

Eurobank Group UK Tax Strategy

Scope and application

This document sets out the Eurobank Group (“the Group”) tax strategy covering all UK entities, permanent establishments and operations in the UK. Eurobank SA (“The Bank”), which is listed on the Athens Stock Exchange, is the parent company of the Group.

The Bank is active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Bank is incorporated in Greece and operates mainly in Greece, Cyprus, Luxembourg, Bulgaria and UK, where it controls / owns directly or indirectly several entities and permanent establishments.

The Bank is committed to complying with all tax laws in the jurisdictions where it operates. In addition, it has a low tolerance towards tax risk and does not use complex structures to minimize Group tax liabilities.

This strategy is published in compliance with Schedule 19 of the Finance Act 2016 and is effective from the date of publication until it is superseded or amended.

Risk management and governance arrangements in respect of UK tax

The Group Chief Financial Officer (“CFO”) has executive responsibility of all Group tax matters and reports to the Board of Directors and Audit Committee on relevant tax matters. The Board of Directors and Audit Committee understand the importance of tax compliance and the management of the tax risks associated.

The CFO delegates responsibility for Group tax matters to the Group’s in-house Group Tax Sector based in Greece, staffed by experienced tax professionals. They review tax related matters faced by the Group in order to ensure that tax implications are fully considered on Group operations and corporate transactions. Given that taxation is an increasingly complex area, in evaluating tax compliance issues and tax practices followed by Group subsidiaries, the Group Tax Sector examines all available supporting evidence (Ministry of Finance circulars, individual rulings, case law, ad hoc external tax / legal opinions etc.) to the extent that they are applicable to the facts and circumstances of the particular Group case / transaction to ensure compliance with relevant tax legislation.

In the case of Eurobank Private Bank Luxembourg S.A. London Branch (engaging in corporate and retail banking), day-to-day tax related matters are addressed by the London Branch manager who is primarily supported by the Luxembourg Head Office, and where applicable, external advisors.

We consider our tax affairs in the UK to be relatively straightforward, although we do recognise there are situations where we may require assistance from suitably qualified and reputable external advisors. Examples relevant to the Group include:

- preparation or review of UK tax returns;
- awareness of and compliance with new tax laws or changes to existing tax laws and practices; and
- where material transactions / restructurings are entered into which affect UK operations.

Attitude towards tax planning and acceptable level of tax risk

The Group's approach to Tax, in relation to all its operations (including UK operations) involves the following Principles:

- Comply with tax filing, tax reporting and tax payment obligations,
- Minimise exposure to payment of additional taxes / penalties and negative publicity through non-compliance,
- Increase tax transparency,
- Enter into transactions with commercial and economic substance.

Eurobank Private Bank Luxembourg S.A. London Branch has formally adopted and complies with HMRC's Code of Practice on Taxation for Banks, which sets out the principles and behaviors expected for Banking Groups with regard to tax.

We do not engage in tax planning other than that which supports genuine commercial activity and we have a conservative appetite for tax risk.

We rely on the implementation of our Tax Strategy, our Principles in relation to managing tax affairs and Group Tax Sector to minimize our exposure to tax risk. We manage our tax affairs to ensure compliance with both the letter and spirit of the law, where the intentions of Parliament are readily discernible.

Approach to dealings with HMRC

The Group seeks a pro-active and cooperative relationship with all tax authorities including HMRC, and strives to ensure that HMRC are kept aware of significant transactions and changes in our UK operations. External tax advisers may liaise with HMRC on our behalf where the tax law is complex or open to interpretation. In addition we:

- aim to meet all statutory deadlines; and
- respond with full disclosure to queries raised by HMRC on a timely basis.