



EUROBANK S.A.

FINANCIAL STATEMENTS

**FOR THE YEAR ENDED
31 DECEMBER 2021**

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Index to the Financial Statements	Page
Balance Sheet	1
Income Statement	2
Statement of Comprehensive Income	3
Statement of Changes in Equity	4
Cash Flow Statement	5

Notes to the Financial Statements

1. General information	6
2. Basis of preparation and principal accounting policies	6
2.1 Basis of preparation	6
2.2 Principal accounting policies	12
2.3 Impact of IFRIC agenda decision – Attributing Benefit to Periods of Service (IAS 19)	35
3. Critical accounting estimates and judgments in applying accounting policies	36
4. Capital Management	44
5. Financial risk management and fair value	46
5.2.1 Credit Risk	48
5.2.2 Market risk	79
5.2.3 Liquidity risk	83
5.2.4 Interest Rate Benchmark reform – IBOR reform	85
5.2.5 Climate-related risk	87
5.3 Fair value of financial assets and liabilities	87
6. Net interest income	91
7. Net banking fee and commission income	92
8. Income from non banking services	92
9. Dividend income	92
10. Net trading income and gains less losses from investment securities	93
11. Other income/ (expenses)	93
12. Operating expenses	93
13. Other impairments, restructuring costs and provisions	94
14. Income tax	95
15. Cash and balances with central banks	98
16. Cash and cash equivalents and other information on cash flow statement	98
17. Due from credit institutions	99
18. Securities held for trading	100
19. Derivative financial instruments and hedge accounting	100
20. Loans and advances to customers	103

20.1 Project “Mexico” – loans’ derecognition	104
21. Impairment allowance for loans and advances to customers	106
22. Investment securities.....	108
23. Shares in subsidiaries.....	111
23.1 Demerger of Eurobank Ergasias Leasing Single Member S.A.	113
24. Investments in associates and joint ventures.....	114
25. Property and equipment	115
26. Investment property.....	116
27. Intangible assets	118
28. Other assets	118
29. Disposal groups classified as held for sale	119
30. Due to central banks.....	120
31. Due to credit institutions	121
32. Due to customers.....	121
33. Debt securities in issue	121
34. Other liabilities	123
35. Standard legal staff retirement indemnity obligations.....	124
36. Share capital	125
37. Reserves and retained earnings/losses	125
38. Share options.....	126
39. Transfers of financial assets.....	127
40. Leases	128
41. Contingent liabilities and other commitments	130
42. Post balance sheet events	131
43. Related parties.....	131
44. External Auditors	133
45. Board of Directors.....	134

Balance Sheet

		31 December	
		2021	2020
			Restated ⁽¹⁾
	Note	€ million	€ million
ASSETS			
Cash and balances with central banks	15	8,373	3,736
Due from credit institutions	17	3,100	3,573
Securities held for trading	18	50	22
Derivative financial instruments	19	1,959	2,606
Loans and advances to customers	20	28,892	29,261
Investment securities	22	8,994	6,463
Shares in subsidiaries	23	1,922	1,919
Investments in associates and joint ventures	24	102	104
Property and equipment	25	587	549
Investment property	26	984	914
Intangible assets	27	172	173
Deferred tax assets	14	4,414	4,508
Other assets	28	1,990	1,765
Assets of disposal groups classified as held for sale	29	65	36
Total assets		61,604	55,629
LIABILITIES			
Due to central banks	30	10,813	7,231
Due to credit institutions	31	2,896	4,138
Derivative financial instruments	19	2,414	2,937
Due to customers	32	37,221	34,448
Debt securities in issue	33	2,590	1,544
Other liabilities	34	1,186	1,151
Liabilities of disposal groups classified as held for sale	29	37	-
Total liabilities		57,157	51,449
EQUITY			
Share capital	36	3,941	4,052
Corporate law reserves	37	28	-
Special reserves	37	368	228
Other reserves	37	263	299
Retained earnings/(losses)	37	(153)	(399)
Total equity		4,447	4,180
Total equity and liabilities		61,604	55,629

⁽¹⁾ The comparative information has been restated due to change in accounting policy (note 2.3).

Note: Information for the change in presentation of reserves and retained earnings is provided in note 37

Notes on pages 6 to 134 form an integral part of these financial statements

Income Statement

		Year ended 31 December 2021	Period 20 March - 31 December 2020 Restated⁽¹⁾
	Note	€ million	€ million
Interest income		1,451	1,167
Interest expense		(513)	(432)
Net interest income	6	938	735
Banking fee and commission income		306	201
Banking fee and commission expense		(96)	(60)
Net banking fee and commission income	7	210	141
Income from non banking services	8	68	51
Dividend income	9	200	3
Net trading income/(loss)	10	(25)	13
Gains less losses from investment securities	10	100	418
Other income/(expenses)	11	28	179
Operating income		1,519	1,540
Operating expenses	12	(607)	(463)
Profit from operations before impairments, provisions and restructuring costs		912	1,077
Impairment losses relating to loans and advances to customers	21	(323)	(444)
Impairment losses on goodwill	27	-	(160)
Other impairment losses and provisions	13	7	(18)
Restructuring costs	13	(17)	(140)
Profit before tax		579	315
Income tax	14	(110)	(302)
Net profit		469	13

⁽¹⁾ The comparative information has been restated due to change in accounting policy (note 2.3).

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Statement of Comprehensive Income

	Year ended 31 December 2021		Period 20 March - 31 December 2020 Restated⁽¹⁾	
	€ million		€ million	
Net profit		469		13
Other comprehensive income:				
Items that are or may be reclassified subsequently to profit or loss:				
Cash flow hedges				
- changes in fair value, net of tax	36		(13)	
- transfer to net profit, net of tax	<u>1</u>	<u>37</u>	<u>(1)</u>	<u>(14)</u>
Debt securities at FVOCI				
- changes in fair value, net of tax (note 22)	(79)		360	
- transfer to net profit, net of tax (note 22)	<u>3</u>	<u>(76)</u>	<u>(285)</u>	<u>75</u>
		<u>(39)</u>		<u>61</u>
Items that will not be reclassified to profit or loss:				
- Gains/(losses) from equity securities at FVOCI, net of tax		2		-
- Actuarial gains/ (losses) on post employment benefit obligations, net of tax		<u>1</u>		<u>(1)</u>
		<u>3</u>		<u>(1)</u>
Other comprehensive income		(36)		60
Total comprehensive income		433		73

⁽¹⁾ The comparative information has been restated due to change in accounting policy (note 2.3).

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Statement of Changes in Equity

	Share capital	Reserves and Retained earnings	Total
	€ million	€ million	€ million
Balance at 20 March 2020	4,052	38	4,090
Restatement due to change in accounting policy (note 2.3)	-	17	17
Balance at 20 March 2020, as restated	4,052	55	4,107
Net profit (restated, note 2.3)	-	13	13
Other comprehensive income (restated, note 2.3)	-	60	60
Total comprehensive income for the period ended 31 December 2020	-	73	73
Balance at 31 December 2020, as restated	4,052	128	4,180
Balance at 1 January 2021	4,052	128	4,180
Net profit	-	469	469
Other comprehensive income	-	(36)	(36)
Total comprehensive income for the year ended 31 December 2021	-	433	433
Distribution in kind through share capital decrease (notes 20.1 and 36)	(102)	(16)	(118)
Formation of a corporate law reserve (note 36)	(9)	9	-
Demerger of Eurobank Ergasias Leasing Single Member S.A. (note 23.1)	-	(50)	(50)
Share-based payment:			
- Value of employee services (note 38)	-	2	2
	(111)	(55)	(166)
Balance at 31 December 2021	3,941	506	4,447
	Note 36	Note 37	

Notes on pages 6 to 134 form an integral part of these financial statements

Cash Flow Statement

		Year ended 31 December 2021	Period 20 March - 31 December 2020 Restated⁽¹⁾
	Note	€ million	€ million
Cash flows from operating activities			
Profit before income tax (note 2.3)		579	315
Adjustments for :			
Impairment losses relating to loans and advances to customers	21	323	444
Impairment losses on goodwill	27	-	160
Other impairment losses, provisions and restructuring costs (note 2.3)	13	10	158
Depreciation and amortisation	12	85	61
Other (income)/losses on investment securities	16	(90)	(469)
(Gain)/loss on sale of subsidiaries, associates and joint ventures (note 2.3)	11	(1)	(178)
Dividends from subsidiaries, associates and joint ventures	9	(199)	-
Valuation of investment property	26	(33)	(8)
Other adjustments		13	(6)
		687	477
Changes in operating assets and liabilities			
Net (increase)/decrease in cash and balances with central banks		1	318
Net (increase)/decrease in securities held for trading		(28)	4
Net (increase)/decrease in due from credit institutions		296	336
Net (increase)/decrease in loans and advances to customers		(194)	(1,018)
Net (increase)/decrease in derivative financial instruments		94	(71)
Net (increase)/decrease in other assets		(137)	12
Net increase/(decrease) in due to central banks and credit institutions		2,341	992
Net increase/(decrease) in due to customers		2,696	1,176
Net increase/(decrease) in other liabilities		(20)	(142)
		5,049	1,607
Income tax paid		(2)	-
Net cash from/(used in) operating activities		5,734	2,084
Cash flows from investing activities			
Acquisition of fixed and intangible assets		(94)	(77)
Proceeds from sale of fixed and intangible assets		2	4
(Purchases)/sales and redemptions of investment securities		(2,409)	922
Acquisition of subsidiaries, associates, joint ventures and participation in capital increases		(37)	(69)
Proceeds from disposal/liquidation/capital decrease of holdings in subsidiaries, associates and joint ventures		83	235
Dividends from investment securities, subsidiaries, associates and joint ventures	9	200	3
Net cash from/(used in) investing activities		(2,255)	1,018
Cash flows from financing activities			
(Repayments)/proceeds from debt securities in issue	16	1,036	(849)
Repayment of lease liabilities		(25)	(25)
Net cash from/(used in) financing activities		1,011	(874)
Net increase in cash and cash equivalents		4,490	2,228
Cash and cash equivalents at beginning of year	16	4,016	1,788
Cash and cash equivalents at end of year	16	8,506	4,016

⁽¹⁾ The comparative information has been restated due to change in accounting policy (note 2.3).

Notes on pages 6 to 134 form an integral part of these financial statements

Notes to the Financial Statements

1. General information

Eurobank S.A. (hereafter the Bank), which resulted from the demerger of Eurobank Ergasias S.A. (“Demerged entity”) through its banking sector’s hive down, is a wholly owned subsidiary of Eurobank Ergasias Services and Holdings S.A. (the “Parent Company”). In particular, on 20 March 2020, the demerger of Eurobank Ergasias S.A. through the banking sector’s hive down and the establishment of a new company-credit institution (“Demerger”) under the corporate name “Eurobank S.A.” (“the Beneficiary”) as well as the Articles of Association of the Beneficiary were approved by virtue of the decision of the Ministry of Development and Investments No 31847/20.03.2020, which was registered on the same day in the General Commercial Registry. At the aforementioned date the Demerged Entity became the shareholder of the Beneficiary by acquiring all the shares issued by the Beneficiary and the Beneficiary substituted the Demerged Entity, by way of universal succession, to all the transferred assets and liabilities, as set out in the transformation balance sheet of the hived down sector as at 30 June 2019 and formed up to 20 March 2020, day of the Demerger’s completion. In addition, the corporate name and the distinctive title of the Demerged Entity was amended to “Eurobank Ergasias Services and Holdings S.A.” and “Eurobank Holdings” respectively.

As a result of the hive down, Eurobank S.A. and the subsidiaries contributed by Eurobank Ergasias, form a new reporting entity Eurobank S.A. Group (hereafter the Group) that is active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Bank operates mainly in Greece and through its subsidiaries in Central and Southeastern Europe.

These financial statements, were approved by the Board of Directors on 5 April 2022. The Independent Auditor’s Report of the Financial Statements is included in the section IV of the Annual Financial Report.

2. Basis of preparation and principal accounting policies

The financial statements of the Bank have been prepared on a going concern basis and in accordance with the principal accounting policies set out below:

2.1 Basis of preparation

The financial statements of the Bank have been prepared in accordance with International Financial Reporting Standards (IFRS) issued by the IASB, as endorsed by the European Union (EU), and in particular with those standards and interpretations, issued and effective or issued and early adopted as at the time of preparing these financial statements.

The financial statements are prepared under the historical cost basis except for the financial assets measured at fair value through other comprehensive income, financial assets and financial liabilities (including derivative instruments) measured at fair-value-through-profit-or-loss and investment property measured at fair value.

The accounting policies for the preparation of the financial statements have been consistently applied to the years 2021 and 2020, after taking into account the amendments in IFRSs as described in section 2.1.1 “New and amended standards and interpretations” and the amendments in the Bank’s accounting policies as described in sections 2.1.2 and 2.2.18. The comparative information has been restated due to change in accounting policy for employee benefits (note 2.3). In addition, where necessary, comparative figures have been adjusted to conform to changes in presentation in the current year.

The preparation of financial statements in accordance with IFRS requires the use of estimates and judgements that affect the reported amounts of assets and liabilities and disclosure of contingent liabilities at the date of the financial statements, as well as the reported amounts of revenues and expenses during the reporting period. Although these estimates are based on management’s best knowledge of current events and actions, actual results ultimately may differ from those estimates.

The Bank’s presentation currency is the Euro (€). Except as indicated, financial information presented in Euro has been rounded to the nearest million. The figures presented in the notes may not sum precisely to the totals provided due to rounding.

Going concern considerations

The annual financial statements have been prepared on a going concern basis, as the Board of the Directors considered as appropriate, taking into consideration the following:

2021 was a year of strong recovery, as the Greek economy reclaimed most of its pandemic inflicted losses. The significant progress of vaccination programs allowed the gradual relaxation of containment measures and the reopening of the economy that led to the strengthening of consumption and the recovery of the tourism sector providing substantial boost to real GDP growth. Based on Hellenic Statistical Authority’s (ELSTAT) provisional data, Greek real GDP increased by 8.3% in 2021 (9% decrease in 2020), the

Notes to the Financial Statements

seasonally adjusted unemployment rate dropped to 12.8% in December 2021 (2020: 16.3%), while the inflation, as measured by the 12-month average Harmonized Index of Consumer Prices (HICP), closed at 0.6% in 2021, compared to -1.3% in 2020. According to ELSTAT, the HICP increased by 6.3% in February 2022 compared to -1.9% in February 2021 mainly reflecting the current rise in energy and fuel costs. The European Commission (EC), in its winter economic forecasts (February 2022), estimates the real GDP growth rate in Greece at 4.9% and 3.5% in 2022 and 2023 respectively. On the fiscal front, according to 2022 State Budget, the general government's primary balance in European System of Accounts (ESA2010) terms in 2021 and 2022 is expected to register deficits of 7.0% and 1.4% of GDP respectively as a result of the implementation of public support measures amounted to € 16.9 billion in 2021, and € 3.3 billion in 2022 aiming to address the economic and social effects of the Covid-19 pandemic. The gross public debt is estimated at 197.1% and 189.6% of GDP in 2021 and 2022 respectively (2020: primary deficit at 7.1% and public debt at 206.3%). These forecasts take into account the public support measures aiming to alleviate the impact of increased energy and fuel costs in 2021 (€0.9 billion), but not the additional and more encompassing measures announced in 2022 (an additional €2.8 billion as of 17 March 2022). However, since a large part of these measures will be covered by funds earmarked especially for this purpose as well as additional government proceeds, their fiscal impact will be significantly smaller than the above amount. The deviation from the Enhanced Surveillance (ES) primary surplus target of 3.5% of GDP in 2021 and 2022 is not considered a violation of Greece's commitments under the ES framework, as in March 2020 EC activated the general escape clause, allowing for non-permanent deviations from the agreed fiscal paths of the member-states due to the extraordinary health and economic distress caused by the pandemic. According to the 2 June 2021 EC press release, the clause shall remain in force in 2022, and is expected to be deactivated in 2023. These forecasts may change as a result of the actual size of the public sector's support measures, the impact of inflationary pressure on economic growth, and the repercussions of the energy price hikes on public finances.

In response to the Covid-19 outbreak, on 21 July 2020, the European Council agreed on a recovery package under the EC's Next Generation EU framework to support the recovery and resilience of the member states' economies. In this context, on 13 July 2021, the Economic and Financial Affairs Council (ECOFIN) approved the Greek National Recovery and Resilience Plan (NRRP), titled "Greece 2.0". Greece shall receive European Union (EU) funds of more than €30.5 billion (€17.8 billion in grants and €12.7 billion in loans) up to 2026 from the Recovery and Resilience Facility (RRF) to finance projects and initiatives laid down in its NRRP. A pre-financing of € 4 billion was disbursed in August 2021, while on 28 February 2022 the EC preliminarily endorsed Greece's payment request for the first RRF instalment, amounting to € 3.6 billion. Greece has been also allocated about €40 billion through EU's Multiannual Financial Framework (MFF) 2021-2027. Furthermore, on 24 March 2020, the European Central Bank (ECB) established a temporary Pandemic Emergency Purchase Programme (PEPP), with a financial envelope of € 1,850 billion since December 2020, out of which ca € 37 billion are available for the purchase of Greek Government Bonds (GGBs). On 16 December 2021, the ECB announced that it would cease net bond purchases under PEPP at the end of March 2022, as scheduled. Reinvestment of principal from maturing securities will, however, continue at least until the end of 2024, allowing explicitly for the purchase of Greek Government Bonds (GGBs) over and above rollovers of redemptions.

In 2021, the Greek State proceeded with the issuance of six bonds of various maturities, (5-year, 10-year, and 30-year) drawing a total of €14 billion from international financial markets. More recently, on 19 January 2022, the Public Debt Management Agency (PDMA) issued a 10-year bond of € 3 billion at a yield of 1.836%.

Regarding the outlook for the next 12 months the major macroeconomic risks and uncertainties in Greece are as follows: (a) the geopolitical conditions in the near or in broader region, especially the ongoing Russian invasion in Ukraine, and its ramifications on the regional and global stability and security, the European and Greek economy, and the energy sector in particular, (b) a prolongation and/or exacerbation of the ongoing inflationary pressure, especially in the energy sector and the supply chain, and its impact on economic growth, employment, public finances, household budgets, and firms' production costs, (c) further increase in the interest rates worldwide, and in the Euro Area in particular, that may exert upwards pressures on sovereign and private borrowing costs, (d) the actual size and duration of the current and potentially new fiscal measures aimed at alleviating the impact of rising energy and food prices, and their impact on the long-term sustainability of the country's public debt, (e) the impact of the withdrawal of the temporary support measures on growth, employment and the continual service of household and corporate debt, (f) the prospect of the so-called "twin deficits" (i.e. fiscal and current account deficit) becoming more structural, although currently they appear to be more a repercussion of the pandemic, (g) the absorption capacity of the NGEU and MFF funds and the attraction of new investments in the country, (h) the implementation of the reforms and privatizations' agenda in order to meet the ES and EC's Recovery and Resilience Facility (RRF) targets and milestones, (i) the evolution of the health crisis and the probability of emergence of new Covid-19 variants that could adversely impact economic recovery and bring about new movement restrictions and fiscal support measures, and (j) the exacerbation of natural disasters due to the climate change and their effect on GDP, employment and fiscal balance.

Notes to the Financial Statements

Materialization of the above risks including those related to increased energy prices and inflation, would have potentially adverse effects on the fiscal planning of the Greek government, as it could decelerate the pace of expected growth and on the liquidity, solvency and profitability of the Greek banking sector, as well as on the realization of its NPE reduction plans. The Russian invasion in Ukraine poses uncertainties in global economy and international trade with far-reaching and long-term consequences. As the events are still unfolding, any assessment of their impact is premature. However, the risks coming from geopolitical upheaval could be potentially mitigated with coordinated measures at the European level, as per the pandemic precedent. In this context, the Group holds non-significant exposure in Russian assets and is continuously monitoring the developments on the macroeconomic and geopolitical fronts and has increased its level of readiness, so as to accommodate decisions, initiatives and policies to protect its capital and liquidity standing as well as the fulfilment, to the maximum possible degree, of its strategic and business goals for the quarters ahead, focusing primarily on the support of its clients to overcome the challenging juncture, the protection of its asset and capital base and the resilience of its pre-provision profitability.

As at 31 December 2021, following the distribution of the 95% of the mezzanine and junior notes of “Mexico” securitization of the Bank to its parent company through the decrease in kind of the Bank’s share capital and the subsequent derecognition of the underlying securitized loan portfolio of € 3.1 billion (consisting primarily of NPE) end of September (note 20.1), in combination with other actions, the Group decreased significantly its NPE stock by € 2.9 billion to € 2.8 billion (Bank: €2.2 billion) (2020: € 5.7 billion, Bank: €4.8 billion), driving the NPE ratio at 6.8% (2020: 14%), while the NPE coverage ratio stood at 69.2% (2020: 61.8%). The Eurobank S.A. Group’s net profit attributable to shareholders for the year ended 31 December 2021 amounted to €398 million (Period 20 March to 31 December 2020 Restated: €245 million) while the Bank’s after tax result amounted to a profit of €469 million (Period 20 March to 31 December 2020 Restated: € 13 million).

As at 31 December 2021, following the successful completion of projects “Mexico” and “Wave” I & II, the Total Capital Adequacy (total CAD) and Common Equity Tier 1 (CET1) ratios of Eurobank Holdings Group, stood at 16.1% (2020: 16.3%) and 13.7% (2020: 13.9%) respectively. Pro-forma with the completion of the sale of Eurobank’s merchant acquiring business, the total CAD and CET1 ratios would be 16.8% and 14.5% respectively (note 4 in the consolidated financial statements of Eurobank Holdings). At the same date, the Total CAD and CET1 ratios of the Bank amount to 15.3% (2020: 15.2%) and 12.4% (2020: 12.4%) respectively, while the pro-forma Total CAD and CET1 ratios as at 31 December 2021 with the completion of the sale of Eurobank’s merchant acquiring business would be 16.3% and 13.4%, respectively. In addition, the Eurobank Holdings Group completed successfully the 2021 SSM stress test (ST), which was coordinated and conducted by the ECB (note 4).

In terms of liquidity, as at 31 December 2021, the Group’s deposits have increased by € 5.9 billion to € 53.2 billion (2020: € 47.3 billion), while the funding from the targeted long term refinancing operations of the European Central Bank – TLTRO III programme reached € 11.7 billion (Bank: € 10.8 billion) (2020: € 8 billion, Bank: € 7.2 billion). During the year, in the context of its medium-term strategy to meet its MREL target, the Bank proceeded with two issues of preferred senior debt with a nominal value of € 500 million each, in April and September respectively (note 33). The rise in high quality liquid assets of the Eurobank Holding Group led the respective Liquidity Coverage ratio (LCR) to 152% (2020: 124%). In the context of the 2021 ILAAP (Internal Liquidity Adequacy Assessment Process), the liquidity stress tests results indicate that the Bank has adequate liquidity buffer to cover the potential outflows that could occur in all scenarios both in the short term (1 month horizon) and in the medium term (1 year horizon).

Going concern assessment

The Board of Directors, acknowledging the geopolitical and macroeconomic risks to the economy and the banking system and taking into account the above factors relating to (a) the strong recovery of economic activity in 2021 and the prospects for sustainable growth rates in Greece onwards, (b) the pre-provision income generating capacity and the adequacy of capital and liquidity position for both the Bank and parent company’s Group, and (c) the significant improvement of the NPE ratio of the parent company’s Group in 2021, has been satisfied that the financial statements of the Bank can be prepared on a going concern basis.

Notes to the Financial Statements

2.1.1 New and amended standards and interpretations

New and amended standards adopted by the Bank as of 1 January 2021

The following amendments to standards as issued by the International Accounting Standards Board (IASB) and endorsed by the European Union (EU), apply as of 1 January 2021:

Interest Rate Benchmark Reform - Phase 2 - Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16

In the context of the market-wide reform of several interest rate benchmarks (referred to as “IBOR reform”), the IASB has undertaken a two-phase project to address the issues affecting financial reporting by the IBORs’ replacement and considered any reliefs to be provided in order to eliminate the resulted effects. The Phase 1 amendments, adopted by the Bank as of 1 January 2020, provided temporary reliefs from applying specific hedge accounting requirements to the hedging relationships affected by the IBOR reform, during the period before the replacement of an existing interest rate benchmark with an alternative risk-free interest rate (“RFR”).

In August 2020, the IASB issued “Interest Rate Benchmark Reform: Phase 2 Amendments to IFRS 9, IAS 39, IFRS 7, IFRS 4 and IFRS 16”, which addresses the issues that affect financial reporting once an existing rate is replaced with an RFR and provides specific disclosure requirements. The Phase 2 amendments provide key reliefs related to the contractual modifications due to the reform and the hedging designations affected once the Phase 1 reliefs cease to apply.

More specifically, the amendments introduce a practical expedient if a contractual change, or changes to cash flows, result “directly” from the IBOR reform and occurs on an ‘economically equivalent’ basis. In these cases, changes will be accounted for by updating the effective interest rate of the financial instruments subject to reform, similar to the changes to a floating interest rate. A similar practical expedient will apply under IFRS 16 ‘Leases’ for lessees when accounting for lease modifications required by the IBOR reform.

In addition, the Phase 2 amendments permit changes, as a result of the IBOR reform, to be performed to hedge designations and hedge documentation without the hedging relationship being discontinued. Permitted changes include redefining the hedged risk and the description of the hedging instruments and/or the hedged items to reflect RFR as well as amending the description of how an entity will assess the hedge effectiveness (under IAS 39 only). An entity will apply the existing requirements in IAS 39 or IFRS 9 for qualifying fair value and cash flow hedging relationships to account for any changes in the fair value of the hedged item or the hedging instrument while any resulting ineffectiveness will be recognized in the income statement. Upon changing the hedge designation, once the Phase 1 reliefs cease to apply, the amount accumulated in the cash flow hedge reserve is also assumed to be based on the RFR for the purpose of assessing whether the hedged future cash flows are still expected to occur.

Based on the Phase 2 amendments, when performing a retrospective hedge effectiveness assessment under IAS 39, a company may elect to reset the cumulative fair value changes of the hedged item and hedging instrument to zero immediately after ceasing to apply the Phase 1 relief on a hedge-by-hedge basis. The Phase 2 amendments clarify that changes to the method for assessing hedge ineffectiveness due to the modifications required by the IBOR reform, will not result to the discontinuation of the hedge accounting.

As described in note 2.2.3, the Bank elected, as a policy choice permitted under IFRS 9, to continue to apply hedge accounting in accordance with IAS 39. Therefore, for hedge accounting purposes, the Bank applies the Phase 2 amendments to IAS 39.

The amendments to IFRS 4 are designed to allow insurers who are still applying IAS 39 to obtain the same reliefs as those provided by the amendments made to IFRS 9.

In addition, consequential amendments were made by the Phase 2 amendments to IFRS 7, to enable users of financial statements to understand the effect of interest rate benchmark reform on an entity’s financial instruments and risk management strategy.

Upon transition, the adoption of the amendments had no material impact on the financial statements.

The Bank has set up an IBOR transition program to implement the transition to alternative interest rates that focuses on key areas of impact on customers’ contracts, systems and processes, financial reporting, valuation, capital and liquidity planning and communication with counterparties (note 5.2.4).

IFRS 4, Amendment, Deferral of IFRS 9

In June 2020, the IASB extended the fixed expiry date of the temporary exemption from applying IFRS 9 in IFRS 4 to annual reporting periods beginning on or after 1 January 2023, in order to align the effective dates of IFRS 9 Financial Instruments with IFRS 17 Insurance Contracts.

The amendment is not relevant to the Bank’s activities, other than through its associate Eurolife FFH Insurance Group Holdings S.A.

Notes to the Financial Statements

Amendment to IFRS 16 - Covid-19-Related Rent Concessions beyond 30 June 2021

In March 2021, the IASB extended by one year the application period of the practical expedient in IFRS 16 'Leases' that provides practical relief to lessees from applying the IFRS 16 guidance for lease modifications to rent concessions occurring as a direct consequence of the covid-19 pandemic. In particular, based on the aforementioned extension of the practical expedient, the lessee may account for any reduction in lease payments, originally due on or before 30 June 2022, as if they were not lease modifications. The amendment is effective for annual reporting periods beginning on or after 1 April 2021.

The Bank has early adopted the practical expedient to all rent concessions that meet the relevant conditions.

The adoption of the amendment had no impact on the financial statements (note 40).

New standards, amendments to standards and interpretations not yet adopted by the Bank

A number of new standards and amendments to existing standards are effective after 2021, as they have not yet been endorsed by the European Union (EU), or have not been early applied by the Bank. Those that may be relevant to the Bank are set out below:

IFRS 3, Amendments, Reference to the Conceptual Framework (effective 1 January 2022)

The amendments to IFRS 3 "Business Combinations" updated the reference to the current version of Conceptual Framework while added a requirement that, for obligations within the scope of IAS 37 "Provisions, Contingent Liabilities and Contingent Assets", an acquirer applies IAS 37 to determine whether at the acquisition date a present obligation exists as a result of past events. For a levy that would be within the scope of IFRIC 21 Levies, the acquirer applies IFRIC 21 to determine whether the obligating event that gives rise to a liability to pay the levy has occurred by the acquisition date.

