Group and/or (if the Issuer has a solo capital requirement at the relevant time) the Issuer, as of any date, has fallen below 5.125 per cent.	
32	N/A		Full or Partial		Full or Partial	
33	N/A		Temporary		Temporary	
34	N/A		To the extent permitted by the Regulatory Capital Requirements and subject to any Maximum Distributable Amount not being exceeded thereby, the Issuer may at its sole and full discretion, unless previously redeemed, repurchased or cancelled, renege the Current Nominal Amount of each Note, up to a maximum of its Original Nominal Amount, on a pro-rata basis with the other Notes and with any Written Down Additional Tier 1 Instruments, subject to the Maximum Write-Up Amount restrictions		To the extent permitted by the Regulatory Capital Requirements and subject to any Maximum Distributable Amount not being exceeded thereby, the Issuer may at its sole and full discretion, unless previously redeemed, repurchased or cancelled, renege the Current Nominal Amount of each Note, up to a maximum of its Original Nominal Amount, on a pro-rata basis with the other Notes and with any Written Down Additional Tier 1 Instruments, subject to Maximum Write-Up Amount restrictions	
34a	Contractual		Contractual		Contractual	
EU-34b	Rank 3 as per the SIB Annex on Insolvency Ranking		Rank 2 as per the SIB Annex on Insolvency Ranking		Rank 2 as per the SIB Annex on Insolvency Ranking	
35	Junior to any present and future claims of the Senior Creditors (as defined in Condition 3E)		Subject to any mandatory provisions of law, the Notes will constitute direct, unconditional, unsecured, unsubordinated and subordinated obligations of the Issuer and will rank at all times: a) pari passu with the rights and claims of holders of all other present and future subordinated obligations of the Issuer which pursuant to their terms or mandatory provisions of law rank or are deemed to rank pari passu with the Notes, or would but for any applicable limitation on the amount of such capital constitute Additional Tier 1 Capital of the Issuer; b) in priority to any present and future rights and claims in respect of (i) the share capital of the Issuer and (ii) any other obligations or instruments of the Issuer which rank or are expressed to rank junior to the Notes on a Winding-Up, including such instruments or items included in the common equity tier 1 capital (as that term is used in the Regulatory Capital Requirements) of the Issuer; and c) junior to any present and future claims of the Senior Creditors.		Subject to any mandatory provisions of law, the Notes will constitute direct, unconditional, unsecured, unsubordinated and subordinated obligations of the Issuer and will rank at all times: a) pari passu with the rights and claims of holders of all other present and future subordinated obligations of the Issuer which pursuant to their terms or mandatory provisions of law rank or are deemed to rank pari passu with the Notes, or would but for any applicable limitation on the amount of such capital constitute Additional Tier 1 Capital of the Issuer; c) in priority to any present and future rights and claims in respect of (i) the share capital of the Issuer and (ii) any other obligations or instruments of the Issuer which rank or are expressed to rank junior to the Notes on a Winding-Up, including such instruments or items included in the common equity tier 1 capital (as that term is used in the Regulatory Capital Requirements) of the Issuer; and d) junior to any present and future claims of the Senior Creditors.	
36	No		No		No	
37	N/A		N/A		N/A	
37a	Link to the full term and conditions of the instrument (signposting)		<a href="https://www.eurobank.gr/-/media/online-forms/terms-conditions-instruments/2025-06-02.pdf">https://www.eurobank.gr/-/media/online-forms/terms-conditions-instruments/2025-06-02.pdf</a>		<a href="https://www.eurobank.gr/-/media/online-forms/terms-conditions-instruments/2025-11-10.pdf">https://www.eurobank.gr/-/media/online-forms/terms-conditions-instruments/2025-11-10.pdf</a>	