In addition, the issued amendments added a new paragraph to IFRS 3 to clarify that contingent assets do not qualify for recognition in a business combination at the acquisition date.

The adoption of the amendments is not expected to impact the financial statements.

Annual improvement to IFRSs 2018-2020 cycle: IFRS1, IFRS9 and IFRS 16 (effective 1 January 2022)

The improvements introduce changes to several standards. The amendments that are relevant to the Bank's activities are set out below:

The amendments to IFRS 1 "First-time Adoption of International Financial Reporting Standards" provides additional relief to a subsidiary which becomes a first-time adopter later than its parent in respect of accounting for cumulative translation differences. As a result, the amendments allow entities that have measured their assets and liabilities at carrying amounts recorded in their parent's books to also measure any cumulative translation differences using the amounts reported by the parent. This amendment will also apply to associates and joint ventures that have taken the same IFRS 1 exemption.

The amendment to IFRS 9 "Financial Instruments" clarifies which fees should be included in the 10% test for derecognition of financial liabilities. The fees to be included in the assessment are only those paid or received between the borrower (entity) and the lender, including fees paid or received by either the borrower or lender on the other's behalf. The amendment is applied prospectively to modifications and exchanges that occur on or after the date the entity first applies the amendment.

The amendment to IFRS 16 "Leases" removes the illustration of the reimbursement of leasehold improvements, in order to avoid any potential confusion about the treatment of lease incentives.

The adoption of the amendments is not expected to impact the financial statements.

IAS 37, Amendment, Onerous Contracts – Costs of Fulfilling a Contract (effective 1 January 2022)

The amendment to IAS 37 "Provisions, Contingent Liabilities and Contingent Assets" clarifies that the direct costs of fulfilling a contract include both the incremental costs and an allocation of other costs directly related to fulfilling contracts' activities. General and administrative costs do not relate directly to a contract and are excluded unless they are explicitly chargeable to the counterparty under the contract.

The adoption of the amendment is not expected to impact the financial statements.

Notes to the Financial Statements

IFRS 17, Insurance Contracts (effective 1 January 2023)

IFRS 17, which supersedes IFRS 4 “Insurance Contracts” provides a comprehensive and consistent accounting model for insurance contracts. It applies to insurance contracts issued, all reinsurance contracts and to investment contracts with discretionary participating features provided that the entity also issues insurance contracts. Financial guarantee contracts are allowed to be within the scope of IFRS 17 if the entity has previously asserted that it regarded them as insurance contracts.

According to IFRS 17 general model, groups of insurance contracts which are managed together and are subject to similar risks, are measured based on building blocks of discounted, probability-weighted estimates of future cash flows, a risk adjustment and a contractual service margin (“CSM”) representing the unearned profit of the contracts. Under the model, estimates are remeasured at each reporting period. A simplified measurement approach may be used if it is expected that doing so a reasonable approximation of the general model is produced, or if the contracts are of short duration.

Revenue is allocated to periods in proportion to the value of expected coverage and other services that the insurer provides during the period, claims are presented when incurred and any investment components i.e. amounts repaid to policyholders even if the insured event does not occur, are not included in revenue and claims. Insurance services results are presented separately from the insurance finance income or expense.

In June 2020, the IASB issued Amendments to IFRS 17 to assist entities in its implementation. The amendments aim to assist entities to transition in order to implement the standard more easily, while they deferred the effective date, so that entities would be required to apply IFRS 17 for annual periods beginning on or after 1 January 2023.

IFRS 17 is not relevant to the Bank’s activities, other than through its associate Eurolife FFH Insurance Group Holdings S.A.

IAS 8, Amendments, Definition of Accounting Estimates (effective 1 January 2023)

The amendments in IAS 8 “Accounting Policies, Changes in Accounting Estimates and Errors” introduced the definition of accounting estimates and include other amendments to IAS 8 which are intended to help entities distinguish changes in accounting estimates from changes in accounting policies.

The amendments clarify (a) how accounting policies and accounting estimates relate to each other by (i) explaining that accounting estimates are used in applying accounting policies and (ii) making the definition of accounting policies clearer and more concise, (b) that selecting an estimation technique, or valuation technique, used when an item in the financial statements cannot be measured with precision, constitutes making an accounting estimate, and (c) that, in applying IAS 2 Inventories, selecting the first-in, first-out (FIFO) cost formula or the weighted average cost formula for interchangeable inventories constitutes selecting an accounting policy.

The adoption of the amendments is not expected to impact the financial statements.

Amendments to IAS 1 Presentation of Financial Statements and IFRS Practice Statement 2: Disclosure of Accounting policies (effective 1 January 2023)

IASB issued amendments to IAS 1 “Presentation of Financial Statements” that require entities to disclose their material accounting policies rather than their significant accounting policies.

According to IASB, accounting policy information is material if, when considered together with other information included in an entity’s financial statements, it can reasonably be expected to influence decisions that the primary users of general purpose financial statements make on the basis of those financial statements.

Furthermore, the amendments clarify how an entity can identify material accounting policy information, while provide examples of when accounting policy information is likely to be material. The amendments to IAS 1 also clarify that immaterial accounting policy information need not be disclosed. However, if it is disclosed, it should not obscure material accounting policy information. To support these amendments the Board has also developed guidance and examples to explain and demonstrate the application of the ‘four-step materiality process’ described in IFRS Practice Statement 2 Making Materiality Judgements to accounting policy disclosures, in order to support the amendments to IAS 1.

The adoption of the amendments is not expected to impact the financial statements.

IAS 1, Amendments, Classification of Liabilities as Current or Non-Current (effective 1 January 2023, not yet endorsed by EU)

The amendments, published in January 2020, affect only the presentation of liabilities in the balance sheet and provide clarifications over the definition of the right to defer the settlement of a liability, while they make clear that the classification of liabilities as current or non-current should be based on rights that are in existence at the end of the reporting period. In addition, it is clarified that the assessment for liabilities classification made at the end of the reporting period is not affected by the expectations about whether an

Notes to the Financial Statements

entity will exercise its right to defer settlement of a liability. The Board also clarified that when classifying liabilities as current or non-current, an entity can ignore only those conversion options that are recognised as equity.

The adoption of the amendments is not expected to impact the financial statements.

IAS 12, Amendments, Deferred Tax related to Assets and Liabilities arising from a Single Transaction (effective 1 January 2023, not yet endorsed by EU)

The amendments clarify that the initial recognition exemption set out in IAS 12 'Income Taxes' does not apply for transactions such as leases and decommissioning obligations that, on initial recognition, give rise to equal amounts of taxable and deductible temporary differences. Accordingly, for such transactions an entity is required to recognise the related deferred tax asset and liability, with the recognition of any deferred tax asset being subject to the recoverability criteria in IAS 12. The amendments apply to transactions that occur on or after the beginning of the earliest comparative period presented.

The adoption of the amendments is not expected to impact the financial statements.

2.1.2 Other accounting developments

IFRIC agenda decision - Attributing Benefit to Periods of Service (IAS 19)

In May 2021, an IFRIC agenda decision was published that concludes about the periods of service over which an entity should attribute benefits under a specific retirement defined benefit plan based on the existing requirements of IAS 19. In particular, according to the above decision, the attribution of the benefit shall not begin from the start of the employment date but from the date when the employee service first leads to benefits under the terms of the plan until the date when further employee service will lead to no material amount of further benefits.

The Bank implemented the above agenda decision in the fourth quarter of 2021 by amending its accounting policy for 'Employee benefits' (note 2.2.18) and accounted for any resulting adjustments retrospectively in accordance with IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors". The adjustments performed due to the retrospective application of the IFRIC agenda decision are presented in note 2.3.

2.2 Principal accounting policies

2.2.1 Investments in subsidiaries, associates and joint ventures

Investments in subsidiaries, associates and joint ventures, including investments acquired through common control transactions, are accounted at cost less any impairment losses. Cost is the fair value of the consideration given being the amount of cash or shares issued, or if that cannot be determined reliably, the consideration received together with any directly attributable costs.

As an exception to the above measurement basis, when the Bank transfers an existing Group entity or business sector to a new subsidiary formed for this purpose in a share for share exchange that does not have commercial substance, the Bank's investment in that newly formed subsidiary is recognized at the carrying amount of the transferred entity.

Legal mergers that involve the combination of the Bank with one or more of its subsidiaries are accounted for by using the pooling of interest method (also known as merger accounting) pursuant to IAS 8 "Accounting Policies, Changes in Accounting Estimates and Errors" with reference to the most recent pronouncements of other standard-setting bodies that use a similar conceptual framework and comply with the IFRS general principles, as well as accepted industry practices. Under the pooling of interest method, the Bank incorporates the acquired assets and liabilities of the merged subsidiary at their carrying amounts in the financial statements as of the date of the legal merger without any fair value adjustments. Any difference between the carrying amount of the investment in the merged subsidiary before the legal merger, and the carrying amount of net assets acquired is recognized in the Bank's equity.

Legal mergers that involve the absorption of an entity by the Bank, other than an entity under common control, are accounted for by using the purchase method of accounting pursuant to IFRS 3 for business combinations. The consideration transferred for an acquisition is measured at the fair value of the assets given, equity instruments issued or exchanged and liabilities undertaken at the date of acquisition, including the fair value of assets or liabilities resulting from a contingent consideration arrangement. Acquisition related costs are expensed as incurred. Under the purchase method of accounting, the identifiable assets acquired and liabilities and contingent liabilities assumed are measured initially at their fair values at the acquisition date. Any previously held interest in the acquiree is remeasured to fair value at the acquisition date with any gain or loss recognized in the income statement.

Notes to the Financial Statements

The excess of the consideration transferred and the acquisition-date fair value of any previous equity interest in the acquiree over the fair value of the identifiable net assets of the entity acquired, is recorded as goodwill. If this is less than the fair value of the net assets of the acquiree, the difference is recognized directly in the income statement. If the initial accounting for the acquisition is incomplete by the end of the reporting period in which it occurs, the Bank reports provisional amounts for the items for which the accounting is incomplete. Those provisional amounts are adjusted retrospectively during the measurement period to reflect the new information obtained about the facts and circumstances that existed at the acquisition date that, if known, would have affected the amounts recognized at that date. The measurement period adjustments, as mentioned above, affect accordingly the amount of goodwill that was initially recognized, while the measurement period cannot exceed one year from the acquisition date.

For acquisitions of entities not meeting the definition of a business, the Bank allocates the consideration to the individual identifiable assets and liabilities based on their relative fair values at the date of acquisition. Such transactions or events do not give rise to goodwill.

Where necessary, accounting policies of merged subsidiaries or other entities have been changed to ensure consistency with the policies of the Bank.

A listing of the Bank's subsidiaries, associates and joint ventures is set out in notes 23 and 24, respectively.

2.2.2 Foreign currencies

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions are recognized in the income statement.

Monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the exchange rates prevailing at each reporting date and exchange differences are recognized in the income statement, except when deferred in equity as qualifying cash flow hedges.

Non-monetary assets and liabilities are translated into the functional currency at the exchange rates prevailing at initial recognition, except for non-monetary items denominated in foreign currencies that are measured at fair value which are translated at the rate of exchange at the date the fair value is determined. The exchange differences relating to these items are treated as part of the change in fair value and are recognized in the income statement or recorded directly in equity depending on the classification of the non-monetary item.

2.2.3 Derivative financial instruments and hedging

Derivative financial instruments, including foreign exchange contracts, forward currency agreements and interest rate options (both written and purchased), currency and interest rate swaps, and other derivative financial instruments, are initially recognized in the balance sheet at fair value on the date on which a derivative contract is entered into and subsequently are re-measured at their fair value. All derivatives are carried as assets when fair value is positive and as liabilities when fair value is negative.

Fair values of derivatives are determined based on quoted market prices, including recent market transactions, or by using other valuation techniques, as appropriate. The principles for the fair value measurement of financial instruments, including derivative financial instruments, are described in notes 3.2 and 5.3.

Embedded derivatives

Embedded derivatives are components of hybrid contracts that also include non-derivative hosts with the effect that some of the cash flows of the combined instruments vary in a way similar to stand-alone derivatives.

Financial assets that contain embedded derivatives are recognised in the balance sheet in their entirety in the appropriate classification category, following instruments' assessment of their contractual cash flows and their business model as described in note 2.2.10.

On the other hand, derivatives embedded in financial liabilities, are treated as separate derivatives when their risks and characteristics are not closely related to those of the host contract and the host contract is not carried at fair value through profit or loss. These embedded derivatives are measured at fair value with changes in fair value recognized in the income statement.

The use of derivative financial instruments is inherent in the Bank's activities and aims principally at managing risk effectively.

Notes to the Financial Statements

Accordingly, the Bank, as part of its risk management strategy, may enter into transactions with external counterparties to hedge partially or fully interest rate, foreign currency, equity and other exposures that are generated from its activities.

The objectives of hedging with derivative financial instruments include:

- Reduction of interest rate exposure that is in excess of the Bank's interest rate limits
- Efficient management of interest rate risk and fair value exposure
- Management of future variable cash flows
- Reduction of foreign currency risk or inflation risk
- Management of credit risk

Hedge accounting

The Bank has elected, as a policy choice permitted under IFRS 9, to continue to apply hedge accounting in accordance with IAS 39, until the project of accounting of macro hedging activities is completed by the IASB.

For hedge accounting purposes, the Bank forms a hedging relationship between a hedging instrument and a related item or group of items to be hedged. A hedging instrument is a designated derivative or a designated non-derivative financial asset or financial liability whose fair value or cash flows are expected to offset changes in the fair value or cash flows of a designated hedged item.

Specifically, the Bank designates certain derivatives as: (a) hedges of the exposure to changes in fair value of recognized assets or liabilities or unrecognized firm commitments (fair value hedge), (b) hedges of the exposure to variability in cash flows of recognized assets or liabilities or highly probable forecasted transactions (cash flow hedge).

In order to apply hedge accounting, specified criteria should be met. Accordingly, at the inception of the hedge accounting relationship, the Bank documents the relationship between hedging instruments and hedged items, as well as its risk management objective and strategy for undertaking various hedge transactions, together with the method that will be used to assess the effectiveness of the hedging relationship. The Bank also documents its assessment, both at inception of the hedge and on an ongoing basis, of whether the derivatives that are used in the hedging transactions are highly effective in offsetting changes in fair values or cash flows of hedged items and whether the actual results of each hedge are within a range of 80-125%. If a relationship does not meet the abovementioned hedge effectiveness criteria, the Bank discontinues hedge accounting prospectively. Similarly, if the hedging derivative expires or is sold, terminated or exercised, or the hedge designation is revoked, then hedge accounting is discontinued prospectively. In addition, the Bank uses other derivatives, not designated in a qualifying hedge relationship, to manage its exposure primarily to interest rate and foreign currency risks. Non qualifying hedges are derivatives entered into as economic hedges of assets and liabilities for which hedge accounting was not applied. The said derivative instruments are classified along with those held for trading purposes.

The method of recognizing the resulting fair value gain or loss depends on whether the derivatives are designated and qualify as hedging instruments, and if so, the nature of the item being hedged.

Furthermore, the Bank may designate groups of items as hedged items, by aggregating recognized assets or liabilities or unrecognized but highly probable transactions of similar risk characteristics that share the exposure for which they are hedged. Although the overall risk exposures may be different for the individual items in the group, the specific risk being hedged will be inherent in each of the items in the group.

In 2020, the Bank has applied the Phase 1 IBOR reform amendments to IFRS 9, IAS 39 and IFRS 7, issued in September 2019, that provide temporary reliefs on hedging relationships during the period before the replacement of an existing interest rate benchmark with an alternative risk-free rate (RFR). Based on the reliefs, for the purpose of determining whether a forecast transaction is highly probable, or a hedging relationship is expected to be highly effective, the Bank assumes that the benchmark interest rate does not change as a result of the IBOR reform. In addition, the Bank, is not required to discontinue hedge accounting if the hedge falls outside the 80–125% range during the period of uncertainty arising from the reform. Furthermore, in case of hedges where the hedged item or hedged risk is a non-contractually specified benchmark portion of interest rate risk, following the IBOR reform reliefs, it is assumed that the designated risk portion only needs to be separately identifiable at the inception of the hedging relationship and not on a going basis.

The reliefs cease to apply once certain conditions are met i.e. at the earlier of (a) when the uncertainties arising from the IBOR reform are no longer present with respect to the timing and the amount of the benchmark rate-based cash flows of the hedged items or hedging instruments and (b) when the hedging relationships to which the reliefs apply are discontinued.

Notes to the Financial Statements

As described in note 2.1.1, the Bank has applied the Phase 2 IBOR reform amendments to IFRS 9/IAS 39, that provide temporary reliefs that allow the Bank's hedging relationships to continue upon the replacement of an existing interest rate benchmark with an RFR. Specifically, the amendments introduce an exception to the existing requirements so that changes in the formal designation and documentation of a hedge accounting relationship or to the method for assessing hedge effectiveness due to modifications required by IBOR reform will not result in the discontinuation of hedge accounting or the designation of a new hedging relationship.

(i) Fair value hedge

The Bank applies fair value hedging to hedge exposures primarily to changes in the fair value attributable to interest rate risk and currency risk.

The items that qualify for fair value hedge accounting include fixed rate debt securities classified as FVOCI and amortized cost financial assets, fixed rate term deposits or term loans measured at amortized cost, as well as fixed rate debt securities in issue.

The interest rate and currency risk with respect to the applicable benchmark rate may be hedged using interest rate swaps and cross currency swaps.

The Bank uses the dollar-offset method in order to assess the effectiveness of fair value hedges. This is a quantitative method that involves the comparison of the change in the fair value of the hedging instrument with the change in the fair value of the hedged item attributable to the hedged risk. Even if a hedge is not expected to be highly effective in a particular period, hedge accounting is not precluded if effectiveness is expected to remain sufficiently high over the life of the hedge.

Changes in the fair value of derivatives that are designated and qualify as fair value hedges are recorded in the income statement, together with the changes in the fair value of the hedged assets or liabilities that are attributable to the hedged risk.

The Bank discontinues hedge accounting prospectively in case the hedging instrument expires or is sold, terminated or exercised, the hedge no longer meets the qualifying criteria for hedge accounting, or designation is revoked. In such cases, any adjustment to the carrying amount of the hedged item, for which the effective interest method is applied, is amortized to profit or loss over the period to maturity. If the hedged item is derecognised, the unamortised fair value adjustment is recognised immediately in the income statement. Hedge ineffectiveness may arise in case of potential differences in the critical terms between the hedged item and the hedging instrument such as maturity, interest rate reset frequency and discount curves.

(ii) Cash flow hedge

The Bank applies cash flow hedging to hedge exposures to variability in cash flows primarily attributable to the interest rate risk and currency risk associated with a recognized asset or liability or a highly probable forecast transaction.

The items that qualify for cash flow hedging include recognized assets and liabilities such as variable rate deposits or loans measured at amortized cost, variable rate debt securities in issue and foreign currency variable rate loans. The interest rate risk with respect to the applicable benchmark rate may be hedged using interest rate swaps and cross currency swaps. The foreign currency risk may be hedged using currency forwards and currency swaps.

Furthermore, cash flow hedging is used for hedging highly probable forecast transactions such as the anticipated future rollover of short-term deposits or repos measured at amortized cost. Specifically, the forecast variable interest payments of a series of anticipated rollovers of these financial liabilities are aggregated and hedged as a group with respect to changes in the benchmark interest rates, eliminating cash flow variability. In addition, cash flow hedging applies to hedges of currency risk arising from probable forecasted sales of financial assets or settlement of financial liabilities in foreign currency.

If the hedged item is documented as a forecast transaction, the Bank assesses and verifies that there is a high probability of the transaction occurring.

In order to assess the effectiveness of cash flow hedges of interest rate risk, the Bank uses regression analysis which demonstrates that there is high historical and expected future correlation between the interest rate risk designated as being hedged and the interest rate risk of the hedging instrument. For assessing the effectiveness of cash flow hedges of currency risk, the Bank uses the dollar-offset method.

The effective portion of changes in the fair value of derivatives that are designated and qualify as cash flow hedges is recognized in other comprehensive income whereas the ineffective portion is recognized in the income statement.

Amounts accumulated in equity are recycled to the income statement in the periods in which the hedged item will affect profit or loss (for example, when the forecast sale that is hedged takes place).

Notes to the Financial Statements

When a hedging instrument expires or is sold, or when a hedge no longer meets the criteria for hedge accounting, the cumulative gain or loss existing in equity at that time remains in equity until the forecast transaction affects the income statement.

When a forecast transaction is no longer expected to occur, the cumulative gain or loss that was reported in equity is immediately transferred to the income statement.

(iii) Derivatives not designated as hedging instruments for hedge accounting purposes

Changes in the fair value of derivative financial instruments that are entered into for trading purposes or as economic hedges of assets, liabilities or net positions in accordance with the Bank's hedging objectives that may not qualify for hedge accounting are recognized in the income statement.

The fair values of derivative instruments held for trading, including those entered into as economic hedges, and hedge accounting purposes are disclosed in note 19.

2.2.4 Offsetting financial instruments

Financial assets and liabilities are offset and the net amount is presented in the balance sheet when, and only when, the Bank currently has a legally enforceable right to set off the recognized amounts and intends either to settle on a net basis, or to realize the asset and settle the liability simultaneously.

2.2.5 Income statement

(i) Interest income and expense

Interest income and expense is recognized in the income statement for all interest bearing financial instruments on an accrual basis, using the effective interest rate (EIR) method. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the gross carrying amount of the financial asset or to the amortized cost of a financial liability. When calculating the EIR for financial instruments other than purchased or originated credit-impaired, the Bank estimates cash flows considering all contractual terms of the financial instrument but does not consider expected credit losses. For purchased or originated credit impaired (POCI) financial assets, the Bank calculates the credit-adjusted EIR, which is the interest rate that upon the original recognition of the POCI financial asset discounts the estimated future cash flows (including expected credit losses) to the fair value of the POCI asset.

The amortized cost of a financial asset or liability is the amount at which it is measured upon initial recognition minus principal repayments, plus or minus cumulative amortization using the EIR (as described above) and for financial assets it is adjusted for the expected credit loss allowance. The gross carrying amount of a financial asset is its amortized cost before adjusting for ECL allowance.

The EIR calculation includes all fees and points paid or received that are an integral part of the effective interest rate, transaction costs, and all other premiums or discounts. Transaction costs include incremental costs that are directly attributable to the acquisition or issue of a financial asset or liability.

The Bank calculates interest income and expense by applying the EIR to the gross carrying amount of non-impaired financial assets (exposures in Stage 1 and 2) and to the amortized cost of financial liabilities respectively.

For financial assets that have become credit-impaired subsequent to initial recognition (exposures in Stage 3), the Bank calculates interest income by applying the effective interest rate to the amortized cost of the financial asset (i.e. gross carrying amount adjusted for the expected credit loss allowance). If the asset is no longer credit-impaired, then the EIR is applied again to the gross carrying amount with the exception of POCI assets for which interest income does not revert to gross basis calculation. For inflation-linked instruments the Bank recognizes interest income and expense by adjusting the effective interest rate on each reporting period due to changes in expected future cash flows, incorporating changes in inflation expectations over the term of the instruments. The adjusted effective interest rate is applied in order to calculate the new gross carrying amount on each reporting period.

The changes to the basis for determining the financial instruments' contractual cash flows, required in the context of IBOR reform, are accounted for as an update to the instruments' EIR.

Interest income and expense is presented separately in the income statement for all interest bearing financial instruments within net interest income.

Notes to the Financial Statements

(ii) Fees and commissions

Fee and commission received or paid that are integral to the effective interest rate on a financial asset or financial liability are included in the effective interest rate.

Other fee and commission income such as account servicing and asset management fees (including performance based fees) is recognised over time as the related services are being provided to the customer, to the extent that it is highly probable that a significant reversal of the revenue amount recognized will not occur. Transaction-based fees such as foreign exchange transactions, imports-exports, remittances, bank charges and brokerage activities are recognised at the point in time when the transaction takes place. Other fee and commission expenses relate mainly to transaction and service fees, which are expensed as the services are received.

In the case of a contract with a customer that results in the recognition of a financial instrument in the Bank's financial statements which may be partially in the scope of IFRS 9 and partially in the scope of IFRS 15, the Bank first applies IFRS 9 to separate and measure the part of the contract that is in the scope of IFRS 9 and subsequently applies IFRS 15 to the residual part.

2.2.6 Property, equipment and Investment property

(i) Property and equipment

Property and equipment are stated at cost less accumulated depreciation and accumulated impairment losses. Cost includes expenditure that is directly attributable to the acquisition of the asset. Subsequent expenditure is recognized in the asset's carrying amount only when it is probable that future economic benefits will flow to the Bank and the cost of the asset can be measured reliably. All other repair and maintenance costs are recognized in the income statement as incurred.

Depreciation is calculated using the straight-line method to write down the cost of property and equipment, to their residual values over their estimated useful life as follows:

- Land: no depreciation;
- Freehold buildings: 40-50 years and up to 70 years (for specific strategic properties constructed or heavily renovated according to the best practices and guidelines of sustainable construction and renovation, using resilient materials and designs);
- Leasehold improvements: over the lease term or the useful life of the asset if shorter;
- Computer hardware and related integral software: 4-10 years;
- Other furniture and equipment: 4-20 years; and
- Motor vehicles: 5-7 years.

(ii) Investment property

Property held for rental yields and/or capital appreciation that is not occupied by the Bank is classified as investment property.

Investment property is measured initially at its cost, including related transaction costs. Under fair value model of IAS 40 "Investment property" after initial recognition, investment property is carried at fair value as determined by independent certified valuers, with any change therein recognized in income statement. Investment property under construction is measured at fair value only if it can be measured reliably.

Subsequent expenditure is charged to the asset's carrying amount only when it is probable that future economic benefits associated with the item will flow to the Bank and the cost of the item can be measured reliably. Repairs and maintenance costs are recognized to the income statement during the financial period in which they are incurred.

Investment property is derecognised when disposed or when it is permanently withdrawn from use and there is no future economic benefit expected from its disposal. Any arising gain or loss (calculated as the difference between the net proceeds from disposal and the carrying amount of the asset) is recognized in income statement.

If an investment property becomes owner-occupied, it is reclassified as property and equipment and its fair value at the date of reclassification becomes its deemed cost. If an item of property and equipment becomes an investment property because its use has changed, any resulting decrease between the carrying amount and the fair value of this item at the date of transfer is recognized in income statement while any resulting increase, to the extent that the increase reverses previous impairment loss for that property, is recognized in income statement while any remaining part of the increase is recognized in other comprehensive income and increases the revaluation surplus within equity.

Notes to the Financial Statements

If a repossessed asset becomes investment property, any difference between the fair value of the property at the date of transfer and its previous carrying amount is recognized in income statement.

Reclassifications among own used, repossessed assets and investment properties may occur when there is a change in the use of such properties. Additionally, an investment property may be reclassified to 'non-current assets held for sale' category to the extent that the criteria described in note 2.2.25 are met.

2.2.7 Intangible assets

(i) Goodwill

Goodwill arising on legal mergers that involve the absorption of an entity by the Bank, other than an entity under common control, represents the excess of the aggregate of the fair value of the consideration transferred and the acquisition date fair value of any previously held equity interest in the acquiree over the fair value of the Bank's share of net identifiable assets and contingent liabilities acquired. Goodwill arising is included in 'intangible assets' and is measured at cost less accumulated impairment losses.

(ii) Computer software

Costs associated with the maintenance of existing computer software programs are expensed as incurred. Development costs associated with the production of identifiable assets controlled by the Bank are recognized as intangible assets when they are expected to generate economic benefits and can be measured reliably. Internally generated computer software assets are amortized using the straight-line method over 4 years, except for core systems whose useful life may extend up to 20 years.

(iii) Other intangible assets

Other intangible assets are assets that are separable or arise from contractual or other legal rights and are amortized over their estimated useful lives. These include intangible assets acquired in business combinations.

Intangible assets that have an indefinite useful life are not subject to amortization and are tested annually for impairment.

2.2.8 Impairment of subsidiaries, associates and joint ventures

The Bank assesses as at each reporting date whether there is any indication that its investments in subsidiaries, associates and joint ventures may be impaired by considering both external and internal sources of information, such as the net assets compared to the carrying value of each entity, as well as forward looking developments in the economy sector in which they operate. In addition, the collection of dividends from subsidiaries, associates and joint ventures is also a potential trigger for impairment that may indicate that the respective investments are impaired. When dividend is received from the Bank's subsidiaries, associates or joint ventures, it is also examined if that dividend exceeds the total comprehensive income of the subsidiary, associate or joint venture in the period the dividend is declared, to determine whether an indication of impairment exists.

If any such indication of impairment exists, the Bank estimates the recoverable amount of the investment, being the higher of its fair value less costs to sell and its value in use.

An impairment loss is recognized in profit or loss when the recoverable amount of the investment is less than its carrying amount.

Investments in subsidiaries, associates and joint ventures, for which an impairment loss was recognized in prior reporting periods, are reviewed for possible reversal of such impairment at each reporting date.

2.2.9 Impairment of non-financial assets

(i) Goodwill

Goodwill arising on legal mergers that involve the absorption of an entity by the Bank, other than an entity under common control, is not amortized but tested for impairment annually or more frequently if there are any indications that impairment may have occurred. The Bank's impairment test is performed each year end. The Bank considers external information such as prevailing economic conditions, persistent slowdown in financial markets, volatility in markets and changes in levels of market and exchange risk, an unexpected decline in an asset's market value or market capitalization being below the book value of equity, together with a deterioration in internal performance indicators, in assessing whether there is any indication of impairment.

For the purpose of impairment testing, goodwill is allocated to each Cash Generating Unit (CGU) or groups of CGUs that are expected to benefit from the synergies of the merger. Each unit or group of units to which the goodwill is allocated represents the lowest level

Notes to the Financial Statements

within the Bank at which goodwill is monitored for internal management purposes. The Bank monitors goodwill either at the separate CGU or group of CGUs consistent with the internal monitoring of operating segments.

The Bank impairment model compares the carrying value of a CGU or group of CGUs with its recoverable amount. The carrying value of a CGU is based on the assets and liabilities of each CGU. The recoverable amount is determined on the basis of the value-in-use which is the present value of the future cash flows expected to be derived from the CGU or group of CGUs. The estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset or CGU and the countries where the CGUs operate.

An impairment loss arises if the carrying amount of an asset or CGU exceeds its recoverable amount, and is recognized in the income statement. Impairment losses are not subsequently reversed. Gains and losses on the disposal of an operation within that CGU include the carrying amount of goodwill relating to the operation disposed of.

(ii) Other non-financial assets

Other non-financial assets, including property and equipment and other intangible assets are assessed for indications of impairment at each reporting date by considering both external and internal sources of information such as a significant reduction in the asset's value and evidence that the economic performance of the asset is or will be worse than expected. When events or changes in circumstances indicate that the carrying amount may not be recoverable, an impairment loss is recognized for the amount by which the asset's carrying amount exceeds its recoverable amount. The recoverable amount is the higher of an asset's fair value less costs to sell and value in use. For the purposes of assessing impairment, assets are grouped at the lowest levels for which there are separately identifiable cash flows, where applicable. Non-financial assets, other than goodwill, for which an impairment loss was recognized in prior reporting periods, are reviewed for possible reversal of such impairment at each reporting date.

2.2.10 Financial assets

Financial assets - Classification and measurement

The Bank classifies financial assets based on the business model for managing those assets and their contractual cash flow characteristics. Accordingly, financial assets are classified into one of the following measurement categories: amortized cost, fair value through other comprehensive income or fair value through profit or loss.

Purchases and sales of financial assets are recognized on trade date, which is the date the Bank commits to purchase or sell the assets. Loans originated by the Bank are recognized when cash is advanced to the borrowers.

Financial Assets measured at Amortized Cost ('AC')

The Bank classifies and measures a financial asset at AC only if both of the following conditions are met and is not designated as at FVTPL:

- (a) The financial asset is held within a business model whose objective is to collect contractual cash flows (hold-to-collect business model) and
- (b) The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding (SPPI).

These financial assets are recognized initially at fair value plus or minus direct and incremental transaction costs and fees received that are attributable to the acquisition of these assets, and are subsequently measured at amortized cost, using the effective interest rate (EIR) method (as described in note 2.2.5 above).

Interest income, realized gains and losses on derecognition, and changes in expected credit losses from assets classified at AC, are included in the income statement.

Financial Assets measured at Fair Value through Other Comprehensive Income ('FVOCI')

The Bank classifies and measures a financial asset at FVOCI only if both of the following conditions are met and is not designated as at FVTPL:

- (a) The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets (hold-to-collect-and-sell business model) and
- (b) The contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

Notes to the Financial Statements

Financial assets that meet these criteria are debt instruments and are measured initially at fair value, plus or minus direct and incremental transaction costs that are attributable to the acquisition of these assets.

Subsequent to initial recognition, FVOCI debt instruments are re-measured at fair value through OCI, except for interest income, related foreign exchange gains or losses and expected credit losses, which are recognized in the income statement. Cumulative gains and losses previously recognized in OCI are transferred from OCI to the income statement when the debt instrument is derecognised.

Equity Instruments designated at FVOCI

The Bank may make an irrevocable election to designate an equity instrument at 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 derecognized, are recorded in OCI and are not subsequently reclassified to the income statement. Dividends received are recorded in the income statement.

Financial Assets measured at Fair Value through Profit and Loss ("FVTPL")

The Bank classifies and measures all other financial assets that are not classified at AC or FVOCI, at FVTPL. Accordingly, this measurement category includes debt instruments such as loans and debt securities that are held within the hold-to-collect (HTC) or hold-to-collect-and-sell models (HTCS), but fail the SPPI assessment, equities that are not designated at FVOCI and financial assets held for trading. Derivative financial instruments are measured at FVTPL, unless they are designated as effective hedging instruments, in which case hedge accounting requirements under IAS 39 apply.

Furthermore, a financial asset that meets the above conditions to be classified at AC or FVOCI, may be irrevocably designated by the Bank at FVTPL at initial recognition, if doing so eliminates, or significantly reduces an accounting mismatch that would otherwise arise.

Financial assets measured at 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.

Business model and contractual characteristics assessment

The business model assessment determines how the Bank manages a group of assets to generate cash flows. That is, whether the Bank's objective is solely to collect contractual cash flows from the asset, to realize cash flows from the sale of assets, or both to collect contractual cash flows and cash flows from the sale of assets. In addition, the business model is determined after aggregating the financial assets into groups (business lines) which are managed similarly rather than at an individual instrument's level.

The business model is determined by the Bank's key management personnel consistently with the operating model, considering how financial assets are managed in order to generate cash flows, the objectives and how performance of each portfolio is monitored and reported and any available information on past sales and on future sales' strategy, where applicable.

Accordingly, in making the above assessment, the Bank will consider a number of factors including the risks associated with the performance of the business model and how those risks are evaluated and managed, the related personnel compensation, and the frequency, volume and reasons of past sales, as well as expectations about future sales activity.

Types of business models

The Bank's business models fall into three categories, which are indicative of the key strategies used to generate returns.

The hold-to-collect (HTC) business model has the objective to hold the financial assets in order to collect contractual cash flows. Sales within this model are monitored and may be performed for reasons which are not inconsistent with this business model. More specifically, sales of financial assets due to credit deterioration, as well as, sales close to the maturity are considered consistent with the objective of hold-to-collect contractual cash flows regardless of value and frequency. Sales for other reasons may be consistent with the HTC model such as liquidity needs in any stress case scenario or sales made to manage high concentration level of credit risk. Such sales are monitored and assessed depending on frequency and value to conclude whether they are consistent with the HTC model. Debt instruments classified within this business model include bonds, due from banks and loans and advances to customers including securitized notes issued by special purpose vehicles established by the Bank and recognized in its balance sheet, which are measured at amortized cost, subject to meeting the SPPI assessment criteria.

The hold-to-collect-and-sell business model (HTC&S) has the objective both to collect contractual cash flows and sell the assets. Activities such as liquidity management, interest yield and duration are consistent with this business model, while sales of assets are integral to achieving the objectives of this business model. Debt instruments classified within this business model include investment securities which are measured at FVOCI, subject to meeting the SPPI assessment criteria.

Notes to the Financial Statements

Other business models include financial assets which are managed and evaluated on a fair value basis as well as portfolios that are held for trading. This is a residual category for financial assets not meeting the criteria of the business models of HTC or HTC&S, while the collection of contractual cash flows may be incidental to achieving the business models' objective.

The Bank's business models are reassessed at least annually or earlier, if there is a sales' assessment trigger or if there are any changes in the Bank's strategy and main activities, as evidenced by the Bank's business plan, budget and NPE strategy.

Cash flow characteristics assessment

For a financial instrument to be measured at AC or FVOCI, its contractual terms must give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding.

In assessing whether the contractual cash flows are SPPI, the Bank will consider whether the contractual terms of the instrument are consistent with a basic lending arrangement i.e. interest includes only consideration for the time value of money, credit risk, other basic lending risks and a profit margin. On the initial recognition of a financial asset, an assessment is performed of whether the financial asset contains a contractual term that could change the amount or timing of contractual cash flows in a way that it would not be consistent with the above condition. Where the contractual terms introduce exposure to risk or volatility that are inconsistent with a basic lending arrangement, the related financial asset is considered to have failed the SPPI assessment and will be measured at FVTPL.

For the purpose of the SPPI assessment, the Bank considers the existence of various features, including among others, contractually linked terms, prepayment terms, deferred interest-free payments, extension and equity conversion options and terms that introduce leverage including index linked payments, features that change contractual cash flows based on the borrower meeting certain contractually specified environmental, social and governance (ESG) targets. Moreover, for the securitized notes issued by special purpose vehicles and held by the Bank, the cash flow characteristics of the underlying pool of financial assets as well as the credit risk inherent in each securitization's tranche compared to the credit risk of all of the underlying pool of financial assets, are considered.

In case of special lending arrangements such as non-recourse loans, in its assessment of the SPPI criterion, the Bank considers various factors such as the nature of the borrower and its business, the pricing of the loans, whether it participates in the economic performance of the underlying asset and the extent to which the collateral represents all or a substantial portion of the borrower's assets. Moreover, for special purpose entities, the Bank takes into consideration the borrower's adequacy of loss absorbing capital by assessing jointly the criteria of equity sufficiency, Loan to Value ratio (LTV), the Average Debt Service Coverage ratio (ADSCR) as well as the existence of corporate and personal guarantees.

In certain cases when the time value of money element is modified in that the financial asset's interest rate is periodically reset but the reset frequency does not match the tenor of the interest rate or when a financial asset's interest rate is periodically reset to an average of particular short-term and long-term interest rates, a quantitative assessment is performed (the "Benchmark Test") in order to determine whether the contractual cash flows are SPPI.

In particular, the Bank assesses the contractual cash flows of the "real instrument", whose interest rate is reset with a frequency that does not match the tenor of the interest rate, and those of the "benchmark instrument", which are identical in all respects except that the tenor of the interest rate matches exactly the interest period. If the undiscounted cash flows of the former are significantly different from the benchmark cash flows due to the modified time value of money element, the financial asset does not meet the SPPI criterion. In its assessment, the Bank considers both the effect of the modified time value of money element in each reporting period and cumulatively over the life of the instrument. This is done, as far as the lifetime of the instrument is concerned, by comparing the cumulative projected undiscounted cash flows of the real and the benchmark instrument, and for each quarterly reporting period, by comparing the projected undiscounted cash flows of the two instruments for that quarterly reporting period, based on predefined thresholds.

In addition, for the purposes of the SPPI assessment, if a contractual feature could have an effect that is de-minimis on the contractual cash flows of the financial asset, it does not affect its classification. Moreover, a contractual feature is considered as not genuine by the Bank, if it affects the instrument's contractual cash flows only on the occurrence of an event that is extremely rare, highly abnormal and very unlikely to occur. In such a case, it does not affect the instrument's classification.

The Bank performs the SPPI assessment for its lending exposures on a product basis for the retail and part of the wholesale portfolio where contracts are of standardized form, whereas for the remaining wholesale portfolio, securitized notes issued by special purpose vehicles established by the Bank and debt securities the assessment is performed on an individual basis.

Notes to the Financial Statements

Derecognition of financial assets

The Bank 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 Bank 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 Bank 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.

The main transactions that are subject to the above de-recognition rules are securitization transactions, repurchase agreements and stock lending transactions. In the case of securitization transactions, in order to assess the application of the above mentioned de-recognition principles, the Bank considers the structure of each securitization transaction including its exposure to the more subordinated tranches of the notes issued and/or credit enhancements provided to the special purposes vehicles, as well as the securitization's contractual terms that may indicate that the Bank retains control of the underlying assets. In the case of repurchase transactions and stock lending, the assets transferred are not derecognised since the terms of the transaction entail the retention of all their risks and rewards.

On derecognition of a financial asset, the difference between the carrying amount of the asset and the sum of (i) the consideration received (including any new asset obtained less any new liability assumed) and (ii) any cumulative gain or loss that had been recognized in OCI for financial assets at FVOCI, is recognized in income statement, except for cumulative gains or losses of FVOCI equity instruments which are not reclassified from OCI to income statement at the date of derecognition.

Modification of financial assets that may result in derecognition

In addition, derecognition of financial asset arises when its contractual cash flows are modified and the modification is considered substantial enough so that the original asset is derecognized and a new one is recognised. The Bank records the modified asset as a 'new' financial asset at fair value and the difference with the carrying amount of the existing one is recorded in the income statement as derecognition gain or loss.

The Bank may modify the contractual terms of a lending exposure either as a concession granted to a client facing or that is about to face financial difficulties or due to other commercial reasons such as changes in market conditions, competition or customer retention.

Modifications that may result in derecognition include:

- change in borrower,
- change in the currency that the lending exposure is denominated,
- debt consolidation features where two or more consumer unsecured lending contracts are consolidated into a single new secured lending agreement,
- the removal or addition of conversion features and/or profit sharing mechanisms and similar terms which are relevant to the SPPI assessment;

In addition, the Bank may occasionally enter, in the context of loans' modifications, into debt-for-equity transactions. These are transactions where the terms of a lending exposure are renegotiated and as a result, the borrower issues equity instruments (voting or no voting) in order to extinguish part or all of its financial liability to the Bank. Such transactions may include also exercise of conversion rights embedded into convertible or exchangeable bonds and enforcement of shares held as collateral.

In debt-for-equity transactions, the modified loan is derecognized while the equity instruments received in exchange are recognized at their fair value, with any resulting gain or loss recognized in the Bank's income statement.

2.2.11 Reclassifications of financial assets

The Bank reclassifies a financial asset only when it changes its business model for managing financial assets. Generally, a change in the business model is expected to be rare and occurs when the Bank either begins or ceases to perform an activity that is significant to its operations; for example, when a business line is acquired, disposed of or terminated. In the rare event when there is a change to the existing business models, the updated assessment is approved by the Bank's competent Committees and the amendment is reflected appropriately in the Bank's budget and business plan.

Notes to the Financial Statements

Changes in intention related to particular financial assets (even in circumstances of significant changes in market conditions), the temporary disappearance of a particular market for financial assets or a transfer of financial assets between parts of the Bank with different business models, are not considered by the Bank changes in business model.

The reclassification is applied prospectively from the reclassification date, therefore previously recognized gains, losses (including impairment losses) or interest are not restated.

2.2.12 Financial liabilities

Financial liabilities - Classification and measurement

The Bank classifies its financial liabilities in the following categories: financial liabilities measured at amortized cost and financial liabilities measured at fair-value-through-profit-or-loss (FVTPL).

Financial liabilities at fair-value-through-profit-or-loss comprise two sub categories: financial liabilities held for trading and financial liabilities designated at fair-value-through-profit-or-loss upon initial recognition.

Financial liabilities held for trading, which include short positions of debt securities (sold but not yet purchased), are liabilities that the Bank incurs principally for the purpose of repurchasing in the near term for short term profit or in the context of economic hedging strategies of groups of assets and/or liabilities or net positions for which hedge accounting is not applied.

The Bank may, at initial recognition, irrevocably designate financial liabilities at fair-value-through-profit-or-loss when one of the following criteria is met:

- the designation eliminates or significantly reduces an accounting mismatch which would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases; or
- a group of financial liabilities or financial assets and financial liabilities is managed and its performance is evaluated on a fair value basis in accordance with a documented risk management or investment strategy; or
- the financial liability contains one or more embedded derivatives as components of a hybrid contract which significantly modify the cash flows that otherwise would be required by the contract.

Financial liabilities held for trading or designated at FVTPL are initially recognized at fair value. Changes in fair value are recognized in the income statement, except for changes in fair value attributable to changes in the Bank's own credit risk, which are recognised in OCI and are not subsequently reclassified to the income statement upon derecognition of the liabilities. However, if such treatment creates or enlarges an accounting mismatch in the income statement, all gains or losses of this financial liability, including the effects of changes in the credit risk, are recognized in the income statement.

Derecognition of financial liabilities

A financial liability is derecognized when the obligation under the liability is discharged, cancelled or expires. When an existing financial liability of the Bank is replaced by another from the same counterparty on substantially different terms, or the terms of an existing liability are substantially modified, such an exchange or modification is treated as an extinguishment of the original liability and the recognition of a new liability and any difference arising is recognized in the income statement.

The Bank considers the terms to be substantially different, if the discounted present value of the cash flows under the new terms, including any fees paid net of any fees received and discounted using the original effective interest rate, is at least 10% different from the discounted present value of the remaining cash flows of the original financial liability.

If an exchange of debt instruments or modification of terms is accounted for as an extinguishment, any costs or fees incurred are recognized as part of the gain or loss on the extinguishment. If the exchange or modification is not accounted for as an extinguishment, any costs or fees incurred adjust the carrying amount of the liability and are amortized over the remaining term of the modified liability.

Similarly, when the Bank repurchases any debt instruments issued by the Bank, it accounts for such transactions as an extinguishment of debt.

Notes to the Financial Statements

2.2.13 Fair value measurement of financial instruments

Fair value of financial instruments is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date under current market conditions in the principal or, in its absence, the most advantageous market to which the Bank has access at that date. The fair value of a liability reflects its non-performance risk.

When available, the Bank measures the fair value of an instrument using the quoted price in an active market for that instrument. A market is regarded as active if transactions for the asset or liability take place with sufficient frequency and volume to provide pricing information on an ongoing basis. If there is no quoted price in an active market, then the Bank uses other valuation techniques that maximize the use of relevant observable inputs and minimize the use of unobservable inputs. The chosen valuation technique incorporates all of the factors that market participants would take into account in pricing a transaction.

The Bank has elected to use mid-market pricing as a practical expedient for fair value measurements within a bid-ask spread.

The best evidence of the fair value of a financial instrument at initial recognition is normally the transaction price, i.e. the fair value of the consideration given or received unless the Bank determines that the fair value at initial recognition differs from the transaction price. In this case, if the fair value is evidenced by a quoted price in an active market for an identical asset or liability (i.e. Level 1 input) or based on a valuation technique that uses only data from observable markets, a day one gain or loss is recognized in the income statement. On the other hand, if the fair value is evidenced by a valuation technique that uses unobservable inputs, the financial instrument is initially measured at fair value, adjusted to defer the difference between the fair value at initial recognition and the transaction price (day one gain or loss). Subsequently the deferred gain or loss is amortized on an appropriate basis over the life of the instrument or released earlier if a quoted price in an active market or observable market data become available or the financial instrument is closed out.

All assets and liabilities for which fair value is measured or disclosed in the financial statements are categorized within the fair value hierarchy based on the lowest level input that is significant to the fair value measurement as a whole (note 5.3).

For assets and liabilities that are measured at fair value on a recurring basis, the Bank recognizes transfers into and out of the fair value hierarchy levels at the beginning of the quarter in which a financial instrument's transfer was effected.

2.2.14 Impairment of financial assets

The Bank recognizes allowance for expected credit losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at AC and FVOCI, including loans, securitized notes issued by special purpose vehicles established by the Bank, lease receivables, debt securities, financial guarantee contracts, and loan commitments. No ECL are recognized on equity investments. ECL are a probability-weighted average estimate of credit losses that reflects the time value of money. Upon initial recognition of the financial instruments in scope of the impairment policy, the Bank records a loss allowance equal to 12-month ECL, being the ECL that result from default events that are possible within the next twelve months. Subsequently, for those financial instruments that have experienced a significant increase in credit risk (SICR) since initial recognition, a loss allowance equal to lifetime ECL is recognized, arising from default events that are possible over the expected life of the instrument. If upon initial recognition, the financial asset meets the definition of purchased or originated credit impaired (POCI), the loss allowance is based on the change in the ECL over the life of the asset.

Loss allowances for trade receivables are always measured at an amount equal to lifetime ECL. For all other financial assets subject to impairment, the general three-stage approach applies. Accordingly, ECL are recognized using a three-stage approach based on the extent of credit deterioration since origination:

- Stage 1 – When there is no significant increase in credit risk since initial recognition of a financial instrument, an amount equal to 12-months ECL is recorded. The 12 – month ECL represent a portion of lifetime losses, that result from default events that are possible within the next 12 months after the reporting date and is equal to the expected cash shortfalls over the life of the instrument or group of instruments, due to loss events probable within the next 12 months. Not credit-impaired financial assets that are either newly originated or purchased, as well as, assets recognized following a substantial modification accounted for as a derecognition, are classified initially in Stage 1.
- Stage 2 – When a financial instrument experiences a SICR subsequent to origination but is not considered to be in default, it is included in Stage 2. Lifetime ECL represent the expected credit losses that result from all possible default events over the expected life of the financial instrument.

Notes to the Financial Statements

- Stage 3 – Financial instruments that are considered to be in default are included in this stage. Similar to Stage 2, the allowance for credit losses captures the lifetime expected credit losses.
- POCI - Purchased or originated credit impaired (POCI) assets are financial assets that are credit impaired on initial recognition. They are not subject to stage allocation and are always measured on the basis of lifetime expected credit losses. Accordingly, ECL are only recognized to the extent that there is a subsequent change in the assets' lifetime expected credit losses. Any subsequent favorable change to their expected cash flows is recognized as impairment gain in the income statement even if the resulting expected cash flows exceed the estimated cash flows at initial recognition. Apart from purchased assets, POCI assets may also include financial instruments that are considered new assets, following a substantial modification accounted for as a derecognition (see section 2.2.10).

Definition of default

To determine the risk of default, the Bank applies a default definition for accounting purposes, which is consistent with the European Banking Authority (EBA) definition for non-performing exposure and regulatory definition of default as applied by the Bank on 1 January 2021 (refer to note 5.2.1.2 (a)). The accounting definition of default is also consistent with the one used for internal credit risk management purposes.

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

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

For debt securities, the Bank determines the risk of default using an internal credit rating scale. The Bank considers debt securities as credit impaired if the internal 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.

Significant increase in credit risk (SICR) and staging allocation

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

At each reporting date, the Bank performs an assessment as to whether the risk of a default occurring over the remaining expected lifetime of the exposure has increased significantly from the expected risk of a default estimated at origination for that point in time.

The assessment for SICR is performed using both qualitative and quantitative criteria based on reasonable and supportable information that is available without undue cost or effort including forward looking information and macroeconomic scenarios as well as historical experience. Furthermore, regardless of the outcome of the SICR assessment based on the above indicators, the credit risk of a financial asset is deemed to have increased significantly when contractual payments are more than 30 days past due.

As a primary criterion for SICR assessment, the Bank compares the residual lifetime probability of default (PD) at each reporting date to the residual lifetime PD for the same point in time which was expected at the origination.

The Bank may also consider as a SICR indicator when the residual lifetime PD at each reporting date exceeds certain predetermined values. The criterion may be applied in order to capture cases where the relative PD comparison does not result to the identification of SICR although the absolute value of PD is at levels which are considered high based on the Bank's risk appetite framework.

For a financial asset's risk, a threshold may be applied, normally reflected through the asset's forecasted PD, below which it is considered that no significant increase in credit risk compared to the asset's expected PD at origination date has taken place. In such

Notes to the Financial Statements

a case the asset is classified at Stage 1 irrespectively of whether other criteria would trigger its classification at Stage 2. This criterion primarily applies to debt securities.

Internal credit risk rating (on a borrower basis) is also used as a basis for the identification of SICR with regards to lending exposures of the Wholesale portfolio. Specifically, the Bank takes into consideration the changes of internal ratings by a certain number of notches. In addition, a watchlist status is also considered by the Bank as a trigger for SICR identification. Internal credit risk rating models include borrower specific information as well as, forward-looking information regarding the prospects of the industry in which it operates.

Assessment of SICR for debt securities is performed on an individual basis based on the number of notches downgrade in the internal credit rating scale since the origination date.

Forbearance measures as monitored by the Bank are considered as a SICR indicator and thus the exposures are allocated into Stage 2 upon forbearance, unless they are considered credit-impaired or the net present value of their cash flows before and after the restructuring exceed the threshold of 1%, in which cases they are classified as stage 3. Furthermore, regardless of the outcome of the SICR assessment based on the above indicators, the credit risk of a financial asset is deemed to have increased significantly when contractual payments are more than 30 days past due.

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

Transfers from Stage 2 to Stage 1

A financial asset, which is classified to Stage 2 due to Significant Increase in Credit Risk (SICR), is reclassified to Stage 1, as long as it does not meet anymore any of the Stage 2 Criteria.

Where forbearance measures have been applied, the Bank uses a probation period of two years, in order to fulfill the requirements for a transfer back to Stage 1. If at the end of that period the borrowers have made regular payments of a significant aggregate amount, there are no past due amounts over 30 days and the loans are neither credit impaired, nor any other SICR criteria are met, they exit forborne status and are classified as stage 1.

Transfers from Stage 3 to Stage 2

A financial asset is transferred from Stage 3 to Stage 2, when the criteria based on which the financial asset was characterized as credit impaired are no longer valid and the applicable probation period for the assets' return in non impaired status, ranging from three to twelve months, has passed.

Criteria for grouping of exposures based on shared credit risk characteristics

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

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

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

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

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

Notes to the Financial Statements

Measurement of Expected Credit Losses

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

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

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

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

ECL Key Inputs

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

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

The PD represents the likelihood of default assessed on the prevailing economic conditions at the reporting date, adjusted to take into account estimates of future economic conditions that are likely to impact the risk of default, over a given time horizon.

The Bank uses Point in Time (PiT) PDs in order to remove any bias towards historical data thus aiming to reflect management's view of the future as at the reporting date, incorporating relevant forward looking information including macroeconomic scenarios. Two types of PD are used for calculating ECL:

- 12-month PD, which is the estimated probability of default occurring within the next 12 months (or over the remaining life of the financial asset if this is less than 12 months). It is used to calculate 12-month ECL for Stage 1 exposures.
- Lifetime PD, which is the estimated probability of a default occurring over the remaining life of the financial asset. It is used to calculate lifetime ECL for Stage 2, Stage 3 and POCI exposures.

For debt securities, PDs are obtained by an international rating agency using risk methodologies that maximize the use of objective non-judgmental variables and market data. The Bank assigns internal credit ratings to each issuer/counterparty based on these PDs. In case of counterparties for which no information is available, the Bank assigns PDs which are derived from internal models.

The Exposure at default (EAD) is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest and expected drawdowns on committed facilities. The EAD includes both on and off balance sheet exposures. The on balance sheet exposure corresponds to the total amount that has

Notes to the Financial Statements

been withdrawn and is due to be paid, which includes the outstanding principal, accrued interest and any past due amounts. The off balance sheet exposure represents the credit that is available to be withdrawn, in excess of the on balance sheet exposure.

Furthermore, the CCF factor is used to convert the amount of a credit facility and other off-balance sheet amounts to an EAD amount. It is a modelled assumption which represents a proportion of any undrawn exposure that is expected to be drawn prior to a default event occurring.

In addition, the prepayment rate is an estimate of early prepayments on loan exposure in excess of the contractual repayment according to the repayment schedule and is expressed as a percentage applied to the EAD at each period, reducing the latter amount accordingly.

LGD represents the Bank's expectation of the extent of loss on a defaulted exposure and it is the difference between the contractual cash flows due and those that the Bank expects to receive including any amounts from collateral liquidation. LGD varies by type of counterparty, type and seniority of claim, availability of collateral or other credit support, and is usually expressed as a percentage of EAD. The Bank distinguishes its loan portfolios into two broad categories i.e. secured and unsecured. The Bank estimates the LGD component using cure rates that reflect cash recoveries, estimated proceeds from collateral liquidation, estimates for timing realization, realization costs, etc. Where the LGD's component values are dependent on macro – economic data, such types of dependencies are reflected by incorporating forward looking information, such as forecasted price indices into the respective models. The estimation of the aforementioned component values within LGD reflects available historical data which cover a reasonable period, i.e. a full economic cycle.

For debt securities, the LGD is typically based on historical data derived mainly from rating agencies' studies but may also be determined considering the existing and expected liabilities structure of the obligor and macroeconomic environment.

Furthermore, the seniority of the debt security, any potential collaterals by the obligor or any other type of coverage is taken into account for the calculation.

Forward-looking information

The measurement of expected credit losses for each stage and the assessment of significant increases in credit risk consider information about reasonable and supportable forecasts of future events and macroeconomic conditions. The estimation and application of forward-looking information requires significant judgment.

The Bank uses, at a minimum, three macroeconomic scenarios (i.e. base, adverse and optimistic) to achieve the objective of measuring ECL in a way that reflects an unbiased and probability weighted outcome. The baseline scenario represents the most likely scenario and is aligned with the information used by the Bank for strategic planning and budgeting purposes.

The scenarios are reflected in the risk parameters, and, namely 12-month PD, Lifetime PD and LGD, hence 3 sets of each of these parameters are used, in line with the scenarios developed.

The Bank then proceeds to the calculation of weights for each scenario, which represent the probability of occurrence for each of these scenarios. These weights are applied on the 3 sets of calculations of the parameters in order to produce a single scenario weighted risk parameter value which is subsequently used in both SICR assessment and ECL measurement. ECL calculation incorporates forward-looking macroeconomic variables, including GDP growth rates, house price indices, unemployment rates, interest rates, etc. In order to capture material non – linearities in the ECL model, in the case of individually significant exposures, the Bank considers the relevance of forward looking information to each specific group of borrowers primarily on the basis of the business sector they belong and other drivers of credit risk (if any). As such, different scenario weights are determined per groups of borrowers with the objective of achieving an unbiased ECL amount which incorporates all relevant and supportable information.