## Appendix 3: List of Abbreviations

### Appendix 3: List of Abbreviations

Abbreviation	Definition
AC	Amortised Cost
ADC	Acquisition of Land, Development & Construction
AML/TF	Anti-Money Laundering/Terrorist Financing
APS	Asset Protection Scheme
AT1	Additional Tier 1
AVA	Additional Value Adjustments
BI	Basic Indicator
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
CCB	Capital Conservation Buffer
CCF	Credit Conversion Factor
CCM	Climate Change Mitigation
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CCyB	Counter Cyclical Buffer
CET1	Common equity Tier 1
CIB	Corporate & Investment Banking
COREPs	Common Reports
CQS	Credit Quality Step
CR&E	Climate-Related and Environmental
CRD	Capital Requirements Directive
CRM	Credit Risk Mitigation
CRR	Capital Requirements Regulation
CRSTC	Climate Risk Stress Test Committee
CSA	Credit Support Annex
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
CVA	Credit Value Adjustment
CVP	Collateral Valuation Policy
DNSH	Do No Significant Harm
DPM	Data Point Model
DTC	Deferred Tax Credit
E&S	Environmental & Social
EBA	European Banking Authority
EC	European Commission
ECB	European Central Bank
ECL	Expected Credit Loss
ELSTAT	Hellenic Statistical Authority
EMAS	Eco-Management and Audit Scheme
EPC	Energy Performance Certificate
ESG	Environmental, Social and Governance
ESMS	Environmental and Social Management System
EVE	Economic Value of Equity
FRTB	Fundamental Review of the Trading Book
FVOCI	Fair Value through Other Comprehensive Income
GAR	Green Asset Ratio
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GMRA	Global Master Repurchase Agreement
GRM	Group Risk Management
G-SIIIs	Global Systemic Institution Buffer
GVA	Gross Value Added
HAPS	Hellenic Asset Protection Scheme
HBA	Hellenic Bank Association
HFS	Held For Sale
HQLA	High Quality Liquid Assets

## Appendix 3: List of Abbreviations

Abbreviation	Definition
<b>ICAAP</b>	Internal Capital Adequacy Assessment Process
<b>ICMA</b>	International Capital Markets Association
<b>IFRS</b>	International Financial Reporting Standards
<b>ILAAP</b>	Internal Liquidity Adequacy Assessment Process
<b>IMA</b>	Internal Model Approach
<b>IRC</b>	Incremental Risk Charge
<b>IRRBB</b>	Interest Rate risk in the Banking Book
<b>ISDA</b>	International Swaps and Derivatives Association
<b>KPIs</b>	Key Performance Indicators
<b>KRIs</b>	Key Risks Indicators
<b>KYC</b>	Know-Your-Customer
<b>LCR</b>	Liquidity Coverage Ratio
<b>LMA</b>	Loan Market Association
<b>MRA</b>	Moody's Risk Analyst
<b>MRC</b>	Management Risk Committee
<b>MREL</b>	Minimum Requirement for own funds and Eligible Liabilities
<b>NFRD</b>	Non-Financial Reporting Directive
<b>NGFS</b>	Network for Greening the Financial System
<b>NII</b>	Net Interest Income
<b>NPE</b>	Non-Performing exposures
<b>NSFR</b>	Net Stable Funding Ratio
<b>OCR</b>	Overall Capital Requirement
<b>OSI</b>	Operational Impact Strategy
<b>O-SIIs</b>	Other Systemically Important Institution
<b>P&amp;L</b>	Profit & Loss
<b>P2G</b>	Pillar 2 Guidance
<b>P2R</b>	Pillar 2 Requirement
<b>P3DH</b>	Pillar 3 Data Hub
<b>PCAF</b>	Partnership for Carbon Accounting Financials
<b>PRI</b>	Principles for Responsible Investment
<b>RAF</b>	Risk Appetite Framework
<b>RAS</b>	Risk Appetite Statements
<b>RCSA</b>	Risk & Control Self-Assessment
<b>RES</b>	Renewable Energy Sources
<b>RIMA</b>	Risk Identification & Materiality Assessment
<b>RRF</b>	Recovery and Resilience Facility
<b>RTS</b>	Regulatory Technical Standards
<b>RWEAs</b>	Risk Weighted Exposure Amounts
<b>SDGs</b>	Sustainable Development Goals
<b>SFF</b>	Sustainable Finance Framework
<b>SFTs</b>	Securities Financing Transactions
<b>SIF</b>	Sustainable Investment Framework
<b>SLL</b>	Sustainability Linked Loans
<b>SPTs</b>	Sustainability Performance Targets
<b>SRB</b>	Single Resolution Board
<b>SREP</b>	Supervisory Review and Evaluation Process
<b>SRT</b>	Significant Risk Transfer
<b>SSM</b>	Single Supervisory Mechanism
<b>STD</b>	Standardised Approach
<b>SVAR</b>	Stressed VaR
<b>SyRB</b>	Systemic Risk Buffer
<b>TCFD</b>	Task Force on Climate-Related Financial Disclosures
<b>TSCR</b>	Total SREP Capital Requirement
<b>UNEP FI</b>	UN Environment Programme Finance Initiative
<b>VAR</b>	Value at Risk

**Appendix 4: Guidelines and Regulations mapping on Disclosures Requirements**
**Appendix 4: Guidelines and Regulations mapping on Disclosures Requirements**

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**Appendix 4: Guidelines and Regulations mapping on Disclosures Requirements**

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