Modified Financial Assets

In cases where the contractual cash flows of a financial asset have been modified and the modification is considered substantial enough (for the triggers of derecognition, refer to Derecognition of Financial assets in section 2.2.10 above), the modification date is considered to be the date of initial recognition for impairment calculation purposes, including for the purposes of determining whether a significant increase in credit risk has occurred. Such a modified asset is typically classified as Stage 1 for ECL measurement purposes. However, in some circumstances following a modification that results in derecognition of the original financial asset, there may be evidence that the new financial asset is credit-impaired at initial recognition, and thus, the financial asset is recognized as an originated credit-impaired financial asset (POCI).

Notes to the Financial Statements

In cases where the contractual cash flows of a financial asset have been modified and the modification is not considered substantial enough, the Bank recalculates the gross carrying amount of the financial asset and recognizes the difference as a modification gain or loss in the income statement and determines if the financial asset's credit risk has increased significantly since initial recognition by comparing the risk of a default occurring at initial recognition based on the original unmodified contractual terms and the risk of a default occurring at the reporting date, based on the modified contractual terms.

Presentation of impairment allowance

For financial assets measured at amortized cost, impairment allowance is recognized as a loss allowance reducing the gross carrying amount of the financial assets in the balance sheet. For debt instruments measured at FVOCI, impairment allowance is recognized in other comprehensive income and does not reduce the carrying amount of the debt instruments in the balance sheet. For off-balance sheet financial items arising from lending activities, impairment allowance is presented in Other Liabilities. The respective ECL for the above financial items is recognised within impairment losses.

Write-off of financial assets

Where the Bank has no reasonable expectations of recovering a financial asset either in its entirety or a portion of it, the gross carrying amount of that instrument is reduced directly, partially or in full, against the impairment allowance. The amount written-off is considered as derecognized. Subsequent recoveries of amounts previously written off decrease the amount of the impairment losses in the income statement.

Financial assets that are written off could still be subject to enforcement activities in order to comply with the Bank's procedures for recovery of amounts due.

2.2.15 Sale and repurchase agreements, securities lending and borrowing

(i) Sale and repurchase agreements

Securities sold subject to repurchase agreements (repos) continue to be recorded in the Bank's Balance Sheet as the Bank retains substantially all risks and rewards of ownership, while the counterparty liability is included in amounts due to other banks or due to customers, as appropriate. Securities purchased under agreements to resell (reverse repos) are recorded as loans and advances to other banks or customers, as appropriate. The difference between the sale and repurchase price in case of repos and the purchase and resale price in case of reverse repos is recognized as interest and accrued over the period of the repo or reverse repo agreements using the effective interest method.

(ii) Securities lending and borrowing

Securities lent to counterparties are retained in the financial statements. Securities borrowed are recognized as trading liabilities when sold to third parties and measured at fair value with any gains or losses included in the income statement.

2.2.16 Leases

(i) Accounting for leases as lessee

When the Bank becomes the lessee in a lease arrangement, it recognizes a lease liability and a corresponding right-of-use (RoU) asset at the commencement of the lease term when the Bank acquires control of the physical use of the asset.

Lease liabilities are presented within Other liabilities and RoU assets within Property and equipment and investment property. Lease liabilities are measured based on the present value of the future lease payments over the lease term, discounted using an incremental borrowing rate. The interest expense on lease liabilities is presented within net interest income.

The lease liability is remeasured when there is a change in future lease payments arising from a change in an index or rate, a change in the Bank's estimate of the amount expected to be payable under a residual value guarantee or if the Bank changes its assessment of whether it will exercise a purchase, extension or termination option. When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset, or is recorded in profit or loss if the carrying amount of the right-of-use asset has been reduced to zero.

The RoU asset is initially recorded at an amount equal to the lease liability and is adjusted for rent prepayments, initial direct costs, or lease incentives received. Subsequently, the RoU asset is depreciated over the shorter of the lease term or the useful life of the underlying asset, with the depreciation presented within operating expenses.

Notes to the Financial Statements

When a lease contains extension or termination options that the Bank considers reasonably certain to be exercised, the expected future lease payments or costs of early termination are included within the lease payments used to calculate the lease liability.

As described in note 2.1.1, with respect to the rent concessions that are a direct consequence of the COVID-19 pandemic, the Bank has applied COVID-19-Related Rent Concessions - Amendment to IFRS 16, which provides a practical expedient allowing the Bank not to assess whether eligible rent concessions are lease modifications.

(ii) Accounting for leases as lessor

At inception date of the lease, the Bank, acting as a lessor, classifies each of its leases as either an operating lease or a finance lease based on certain criteria.

Finance leases

At commencement date, the Bank derecognizes the carrying amount of the underlying assets held under finance lease, recognizes a receivable at an amount equal to the net investment in the lease and recognizes, in income statement, any profit or loss from the derecognition of the asset and the recognition of the net investment. The net investment in the lease is calculated as the present value of the future lease payments in the same way as for the lessee.

After commencement date, the Bank recognizes finance income over the lease term, based on a pattern reflecting a constant periodic rate of return on the lessor's net investment in the lease. The Bank also recognizes income from variable payments that are not included in the net investment in the lease. After lease commencement, the net investment in a lease is not remeasured unless the lease is modified or the lease term is revised.

Operating leases

The Bank continues to recognize the underlying asset and does not recognize a net investment in the lease on the balance sheet or initial profit (if any) on the income statement.

The Bank recognizes lease payments from the lessees as income on a straight-line basis or another systematic basis considered as appropriate. Also it recognizes costs, including depreciation, incurred in earning the lease income as an expense. The Bank adds initial direct costs incurred in obtaining an operating lease to the carrying amount of the underlying asset and recognizes those costs as an expense over the lease term on the same basis as the lease income.

Subleases

The Bank, acting as a lessee, may enter into arrangements to sublease a leased asset to a third party while the original lease contract is in effect. The Bank acts as both the lessee and lessor of the same underlying asset. The sublease is a separate lease agreement, in which the intermediate lessor classifies the sublease as a finance lease or an operating lease as follows:

- if the head lease is a short-term lease, the sublease is classified as an operating lease; or
- otherwise, the sublease is classified by reference to the right-of-use asset arising from the head lease, rather than by reference to the underlying asset.

2.2.17 Income tax

Income tax consists of current and deferred tax.

(i) Current income tax

Income tax payable on profits, based on the applicable tax law, is recognized as an expense in the period in which profits arise.

(ii) Deferred tax

Deferred tax is provided in full, using the liability method, on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the financial statements. Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realized or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date. The principal temporary differences arise from impairment/valuation relating to loans, Private Sector Initiative (PSI+) tax related losses, losses from disposals and crystallized write-offs of loans, depreciation of property and equipment, fair value adjustment of investment property, pension and other retirement benefit obligations, and revaluation of certain financial assets and liabilities, including derivative financial instruments.

Deferred tax assets are recognized where it is probable that future taxable profit will be available against which the temporary differences can be utilized. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent

Notes to the Financial Statements

that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. Any such reduction is reversed to the extent that it becomes probable that sufficient taxable profit will be available. The Bank recognises a previously unrecognised deferred tax asset to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered. Deferred tax related to investment securities at FVOCI and cash flow hedges is recognized to other comprehensive income, and is subsequently recognized in the income statement together with the deferred gain or loss.

The deferred tax asset on income tax losses carried forward is recognized as an asset when it is probable that future taxable profits will be available against which these losses can be utilized.

(iii) Uncertain tax positions

The Bank determines and assesses all material tax positions taken, including all, if any, significant uncertain positions, in all tax years that are still subject to assessment (or when the litigation is in progress) by relevant tax authorities. In evaluating tax positions, the Bank examines all supporting evidence (Ministry of Finance circulars, individual rulings, case law, past administrative practices, ad hoc tax/legal opinions etc.) to the extent they are applicable to the facts and circumstances of the particular Bank's case/ transaction.

In addition, judgments concerning the recognition of a provision against the possibility of losing some of the tax positions are highly dependent on advice received from internal/ external legal counselors. For uncertain tax positions with a high level of uncertainty, the Bank recognizes, on a transaction by transaction basis, or together as a group, depending on which approach better predicts the resolution of the uncertainty using an expected value (probability-weighted average) approach: (a) a provision against tax receivable which has been booked for the amount of income tax already paid but further pursued in courts or (b) a liability for the amount which is expected to be paid to the tax authorities. The Bank presents in its balance sheet all uncertain tax balances as current or deferred tax assets or liabilities.

The Bank as a general rule has opted to obtain an 'Annual Tax Certificate', which is issued after a tax audit is performed by the same statutory auditor or audit firm that audits the annual financial statements. Further information in respect of the Annual Tax Certificate and the related tax legislation, is provided in note 14.

2.2.18 Employee benefits

(i) Short term benefits

Short term employee benefits are those expected to be settled wholly before twelve months after the end of the annual reporting period in which the employees render the related services and are expensed as these services are provided.

(ii) Pension obligations

The Bank provides a number of defined contribution pension plans where annual contributions are invested and allocated to specific asset categories. Eligible employees are entitled to the overall performance of the investment. The Bank's contributions are recognized as employee benefit expense in the year in which they are paid.

(iii) Standard legal staff retirement indemnity obligations (SLSRI) and termination benefits

The Bank operates unfunded defined benefit plans under the regulatory framework. In accordance with the local labor legislation, the Bank provides for staff retirement indemnity obligation for employees which are entitled to a lump sum payment based on the number of years of service, as of the date when employee service first leads to benefits under the plan until the date when further employee service will lead to no material amount of further benefits, and the level of remuneration at the date of retirement, if they remain in the employment of the Bank until normal retirement age. Provision has been made for the actuarial value of the lump sum payable on retirement (SLSRI) using the projected unit credit method. Under this method the cost of providing retirement indemnities is charged to the income statement so as to spread the cost over the period of service of the employees, in accordance with the actuarial valuations which are performed every year.

The SLSRI obligation is calculated as the present value of the estimated future cash outflows using interest rates of high quality corporate bonds. The currency and term to maturity of the bonds used are consistent with the currency and estimated term of the retirement benefit obligations. Actuarial gains and losses that arise in calculating the Bank's SLSRI obligations are recognized directly in other comprehensive income in the period in which they occur and are not reclassified to the income statement in subsequent periods.

Notes to the Financial Statements

Interest on the staff retirement indemnity obligations and service cost, consisting of current service cost, past service cost and gains or losses on settlement are recognized in the income statement. In calculating the SLSRI obligation, the Bank also considers potential separations before normal retirement based on the terms of previous voluntary exit schemes.

Termination benefits are payable when employment is terminated by the Bank before the normal retirement date, or whenever an employee accepts voluntary redundancy in exchange for these benefits (including those in the context of the Voluntary Exit Schemes implemented by the Bank). The Bank recognizes termination benefits at the earlier of the following dates: (a) when the Bank can no longer withdraw the offer of those benefits; and (b) when the Bank recognizes costs for a restructuring that involves the payment of termination benefits. In the case of an offer made to encourage voluntary redundancy, the termination benefits are measured based on the number of employees expected to accept the offer. Termination benefits falling due more than 12 months after the end of the reporting period are discounted to their present value.

In the fourth quarter of 2021, the Bank implemented the IFRIC agenda decision and changed its accounting policy regarding the attribution of benefit, arising from defined benefit plans (note 2.1.2). In accordance with IAS 8 “Accounting policies, changes in accounting estimates and errors”, the above change in the Bank’s accounting policy for employee benefits was applied retrospectively as of 20 March 2020 (note 2.3).

(iv) Performance-based cash payments

The Bank’s Management awards high performing employees with bonuses in cash, from time to time, on a discretionary basis. Cash payments requiring only Management approval are recognized as employee benefit expenses on an accrual basis. Cash payments requiring General Meeting approval as distribution of profits to staff are recognized as employee benefit expense in the accounting period that they are approved by the Bank’s shareholders.

(v) Share-based payments

The Management of the parent company of the Bank (Eurobank Ergasias Services and Holdings S.A.) awards employees of the Bank with bonuses in the form of shares and share options on a discretionary basis and after taking into account the current legal framework. Such awards are treated as equity-settled, share-based payment transactions by the Bank.

Non-performance related shares vest in the period granted. Share based payments that are contingent upon the achievement of a performance and service condition, vest only if both conditions are satisfied.

The fair value of the share options granted is recognized as an employee benefit expense over the vesting period, with no impact on the Bank’s equity. The amount ultimately recognised as an expense is based on the number of awards that meet the related service and non-market performance conditions at the vesting date.

The fair value of the share options at grant date is determined by using an adjusted option pricing model which takes into account the exercise price, the exercise dates, the term of the option, the share price at grant date and expected price volatility of the underlying share, the expected dividend yield and the risk-free interest rate for the term of the options. The expected volatility is measured at the grant date of the options and is based on the historical volatility of the share price.

For share-based payment awards with non-vesting conditions, the fair value of the share-based payment at grant date also reflects such conditions and there is no true-up for differences between expected and actual outcomes.

When the options are exercised and new shares are issued, the proceeds received net of any directly attributable transaction costs are credited to share capital (par value) and share premium of the parent company.

2.2.19 Repossessed properties

Land and buildings repossessed through an auction process to recover impaired loans are, except where otherwise stated, included in ‘Other Assets’. Assets acquired from an auction process are held temporarily for liquidation and are valued at the lower of cost and net realizable value, which is the estimated selling price, in the ordinary course of business, less costs necessary to make the sale.

In cases where the Bank makes use of repossessed properties as part of its operations, they may be reclassified to own occupied or investment properties, as appropriate.

Any gains or losses on liquidation are included in the income statement.

Notes to the Financial Statements

2.2.20 Related party transactions

Related parties of the Bank include:

- (a) an entity that has control over the Bank and entities controlled, jointly controlled or significantly influenced by this entity, as well as members of its key management personnel and their close family members;
- (b) an entity that has significant influence over the Bank and entities controlled by this entity,
- (c) members of key management personnel of the Bank, their close family members and entities controlled or jointly controlled by the abovementioned persons;
- (d) associates and joint ventures of the Bank; and
- (e) subsidiaries.

Transactions of similar nature are disclosed on an aggregate basis. All banking transactions entered into with related parties are in the normal course of business and are conducted on an arm's length basis.

2.2.21 Provisions

Provisions are recognized when the Bank has a present legal or constructive obligation as a result of past events, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation, and reliable estimates of the amount of the obligation can be made.

The amount recognized as a provision is the best estimate of the expenditure required to settle the present obligation at each reporting date, taking into account the risks and uncertainties surrounding the amount of such expenditure.

Provisions are reviewed at each reporting date and adjusted to reflect the current best estimate. If, subsequently, it is no longer probable that an outflow of resources embodying economic benefits will be required to settle the obligation, the provision is reversed.

2.2.22 Share capital

Ordinary shares and preference shares are classified as equity. Incremental costs directly attributable to the issue of new shares or options are shown in equity as a deduction from the proceeds, net of tax.

Dividend distribution on shares is recognized as a deduction in the Bank's equity when approved by the General Meeting of shareholders and the required regulatory approvals, if any, are obtained. Interim dividends are recognized as a deduction in the Bank's equity when approved by the Board of Directors.

Intercompany non-cash distributions that constitute transactions between entities under common control are recorded in the Company's equity by reference to the book value of the assets distributed.

Where the Bank purchases own shares (treasury shares), the consideration paid including any directly attributable incremental costs (net of income taxes), is deducted from shareholders' equity until the shares are cancelled, reissued or disposed of. Where such shares are subsequently sold or reissued, any consideration received is included in shareholders' equity.

2.2.23 Hybrid capital

Hybrid capital issued by the Bank is classified as equity when there is no contractual obligation to deliver to the holder cash or another financial asset. Incremental costs directly attributable to the issue of new hybrid capital are shown in equity as a deduction from the proceeds, net of tax.

Dividend distribution on hybrid capital is recognized as a deduction in the Bank's equity on the date it is due.

Where hybrid capital, issued by the Bank, is repurchased, the consideration paid including any directly attributable incremental costs (net of income taxes), is deducted from shareholders' equity. Where such securities are subsequently called or sold, any consideration received is included in shareholders' equity.

2.2.24 Financial guarantees and commitments to extend credit

Financial guarantees

Financial guarantee contracts are contracts that require the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payments when due, in accordance with the terms of a debt instrument. Financial guarantees granted by the Bank to banks, financial institutions and other bodies on behalf of customers to secure loans, overdrafts and other banking facilities, are initially recognized at fair value, being the premium received. Subsequent to initial recognition, such

Notes to the Financial Statements

guarantees are measured at the higher of the amount of the ECL allowance, and the amount initially recognised less any cumulative amortization of the fee earned, where appropriate.

Financial guarantees purchased by the Bank that are considered as integral to the contractual terms of the guaranteed instrument are not accounted for separately and the cash flows from the guarantee are taken into account in the measurement of the guaranteed instrument's expected credit losses, whereas any fees paid or transaction costs incurred for the acquisition of the financial guarantee are considered as part of the guaranteed asset's effective interest rate.

On the other hand, financial guarantees purchased that are not considered as integral to the contractual terms of the guaranteed instruments are accounted for separately where a reimbursement asset is recognized and included in Other Assets once it is virtually certain that, under the terms and conditions of the guarantee, the Bank will be reimbursed for the credit loss incurred. The changes in the carrying amount of the above reimbursement asset arising from financial guarantees, entered into to mitigate the credit risk of lending exposures measured at amortized cost, are recognized under 'Impairment losses' in the Bank's income statement.

Commitments to extend credit

Commitments represent off-balance sheet items where the Bank commits, over the duration of the agreement, to provide a loan with pre-specified terms to the customer. Such contractual commitments represent commitments to extend credit and standby letters and they are part of the normal lending activities of the Bank, for which an ECL allowance is recognised under IFRS 9.

ECL allowance for off-balance sheet exposures (financial guarantees granted and commitments) is included within Other Liabilities.

2.2.25 Non-current assets classified as held for sale and discontinued operations

Non-current assets are classified as held for sale if their carrying amount will be recovered through a sale transaction rather than through continuing use. For a non-current asset to be classified as held for sale, it is available for immediate sale in its present condition, subject to terms that are usual and customary for sales of such assets, and the sale is considered to be highly probable. In such cases, management is committed to the sale and actively markets the property for sale at a price that is reasonable in relation to the current fair value. The sale is also expected to qualify for recognition as a completed sale within one year from the date of classification. Before their classification as held for sale, assets are remeasured in accordance with the respective accounting standard.

Assets held for sale are subsequently remeasured at the lower of their carrying amount and fair value less cost to sell. Any loss arising from the above measurement is recorded in profit or loss and can be reversed in the future. When the loss relates to a disposal group, it is allocated to the assets within that disposal group.

The Bank presents discontinued operations in a separate line in the income statement if a component of the Bank's operations has been disposed of or is classified as held for sale and:

- (a) Represents a separate major line of business or geographical area of operations;
 - (b) Is part of a single coordinated plan to dispose of a separate major line of business or geographical area of operations;
- Profit or loss from discontinued operations includes the profit or loss before tax from discontinued operations, the gain or loss on disposal before tax or measurement to fair value less costs to sell and discontinued operations tax expense. Upon classification of a component of the Bank's operations as a discontinued operation, the Bank restates prior periods in the income statement.

2.2.26 Cash and cash equivalents

Cash and cash equivalents include cash in hand, unrestricted deposits with central banks, due from credit institutions and other short-term highly liquid investments with original maturities of three months or less.

2.2.27 Government grants

Government grants are transfers of resources to the Bank by a government entity such as government, government agencies and similar bodies whether local, national or international, in return for compliance with certain past or future conditions related to the Bank's operating activities.

Government grants are recognized when there is reasonable assurance that the grant will be received and the Bank will comply with the conditions attached to it. The grants are recognized in the income statement on a systematic basis to match the way that the Bank recognizes the expenses for which the grants are intended to compensate. In case of subsequent changes in the Bank's expectations of meeting the conditions attached to the government grants, the effect of such changes is recognised in income statement.

Notes to the Financial Statements

2.2.28 Fiduciary activities

The Bank provides custody, trustee, corporate administration, investment management and advisory services to third parties that result in the holding or investing of assets on behalf of its clients. This involves the Bank making allocation, purchase and sale decisions in relation to a wide range of financial instruments. The Bank receives fee income for providing these services. Those assets that are held in a fiduciary capacity are not assets of the Bank and are not recognized in the financial statements. In addition, the Bank does not guarantee these investments and as a result it is not exposed to any credit risk in relation to them.

2.3 Impact of IFRIC agenda decision – Attributing Benefit to Periods of Service (IAS 19)

The tables below present the impact from the application of the IFRIC agenda decision regarding the employee benefits' attribution over the period of service that was applied by the Bank retrospectively as change in accounting policy (note 2.1.2).

In particular, the below adjustments refer to the individual line items affected for the period ended 31 December 2020. The line items that were not affected by the changes have not been included.

Balance Sheet	31 December 2020		
	As published	Restatement	Restated
	€ million	€ million	€ million
ASSETS			
Deferred tax assets	4,515	(7)	4,508
Total assets	<u>55,636</u>	<u>(7)</u>	<u>55,629</u>
LIABILITIES			
Other liabilities	1,174	(23)	1,151
Total liabilities	<u>51,472</u>	<u>(23)</u>	<u>51,449</u>
EQUITY			
Reserves and retained earnings	112	16	128
Total equity	<u>4,164</u>	<u>16</u>	<u>4,180</u>
Total equity and liabilities	<u>55,636</u>	<u>(7)</u>	<u>55,629</u>

As at 20 March 2020, the impact from the application of the IFRIC agenda decision was the net decrease of "Standard legal staff retirement indemnity obligations" by € 24 million against a) € 17 million increase in equity and b) € 7 million decrease in deferred tax assets.

Income Statement	Period 20 March - 31 December 2020		
	As published	Restatement	Restated
	€ million	€ million	€ million
Other income/(expenses) (note 11)	184	(2)	182
- of which dividend income ⁽¹⁾	3	-	3
Operating income	<u>1,542</u>	<u>(2)</u>	<u>1,540</u>
Profit from operations before impairments, provisions and restructuring costs	<u>1,079</u>	<u>(2)</u>	<u>1,077</u>
Restructuring costs (note 13)	(139)	(1)	(140)
Profit before tax	<u>318</u>	<u>(3)</u>	<u>315</u>
Income tax	(303)	1	(302)
Net profit	<u>15</u>	<u>(2)</u>	<u>13</u>

⁽¹⁾ As at 31 December 2021, dividend income is presented separately in income statement.

Notes to the Financial Statements

Statement of Comprehensive Income

	Period 20 March - 31 December 2020		
	As published	Restatement	Restated
	€ million	€ million	€ million
Net profit	15	(2)	13
- Actuarial gains/(losses) on post employment benefit obligations, net of tax	(2)	1	(1)
Other comprehensive income	59	1	60
Total comprehensive income	74	(1)	73

3. Critical accounting estimates and judgments in applying accounting policies

In the process of applying the Bank's accounting policies, Management makes various judgments, estimates and assumptions that may affect the reported amounts of assets and liabilities, revenues and expenses recognized in the financial statements within the next financial year and the accompanying disclosures. Estimates and judgments are continually evaluated and are based on current conditions, historical experience and other factors, including expectations of future events that are believed to be reasonable under the circumstances. Revisions to estimates are recognized prospectively. The most significant areas in which the Bank makes judgments, estimates and assumptions in applying its accounting policies are set out below:

3.1 Impairment losses on loans and advances to customers

Expected Credit Loss (ECL) measurement

The ECL measurement requires Management to apply judgment, in particular, the estimation of the amount and timing of future cash flows and collateral values when determining impairment losses and the assessment of a significant increase in credit risk. These estimates are driven by a number of factors, changes in which can result in significant changes to the timing and amount of allowance for credit loss to be recognized.

The Bank's ECL calculations are outputs of complex models with a number of underlying assumptions regarding the choice of variable inputs and their interdependencies. In addition, temporary adjustments may be required to capture new developments and information available, which are not reflected yet in the ECL calculation through the risk models.

As of 1 January 2021, the Bank adopted the new Definition of Default (DoD), according to the EBA guideline (Article 178 of Regulation (EU) No 575/2013), the Commission Delegated Regulation (EU) 2018/171 and European Banking Authority (EBA) Guidelines (EBA/GL/2016/07). Information on the new DoD as implemented by the Bank is provided in note 5.2.1.2 (a).

The elements of the ECL models that are considered significant accounting judgments and estimates include:

Determination of a significant increase of credit risk

IFRS 9 does not include a definition of what constitutes a significant increase in credit risk (SICR). An assessment of whether credit risk has increased significantly since initial recognition is performed at each reporting period by considering primarily the change in the risk of default occurring over the remaining life of the financial instrument. The Bank assesses whether a SICR has occurred since initial recognition based on qualitative and quantitative reasonable and supportable forward-looking information that includes significant management judgment. More stringent criteria could significantly increase the number of instruments migrating to stage 2.

In the second quarter of 2021, the Bank revisited the segregation of its lending exposures that was performed at year end 2020, depending on whether the respective borrowers were affected by the Covid-19 pandemic or not. The above segregation was applied in order to address the fact that the borrowers were not equally affected by the pandemic and the effect of moratoria and other government support measures were not fully captured in the macroeconomic variables applied in the IFRS9 models. In particular, as of the second quarter of 2021, given the actual evolution of the projected macroeconomic variables in 2021 as well as the expiration of the majority of the moratoria relief measures provided by the Bank, Management assessed that the above-mentioned

Notes to the Financial Statements

segmentation of its lending exposures is no longer required. Accordingly, the Bank returned to its standard IFRS 9 approach in performing both the SICR assessment and ECL measurement.

Retail lending

For retail lending exposures the primary criterion is the change in the residual cumulative lifetime Probability of Default (PD) above specified thresholds. These thresholds are set and vary per portfolio, modification status (modified/non-modified), product type as well as per origination PD level. In general, thresholds for lower origination PDs are higher than those assessed for higher origination PDs.

As at 31 December 2021 and 2020, the range of lifetime PD thresholds based on the above segmentation, that triggers the allocation to stage 2 for Greece's retail exposures are set out below. It is noted that the application of the new Definition of Default and the results from the recalibration of retail portfolios PD scorecards did not impact the SICR thresholds:

Retail exposures	Range of SICR thresholds
Mortgage	30%-50%
Home Equity	10%-80%
SBB	10%-65%
Consumer	60%-100%

Wholesale lending

For wholesale lending exposures, the origination PD curves and the residual lifetime PD curves at each reporting date are mapped to credit rating bands. Accordingly, SICR thresholds are based on the comparison of the origination and reporting date credit ratings, whereby rating downgrades represent changes in residual lifetime PD. Similar to retail exposures, the Bank segments the wholesale lending exposures based on asset class, loan type and credit rating at origination. In addition, for securitized notes issued by special purpose entities established by the Bank, the SICR assessment is performed by considering the performance of the underlying assets.

As at 31 December 2021, the credit rating deterioration thresholds, as these were reformed following the application of the new definition of default and the resulting recalibration of the corporate rating models, that trigger allocation to stage 2 per rating bands for Greece's wholesale lending exposures are set out in the tables below. In particular, as per the Bank's updated SICR policy, any downgrade to rating band 6 or high-risk rating bands (7,8 or 9) is considered as SICR event to all corporate lending portfolios. The changes introduced by the updated SICR policy affected mainly the SME loans, where downgrades to credit rating up to 5 is no longer considered as a SICR event. The respective thresholds that were applicable as of 31 December 2020 are also provided:

31 December 2021	
Wholesale internal rating bands	SICR threshold range
1	Five notches
2	Four notches
3	Three notches
4	Two notches
5-8	One notch or more

31 December 2020	
Wholesale internal rating bands	SICR threshold range
1-2	Two to Three notches
3-4	Two notches or more
5-8	One notch or more

Determination of scenarios, scenario weights and macroeconomic factors

To achieve the objective of measuring ECL, the Bank evaluates a range of possible outcomes in line with the requirements of IFRS 9 through the application of a minimum three macroeconomic scenarios, i.e. baseline, adverse and optimistic, in a way that reflects an unbiased and probability weighted outcome. Each of the scenarios is based on Management's assumptions around future economic conditions in the form of macroeconomic, market and other factors. As at 31 December 2021 and 2020, the probability weights for the above mentioned scenarios applied by the Bank in the ECL measurement calculations are 50% for the baseline scenario and 25% for the adverse and optimistic scenarios.

Notes to the Financial Statements

The key assumptions underlying in each macroeconomic scenario are provided below:

- *Baseline scenario*

The baseline scenario assumes the continuation of the economy's recovery in 2022, driven mainly by (a) the expected investments, as a result of the initiation of the main bulk of the Resilience and Recovery Facility projects, the positive effect of structural reforms, and the efficient use of the EU budget funds, and (b) the external demand, as a result of the increased exports of goods and services (mainly tourism revenues). The impact of the most recent covid 19 variant (Omicron), is expected to be limited compared to the similar experience of previous years (2020-2021).

- *Optimistic scenario*

The optimistic scenario assumes a quicker recovery of the economic activity during 2022, as a result of higher than expected tourism revenues, the vaccination proceeding according to the optimistic end of estimates both domestically and abroad, as well as the better absorption of EU budget funds and related initiatives.

- *Adverse scenario*

The adverse scenario assumes a sporadic re-enactment of the lockdowns throughout 2022, as a result of the Covid-19 variant (Omicron) and the vaccination aversion observed in a significant part of the population. This results to a slower resumption to positive economic growth in 2022, the destruction of productive capabilities and the continuation of inflationary pressures well into the second half of 2022. This scenario also considers inadequate budget funding funds conditional on the continuation of the lockdowns, while it expects also further delays in the flows of available EU budget funds and related initiatives.

Forward-looking information

The Bank ensures that impairment estimates and macroeconomic forecasts, as provided by Economic Analysis & Financial Markets Research Division, applicable for business and regulatory purposes are fully consistent. Accordingly, the IFRS 9 probability weighted scenario applied in the ECL calculation coincides with the one used for ICAAP and business planning. In addition, relevant experience gained from the stress tests imposed by the regulator, has been taken into account in the process of developing the macroeconomic scenarios, as well as, impairments for stress testing purposes have been forecasted in line with IFRS 9 ECL methodology.

In terms of macroeconomic assumptions, the Bank assesses a number of indicators in projecting the risk parameters, namely Residential and Commercial Property Price Indices, unemployment, Gross Domestic Product (GDP), Greek Government Bond (GGB) spread over Euribor and inflation as well as interest and FX rates.

The arithmetic averages of the scenarios' probability-weighted annual forecasts for the next four year period, following the reporting date, used in the ECL measurement of Greek lending portfolios for the year ended 31 December 2021 and 2020, are set in the following table:

Key macroeconomic indicator	31 December 2021	31 December 2020
	Average (2022-2025) annual forecast	Average (2021-2024) annual forecast
Gross Domestic Product growth	3.27%	3.36%
Unemployment rate	12.60%	16.57%
Residential property prices' index	5.55%	3.13%
Commercial property prices' index	5.75%	4.08%

Changes in the scenarios and weights, the corresponding set of macroeconomic variables and the assumptions made around those variables for the forecast horizon would have a significant effect on the ECL amount. The Bank independently validates all models and underlying methodologies used in the ECL measurement through competent resources, who are independent of the model development process.

Development of ECL models, including the various formulas, choice of inputs and interdependencies

For the purposes of ECL measurement the Bank performs the necessary model parameterization based on observed point-in-time data on a granularity of monthly intervals. The ECL calculations are based on input parameters, i.e. exposure at default (EAD), PDs, loss given default (LGD), credit conversion factors (CCFs) etc. incorporating Management's view of the future. The Bank also determines the links between macroeconomic scenarios and, economic inputs, such as unemployment levels and collateral values, and the effect on PDs, EADs and LGDs.

Notes to the Financial Statements

Furthermore, the PDs are unbiased rather than conservative and incorporate relevant forward looking information including macroeconomic scenarios. The forecasting risk parameters models incorporate a number of explanatory variables, such as GDP, unemployment etc. which are used as independent variables for optimum predictive capability. The models are based on logistic regressions and run under the different macroeconomic scenarios and relevant changes and shocks in the macro environment reflected accordingly in a non-linear manner. In the context of the new DoD application (note 5.2.1.2 (a)), the Bank proceeded with the recalibration of its ECL models.

Segmentation of financial assets when their ECL is assessed on a collective basis

The Bank segments its exposures on the basis of shared credit risk characteristics upon initial recognition 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. On subsequent periods, the Bank re-evaluates the grouping of its exposures at least on an annual basis, in order to ensure that the groups remain homogeneous in terms of their response to the identified shared credit risk characteristics. Re-segmentation reflects management's perception in respect to the change of credit risk associated with the particular exposures compared to initial recognition.

Modeling and Management overlays / adjustments

A number of sophisticated models have been developed or modified to calculate ECL, while temporary management adjustments may be required to capture new developments and information available, which are not yet reflected in the ECL calculation through the risk models. Internal counterparty rating changes, new or revised models and data may significantly affect ECL. The models are governed by the Bank's validation framework, which aim to ensure independent verification, and are approved by the Board Risk Committee (BRC).

In the fourth quarter 2021, Management revisited the temporary adjustment formed in 2020 to reflect existing risk factors in the Covid-19 environment not fully captured in the modelled results and decided that the modelled ECL is no longer required to be amended in the light of the continued improvement of the macroeconomic and lending portfolios' outlook. In particular, considering: (a) the on-going recovery of the economic conditions as supported by the actual evolution of the macroeconomic variables and (b) the credit quality of the Bank's lending exposures that remained solid (after the expiration of the moratoria relief measures and the gradual phase out of the government support measures), the abovementioned temporary adjustment has been incorporated in the standard procedures of ECL outputs and calculations and allocated to the portfolios as per the Bank's ECL policy.

The Bank continues to monitor closely and constantly re-assesses all available information for the Covid-19 pandemic, the prospects of the economies in which the Bank operates, the nature, size and effectiveness of the government support measures, in order to revise its estimates and assumptions applied to the assessment of impairment losses as appropriate.

Sensitivity analysis on lending portfolios

The sensitivity analysis when performed on certain key parameters can provide meaningful information only for portfolios where the risk parameters have a significant impact on the overall credit risk of a lending portfolio, particularly where such sensitivities are also used for internal credit risk management purposes. Otherwise, a sensitivity analysis on certain combinations of some risk parameters may not produce meaningful results, as in reality there are interdependencies between the various economic inputs, rendering any changes in the parameters, changes correlated in other factors.

The sensitivity analysis presented in the tables below was performed assuming a favorable and an adverse shift in scenario weighting as at 31 December 2021 and 2020. The former assumes an increase in the weighting of the optimistic scenario at 75% and a decrease in the weighting of the baseline scenario at 25%, while the latter assumes an increase in the weighting of the adverse scenario at 75% and a decrease in the weighting of the baseline scenario at 25% compared to the scenario weighting applied by the Bank in ECL measurement. Based on the above scenario weighting variations, a re-estimation of all key macroeconomic indicators linked to these variations, namely GDP growth, unemployment rate and property indices, was performed.

Notes to the Financial Statements

The tables below present the estimated effect in the Bank's ECL measurement (including off-balance sheet items) per stage, upon potential reasonable combined changes of forecasts in key macroeconomic indicators over the next 5 years (2022-2026 and 2021-2025, respectively):

As at 31 December 2021				As at 31 December 2020			
Sensitivity scenario				Sensitivity scenario			
Key macroeconomic indicators	Combined change %			Key macroeconomic indicators	Combined change %		
	Positive change	Adverse change			Positive change	Adverse change	
GDP growth	20%	-20%	change of annual forecasts	GDP growth	12%	-15%	change of annual forecasts
Unemployment Rate	-11%	11%	change of annual forecasts	Unemployment Rate	-3%	4%	change of annual forecasts
Property indices (RRE/CRE)	3%	-3%	change of index adjusted real estate collateral market values	Property indices (RRE/CRE)	3%	-3%	change of index adjusted real estate collateral market values

Estimated effect per stage as at 31 December 2021								
	Positive change				Adverse change			
	12-month	Lifetime	Lifetime	Total	12-month	Lifetime	Lifetime	Total
	ECL - Stage 1	ECL - Stage 2	ECL credit-impaired	31 December 2021	ECL - Stage 1	ECL - Stage 2	ECL credit-impaired	31 December 2021
Impact in € million	(8)	(22)	(11)	(41)	5	27	16	48
Impact in % allowance	-5.99	-7.95	-0.7	-2.15	3.21	9.77	1.07	2.5

Estimated effect per stage as at 31 December 2020								
	Positive change				Adverse change			
	12-month	Lifetime	Lifetime	Total	12-month	Lifetime	Lifetime	Total
	ECL - Stage 1	ECL - Stage 2	ECL credit-impaired	31 December 2020	ECL - Stage 1	ECL - Stage 2	ECL credit-impaired	31 December 2020
Impact in € million	(9)	(23)	(35)	(68)	10	29	37	76
Impact in % allowance	-5.01	-5.72	-1.33	-2.08	5.78	7.00	1.40	2.34

The Bank updates and reviews the reasonability and performs back-testing of the main assumptions used in its methodology assessment for SICR and ECL measurement, at least on an annual basis or earlier, based on facts and circumstances. In this context, experienced and dedicated staff within the Bank's Risk Management function monitor the risk parameters applied for the estimation of ECL. Furthermore, as part of the well-defined governance framework, any revisions to the methodology used are approved by the Bank competent committees and ultimately the Board Risk Committee (BRC).

3.2 Fair value of financial instruments

The fair value of financial instruments is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants in the principal (or most advantageous) market at the measurement date under current market conditions (i.e. an exit price) regardless of whether that price is directly observable or estimated using another valuation technique.

The fair value of financial instruments that are not quoted in an active market are determined by using other valuation techniques that include the use of valuation models. In addition, for financial instruments that trade infrequently and have little price transparency, fair value is less objective and requires varying degrees of judgment depending on liquidity, concentration, uncertainty of market factors, pricing assumptions and other risks affecting the specific instrument. In these cases, the fair values are estimated from observable data in respect of similar financial instruments or using other valuation techniques.

The valuation models used include present value methods and other models based mainly on observable inputs and to a lesser extent to non-observable inputs, in order to maintain the reliability of the fair value measurement.

Valuation models are used mainly to value over-the-counter derivatives and securities measured at fair value.

Where valuation techniques are used to determine the fair values of financial instruments that are not quoted in an active market, they are validated and periodically reviewed by qualified personnel independent of the personnel that created them. All models are

Notes to the Financial Statements

certified before they are used, and are calibrated to ensure that outputs reflect actual data and comparative market prices. The main assumptions and estimates, considered by management when applying a valuation model include:

- the likelihood and expected timing of future cash flows;
- the selection of the appropriate discount rate, which is based on an assessment of what a market participant would regard as an appropriate spread of the rate over the risk-free rate; and
- judgment to determine what model to use in order to calculate fair value.

To the extent practicable, models use only observable data, however areas such as credit risk (both own and counterparty), volatilities and correlations require the Management to make estimates to reflect uncertainties in fair values resulting from the lack of market data inputs. Inputs into valuations based on unobservable data are inherently uncertain because there is little or no current market data available. However, in most cases there will be some historical data on which to base a fair value measurement and consequently even when unobservable inputs are used, fair values will use some market observable inputs.

Information in respect of the fair valuation of the Bank's financial assets and liabilities is provided in note 5.3.

3.3 Classification of financial instruments

The Bank applies significant judgment in assessing the classification of its financial instruments and especially, in the below areas:

Business model assessment

Judgment is exercised in order to determine the appropriate level at which to assess the business model. In assessing the business model of financial instruments, these are aggregated into groups (business lines) based on their characteristics, and the way they are managed in order to achieve the Bank's business objectives. In general the assessment is performed at the business unit level for lending exposures including securitized notes issued by special purpose entities established by the Bank and debt securities. However, further disaggregation may be performed by business strategy/ region, etc.

In assessing the business model for financial instruments, the Bank performs a past sales evaluation of the financial instruments and assesses their expected evolution in the future. Judgment is exercised in determining the effect of sales to a "hold to collect" business model depending on their objective and their acceptable level and frequency.

Contractual cash flow characteristics test (SPPI test)

The Bank performs the SPPI assessment of lending exposures including securitized notes issued by special purpose entities established by the Bank and debt securities by considering all the features which might potentially lead to SPPI failure. Judgment is applied by the responsible Business Units when considering whether certain contractual features significantly affect future cash flows. Accordingly, for non-recourse financial assets, the Bank assesses jointly criteria such as the adequacy of equity, LTV (Loan-to-Value) and DSCR (Debt-Service-Coverage-Ratio) ratios as well as the existence of corporate and personal guarantees. For the securitized notes issued by special purpose vehicles and held by the Bank, the cash flow characteristics of the notes and the underlying pool of financial assets as well as the credit risk inherent in each securitization's tranche compared to the credit risk of all of the underlying pool of financial assets, are assessed. Furthermore, in order to assess whether any variability in the cash flows is introduced by the modified time value of money element, the Bank performs a quantitative assessment (as described in note 2.2.10). Moreover, the Bank evaluates certain cases on whether the existence of performance-related terms exposes the Bank to asset risk rather to the borrower's credit risk.

The Bank has established a robust framework to perform the necessary assessments in accordance with Bank's policies in order to ensure appropriate classification of financial instruments, including reviews by experienced staff for lending exposures and debt securities.

3.4 Income tax

The Bank is subject to income tax and estimates are required in determining the liability for income tax. The Bank recognizes liabilities for anticipated tax audit issues based on estimates of whether additional taxes will be due or for anticipated tax disputes. Where the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will impact the income tax and deferred tax in the period in which such determination is made. Further information in relation to the above is provided in note 14.

In addition, the Bank recognizes deferred tax assets to the extent that it is probable that sufficient taxable profit will be available against which unused tax losses and deductible temporary differences can be utilized. Recognition therefore involves judgment

Notes to the Financial Statements

regarding the Bank's future financial performance in which the deferred tax asset has been recognized. Particularly, in order to determine the amount of deferred tax assets that can be recognized, significant management judgments are required regarding the likely timing and level of future taxable profits. In making this evaluation, the Bank has considered all available evidence, including management's projections of future taxable income and the tax legislation.

The most significant judgment exercised by Management relates to the recognition of deferred tax assets in respect of losses realized in Greece. In the event that, the Bank assesses that it would not be able to recover any portion of the recognized deferred tax assets in the future, the unrecoverable portion would impact the deferred tax balances in the period in which such judgment is made.

Further information in respect of the recognized deferred tax assets and the Bank's assessment for their recoverability as of 31 December 2021 is provided in note 14.

3.5 Retirement benefit obligations

The present value of the retirement benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions, such as the discount rate and future salary increases. Any changes in these assumptions will impact the carrying amount of pension obligations. The Bank determines the appropriate discount rate used to calculate the present value of the estimated retirement obligations, at the end of each year based on interest rates of high quality corporate bonds. The currency and term to maturity of the bonds used are consistent with the currency and estimated average term to maturity of the retirement benefit obligations. The salary rate increase assumption is based on future inflation estimates reflecting also the Bank's reward structure and expected market conditions.

Other assumptions for pension obligations, such as future inflation estimates, are based in part on current and expected market conditions.

For information in respect of the sensitivity analysis of the Bank's retirement benefit obligations to reasonably possible, at the time of preparation of these financial statements, changes in the abovementioned key actuarial assumptions, refer to note 35.

3.6 Investment properties

Investment property is carried at fair value, as determined by external, independent, certified valuers on an annual basis, or more frequently if deemed appropriate upon assessment of any relevant circumstances.

The main factors underlying the determination of fair value are related with rental income from current leases and assumptions about rental income from future leases in the light of current market conditions, future vacancy rates and periods, discount rates or rates of return, the terminal values as well as the level of future maintenance and other operating costs.

Additionally, where the fair value is determined based on market prices of comparable transactions those prices are subject to appropriate adjustments, in order to reflect current economic conditions and management's best estimate regarding the future trend of properties market based on advice received from its independent external valuers.

Further information in respect of the fair valuation of the Bank's investment properties and the remaining uncertainties due to Covid-19 pandemic is provided in note 26.

3.7 Provisions and contingent liabilities

The Bank recognizes provisions when it has a present legal or constructive obligation, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of its amount.

A provision is not recognized and a contingent liability is disclosed when it is not probable that an outflow of resources will be required to settle the obligation, when the amount of the obligation cannot be measured reliably or in case that the obligation is considered possible and is subject to the occurrence or non -occurrence of one or more uncertain future events.

Considering the subjectivity and uncertainty inherent in the determination of the probability and amount of the abovementioned outflows, the Bank takes into account a number of factors such as legal advice, the stage of the matter and historical evidence from similar cases. In the case of an offer made within the context of the Bank's voluntary exit scheme, the number of employees expected to accept the abovementioned offer along with their age cluster is a significant factor affecting the measurement of the outflow for the termination benefits.

Further information in relation to the Bank's provisions and contingent liabilities is provided in notes 34 and 41.

Notes to the Financial Statements

3.8 Share-based payments

The Parent Company of the Bank (Eurobank Ergasias Services and Holdings S.A.) grants shares and share options to the employees as a common feature of employee remuneration. IFRS 2 requires recognition of an expense for those shares and share options at the fair value on the grant date (equity-settled plans). For shares granted to employees, the fair value is measured directly at the market price of the entity's shares, adjusted to take into account the terms and conditions upon which the shares were granted. For share options granted to employees, in many cases market prices are not available because the options granted are subject to terms and conditions that do not apply to traded options. If this is the case, the fair value of the equity instruments granted is estimated by using a valuation technique, which is consistent with generally accepted valuation methodologies.

The valuation method and the inputs used to measure the share options granted to employees of the Bank are presented in note 38.

3.9 Leases

The Bank, as a lessee, determines the lease term as the non-cancellable term of the lease, together with any periods covered by an option to extend the lease if it is reasonably certain to be exercised, or any periods covered by an option to terminate the lease, if it is reasonably certain not to be exercised.

The Bank applies judgement in evaluating whether it is reasonably certain or not to exercise an option to renew or terminate the lease, by considering all relevant factors and economic aspects that create an economic incentive. The Bank reassesses the lease term if there is a significant event or change in circumstances that is within its control that affects its ability to exercise or not to exercise the option to renew or to terminate, such as significant leasehold improvements or significant customization of the leased asset.

In measuring lease liabilities, the Bank uses the lessees' incremental borrowing rate ('IBR') when it cannot readily determine the interest rate implicit in the lease. The IBR is the rate of interest that the Bank would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right-of-use asset in a similar economic environment.

Therefore, estimation is required when no observable rates are available (such as for subsidiaries that do not enter into financing transactions) or when they need to be adjusted to reflect the terms and conditions of the lease. The Bank estimates the IBR using observable inputs (such as government bond yields) as a starting point when available, and performs certain additional entity-specific adjustments, such as credit spread adjustments or adjustments to reflect the lease terms and conditions. For the Bank, the IBR is derived from the estimated covered bonds yield curve, which is constructed based on observable Greek Government Bond yields.

3.10 Other accounting estimates and judgments

Information in respect of other estimates and judgments that are made by the Bank is provided in notes, 20, 29, and 30.

Notes to the Financial Statements

4. Capital Management

The Bank's capital adequacy position is presented in the following table:

	31 December 2021 € million	31 December 2020 ⁽¹⁾ € million
Total equity	4,447	4,164
Add: Adjustment due to IFRS 9 transitional arrangements	420	683
Less: Other regulatory adjustments	(771)	(602)
Common Equity Tier 1 Capital	4,096	4,245
Total Tier 1 Capital	4,096	4,245
Tier 2 capital-subordinated debt	950	950
Total Regulatory Capital	5,046	5,195
Risk Weighted Assets	32,983	34,185
Ratios:	%	%
Common Equity Tier 1	12.4	12.4
Tier 1	12.4	12.4
Total Capital Adequacy Ratio	15.3	15.2

⁽¹⁾ The capital adequacy ratios as at 31 December 2020 have not been adjusted following the change in accounting policy (note 2.3).

Notes:

a) The profit of € 469 million for the year ended 31 December 2021 (2020: profit of € 15 million as published) has been included in the calculation of the above capital ratios.

b) The Bank has elected to apply the phase-in approach for mitigating the impact of IFRS 9 transition on the regulatory capital, according to the Regulation (EU) 2017/2395 (providing a 5-year transition period to recognize the impact of IFRS 9 adoption) and the Regulation 2020/873 (CRR quick fix). The transition effect is included in the regulatory capital as of the first quarter of each year.

c) The implementation of the new Definition of Default from 1 January 2021 (note 5.2.1.2) had a negative impact on the regulatory capital by increasing the Internal Ratings Based (IRB) approach shortfall, which is presented above within other regulatory adjustments.

d) The Bank's CET1 as at 31 December 2021, based on the full implementation of the Basel III rules in 2025 (fully loaded CET1), referring mainly to the completion of the aforementioned IFRS 9 transitional arrangements, would be 11.7% (2020: 10.7%).

e) The pro-forma Common Equity Tier 1 and Total Capital Adequacy ratios as at 31 December 2021 with the completion of the sale of Eurobank's merchant acquiring business (note 29) would be 13.4% and 16.3%, respectively.

The Bank has sought to maintain an actively managed capital base to cover risks inherent in the business. The adequacy of the Bank's capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision (BIS rules/ratios) which have been incorporated in the European Union (EU) legislation through the Directive 2013/36/EU (known as CRD IV) as in force, along with the Regulation No 575/2013/EU (known as CRR) as in force. Directive 2013/36/EU was transposed into Greek legislation by Law 4261/2014. In May 2021, Law 4261/2014 was amended by Law 4799/2021, which introduced Directive 2019/878 (CRD V) into Greek law. Supplementary to that, in the context of Internal Capital Adequacy Assessment Process (ICAAP), the Bank considers a broader range of risk types and the Bank's risk management capabilities. ICAAP aims ultimately to ensure that the Bank has sufficient capital to cover all material risks that it is exposed to, over a three-year horizon.

Based on Council Regulation No 1024/2013, the European Central Bank (ECB) conducts annually a Supervisory Review and Evaluation Process (SREP) in order to define the prudential requirements of the institutions under its supervision. The key purpose of the SREP is to ensure that institutions have adequate arrangements, strategies, processes and mechanisms as well as capital and liquidity to ensure a sound management and coverage of their risks, to which they are or might be exposed, including those revealed by stress testing and risks the institution may pose to the financial system.

Taking into account the 2020 SREP decision, for 2021, the Bank was required to meet on an individual basis a Common Equity Tier 1 Ratio of at least 8.71% and a Total Capital Adequacy Ratio of at least 13.52% (Overall Capital Requirement or OCR), including Combined Buffer Requirement of 2.52% which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR). However as of March 2020, based on the ECB's measures announced in response to the Covid-19 outbreak, banks are allowed, among others, to operate below the level of capital defined by the Pillar 2 Guidance and, without prejudice to the restrictions set out in CRD

Notes to the Financial Statements

IV, the Combined Buffer Requirement (i.e. Capital Conservation Buffer, Countercyclical Capital Buffer, Other Systemically Important Institutions Buffer) until at least the end of 2022. According to the FAQs published by the ECB (last updated 10 February 2022), the above allowance provided to banks to operate below the combined buffer requirement results in the ECB taking a flexible approach to approving capital conservation plans that banks are legally required to submit if they breach that requirement. Banks are also allowed to partially use capital instruments that do not qualify as CET1 capital (i.e. Additional Tier 1 or Tier 2 instruments) to meet the Pillar 2 Requirement (P2R). On 10 February 2022, the ECB announced that banks are expected to operate above Pillar 2 Guidance from 1 January 2023.

The breakdown of the Bank's CET1 and Total Capital requirements is presented below.

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

According to the 2021 SREP decision, for 2022, the Bank is required to meet on an individual basis a Common Equity Tier 1 Ratio of at least 9.46% and a Total Capital Adequacy Ratio of at least 14.27% (Overall Capital Requirements or OCR) including Combined Buffer Requirement of 3.27% (Capital conservation buffer of 2.5%, Countercyclical capital buffer of 0.02% and Other Systemically Important Institution (O-SII) buffer of 0.75% which will apply at Eurobank S.A. individual level from 2022 onwards).

Furthermore, the Regulation 2020/873 (CRR quick fix) that was adopted by the Council of the European Union and the European Parliament in June 2020, introduced some changes in the CRR to maximize the ability of banks to continue lending during the Covid-19 pandemic. These changes include among others:

- Extension by two years of the transitional arrangements for IFRS 9 and further relief measures, allowing banks to add back to their regulatory capital any increase in new provisions for expected losses that they recognize in 2020 and 2021 for their financial assets, which have not been defaulted. Accordingly, the relief applied for 2022 is 75%, for 2023 50% and for 2024 25%.

- Earlier application of the revised supporting factors for loans to SMEs and certain infrastructure projects' companies, which allows for a more favorable prudential treatment of these exposures.

- A preferential treatment of exposures to public debt issued in the currency of another Member State and flexibility regarding the large exposures limit.

In October 2021, as part of EU's Banking Package for 2021, the European Commission (EC) adopted legislative proposals to amend a) Regulation 575/2013 (CRR) aiming to implement the Basel IV reform in the EU and b) Directive 2013/36/EU (CRD IV) introducing, among others, explicit rules on the management of Environmental Social and Governance (ESG) risks. The Bank will monitor developments on the aforementioned proposals until their expected adoption by the European Parliament and the Council of the EU.

Further disclosures regarding capital adequacy in accordance with the Regulation 575/2013, are provided in the Pillar 3 Report of Eurobank S.A. for the year ended 31 December 2021 in the Bank's website.

2021 EU – wide stress test

On 30 July 2021, Eurobank Holdings announced that Eurobank Holdings Group successfully completed the 2021 SSM Stress Test (ST), which was coordinated and conducted by the ECB.

Information about the results of the 2021 EU-wide stress test is included in the consolidated financial statements of Eurobank Holdings for the year ended 31 December 2021.

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

Under the Directive 2014/59 (Bank Recovery and Resolution Directive or BRRD), as amended by Directive 2019/879 (BRRD II), which was transposed into the Greek legislation pursuant to Law 4799/2021 amending Law 4335/2015, European banks are required to

Notes to the Financial Statements

meet the minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board (SRB) has determined Eurobank S.A. as Eurobank Holdings' Group resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes.

Information about the Bank's MREL on a consolidated basis is included in the consolidated financial statements Eurobank SA for the year ended 31 December 2021.

Post balance sheet event

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

5. Financial risk management and fair value

5.1 Use of financial instruments

By their nature the Bank's activities are principally related to the use of financial instruments including derivatives. The Bank accepts deposits from customers, at both fixed and floating rates, and for various periods and seeks to earn above average interest margins by investing these funds in high quality assets. The Bank seeks to increase these margins by consolidating short-term funds and lending for longer periods at higher rates, while maintaining sufficient liquidity to meet all claims that might fall due.

The Bank also seeks to raise its interest margins by obtaining above average margins, net of provisions, through lending to commercial and retail borrowers within a range of credit standing. Such exposures include both on-balance sheet loans and advances and off-balance sheet guarantees and other commitments such as letters of credit.

The Bank also trades in financial instruments where it takes positions in traded and over the counter financial instruments, including derivatives, to take advantage of short-term market movements in the equity and bond markets and in currency and interest rates.

5.2 Financial risk factors

Due to its activities, the Bank is exposed to several financial risks, such as credit risk, market risk (including currency, interest rate, spread, equity and volatility risk), liquidity and operational risks. The Bank's overall risk management strategy seeks to minimize any potential adverse effects on its financial performance, financial position and cash flows.

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 enable the Group to identify and deal with the risks associated with those changes. The Bank'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 European Central Bank (ECB) and of the Single Resolution Board (SRB), the guidelines of the European Banking Authority (EBA) and the Basel Committee for 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 credit, market, liquidity and operational risk, both in Greece and in each country of its international operations. The risk management policies implemented by the Bank and its subsidiaries are reviewed mainly annually.

The Group Risk and Capital Strategy, which has been formally documented, outlines the Group's overall direction regarding risk and capital management issues, the risk management mission and objectives, risk definitions, risk management principles, risk appetite framework, risk governance framework, strategic objectives and key management initiatives for the improvement of the risk management framework in place.

The maximum 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 specific risk types, including specific tolerance levels as described in the Group's Risk Appetite Framework. The objectives are to support the Group's business growth, balance a strong capital position with higher returns on equity and to ensure the Group's adherence to regulatory requirements.

Notes to the Financial Statements

Risk appetite that is clearly communicated throughout the Group, determines risk culture and forms the basis on which risk policies and risk limits are established at Group and regional level. Within the context of its Risk Appetite Framework, the Bank has further enhanced the risk identification process and the risk materiality assessment methodology.

The identification and assessment of all risks is the cornerstone for the 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. In this context, the Bank has recognized climate change risk as a material risk and based on its supervisory guidelines, is in the process of adapting its policies and methodologies for identifying and monitoring the relevant risks (note 5.2.5).

Board Risk Committee (BRC)

The Board Risk Committee (BRC) is a committee of the BoD and its task is to assist the BoD to ensure that the Group has a well-defined risk and capital strategy in line with its business plan and an adequate and robust risk appetite.

The BRC assesses the Group's risk profile, monitors compliance with the approved risk appetite and risk tolerance levels and ensures that the Group has developed an appropriate risk management framework with appropriate methodologies, modelling tools, data sources and sufficient and competent staff to identify, assess, monitor and mitigate risks. Moreover, BRC is conferred with certain approval authorities for credit proposals, debt forgiveness and write-offs.

The BRC consists of six (6) non-executive directors, meets at least on a monthly basis and reports to the BoD on a quarterly basis and on ad hoc instances if it is needed.

Management Risk Committee

The Management Risk Committee (MRC) is a management committee established by the CEO and operates as an advisory committee to the BRC.

The main responsibility of the MRC is to oversee the risk management framework of the Group. As part of its responsibility, the MRC facilitates reporting to the BRC on the range of risk-related topics under its purview. 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 risks and to comply with regulatory requirements.

Group Risk Management General Division

The Group's Risk Management General Division which is headed by the Group Chief Risk Officer (GCRO), operates independently from the business units and is responsible for the monitoring, measurement and management of credit, market, operational and liquidity risks of the Group. It comprises of the Group Credit General Division, the Group Credit Control Sector (GCCS), the Group Credit Risk Capital Adequacy Control Sector (GCRCACS), the Group Market and Counterparty Risk Sector (GMCRS), the Group Operational Risk Sector, the Group Model Validation and Governance Sector, the Group Risk Management Strategy Planning and Operations Division, the Supervisory Relations and Resolution Planning Sector (dual reporting also to the Group Chief Financial Officer), Climate Risk Division and the Risk Analytics Division.

Non-Performing Exposures (NPE) management

The Bank, following the strategic partnership with doValue S.p.A. and the successful transition to the new operating model for the management of NPE, realizes the NPE Strategy Plan through its implementation by doValue Greece for the assigned portfolio and the successful securitization transactions.

Troubled Assets Committee

The Troubled Assets Committee (TAC) is established according to the regulatory provisions and its 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.

Remedial and Servicing Strategy (RSS)

Eurobank, established Remedial Servicing & Strategy Sector (RSS) with the mandate to devise the NPE reduction plan, to closely monitor the overall performance of the NPE portfolio as well as the relationship of the Bank with doValue Greece.

Furthermore following Eurobank's commitments against the significant risk transfer (SRT) 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.

Notes to the Financial Statements

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:

- Develop and actively monitor the NPE targets and reduction plan
- Set the strategic principles, priorities, policy framework and KPIs 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 Eurobank's portfolio assigned to doValue Greece including the securitized portfolio of ERB Recovery DAC
- Monitoring of 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
- Maintain supervisory dialogue

NPE Management Strategy and Operational targets

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

5.2.1 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, 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 Bank remits payments before it can ascertain that the counterparties' payments have been received.

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

(a) Credit approval process

The credit approval and credit review processes are centralized both in Greece and in the International operations. The 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 centralized through establishment of Credit Committees with escalating Credit Approval Levels. Main Committees of the Bank are considered to be the following:

- Credit Committees (Central and Local) authorized to approve new financing, renewals or amendments for domestic groups in the existing credit limits, in accordance with their credit approval authority, depending on total limit amount and customer risk category (i.e. high, medium or low), as well as the value and type of security;
- Special Handling Credit Committees authorized 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, authorized 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

Notes to the Financial Statements

- 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 General Division (GCGD)

Within an environment of increased risk challenges, Group Credit General Division (GCGD) mission is to safeguard the banks' asset side, by evaluating credit risk and making recommendations, so that borrowers' credit exposure is acceptable and within the approved Risk Appetite Framework. GCGD is headed by the Group Chief Credit Officer (GCCO) with direct reporting to the Group Chief Risk Officer (GCRO).

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

1. Corporate Credit Risk

- (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) 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, which includes:
 - i. assessment of the customer credit profile based on the qualitative and quantitative risk factors identified (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 separate 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 divisions.
 - 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 GCGD through its specialized International Credit Sector (ICS) is responsible to actively participate in the design, implementation and review of the credit underwriting function for the wholesale portfolio of the International Subsidiaries covering Bulgaria, Cyprus, Serbia, the remaining Romania portfolio and portion of the loan portfolio of Luxemburg (including London Branch). Moreover, the respective unit's tasks and responsibilities are highlighted below:
 - Participation right in all International Committees (Regional and Special Handling) with voting right and Country Risk Committees (CRCs) without voting right;
 - Participation in the sessions of Special Handling Monitoring Committees for Bulgaria and Serbia which monitor and decide on the strategy of problematic corporate relationships with loan outstanding exceeding a certain threshold, that is jointly set by ICS and Country Troubled Asset Groups;
 - Advice on best practices to the Credit Risk Units of International Subsidiaries
 - Initiation of, or participation in, non-recurring credit related projects involving the International Subsidiaries, such as, indicatively, Wholesale Field Reviews, regulatory Asset Quality Reviews, acquisition and /or sale of wholesale portfolios etc.

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

2. Retail Credit Risk

The scope of the Retail Banking Credit Risk & Underwriting Sector is the assessment of credit applications submitted by Retail Business Units (domestic operations only), in relation to Borrowers of the retail credit portfolio (SBB loans and Individuals' banking) based on thresholds, for which an assessment by GCGD is required as per the provisions of the relevant Credit Approval Procedures.

Notes to the Financial Statements

The tasks of Retail Credit Risk function are outlined below:

- Assess credit requests in alignment with the credit risk granting criteria and methodology provided in the appropriate Credit Policy Manual. The evaluation of the SBB portfolio includes the assessment of the borrower's financial position and statistical scorecards. Regarding the Individual Banking (mortgage and consumer loans), the credit criteria include among others the payment behaviour, financial position of the borrower, the existence of real estate property and the type and quality of securities.
- Analyze and evaluate risk factors depending on the type of credit request.
- Prepare an independent Credit Opinion presenting the official GCGD opinion on the credit application and confirm, where required, the Borrower Rating for each Borrower in its portfolio ensuring that the risks identified are fully reflected in the Rating.
- Participate with voting rights in the credit committees as per the credit approval process, according to the Approval Levels defined in the Credit Policy Manual.

(b) Credit risk monitoring

Group Credit Control Sector

The Group Credit Control Sector (GCCS) monitors and assesses the quality of all of the Group's loan portfolios and operates independently from the business units of the Bank. The GCCS reports directly to the GCRO.

The main responsibilities of the GCCS are to:

- supervise, support and maintain the credit rating and impairment systems used to assess the wholesale 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 Board of Directors 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 (NPE) and the achievement of targets for NPE 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;
- ensure that EBA classifications are made 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;
- 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.
- monitor the proper technical valuation of Real Estate collaterals, 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;

Group Credit Risk Capital Adequacy Control Sector

The Group Credit Risk Capital Adequacy Control Sector implements and maintains the Internal Ratings Based (IRB) approach in accordance with the Basel framework and the Capital Requirements Directive (CRD) and maintains the credit risk assessment models for the loans portfolio of the Group. The Sector reports directly to the GCRO.

Specifically, the main responsibilities of the Group Credit Risk Capital Adequacy Control Sector are to:

- control, measure and monitor the capital requirements arising from the Bank's loan portfolio along with the relevant reporting to Management and regulators (ECB/SSM);
- measure and monitor the risk parameters (PD, LGD, EAD) for the purposes of capital adequacy calculations, as well as, the estimation of risk related parameters (such as forecast 12-m PD, forecast lifetime PD) for impairment calculation purposes;
- review the grouping of lending exposures and ensuring their homogeneity in accordance with the Group's IFRS accounting policies
- re-assess and re-develop if required, the significant increase in credit risk (SICR) thresholds under IFRS9 standard;

Notes to the Financial Statements

- prepare monthly capital adequacy calculations (Pillar 1) and relevant management, as well as, regulatory reports (COREPs, SREP) on a quarterly basis;
- participate in the preparation of the business plan, the NPE targets plan and the recovery plan of the Group in relation to asset quality and capital requirements for the loan book (projected impairments and RWAs), as well as participate 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;
- monitor the regulatory framework in relation to the IRB framework performing impact assessment by initiating and managing relevant projects;
- manage the models development, implementation, monitoring of the IRB models of Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) for evaluating credit risk;
- prepare the credit risk analyses for Internal Capital Adequacy Assessment (ICAAP)/ Pillar 2 purposes;
- implement the IRB roll-out plan of the Group;
- prepare the Basel Pillar 3 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), updates on regulatory changes and impact assessment and asset quality reviews;
- 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 Sector in the risk assessment and risk impact of various programs and products.

Group Model Validation and Governance Sector

The Group Model Validation and Governance Sector was established in September 2018, with key mandates:

- the establishment of a comprehensive model governance and validation framework, and
- the independent validation of the technical and operational completeness of all models used by the Group and their parameters, as well as their compliance with the provisions of the regulatory framework.

In more detail, the tasks of the Sector 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;
- Prepare and update the Group Models Validation Framework, while providing support to Group's subsidiaries in its implementation;
- Monitor changes in ECB guidelines on models' validation;
- 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 of the model valuation results according to the specific requirements of the model validated, if any, which are communicated to BRC on an annual basis along with any related proposed remediation plan;
- Disseminate models' validation test results within the Group's BRC or MRC following reporting to Group CRO, 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 approval process of new models for assessing ratings' system accuracy and suitability; and
- Monitor industry practices on the development and use of models as well as related ECB guidelines and restrictions.

Notes to the Financial Statements

Group Market and Counterparty Risk Sector

Group Market and Counterparty Risk Sector (GMCRS) is responsible for the measurement, monitoring and periodic reporting of the Group's exposure to counterparty risk (issuer risk and market driven counterparty risk), which is the risk of loss due to the customer's failure to meet its contractual obligations in the context of treasury positions, such as debt securities, derivatives, repos, reverse repos, interbank placings, etc.

In addition, GMCRS monitors, controls and regularly reports country limits, exposures and escalates breaches to the Management and to Committees. GMCRS uses a comprehensive methodology approved by the BRC, for determining the acceptable country risk level, including the countries in which the Group has a strategic presence.

The Group sets limits on the level of counterparty risk that are based mainly on the counterparty's credit rating, as provided by international rating agencies, the product type and the maturity of the transaction (e.g. control limits on net open derivative positions by both amount and term, sovereign bonds exposure, corporate securities, asset backed securities etc.).

GMCRS maintains and updates the limits' monitoring systems and ensures the correctness and compliance of all financial institutions limits with the Bank's policies as approved by the Group's relevant bodies.

The utilization of the abovementioned limits, any excess of them, as well as the aggregate exposure per Group's entity, counterparty and product type are monitored by GMCRS on a daily basis. Risk mitigation contracts are taken into account for the calculation of the final exposure.

Also, GMCRS ensures that the exposure arising from counterparties complies with the approved country limits framework. The GMCRS's exposure measurement and reporting tool is also available to the Group's subsidiaries treasury divisions, thus enabling them to monitor each counterparty's exposure and the limit availability.

Additionally, for the banks' corporate bond portfolio, GMCRS measures and monitors daily the total notional limits, the sectoral concentration and the maximum size per issuer. It uses a measurement tool for monitoring any downgrades and any idiosyncratic spread widening from purchase and any breach is communicated to the Management and to the relevant Committees.

GMCRS implements the market's best practices and safeguards the compliance of all involved parties to limits' policies and procedures. To this direction, for various units and International subsidiaries, GMCRS provides support and guidance for implementation of the limits' guidelines and policies.

Furthermore, GMCRS prepares specialized reports for the Management/Committees along with regular reporting that includes the exposure to the Hellenic Republic and a report that is based on the calculation of the Lifetime Expected Losses for the exposure towards the Hellenic Republic (HR).

(c) Credit related commitments

The primary purpose of credit related commitments is to ensure that funds are available to a customer as agreed. Financial guarantee contracts carry the same credit risk as loans since they represent irrevocable assurances that the Bank will make payments in the event that a customer cannot meet its obligations to third parties. Documentary and commercial letters of credit, which are written undertakings by the Bank on behalf of a customer authorizing a third party to draw drafts on the Bank up to a stipulated amount under specific terms and conditions, are secured by the underlying shipment of goods to which they relate and therefore carry less risk than a loan. Commitments to extend credit represent contractual commitments to provide credit under pre-specified terms and conditions (note 41) in the form of loans, guarantees or letters of credit for which the Bank usually receives a commitment fee. Such commitments are irrevocable over the life of the facility or revocable only in response to a material adverse effect.

(d) Concentration risk

The Bank structures the levels of credit risk it undertakes by placing exposure limits by borrower, or groups of borrowers, and by industry segments. The exposure to each borrower is further restricted by sub-limits covering on and off-balance sheet exposures, and daily delivery risk limits in relation to trading items such as forward foreign exchange contracts.

Such risks are monitored on a revolving basis and are subject to an annual or more frequent review. Risk concentrations are monitored regularly and reported to the BRC. Such reports include the 25 largest exposures, major watch list and problematic customers, industry analysis, analysis by rating/risk class, by delinquency bucket, and loan portfolios by country.

Notes to the Financial Statements

(e) Rating systems

Rating of wholesale lending exposures

The Bank has decided upon the differentiation of rating models for wholesale lending activities, in order to reflect appropriately the risks arising from customers with different characteristics. Accordingly, the Bank employs the following rating models for the wholesale portfolio:

- Moody's Risk Analyst model ("MRA" or "Fundamental Analysis"- "FA") is used to assess the risk of borrowers for Corporate Lending.
- Internal Credit Rating model ("ICR") is used for those customers that cannot be rated by MRA.
- Transactional Rating model ("TR") has been developed in order to assess the risk of transactions taking into consideration their collaterals/guarantees.
- Slotting rating models are employed in view of assessing the risk of specialized exposures, which are part of the Specialized Lending corporate portfolio.
- Finally, an assessment of the borrowers' viability and the identification of impairment triggers is performed using the "Unlikely to Pay" ("UTP") / impairment test.

MRA, ICR, Slotting and "UTP" functions are supported by the CreditLens ("CL") computing platform provided by an external provider (Moody's Analytics), while the TR is internally developed and is being supported by the core applications of the Bank.

MRA follows the Moody's fundamental analysis (FA) approach. The FA models belong to a family of models defined as Knowledge Based Systems and rely on a probabilistic reasoning approach. They use quantitative and qualitative information of individual obligors in order to assess their creditworthiness and determine their credit rating. In particular, MRA takes into account the entity's balance sheets, profit & loss accounts and cash flow statements to calculate key ratios. Its ratio analysis includes assessments of each ratio's trend across multiple periods, both in terms of the slope and volatility of the trend. It also compares the value of the ratio for the most recent period with the quartile values for a comparable peer group. Moreover, MRA is supplied with a commonly used set of qualitative factors relating to the quality of the company's management, the standing of the company within its industry and the perceived riskiness of the industry. MRA is used for the assessment of all legal entities with full accountancy tax books irrespective of their legal form, and is calibrated on the Greek corporate environment.

The MRA is not employed for certain types of entities that use different accounting methods to prepare their financial statements, such as Insurance companies and brokerage firms. Moreover, entities such as start-ups that have not produced financial information for at least two annual accounting periods are not rated with MRA. In such cases, the Internal Credit Rating ("ICR") is utilized, which is a scorecard consisting of a set of factors grouped into 3 main sections corresponding to particular areas of analysis: Financial Information, Qualitative Criteria, and Behavior Analysis. In addition, the Bank performs an overall assessment of wholesale customers, based both on their rating (MRA or ICR) and the collaterals and guarantees regularly at every credit assessment.

In 2021, in combination with the application of the new Definition of Default the Bank calibrated its MRA and ICR models, which were approved by the regulatory authorities.

With reference to Specialized Lending portfolio (for which the Bank is using Slotting rating models) and in line with European Banking Authority (EBA) definitions, it comprises types of exposures towards entities specifically created to finance or operate physical assets, where the primary source of income and repayment of the obligation lies directly with the assets being financed. Accordingly, three of its product lines that are included in the Specialized Lending exposure class: Project Finance (assessed with the Project Finance Scorecard), Commercial Real Estate (assessed with the CRE investor & CRE Developer Scorecards) and Object Finance (assessed with the Object Finance Scorecard tailored for the Shipping portfolio).

In addition, the Bank has developed an Unlikely to Pay/Impairment test. Unlikelihood to pay refers to circumstances when a Borrower is assessed as unlikely to pay its credit obligations in full without realization of collateral, regardless of the existence of any past due amount or of the days past due (i.e. to exposures less than 90 dpd). The impairment test, which is performed to all borrowers during every credit assessment is implemented in the CL platform and includes clearly defined indicators of unlikelihood to pay (UTP). These indicators are separated in "Hard" and "Soft" UTP triggers.

- Hard UTP indicators lead directly to a recognition of non-performing (automatic NPE classification), as in most cases these events, by their very nature, directly fulfil the definition of UTP and there is little room for interpretation.
- Soft UTP triggers when applied, do not automatically mean that an exposure is non-performing, but that a thorough assessment should be performed (assessment prior to NPE classification).

Notes to the Financial Statements

The Bank has further enhanced its wholesale credit risk assessment models linking risk parameters estimation with macro-economic factors allowing the forecasting of rating transitions under different macroeconomic scenarios (base, adverse and optimistic).

The rating systems described above are an integral part of the wholesale banking decision-making and risk management processes:

- the credit approval or rejection, both at the origination and review process;
- the allocation of competence levels for credit approval;
- risk-adjusted pricing;
- the calculation of Economic Value Added (EVA) and internal capital allocation; and
- the impairment calculation (staging criteria and subsequent ECL estimation of forecasted risk parameters).

Rating of retail lending exposures

The Bank assigns credit scores to its retail customers using a number of statistically-based models both at the origination and on ongoing basis through behavioral scorecards. These models have been developed to predict, on the basis of available information, the probability of default, the loss given default and the exposure at default. They cover the entire spectrum of retail products (credit cards, consumer lending, unsecured revolving credits, car loans, personal loans, mortgages and small business loans).

The Bank's models were developed based on historical data and credit bureau data. Behavioral scorecards are calculated automatically on a monthly basis, thus ensuring that the credit risk assessment is up to date.

The models are applied in the credit approval process, the credit limits management, as well as the collection process for the prioritization of the accounts in terms of handling. Furthermore, the models are often used for the risk segmentation of the customers and the risk based pricing of particular segments or new products introduced as well as in the calculation of the Economic Value Added (EVA) and Risk Adjusted Return on Capital (RaRoC) measures.

The rating systems employed by the Bank meets the requirements of the Basel III-Internal Ratings Based (IRB) approach. The Bank is IRB certified since 2008 for the Greek portfolios, both wholesale and retail (as detailed in Basel III, Pillar 3 disclosures available at the Bank's website).

In the context of IFRS9 implementation, the Bank has further enhanced its retail credit risk assessment models linking risk parameters estimation with macro-economic factors allowing their forecasting over one year and lifetime horizon under different macroeconomic scenarios (base, adverse and optimistic) and supporting the staging analysis and allocation to risk classes under homogeneous pools.

The Group Credit Risk Capital Adequacy Control Sector monitors the capacity of rating models and scoring systems to classify customers according to risk, as well as to predict the probability of default and loss given default and exposure at default on an ongoing basis. The Group Models Validation and Governance Sector implements the Bank's validation policy which complies with international best practices and regulatory requirements. The Bank verifies the validity of the rating models and scoring systems on an annual basis and the validation includes both quantitative and qualitative aspects. The validation procedures are documented, and regularly reviewed and reported to the BRC.

The Group's Internal Audit Division also independently reviews the validation process in wholesale and retail rating systems annually.

(f) 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.

Types of collateral commonly accepted by the Bank

The Bank has internal policies in place which set out the following types of collateral that 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 policies; and
- equipment, mainly, vehicles and vessels.

Notes to the Financial Statements

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), the Bank accepts as collateral only cash or liquid bonds.

Valuation principles of collaterals

In defining the maximum collateral ratio for loans, the Bank considers all relevant information available, including the collaterals' specific characteristics, if market participants would take those into account when pricing the relevant assets. The valuation and hence eligibility is based on the following factors:

- the collateral's fair value, i.e. the exit price that would be received to sell the asset in an orderly transaction under current market conditions;
- the fair value reflects market participants' ability to generate economic benefits by using the asset in its highest and best use or by selling it;
- a reduction in the collateral's value is considered if the type, location or condition (such as deterioration and obsolescence) of the asset indicate so; and
- no collateral value is assigned if a pledge is not legally enforceable.

The Bank performs collaterals' valuation in accordance with its processes and policies. With the exception of special cases (e.g. syndicated loans), the real estate collaterals of all units are valued by Cerved Property Services S.A. ("CPS") who is the successor of the Bank's former subsidiary, Eurobank Property Services S.A. CPS is regulated by the Royal Institute of Chartered Surveyors and employs internal or external qualified appraisers based on predefined criteria (qualifications and expertise). All appraisals take into account factors such as the region, age and marketability of the property, and are further reviewed and countersigned by experienced staff. The valuation methodology employed is based on International Valuation Standards (IVS), while quality controls are in place, such as reviewing mechanisms, independent sample reviews by independent well established valuation companies.

In order to monitor the valuation of residential property held as collateral, the Bank uses the Residential Property Index developed in collaboration with other major banks in Greece. This methodology, has been approved by the Bank of Greece, and its use enables a dynamic monitoring of residential properties' values and market trends, on an annual basis. The Residential Property Index is used in combination with physical inspection and desktop valuation, depending on the EBA status and the balance of the loan.

For commercial real estates, the Bank uses the Commercial Real Estate Index developed by CPS. This index is derived through a combination of CPS & BoG CRE indices and it is based on internationally accepted methodology. It constitutes a tool for the statistical monitoring of possible changes of the values of the commercial properties as well as for the trends in the particular market. It is updated on an annual basis. The Commercial Real Estate Index is used in combination with physical inspection and desktop valuation, depending on the EBA status and the balance of the loan.

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

Collateral policy and documentation

Regarding collaterals, Bank's policy emphasizes the need that collaterals and relevant processes are timely and prudently executed, in order to ensure that collaterals and relevant documentation are legally enforceable at any time. The Bank holds the right to liquidate collateral in the event of the obligor's financial distress and can claim and control cash proceeds from the liquidation process.

Guarantees

The guarantees used as credit risk mitigation by the Bank are largely issued by the government. The Hellenic Development Bank (HDB) and similar funds, banks and insurance companies are also significant guarantors of credit risk.

Management of repossessed properties

The objective of the repossessed assets' management is to minimize the time cycle of the asset's disposal and to maximize the recovery of the capital engaged.

Notes to the Financial Statements

To this end, the management of repossessed assets aims at improving rental and other income from the exploitation of such assets, and at the same time reducing the respective holding and maintenance costs. Additionally, the Bank is actively engaged in identifying suitable potential buyers for its portfolio of repossessed assets (including specialized funds involved in acquiring specific portfolios of properties repossessed), both in Greece and abroad, in order to reduce its stock of properties with a time horizon of 3-5 years.

Repossessed assets are closely monitored based on technical and legal due diligence reports, so that their market value is accurately reported and updated in accordance with market trends.

Counterparty risk

The Bank mitigates counterparty risk arising from treasury activities by entering into master netting arrangements and similar agreements, as well as collateral agreements with counterparties with which it undertakes a significant volume of transactions. Master netting arrangements do not generally result in the offset of balance sheet assets and liabilities, as the transactions are usually settled on a gross basis. However, the respective credit risk is reduced through a master netting agreement to the extent that if an event of default occurs, all amounts with the counterparty are terminated and settled on a net basis.

In the case of derivatives, the Bank makes use of International Swaps and Derivatives Association (ISDA) contracts, which limit the exposure via the application of netting, and Credit Support Annex (CSAs), which further reduce the total exposure with the counterparty. Under these agreements, the total exposure with the counterparty is calculated on a daily basis taking into account any netting arrangements and collaterals.

The same process is applied in the case of repo transactions where standard Global Master Repurchase Agreements (GMRAs) are used. The exposure (the net difference between repo cash and the market value of the securities) is calculated on a daily basis and collateral is transferred between the counterparties thus minimizing the exposure.

Following the European Market Infrastructure Regulation (EMIR), the Bank performs centrally cleared transactions for eligible derivative contracts through an EU authorized European central counterparty (CCP), recorded in trade repositories. The use of CCP increases market transparency and reduces counterparty credit and operational risks inherent in derivatives markets.

The Bank uses a comprehensive collateral management system for the monitoring of ISDA, CSAs and GMRAs, i.e. the daily valuation of the derivatives and the market value of the securities are used for the calculation of each counterparty's exposure. The collateral which should be posted or requested by the relevant counterparty is calculated daily.

With this system, the Bank monitors and controls the collateral flow in case of derivatives and repos, independently of the counterparty. The effect of any market movement that increases the Bank's exposure is reported and the Bank proceeds to collateral call accordingly.

Notes to the Financial Statements

5.2.1.1 Maximum exposure to credit risk before collateral held

	31 December 2021 € million		31 December 2020 € million	
Credit risk exposures relating to on-balance sheet assets are as follows:				
Due from credit institutions	3,100		3,573	
Less: Impairment allowance	-	3,100	(0)	3,573
Debt securities held for trading		50		22
Derivative financial instruments		1,959		2,606
Loans and advances to customers at amortised cost:				
- Wholesale lending ⁽¹⁾	17,248		16,019	
- Mortgage lending	8,419		10,207	
- Consumer lending	1,607		2,027	
- Small business lending	3,175		3,870	
Less: Impairment allowance	(1,580)	28,869	(2,882)	29,241
Loans and advances to customers measured at FVTPL		23		20
Investment securities:				
- Debt securities measured at amortised cost	3,938		2,103	
Less: Impairment allowance	(6)	3,932	(4)	2,099
Debt securities measured at FVOCI		4,980		4,274
Investment securities at FVTPL		82		90
Other financial assets ⁽²⁾	185		79	
Less: Impairment allowance	(20)	165	(25)	54
Credit risk exposures relating to off-balance sheet items (note 41):				
- Loan commitments		3,358		3,061
- Financial guarantee contracts and other commitments		2,569		1,981
Total		49,087		47,022

⁽¹⁾ Includes loans to public sector.

⁽²⁾ Refers to financial assets subject to IFRS 9 impairment requirements, which are recognised within other assets.

The above table represents the Bank's maximum credit risk exposure as at 31 December 2021 and 31 December 2020 respectively, without taking account of any collateral held or other credit enhancements that do not qualify for offset in the Bank's financial statements.

For on-balance sheet assets, the exposures set out above are based on the carrying amounts as reported in the balance sheet. For off-balance sheet items, the maximum exposure is the nominal amount that the Bank may be required to pay if the financial guarantee contracts and other commitments are called upon and the loan commitments are drawn down. Off-balance sheet loan commitments presented above, include revocable commitments to extend credit of € 2.4 billion (2020: € 3 billion) that are subject to ECL measurement.

5.2.1.2 Loans and advances to customers

The section below provides an overview of the Bank's exposure to credit risk arising from its customer lending portfolios, in line with the guidelines set by the Hellenic Capital Markets Commission and the Bank of Greece (BoG) released on 30 September 2013, and the revised IFRS 7 'Financial Instruments: Disclosures', following the adoption of IFRS 9 from 2018. In addition, the types of the Bank's forbearance programs are in line with the BoG's Executive Committee Act 42/30.05.2014 and its amendments.

(a) Credit quality of loans and advances to customers

Loans and advances to customers carried at amortised cost are classified depending on how ECL is measured.

Accordingly, loans reported as non-impaired include loans for which a '12-month ECL allowance' is recognized as they exhibit no significant increase in credit risk since initial recognition and loans for which a 'Lifetime ECL allowance' is recognized 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 a 'Lifetime ECL' is recognized, and loans classified as 'Purchased or originated credit impaired' (POCI) which are always measured on the basis of a 'Lifetime ECL'.

Notes to the Financial Statements

Loans and advances to customers carried at FVTPL are not subject to ECL measurement and therefore are not included in the quantitative information provided in the below sections for loans and advances measured at amortised cost, except where indicated.

Definition of default

In accordance with its accounting policy 2.2.14 “Impairment of financial assets”, the Bank applies a default definition for accounting purposes, which is consistent with the European Banking Authority (EBA) definition for non-performing exposure and regulatory definition of default as applied by the Bank on 1 January 2021. More specifically, as of 1 January 2021, the Bank applied the new definition of default (DoD) for regulatory purposes, as is set in the Article 178 of Regulation (EU) No. 575/2013, the Commission Delegated Regulation (EU) 2018/171 and European Banking Authority (EBA) Guidelines (EBA/GL/2016/07). The new DoD aims at the harmonization of the definition of defaulted exposures across institutions and jurisdictions in the European Union and introduced a new set of standards with a significant impact on governance, data, processes, systems and credit models. In particular, the main changes introduced by the new DoD guidelines specify that days past due are counted from the date that both materiality thresholds are breached (an absolute amount of the total exposure and a relative as a percentage of the exposure) for more than 90 days past due, include conditions for a return to non-defaulted status (introduction of a three month probation period for non-forborne exposures) and additional unlikely to pay triggers such as the diminished financial obligation criterion for restructured loans (ie. difference between the net present value of cash flows before and after the restructuring exceeds the threshold of 1%).

The Bank applied the new provisions of DoD, in order to identify defaulted exposures starting from 1 January 2021, consistently across all its lending portfolios. The effect from the implementation of the new DoD on the Bank’s expected credit losses was neutral since any negative effect, due to introduction of new DoD to the lending exposures’ probability of default, was almost entirely off-set by the improvement of the cure rates as these reflected in the lending exposures loss given default. Information regarding the impact of the new DoD on the Bank’s regulatory capital is provided in note 4.

Accordingly, the perimeters of the credit impaired loans under IFRS9, the non-performing exposures under EBA guidelines and defaulted exposures for regulatory purposes have been aligned.

The Bank’s accounting policy for impairment of financial assets is set out in note 2.2.14.

Quantitative information

The following tables present the total gross carrying and nominal amount, representing the maximum exposure to credit risk before the impairment allowance, of loans and advances including securitized notes issued by special purpose vehicles established by the Bank and credit related commitments respectively, that are classified as non-impaired (stage 1 and stage 2) and those classified as credit-impaired (stage 3 and POCI). They also present the impairment allowance recognized in respect of all loans and advances and credit related commitments, analyzed into individually or collectively assessed, based on how the respective impairment allowance has been calculated, the carrying amount of loans and advances, as well as the value of collateral held to mitigate credit risk.

Public Sector lending exposures include exposures to the central government, local authorities, state-linked companies and entities controlled and fully or partially owned by the state, excluding public and private companies with commercial activity. For credit risk management purposes, exposures to Public Sector are incorporated in wholesale lending.

In addition, the value of collateral presented in the tables below is capped to the respective gross loan amount.

Notes to the Financial Statements

The following tables present information about the credit quality of the gross carrying amount of loans and advances to customers carried at amortised cost, the nominal exposure of credit related commitments and the respective impairment allowance as well as the carrying amount of loans and advances to customers carried at FVTPL:

	31 December 2021										
	Lifetime ECL - Stage 3					Impairment allowance				Carrying amount € million	Value of collateral € million
						Lifetime ECL - Stage 3					
	12-month ECL- Stage 1 € million	Lifetime ECL - Stage 2 € million	Individually assessed € million	Collectively assessed € million	Total gross carrying amount/nominal exposure € million	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Individually assessed € million	Collectively assessed € million		
Retail Lending	8,753	3,446	53	949	13,201	(77)	(211)	(26)	(422)	12,465	9,159
- Mortgage	5,372	2,640	16	391	8,419	(16)	(133)	(9)	(113)	8,148	
Value of collateral	4,975	2,157	11	306							7,449
- Consumer	795	125	0	135	1,055	(20)	(18)	(0)	(98)	919	
Value of collateral	0	0	-	3							3
- Credit card	490	24	0	38	552	(6)	(6)	(0)	(34)	506	
Value of collateral	-	-	-	-							-
- Small business	2,096	657	37	385	3,175	(35)	(54)	(17)	(177)	2,892	
Value of collateral	1,017	488	21	181							1,707
Wholesale Lending	14,883	923	1,140	269	17,215	(53)	(66)	(593)	(128)	16,375	10,182
- Large corporate	8,086	436	451	20	8,993	(31)	(35)	(232)	(11)	8,684	
Value of collateral	3,115	224	186	6							3,531
- SMEs	2,015	487	689	249	3,440	(22)	(31)	(361)	(117)	2,909	
Value of collateral	1,055	306	389	119							1,869
-Securitized notes ⁽¹⁾	4,782	-	-	-	4,782	(0)	-	-	-	4,782	
Value of collateral	4,782	-	-	-							4,782
Public Sector	30	2	-	1	33	(1)	(0)	-	(1)	31	2
- Greece	30	2	-	1	33	(1)	(0)	-	(1)	31	
Value of collateral	1	1	-	0	-	-	-	-	-		2
Loans and advances to customers at FVTPL										23	23
Total	23,666	4,371	1,193	1,219	30,449	(131)	(277)	(619)	(551)	28,894	19,366
Total value of collateral	14,945	3,176	607	615							
Credit related commitments	5,192	290	65	380	5,927	(11)	(4)	(35)	(290)		
Loan commitments	3,167	168	23	-	3,358	(7)	(1)	(1)	-		
Financial guarantee contracts and other commitments	2,025	122	42	380	2,569	(4)	(3)	(34)	(290)		
Value of collateral	914	38	19	7							

Notes to the Financial Statements

	31 December 2020										
	Lifetime ECL - Stage 3					Impairment allowance				Carrying amount	Value of collateral
						Lifetime ECL - Stage 3					
	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Individually assessed	Collectively assessed	Total gross carrying amount/nominal exposure	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Individually assessed	Collectively assessed	€ million	€ million
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		€ million
Retail Lending	8,857	4,081	252	2,914	16,104	(79)	(311)	(143)	(1,384)	14,188	11,000
- Mortgage	5,845	2,688	132	1,543	10,207	(22)	(150)	(73)	(551)	9,411	
Value of collateral	5,232	2,187	89	1,166							8,674
- Consumer	745	248	0	505	1,498	(13)	(42)	(0)	(431)	1,012	
Value of collateral	0	0	-	93							94
- Credit card	453	34	0	41	529	(15)	(5)	(0)	(40)	469	
Value of collateral	-	-	-	-							-
- Small business	1,814	1,112	120	825	3,870	(29)	(113)	(69)	(363)	3,296	
Value of collateral	909	732	73	518							2,232
Wholesale Lending	13,201	1,134	1,156	488	15,980	(68)	(88)	(575)	(234)	15,016	8,409
- Large corporate	8,381	506	607	27	9,522	(53)	(36)	(285)	(10)	9,137	
Value of collateral	2,912	296	277	17							3,502
- SMEs	1,323	628	549	461	2,961	(14)	(52)	(290)	(224)	2,381	
Value of collateral	500	371	300	238							1,409
-Securitized notes ⁽¹⁾	3,498	-	-	-	3,498	(0)	-	-	-	3,498	
Value of collateral	3,498	-	-	-							3,498
Public Sector	22	17	-	-	39	(1)	(1)	-	-	38	2
- Greece	22	17	-	-	39	(1)	(1)	-	-	38	
Value of collateral	1	1	-	-	-						2
Loans and advances to customers at FVTPL										20	20
Total	22,081	5,232	1,408	3,402	32,124	(148)	(399)	(718)	(1,617)	29,261	19,431
Total value of collateral	13,052	3,588	738	2,032							
Credit related commitments	4,212	394	38	421	5,066	(32)	(10)	(29)	(301)		
Loan commitments	2,853	206	0	1	3,061	(23)	(4)	-	-		
Financial guarantee contracts and other commitments	1,359	188	38	420	2,005	(10)	(7)	(29)	(301)		
Value of collateral	513	69	4	9							

⁽¹⁾ It refers to the senior notes of the Pillar, Cairo and Mexico securitizations that are collateralized by the underlying pool of loans held by the respective securitization vehicles (note 20). The amount of the securitized loan portfolios has been capped to the gross carrying amount of the senior notes. In addition, the senior notes of the Cairo and Mexico securitizations are guaranteed by the Hellenic Republic in the context of Hellenic Asset Protection Scheme (note 20).

Notes to the Financial Statement

The Bank assesses the credit quality of its loans and advances to customers and credit related commitments that are subject to ECL using internal credit rating systems for the wholesale portfolio, which are based on a variety of quantitative and qualitative factors, while the credit quality of the retail portfolio is based on the allocation of risk classes into homogenous pools.

The following tables present the distribution of the gross carrying amount of loans and advances and the nominal exposure of credit related commitments based on the credit quality classification categories and stage allocation:

Internal credit rating	31 December 2021				31 December 2020			
	12-month ECL-	Lifetime ECL-	Lifetime ECL-	Total gross	12-month ECL-	Lifetime ECL-	Lifetime ECL-	Total gross
	Stage 1	Stage 2	Stage 3	carrying	Stage 1	Stage 2	Stage 3	carrying
	€ million	€ million	€ million	amount	€ million	€ million	€ million	amount
Retail Lending								
- Mortgage								
PD<2.5%	4,301	415	-	4,716	5,218	182	-	5,400
2.5%<=PD<4%	520	463	-	983	188	315	-	503
4%<=PD<10%	485	1,127	-	1,612	213	524	-	736
10%<=PD<16%	37	275	-	312	109	221	-	330
16%<=PD<99.99%	29	360	-	389	118	1,447	-	1,565
100%	-	-	407	407	-	-	1,674	1,674
- Consumer								
PD<2.5%	14	13	-	27	447	6	-	452
2.5%<=PD<4%	281	19	-	300	75	15	-	89
4%<=PD<10%	470	75	-	545	203	72	-	275
10%<=PD<16%	30	4	-	34	11	40	-	51
16%<=PD<99.99%	0	14	-	14	10	116	-	125
100%	-	-	135	135	-	-	505	505
- Credit card								
PD<2.5%	283	1	-	284	244	0	-	244
2.5%<=PD<4%	207	17	-	224	158	13	-	172
4%<=PD<10%	-	-	-	-	48	4	-	52
10%<=PD<16%	-	-	-	-	4	9	-	13
16%<=PD<99.99%	-	6	-	6	0	7	-	7
100%	-	-	38	38	-	-	41	41
- Small business								
PD<2.5%	1,327	18	-	1,345	125	13	-	139
2.5%<=PD<4%	177	11	-	188	678	12	-	690
4%<=PD<10%	356	77	-	433	528	26	-	554
10%<=PD<16%	78	131	-	209	165	34	-	199
16%<=PD<99.99%	158	420	-	578	318	1,026	-	1,343
100%	-	-	422	422	-	-	945	945
Wholesale Lending								
- Large corporate								
Strong	5,391	-	-	5,391	5,703	2	-	5,705
Satisfactory	2,575	232	-	2,807	2,439	287	-	2,726
Watch list	120	204	-	324	239	217	0	456
Impaired (Defaulted)	-	-	471	471	-	-	634	634
- SMEs								
Strong	603	0	-	603	782	21	-	802
Satisfactory	1,142	99	-	1,241	466	180	-	646
Watch list	270	388	-	658	75	428	-	503
Impaired (Defaulted)	-	-	938	938	-	-	1,010	1,010
-Securitized notes								
Strong	4,782	-	-	4,782	3,498	-	-	3,498
Public Sector								
All countries								
Strong	21	-	-	21	0	-	-	0
Satisfactory	3	-	-	3	21	-	-	21
Watch list	6	2	-	8	1	17	-	18
Impaired (Defaulted)	-	-	1	1	-	-	-	-
Total	23,666	4,371	2,412	30,449	22,081	5,232	4,810	32,124

Notes to the Financial Statement

Internal credit rating	31 December 2021				31 December 2020			
	12-month ECL- Stage 1	Lifetime ECL - Stage 2	Lifetime ECL - Stage 3	Total nominal amount	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	Total nominal amount
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Credit Related Commitments								
Retail Lending								
Loan commitments								
PD<2.5%	1,140	3	-	1,143	746	0	-	746
2.5%≤PD<4%	813	44	-	857	623	39	-	662
4%≤PD<10%	314	88	-	402	655	82	-	737
10%≤PD<16%	38	10	-	48	209	30	-	239
16%≤PD<99.99%	-	1	-	1	10	27	-	37
100%	-	-	-	-	-	-	1	1
Financial guarantee contracts and other commitments								
PD<2.5%	75	-	-	75	1	-	-	1
2.5%≤PD<4%	36	-	-	36	49	-	-	49
4%≤PD<10%	9	-	-	9	69	-	-	69
10%≤PD<16%	-	-	-	-	-	-	-	-
16%≤PD<99.99%	-	-	-	-	0	-	-	0
100%	-	-	1	1	-	-	0	0
Wholesale Lending								
Loan commitments								
Strong	498	-	-	498	331	-	-	331
Satisfactory	328	20	-	348	277	1	-	277
Watch list	36	2	-	38	3	28	-	31
Impaired (Defaulted)	-	-	23	23	-	-	-	-
Financial guarantee contracts and other commitments								
Strong	1,321	-	-	1,321	744	34	-	778
Satisfactory	552	46	-	598	374	57	-	431
Watch list	32	76	-	108	98	97	-	195
Impaired (Defaulted)	-	-	421	421	-	-	457	457
Total	5,192	290	445	5,927	4,188	394	459	5,042

The table below depicts the internal credit rating bands (MRA rating scale or equivalent) for the wholesale portfolio that correspond to the credit quality classification categories presented in the above tables:

Wholesale Lending		
Credit Quality classification categories	Internal Credit Rating	Internal Credit Rating
	Large Corporate	SMEs
Strong	1-4	1-3
Satisfactory	5-6	4-6
Watch list	7-9	7-9
Impaired (Defaulted)	10	10

The 2021 credit quality classification for the retail portfolios as depicted in the above table is affected mainly by two factors which have opposite effects on the 12m Probability of Default (PD):

- the positive impact from the improving macroeconomic environment; and
- the negative impact of the introduction of new definition of default (DoD) on the PD. However, the overall impact of new DoD on expected credit loss (ECL) was neutral since any negative effect on the PD was almost entirely off-set by an improvement of Loss Given Default (LGD).

The combined effect of these factors on each lending portfolio, along with portfolio-specific movements differs as follows:

Mortgage: The improving macroeconomic effect is largely offset by the new DoD impact. In parallel, the annual repayments of the existing performing loans exceed the new high credit quality loan originations, leading to a decrease of loan balance in the low PD segments as at 31 December 2021.

Consumer: The negative impact of the new DoD supersedes the improving macroeconomic effect. In particular, the introduction of the new DoD had its highest impact among asset classes on the PD of consumer loans.

Notes to the Financial Statement

Credit cards: the Bank has proceeded with the calibration of PD estimates to incorporate the high credit quality effect of accounts with unutilized limits. For consistency purposes, the 2020 comparative segmentation has been restated to reflect the calibrated PDs.

Small business: The small business performing portfolio significant improvement in the credit quality segmentation of 2021 is explained by the high correlation of the specific exposures' PD with the GDP evolution, which exhibited a strong improving trend during 2021, outweighing any negative impact from the new DoD.

For Wholesale lending, the 2021 segmentation is mainly affected by the recalibration of the internal credit rating models that took place during the year and its consequent effects on the population mix of each risk segment with the notable reclassification of SME population with credit rating 4 from the strong to the satisfactory risk segment. In this context, where appropriate, the 2020 comparative segmentation has also been restated.

Notes to the Financial Statements

The following tables present the movement of the gross carrying amounts for loans and advances to customers by product line and stage and is calculated by reference to the opening and closing balances for the reporting year from 1 January 2021 to 31 December 2021 and the period from 1 April 2020 to 31 December 2020:

	31 December 2021												
	Wholesale			Mortgage			Consumer			Small business			Total
	12-month	Lifetime ECL-	Lifetime ECL-	12-month	Lifetime ECL-	Lifetime ECL-	12-month	Lifetime ECL-	Lifetime ECL-	12-month	Lifetime ECL-	Lifetime ECL-	
	ECL-Stage 1	Stage 2	Stage 3	ECL-Stage 1	Stage 2	Stage 3	ECL-Stage 1	Stage 2	Stage 3	ECL-Stage 1	Stage 2	Stage 3	
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		
Gross carrying amount at 1 January	13,224	1,151	1,645	5,845	2,688	1,674	1,198	282	547	1,814	1,112	945	32,124
New loans and advances originated or purchased	3,102	-	-	267	-	-	270	-	-	384	-	-	4,023
Arising from acquisitions (note 23.1)	2	65	386	-	-	-	-	-	-	0	0	91	544
Securitized notes	1,628	-	-	-	-	-	-	-	-	-	-	-	1,628
Transfers between stages	-	-	-	-	-	-	-	-	-	-	-	-	-
-to 12-month ECL	226	(207)	(19)	503	(499)	(4)	105	(102)	(3)	408	(406)	(2)	-
-to lifetime ECL	(351)	379	(28)	(707)	917	(210)	(53)	73	(20)	(118)	181	(63)	-
-to lifetime ECL credit-impaired loans	(3)	(180)	183	(85)	(211)	296	(42)	(62)	104	(56)	(131)	187	-
Loans and advances derecognised during the year	(330)	(33)	(486)	(22)	(220)	(1,254)	(3)	(14)	(336)	(5)	(81)	(636)	(3,420)
Amounts written-off ⁽¹⁾	-	-	(152)	-	-	(70)	-	-	(100)	-	-	(76)	(398)
Repayments	(2,772)	(246)	(131)	(603)	(144)	(48)	(239)	(37)	(52)	(337)	(53)	(34)	(4,696)
Foreign exchange differences and other movements	187	(4)	12	174	109	23	49	9	33	6	35	10	643
Gross Carrying amount at 31 December	14,913	925	1,410	5,372	2,640	407	1,285	149	173	2,096	657	422	30,448
Impairment allowance	(54)	(66)	(722)	(16)	(133)	(122)	(26)	(24)	(133)	(35)	(54)	(195)	(1,580)
Carrying amount at 31 December	14,859	859	688	5,356	2,507	285	1,259	125	40	2,061	603	227	28,868

Notes to the Financial Statements

	31 December 2020												
	Wholesale			Mortgage			Consumer			Small business			Total € million
	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
Gross carrying amount at 1 April	12,559	1,075	1,847	5,864	2,791	1,829	1,294	267	648	1,606	875	982	
New loans and advances originated or purchased	2,087	-	-	162	-	-	147	-	-	650	-	-	3,046
Transfers between stages													
-to 12-month ECL	157	(157)	(0)	473	(466)	(6)	47	(45)	(2)	143	(142)	(1)	-
-to lifetime ECL	(392)	403	(11)	(319)	514	(195)	(85)	110	(25)	(286)	322	(37)	-
-to lifetime ECL credit- impaired loans	(16)	(27)	43	(23)	(103)	126	(20)	(31)	52	(12)	(49)	61	-
Loans and advances derecognised during the period	-	-	-	(1)	-	(1)	(1)	(0)	(0)	(3)	(2)	(0)	(9)
Amounts written-off ⁽¹⁾	-	-	(161)	-	-	(72)	-	-	(116)	-	-	(76)	(425)
Repayments	(964)	(143)	(51)	(406)	(70)	(32)	(176)	(22)	(19)	(112)	(43)	(11)	(2,048)
Foreign exchange differences and other movements	(208)	1	(23)	96	22	26	(8)	4	9	(174)	150	27	(79)
Gross Carrying amount at 31 December	13,224	1,151	1,645	5,845	2,688	1,674	1,198	282	547	1,814	1,112	945	32,124
Impairment allowance	(68)	(88)	(809)	(22)	(150)	(624)	(28)	(47)	(470)	(29)	(113)	(432)	(2,882)
Carrying amount at 31 December	13,155	1,063	836	5,823	2,538	1,050	1,170	234	76	1,784	998	513	29,241

⁽¹⁾ The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2021 and that are still subject to enforcement activity is € 186 million (2020: € 424 million).

Note 1: Wholesale product line category includes also Public sector loans portfolio.

Note 2: "Loans and advances derecognised during the year" presents loans derecognized during the year due to a) securitization and sale transactions (note 20) and b) substantial modifications of the loans' contractual terms.

Note 3: For 2021, "Loans and advances derecognised during the year" includes € 329 million Cairo senior notes sold to the Bank's subsidiaries "Eurobank Bulgaria A.D.", "Eurobank Cyprus Ltd" and "Eurobank Private Bank Luxembourg S.A.".

Notes to the Financial Statements

Credit impaired loans and advances to customers

The following tables present the ageing analysis of credit impaired (Stage 3) loans and advances by product line at their gross carrying amounts, as well as the respective impairment allowance and the value of collaterals held to mitigate credit risk.

For denounced loans, the Bank ceases to monitor the delinquency status and therefore the respective balances have been included in the 'over 360 days' time band, with the exception of consumer exposures which continue to be monitored up to 360 days past due.

31 December 2021								
Retail lending				Wholesale lending		Public sector		Lifetime ECL credit-impaired € million
Mortgage € million	Consumer € million	Credit card € million	Small business € million	Large corporate € million	SMEs € million	Greece € million		
up to 90 days	172	39	2	111	263	271	0	858
90 to 179 days	46	16	3	23	0	22	-	110
180 to 360 days	82	30	4	41	33	30	0	220
more than 360 days	107	50	29	247	175	615	1	1,224
Total gross carrying amount	407	135	38	422	471	938	1	2,412
Impairment allowance	(122)	(98)	(34)	(194)	(243)	(478)	(1)	(1,170)
Carrying amount	285	37	4	228	228	460	0	1,242
Value of Collateral	317	3	-	202	192	508	0	1,222

31 December 2020								
Retail lending				Wholesale lending		Public sector		Lifetime ECL credit-impaired € million
Mortgage € million	Consumer € million	Credit card € million	Small business € million	Large corporate € million	SMEs € million	Greece € million		
up to 90 days	498	61	1	211	265	155	-	1,190
90 to 179 days	42	19	4	24	18	24	-	131
180 to 360 days	53	25	10	15	4	68	-	174
more than 360 days	1,082	401	27	696	347	762	-	3,314
Total gross carrying amount	1,674	505	41	945	634	1,010	-	4,810
Impairment allowance	(624)	(431)	(40)	(432)	(295)	(514)	-	(2,335)
Carrying amount	1,050	75	2	513	339	496	-	2,475
Value of Collateral	1,255	93	-	590	294	538	-	2,770

(b) Collaterals and repossessed assets

Collaterals

The Loan-to-Value (LTV) ratio of the mortgage lending reflects the gross loan exposure at the balance sheet date over the market value of the property held as collateral.

The LTV ratio of the mortgage portfolio is presented below:

	31 December 2021 € million	31 December 2020 € million
Mortgages		
Less than 50%	2,207	2,443
50%-70%	1,625	1,733
71%-80%	1,131	1,192
81%-90%	764	900
91%-100%	961	1,557
101%-120%	624	805
121%-150%	487	641
Greater than 150%	620	936
Total exposure	8,419	10,207
Average LTV	64.37%	72.12%

Notes to the Financial Statements

The breakdown of collateral and guarantees for loans and advances to customers at amortised cost is presented below:

	31 December 2021				
	Value of collateral received				Guarantees
	Real Estate	Financial	Other	Total	received ⁽¹⁾
	€ million	€ million	€ million	€ million	€ million
Retail Lending	8,719	374	66	9,159	595
Wholesale Lending	2,174	84	7,924	10,182	285
Public sector	1	1	0	2	-
Total	10,894	459	7,990	19,343	880

	31 December 2020				
	Value of collateral received				Guarantees
	Real Estate	Financial	Other	Total	received
	€ million	€ million	€ million	€ million	€ million
Retail Lending ⁽²⁾	10,561	383	56	11,000	501
Wholesale Lending	2,169	109	6,131	8,409	259
Public sector	1	1	-	2	-
Total	12,731	493	6,187	19,411	760

⁽¹⁾ In addition to the above presented guarantees, in December 2021, the Bank has entered into two financial guarantees contracts 'Wave I' and 'Wave II' related to the portfolios of performing SMEs and large corporate loans of € 1.7 billion (note 20).

⁽²⁾ Where appropriate, comparative information has been adjusted in order to align with current year's presentation of collateral and guarantees received.

The collaterals presented in the above table under category "Other", include assigned receivables, equipment, inventories, vessels, etc. They also include the amount of the securitized loans held by the securitizations vehicles that issued the Pillar, Cairo and Mexico senior notes. The amount of the securitized loans has been capped to the gross carrying amount of the senior notes. In addition, the senior notes of the Cairo and Mexico securitizations are guaranteed by the Hellenic Republic in the context of Hellenic Asset Protection Scheme (note 20).

Reposessed assets

The Bank recognizes collateral assets on the balance sheet by taking possession usually through legal processes or by calling upon other credit enhancements. As at 31 December 2021, the carrying amount of reposessed assets which are included in "Other assets" amounted to € 547 million (2020: € 461 million) (note 28). These assets are carried at the lower of cost and net realizable value (note 2.2.19).

The main type of collateral that the Bank repossests against repayment or reduction of the outstanding loan is real estate. The below table presents the movement of reposessed real estate assets during the year, including a) those transferred to the appropriate category based on their use by the Bank as part of its operations i.e. investment property or own-used (notes 2.2.6, 25, and 26) and b) those reclassified to "held for sale" category (notes 29).

	31 December 2021			Period 20 March - 31 December 2020		
	Real estate			Real estate		
	Residential	Commercial	Total	Residential	Commercial	Total
	€ million	€ million	€ million	€ million	€ million	€ million
Opening balance	203	258	461	195	239	434
Additions ⁽¹⁾	11	19	30	18	24	42
Arising from demerger (note 23.1)	-	85	85	-	-	-
Disposals	(3)	(4)	(7)	(5)	(2)	(7)
Valuation losses	(2)	(1)	(3)	(2)	(5)	(7)
Held for sale (note 29)	(3)	(16)	(19)	-	-	-
Other	(1)	-	(1)	(3)	2	(1)
Balance at 31 December	205	341	546	203	258	461

⁽¹⁾ The carrying amount of the real estate properties obtained during the year and held at the year ended 31 December 2021 amounted to € 115 million (2020: € 42 million).

In addition, the Bank repossests other types of collaterals mainly referring to equity positions due to the participation in debt for equity transactions as part of forbearance measures (see below "Debt for equity swaps"). The other types of collaterals obtained by the Bank during the year as a result of repossession and held at the year ended 31 December 2021 amounted to € 2.9 million (2020: € 0.4 million).

Notes to the Financial Statements

(c) Geographical and industry concentrations of loans and advances to customers

As described above in note 5.2.1, the Bank holds diversified portfolios across markets and countries and implements limits on concentrations arising from the geographical location or the activity of groups of borrowers that could be similarly affected by changes in economic or other conditions, in order to mitigate credit risk.

The following tables break down the Bank's exposure into loans and advances to customers and credit related commitments at their gross carrying amount and nominal amount respectively by stage, product line, industry and geographical region and impairment allowance by product line, industry and geographical region:

	31 December 2021											
	Greece				Rest of Europe				Other Countries			
	Gross carrying/nominal amount				Gross carrying/nominal amount				Gross carrying/nominal amount			
	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	Impairment allowance € million	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	Impairment allowance € million	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	Impairment allowance € million
Retail Lending	8,685	3,415	998	(722)	68	31	4	(14)	-	-	-	-
-Mortgage	5,305	2,609	403	(257)	67	31	4	(14)	-	-	-	-
-Consumer	794	125	135	(136)	1	0	-	(0)	-	-	-	-
-Credit card	490	24	38	(46)	-	-	-	-	-	-	-	-
-Small business	2,096	657	422	(283)	0	0	-	(0)	-	-	-	-
Wholesale Lending	7,996	914	1,347	(799)	5,022	6	42	(33)	1,865	3	20	(8)
-Commerce and services ⁽¹⁾	3,523	408	761	(452)	4,840	2	13	(10)	331	3	8	(6)
-Manufacturing	2,084	200	170	(139)	-	-	3	(3)	-	-	-	-
-Shipping	0	3	50	(49)	168	-	19	(15)	1,534	-	12	(2)
-Construction	923	65	142	(92)	14	4	7	(5)	-	-	-	-
-Tourism	860	235	221	(60)	-	-	-	-	-	-	-	-
-Energy	606	3	0	(5)	-	-	-	-	-	-	-	-
-Other	-	0	3	(2)	0	-	0	(0)	-	-	-	-
Public Sector	30	2	1	(2)	-	-	-	-	-	-	-	-
Total	16,711	4,331	2,346	(1,523)	5,090	37	46	(47)	1,865	3	20	(8)
Credit related Commitments	4,471	289	73	(46)	552	1	372	(294)	169	-	0	(0)
-Loan commitments	3,034	168	23	(9)	-	-	-	-	133	-	-	(0)
-Financial guarantee contracts and other commitments	1,437	121	50	(37)	552	1	372	(294)	36	-	0	(0)

Notes to the Financial Statements

	31 December 2020											
	Greece				Rest of Europe				Other Countries			
	Gross carrying/nominal amount				Gross carrying/nominal amount				Gross carrying/nominal amount			
	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3	Impairment allowance	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3	Impairment allowance	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3	Impairment allowance
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Retail Lending	8,777	4,050	3,087	(1,891)	80	31	78	(25)	-	-	-	-
-Mortgage	5,767	2,658	1,614	(779)	78	30	60	(17)	-	-	-	-
-Consumer	743	248	503	(485)	1	0	3	(1)	-	-	-	-
-Credit card	453	34	41	(59)	-	-	-	-	-	-	-	-
-Small business	1,813	1,111	929	(567)	0	0	16	(7)	-	-	-	-
Wholesale Lending	8,221	1,123	1,495	(876)	3,689	7	117	(65)	1,291	4	33	(23)
-Commerce and services ⁽¹⁾	4,136	412	847	(500)	3,504	3	60	(47)	68	-	19	(14)
-Manufacturing	2,013	268	221	(154)	-	-	0	(0)	-	-	-	-
-Shipping	0	3	50	(47)	173	-	18	(14)	1,223	4	14	(9)
-Construction	683	155	198	(103)	11	4	7	(3)	-	-	-	-
-Tourism	830	280	178	(69)	-	-	-	-	-	-	-	-
-Energy	559	4	0	(4)	-	-	-	-	-	-	-	-
-Other	0	-	0	(0)	0	0	31	(0)	-	-	-	-
Public Sector	22	17	-	(1)	-	-	-	-	-	-	-	-
Total	17,021	5,190	4,582	(2,769)	3,769	38	195	(90)	1,291	4	33	(23)
Credit related Commitments	3,802	343	56	(67)	332	36	403	(305)	79	16	0	(0)
-Loan commitments	2,816	206	1	(26)	-	-	-	-	38	-	-	(0)
-Financial guarantee contracts and other commitments	986	137	54	(41)	332	36	403	(305)	41	16	0	(0)

⁽¹⁾ The operations in Rest of Europe include € 4,782 million related to the notes of the Pillar, Cairo and Mexico securitizations (2020: € 3,498 million in Rest of Europe related to the notes of the Pillar and Cairo securitizations).

As at 31 December 2021, the carrying amount of Bank's loans measured at FVTPL of € 23 million (2020: € 20 million) were included in Wholesale lending portfolio, of which € 20 million (2020: € 16.4 million) were held by operations in Greece, while € 3.5 million (2020: € 3.5 million) were held by operations in Rest of Europe.

Notes to the Financial Statements

(d) Forbearance practices on lending activities

Modifications of the loans' contractual terms may arise due to various factors, such as changes in market conditions, customer retention and other factors as well as due to the potential deterioration in the borrowers' financial condition. The Bank has employed a range of forbearance solutions in order to enhance the management of customer relationships and the effectiveness of collection efforts, as well as to improve the recoverability of cash flows and minimize credit losses for both retail and wholesale portfolios.

Forbearance practices' classification

Forbearance practices as monitored and reported by the Bank, based on the European Banking Authority Implementing Technical Standards (EBA ITS) guidelines, occur only in the cases where the contractual payment terms of a loan have been modified, as the borrower is considered unable to comply with the existing loan's terms due to apparent financial difficulties, and the Bank grants a concession by providing more favorable terms and conditions that it would not otherwise consider had the borrower not been in financial difficulties.

All other types of modifications granted by the Bank, where there is no apparent financial difficulty of the borrower and may be driven by factors of a business nature are not classified as forbearance measures.

Forbearance solutions

Forbearance solutions are granted following an assessment of the borrower's ability and willingness to repay and can be of a short or longer term nature. The objective is to assist financially stressed borrowers by rearranging their repayment cash outflows into a sustainable modification, and at the same time, protect the Bank from suffering credit losses. The Bank deploys targeted segmentation strategies with the objective to tailor different short or long term and sustainable management solutions to selected groups of borrowers for addressing their specific financial needs.

The nature and type of forbearance options may include but is not necessarily limited to, one or more of the following:

- arrears capitalization;
- arrears repayment plan;
- reduced payment above interest only;
- interest-only payments;
- reduced payment below interest only;
- grace period;
- interest rate reduction;
- loan term extensions;
- split balance and gradual step-up of installment payment plans;
- partial debt forgiveness/write-down;
- operational restructuring; and
- debt to equity swaps.

Specifically for unsecured consumer loans (including credit cards), forbearance programs (e.g. term extensions), are applied in combination with debt consolidation whereby all existing consumer balances are pooled together. Forbearance solutions are applied in order to ensure a sufficient decrease on installment and a viable solution for the borrower. In selected cases, the debt consolidations may be combined with mortgage prenotations to convert unsecured lending exposures to secured ones.

In the case of mortgage loans, a decrease of installment may be achieved through forbearance measures such as extended payment periods, capitalization of arrears, split balance and gradual step-up of installment payment plans.

Wholesale exposures are subject to forbearance when there are indications of financial difficulties of the borrower, evidenced by a combination of factors including the deterioration of financials, credit rating downgrade, payment delays and other.

During 2020 in response to the COVID-19 pandemic, the EBA published guidelines on payment moratoria whereby the application of a general payment moratorium that meets the requirements of the guidelines would not in itself lead to a reclassification under the definition of forbearance. However, institutions should continue to categorize the exposures as performing or non-performing in accordance with the applicable requirements. More precisely, as a general principle, before granting a forbearance measure, credit institutions should carry out an individual assessment of the repayment capacity of the borrower and grant forbearance measures tailored to the specific circumstances of the borrower in question.

Notes to the Financial Statements

Based on this, and following the internal process of individual assessments the Bank flagged as forbearance measures certain payment moratoria for accounts in the hotel sector, which were considered to have increased financial difficulties.

Debt for equity swaps

For wholesale portfolios, the Bank on occasion participates in debt for equity transactions as part of forbearance measures, as described in note 2.2.10. In 2021, equity positions acquired by the Bank and held as of 31 December 2021 relate to a) the participation of 100% in Village Roadshow Operations Hellas S.A. for € 1 million and b) the participation of 29.48% in Intertech S.A. – International Technologies for a cash consideration of € 1.9 million (note 29). Similarly in 2020, equity positions acquired by the Bank and held as of 31 December 2020 related to the participation of 18.9% in Perigenis Business Properties S.A. for € 9.1 million, a special purpose real estate company which was established in the context of the debt restructuring of a Bank's corporate customer.

i. Classification of Forborne loans

Forborne loans are classified either as non-impaired (stage 2), or impaired (stage 3) by assessing their delinquency and credit quality status.

Credit impaired forborne loans enter initially a probation period of one year where the borrowers' payment performance is closely monitored. If at the end of the abovementioned period, the borrowers have complied with the terms of the program and there are no past due amounts and concerns regarding the loans' full repayment, the loans are then reported as non-impaired forborne loans (stage 2). In addition, non-impaired forborne loans, including those that were previously classified as credit impaired and complied with the terms of the program, are monitored over a period of two years. If, at the end of that period, the borrowers have made regular payments of a significant aggregate amount, there are no past due amounts over 30 days and the loans are neither credit impaired nor any other SICR criteria are met they exit forborne status and are classified as stage 1.

Particularly, the category of credit impaired forborne loans includes those that (a) at the date when forbearance measures were granted, were more than 90 days past due or assessed as unlikely to pay, (b) at the end of the one year probation period met the criteria of entering the non-impaired status and during the two years monitoring period new forbearance measures were extended or became more than 30 days past due, and (c) were initially classified as non-impaired and during the two years monitoring period met the criteria for entering the credit impaired status.

Furthermore, forborne loans that fail to perform under the new modified terms and are subsequently denounced cease to be monitored as part of the Bank's forbearance activities and are reported as denounced credit impaired loans (stage 3) consistently with the Bank's management and monitoring of all denounced loans.

ii. Impairment assessment

Where forbearance measures are extended, the Bank performs an assessment of the borrower's financial condition and its ability to repay, under the Bank's impairment policies, as described in notes 2.2.14 and 5.2.1. Accordingly, forborne loans to wholesale customers, retail individually significant exposures and financial institutions are assessed on an individual basis. Forborne retail lending portfolios are generally assessed for impairment separately from other retail loan portfolios on a collective basis as they consist of large homogenous portfolio.

iii. Loan restructurings

In cases where the contractual cash flows of a forborne loan have been substantially modified, the original forborne loan is derecognized and a new loan is recognized. The Bank records the modified asset as a 'new' financial asset at fair value and the difference with the carrying amount of the existing one is recorded in the income statement as derecognition gain or loss.

In cases where the modification as a result of forbearance measures is not considered substantial, the Bank recalculates the gross carrying amount of the loan and recognizes the difference as a modification gain or loss in the income statement. The Bank continues to monitor the modified forborne loan in order to determine if the financial asset exhibits significant increase in credit risk since initial recognition during the forbearance period.

As at 31 December 2021, the carrying amount of Bank's forborne loans measured at FVTPL amounted to € 3.5 million (2020: € 3.5 million).

The following tables present an analysis of Bank's forborne activities for loans measured at amortised cost. In order to align with the quantitative information provided in section (a) based on revised IFRS 7 requirements, the relevant tables below are presented on a

Notes to the Financial Statements

gross carrying amount basis, while cumulative impairment allowance is presented separately, in line with the Bank's internal credit risk monitoring and reporting.

The following table presents a summary of the types of the Bank's forbore activities:

	31 December 2021 € million	31 December 2020 € million
Forbearance measures:		
Split balance	424	1,110
Loan term extension	1,271	1,950
Arrears capitalisation	182	222
Reduced payment below interest owed	107	98
Interest rate reduction	217	411
Reduced payment above interest owed	80	55
Arrears repayment plan	181	57
Interest only	4	9
Grace period	46	39
Debt/equity swaps	16	12
Partial debt forgiveness/Write-down	4	13
Operational restructuring	10	71
Other	44	149
Total gross carrying amount	2,586	4,196
Less: cumulative impairment allowance	(379)	(893)
Total carrying amount	2,207	3,304

The following tables present a summary of the credit quality of forbore loans and advances to customers:

	31 December 2021		
	Total loans & advances at amortised cost € million	Forborne loans & advances € million	% of Forborne loans & advances
Gross carrying amounts:			
12-month ECL-Stage 1	23,666	-	0%
Lifetime ECL-Stage 2	4,371	1,732	40%
Lifetime ECL-Stage 3	2,412	854	35%
Total Gross Amount	30,449	2,586	8%
Cumulative ECL Loss allowance:			
12-month ECL-Stage 1	(131)	-	
Lifetime ECL -Stage 2	(277)	(97)	
Lifetime ECL-Stage 3 of which:	(1,172)	(282)	
- Individually assessed	(620)	(161)	
- Collectively assessed	(552)	(121)	
Total carrying amount	28,869	2,207	8%
Collateral received	19,345	1,990	

Notes to the Financial Statements

31 December 2020		
Total loans & advances at amortised cost € million	Forborne loans & advances € million	% of Forborne loans & advances

Gross carrying amounts:

12-month ECL-Stage 1	22,081	-	0%
Lifetime ECL-Stage 2	5,232	2,740	52%
Lifetime ECL-Stage 3	4,810	1,457	30%
Total Gross Amount	32,124	4,196	13%

Cumulative ECL Loss allowance:

12-month ECL-Stage 1	(148)	-	
Lifetime ECL - Stage 2	(399)	(246)	
Lifetime ECL-Stage 3 of which:	(2,335)	(647)	
- Individually assessed	(718)	(200)	
- Collectively assessed	(1,617)	(447)	
Total carrying amount	29,241	3,304	11%

Collateral received

19,411 2,986

The following table presents the movement of forborne loans and advances:

	2021 € million	2020 € million
Gross carrying amount	4,196	4,420
Forbearance measures in the year ⁽¹⁾	248	323
Forborne loans derecognised during the year ⁽²⁾	(1,122)	-
Write-offs of forborne loans	(26)	(20)
Repayment of loans	(216)	(139)
Loans & advances that exited forbearance status ⁽³⁾	(838)	(432)
Other	344	43
Less: cumulative impairment allowance	(379)	(893)
Carrying amount at 31 December	2,207	3,304

⁽¹⁾ Forbearance measures in the year depict loans to which forbearance measures were granted for the first time during the reporting period.

⁽²⁾ "Forborne loans derecognised during the year" presents loans derecognized during the year due to a) securitization transactions and b) substantial modifications of the loans' contractual terms.

⁽³⁾ In 2021, an amount of € 33.6 million loans and advances that exited forbearance status refers to loans that were denounced (2020: € 43.2 million).

The following table presents the Bank's exposure to forborne loans and advances by product line:

	31 December 2021 € million	31 December 2020 € million
Retail Lending	1,807	3,361
- Mortgage	1,305	2,321
- Consumer	74	202
- Credit card	0	0
- Small business	428	838
Wholesale Lending	779	835
- Large corporate	215	350
- SMEs	564	485
Total gross carrying amount	2,586	4,196
Less: cumulative impairment allowance	(379)	(893)
Total carrying amount	2,207	3,304

Notes to the Financial Statements

The following table presents the Bank's exposure to forborne loans and advances by geographical region:

	31 December 2021 € million	31 December 2020 € million
Greece	2,543	4,100
Rest of Europe	38	88
Other countries	5	8
Total gross carrying amount	2,586	4,196
Less: cumulative impairment allowance	(379)	(893)
Total carrying amount	2,207	3,304

The following table provides information on modifications due to forbearance measures on lending exposures which have not resulted in derecognition. Such financial assets were modified while they had a loss allowance measured at an amount equal to lifetime ECL.

Modified lending exposures	2021 € million	2020 € million
Loans modified during the period with loss allowance measured at an amount equal to lifetime ECL		
Gross carrying amount at 31 December ⁽¹⁾	574	620
Modification gain/(loss)	21	(4)
Loans modified since initial recognition at a time when loss allowance was based on lifetime ECL		
Gross carrying amount at 31 December for which loss allowance has changed to 12-month ECL measurement	572	416

⁽¹⁾ Gross carrying amount at 31 December includes all loans modifications due to forbearance during the year.

In the year ended 31 December 2021, the gross carrying amount of loans previously modified for which the loan allowance has reverted to being measured at an amount equal to lifetime ECL amounted to € 467 million (2020: € 659 million).

(e) Covid-19 relief ('moratoria') and government support measures

Covid-19 relief measures ('moratoria')

In the last two years, the Bank took all appropriate actions to address liquidity difficulties of businesses and individuals caused by the limited or suspended operations of businesses due to the Covid-19 pandemic. Information regarding the Covid-19 relief measures activated by the Bank as well as the respective borrowers' eligibility criteria is provided in note 6.2.1.2 (e) of the financial statements for the year ended 31 December 2020.

As at 31 December 2021, the Bank's moratoria had expired (2020: gross carrying amount of € 1.5 billion).

Government support measures

In addition to the relief measures activated by the Bank, the Greek government has initiated various programs, in order to stimulate liquidity and economic activity and to alleviate the consequences of the Covid-19 outbreak.

The main programs that have been available to eligible borrowers in Greece include:

- (i) State participation (of 40% or 5%) on newly disbursed loans granted by the Bank that is zero-interest bearing, accompanied with a government-subsidy for the interest bearing part of the principal (of 60% or 95% respectively) for the first 2 years. As at 31 December 2021, the Bank had utilized € 0.4 billion under the program,
- (ii) State aid in the form of a guarantee for the 80% of the principal and accrued interest during a period of 90 consecutive days. As at 31 December 2021, the Bank had utilized € 1.4 billion under the program,
- (iii) "Gefyra I" subsidy program, applicable to the Retail lending portfolio secured with prime residence collateral, involving 9-months installments' state subsidy on existing lending exposures which in October 2021 received a 3 month extension on the subsidy (Law

Notes to the Financial Statements

4842/2021) for the existing eligible borrowers. As at 31 December 2021, the gross carrying amount of the lending exposures under the program amounted to € 1.2 billion,

(iv) “Gefyra II” subsidy program (Law 4790/2021) activated in 2021, applicable to Covid-19 affected eligible small business professionals and legal entities, as well as SMEs, involving 8-months state subsidy of up to 90% of monthly installment on existing lending exposures, followed by a probation period from 6 up to 18 months, depending on the loan performance. As at 31 December 2021, the gross carrying amount of the lending exposures under the program amounted to € 0.8 billion,

(v) In December 2020, the Bank signed an agreement with the European Investment Bank (EIB) for the disbursement of new loans financed by EIB. As at 31 December 2021, no significant lending exposures had been disbursed under the program,

(vi) In December 2021, the Bank entered into Guarantee Agreements with EIB and EIF (European Investment Fund) under the Pan-European Guarantee Fund (EGF), which was established with the support of certain member States of the EU to respond to the economic impact of the Covid-19 pandemic. The above programs will be activated within 2022,

(vii) A three-month, government interest subsidy program on existing corporate loans was initiated in February 2021, which could be opted in combination with the other Covid-19 relief measures. The above interest subsidy program expired in the fourth quarter of 2021.

It is noted that the credit enhancement provided by the guarantee programs mentioned above, is not accounted for separately as it is integral to the loans’ terms and as such it is reflected in the guaranteed loans’ ECL measurement.

5.2.1.3 Debt Securities

The following tables present an analysis of debt securities by external credit rating agency designation at 31 December 2021 and 2020, based on Moody's ratings or their equivalent:

	31 December 2021		
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Total
	€ million	€ million	€ million
Debt securities at amortised cost			
Aaa	393	-	393
Lower than A3	3,545	-	3,545
Gross Carrying Amount	3,938	-	3,938
Impairment Allowance	(6)	-	(6)
Carrying Amount	3,932	-	3,932
Debt securities at FVOCI			
Aaa	391	-	391
Aa1 to Aa3	148	-	148
A1 to A3	343	-	343
Lower than A3	3,917	9	3,926
Unrated	128	-	128
Carrying amount	4,927	9	4,936
	31 December 2020		
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Total
	€ million	€ million	€ million
Debt securities at amortised cost			
Gross Carrying Amount - Lower than A3	2,103	-	2,103
Impairment Allowance	(4)	-	(4)
Carrying Amount	2,099	-	2,099
Debt securities at FVOCI			
Aaa	156	-	156
Aa1 to Aa3	340	-	340
A1 to A3	374	-	374
Lower than A3	3,324	10	3,334
Unrated	70	-	70
Carrying amount	4,264	10	4,274

Notes to the Financial Statements

Debt securities at FVTPL

Aa1 to Aa3

Lower than A3

Carrying Amount

31 December 2021	
Debt securities held for trading € million	Debt securities measured at FVTPL € million
-	1
50	0
50	1

Debt Securities at FVTPL

Aa1 to Aa3

Lower than A3

Carrying Amount

31 December 2020	
Debt securities held for trading € million	Debt securities measured at FVTPL € million
-	2
22	0
22	2

Securities rated lower than A3 include: € 5,247 million related to Greek sovereign debt (2020: € 3,963 million), € 580 million related to Eurozone members sovereign debt (2020: € 684 million), and € 244 million related to sovereign debt issued mainly by European Union members and candidate members (2020: € 96 million).

The total exposure of the Bank on Russian government and corporate debt securities as at 31 December 2021 amounted to € 48 million (carrying value).

The following tables present the Bank's exposure in debt securities, as categorized by stage, counterparty's geographical region and industry sector:

	31 December 2021					Total € million
	Greece		Other European countries		Other countries	
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	12-month ECL- Stage 1	12-month ECL- Stage 1	Lifetime ECL- Stage 2	
	€ million	€ million	€ million	€ million	€ million	
Debt securities at amortised cost						
Sovereign	3,162	-	63	-	-	3,225
Banks	284	-	36	-	-	320
Corporate	-	-	232	161	-	393
Gross Carrying Amount	3,446	-	331	161	-	3,938
Impairment Allowance	(6)	-	(0)	(0)	-	(6)
Net Carrying Amount	3,440	-	331	161	-	3,932
Debt securities at FVOCI						
Sovereign	2,074	-	882	333	-	3,289
Banks	156	-	177	-	-	333
Corporate	373	7	657	275	2	1,314
Carrying Amount	2,603	7	1,716	608	2	4,936

Notes to the Financial Statements

	31 December 2020					
	Greece		Other European countries		Other countries	
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	12-month ECL- Stage 1	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Total
	€ million	€ million	€ million	€ million	€ million	€ million
Debt securities at amortised cost						
Sovereign	1,951	-	64	-	-	2,015
Banks	88	-	-	-	-	88
Gross Carrying Amount	2,039	-	64	-	-	2,103
Impairment Allowance	(4)	-	(0)	-	-	(4)
Net Carrying Amount	2,035	-	64	-	-	2,100
Debt securities at FVOCI						
Sovereign ⁽¹⁾	1,992	-	1,098	186	-	3,276
Banks	95	-	207	4	-	306
Corporate	142	6	352	188	4	692
Carrying Amount	2,229	6	1,657	378	4	4,274

⁽¹⁾ Sovereign debt securities of other European countries include EFSF bonds of carrying amount of € 171 million.

31 December 2021			
Other			Total
Greece	European countries	Other countries	
€ million	€ million	€ million	€ million

Debt securities at FVTPL

Corporate	0	1	-	1
Carrying amount	0	1	-	1

Debt held for trading

Sovereign	14	-	-	14
Corporate	-	23	13	36
Carrying amount	14	23	13	50

31 December 2020			
Other			Total
Greece	European countries	Other countries	
€ million	€ million	€ million	€ million

Debt securities at FVTPL

Corporate	0	2	-	2
Carrying amount	0	2	-	2

Debt securities held for trading

Corporate	22	-	-	22
Carrying amount	22	-	-	22

5.2.1.4 Offsetting of financial assets and financial liabilities

The disclosures set out in the tables below include financial assets and financial liabilities that:

- (a) are offset in the Bank's balance sheet according to IAS 32 'Financial Instruments: Presentation' criteria; or
- (b) are subject to enforceable master netting arrangements or similar agreements that cover similar financial instruments, irrespective of whether they are offset in balance sheet.

Notes to the Financial Statements

Regarding the former, financial assets and financial liabilities are offset and the net amount is reported in the balance sheet when, there is a legally enforceable right to offset the recognized amounts and there is an intention to settle on a net basis, or realize the asset and settle the liability simultaneously (the offset criteria), as also set out in Bank's accounting policy 2.2.4.

Regarding the latter, the International Swaps and Derivatives Association (ISDA) and similar master netting arrangements do not meet the criteria for offsetting in the balance sheet, as they create a right of set-off that is enforceable only following an event of default, insolvency or bankruptcy of the Bank or the counterparties or following other predetermined events. In addition, the Bank and its counterparties may not intend to settle on a net basis or to realize the assets and settle the liabilities simultaneously.

Similar agreements to ISDA include derivative clearing agreements, global master repurchase agreements, and global master securities lending agreements. Similar financial instruments include derivatives, repos and reverse repos agreements and securities borrowing and lending agreements. Financial instruments such as loans and deposits are not subject to this disclosure unless they are offset in the balance sheet.

The following tables present financial assets and financial liabilities that meet the criteria for offsetting and thus are reported on a net basis in the balance sheet, as well as amounts that are subject to enforceable master netting arrangements and similar agreements for which the offset criteria mentioned above are not satisfied. The latter amounts, which mainly relate to derivatives, repos and reverse repos, are not set off in the balance sheet. In respect of these transactions, the Bank receives and provides collateral in the form of marketable securities and cash that are included in the tables below under columns 'financial instruments' and 'cash collateral' at their fair value.

	31 December 2021					
	Gross amounts of recognised financial assets	Gross amounts of recognised financial liabilities offset in the balance sheet	Net amounts of financial assets presented in the balance sheet	Related amounts not offset in the BS		
				Financial instruments (incl. non-cash collateral)	Cash collateral received	Net amount
	€ million	€ million	€ million	€ million	€ million	€ million
Financial Assets						
Reverse repos with banks	622	(591)	31	(31)	-	-
Derivative financial instruments	1,955	-	1,955	(1,816)	(41)	98
Total	2,577	(591)	1,986	(1,847)	(41)	98

	31 December 2021					
	Gross amounts of recognised financial liabilities	Gross amounts of recognised financial assets offset in the balance sheet	Net amounts of financial liabilities presented in the balance sheet	Related amounts not offset in the BS		
				Financial instruments (incl. non-cash collateral)	Cash collateral pledged	Net amount
	€ million	€ million	€ million	€ million	€ million	€ million
Financial Liabilities						
Repurchase agreements with banks	2,643	(591)	2,052	(2,052)	-	-
Derivative financial instruments	2,408	-	2,408	(707)	(1,649)	52
Total	5,051	(591)	4,460	(2,759)	(1,649)	52

Notes to the Financial Statements

31 December 2020						
			Related amounts not offset in the BS			
	Gross amounts of recognised financial assets	Gross amounts of recognised financial liabilities offset in the balance sheet	Net amounts of financial assets presented in the balance sheet	Financial instruments (incl. non-cash collateral)	Cash collateral received	Net amount
	€ million	€ million	€ million	€ million	€ million	€ million
Financial Assets						
Reverse repos with banks	1,265	(1,065)	200	(200)	-	-
Derivative financial instruments	2,595	-	2,595	(2,385)	(71)	139
Total	3,860	(1,065)	2,795	(2,585)	(71)	139

31 December 2020						
			Related amounts not offset in the BS			
	Gross amounts of recognised financial liabilities	Gross amounts of recognised financial assets offset in the balance sheet	Net amounts of financial liabilities presented in the balance sheet	Financial instruments (incl. non-cash collateral)	Cash collateral pledged	Net amount
	€ million	€ million	€ million	€ million	€ million	€ million
Financial Liabilities						
Repurchase agreements with banks	4,290	(1,065)	3,225	(3,225)	-	-
Derivative financial instruments	2,933	-	2,933	(753)	(2,163)	17
Total	7,223	(1,065)	6,158	(3,978)	(2,163)	17

Financial assets and financial liabilities are disclosed in the above tables at their recognized amounts, either at fair value (derivative assets and liabilities) or amortized cost (all other financial instruments), depending on the type of financial instrument.

5.2.2 Market risk

The Bank takes on exposure to market risk, which is the risk of potential financial loss due to an adverse change in market variables. Changes in interest rates, foreign exchange rates, credit spreads, equity prices and other relevant factors, such as the implied volatilities, can affect the Bank's income or the fair value of its financial instruments. The market risks the Bank is exposed to, are monitored, controlled and estimated by Group Market and Counterparty Risk Sector (GMCRS).

GMCRS is responsible for the measurement, monitoring, control and reporting of all market risks, including the interest rate risk in the Banking Book (IRRBB) of the Bank. The Sector reports to the GCRO and its main responsibilities include:

- Monitoring of all key market & IRRBB risk indicators (VaR, sensitivities, etc.)
- Implementation of Stress Testing methodologies for market risk and IRRBB (historical and hypothetical),
- Monitoring and reporting of market and IRRBB risk limits utilization,
- Development, maintenance and expansion of risk management infrastructure.

The market risks the Bank is exposed to, are the following:

(a) Interest rate risk

The Bank takes on exposure to the effects of fluctuations in the prevailing levels of market interest rates on its cash flows and the fair value of its financial positions. Cash flow interest rate risk is the risk that the future cash flows of a financial instrument will fluctuate because of changes in market interest rates. Fair value interest rate risk is the risk that the value of a financial instrument will fluctuate because of changes in market interest rates. Fair value interest rate risk is further split into 'General' and 'Specific'. The former refers to changes in the fair valuation of positions due to the movements of benchmark interest rates, while the latter refers to changes in the fair valuation of positions due to the movements of specific issuer yields and credit spreads.

Notes to the Financial Statements

(b) Currency risk

The Bank takes on exposure to the effects of fluctuations in the prevailing foreign currency exchange rates on its financial position and cash flows.

(c) Equity risk

Equity price risk is the risk of the decrease of fair values as a result of changes in the levels of equity indices and the value of individual stocks. The equity risk that the Bank undertakes arises mainly from the investment portfolio.

(d) Implied volatilities

The Bank carries limited implied volatility (vega) risk, mainly as a result of open positions on options.

The Board's Risk Committee sets limits on the level of exposure to market risks, which are monitored on a daily basis.

Market risk is managed and monitored mainly using Value at Risk (VaR) methodology. Sensitivity and stress test analysis is additionally performed.

(i) VaR summary for 2021 and 2020

VaR is a methodology used in measuring financial risk by estimating the potential negative change in the market value of a portfolio at a given confidence level and over a specified time horizon. The VaR that the Bank measures is an estimate based upon a 99% confidence level and a holding period of 1 day and the methodology used for the calculation is Monte Carlo simulation (full re-pricing of the positions is performed).

The VaR models are designed to measure market risk in a normal market environment. It is assumed that any changes occurring in the risk factors affecting the normal market environment will follow a normal distribution.

Although VaR is an important tool for measuring market risk, the assumptions on which the model is based do give rise to certain limitations. Given this, actual outcomes are monitored regularly, via back testing process, to test the validity of the assumptions and the parameters used in the VaR calculation.

The perimeter of the VaR analysis in 2021 takes into account the FVTPL, including trading and FVOCI portfolios. Consequently, the potential impact as it is depicted in the VaR figures would directly affect Bank's Capital (income statement or equity).

Since VaR constitutes an integral part of the Bank's market risk control regime, VaR limits have been established for all the above operations (trading and investment portfolios measured at fair value) and actual exposure is reviewed daily by management. However, the use of this approach does not prevent losses outside of these limits in the event of extraordinary market movements.

VaR by risk type ⁽¹⁾

	2021 (Average) € million	2021 € million	2020 (Average) € million	2020 € million
Interest Rate Risk	14	13	74	11
Foreign Exchange Risk	0	0	0	0
Equities Risk	0	0	0	0
Total VaR	14	13	74	11

⁽¹⁾ Includes all portfolios measured at fair value.

The aggregate VaR of the interest rate, foreign exchange and equities VaR benefits from diversification effects. The largest portion of the Bank's interest rate VaR figures is attributable to the risk associated with interest rate and credit spread sensitive debt securities and derivatives. The average VaR of 2021 is significantly reduced, compared to the average VaR of 2020, due to the smoothing out of the Covid-19 extreme volatility observed in the markets within 2020.

The following tables present the Interest Rate Repricing analysis of the securities, debt issued, securitization notes and derivatives contributing to the Bank's Interest Rate Risk exposure.

Notes to the Financial Statements

	31 December 2021				
	Less than 1	1-3 months	3-12 months	1-5 years	More than 5
	month				years
	€ million	€ million	€ million	€ million	€ million
Securities held for trading	-	-	1	15	31
-Fixed coupon bonds	-	-	1	15	31
Investment securities & Senior notes	308	131	1,287	4,942	5,286
-Fixed coupon bonds	165	28	586	2,202	3,677
-Variable coupon bonds	143	66	412	-	-
-Senior Notes (Cairo, Pillar & Mexico)	-	37	289	2,740	1,609
Debt issued (Third parties)	-	(553)	-	(73)	(1,966)
-Fixed coupon subordinated notes (Tier 2)	-	-	-	-	(950)
-Variable coupon securitisations	-	(553)	-	-	-
-EMTNs	-	-	-	(73)	(1,016)
Derivatives⁽¹⁾	835	179	1,410	1,400	(3,886)

	31 December 2020				
	Less than 1	1-3 months	3-12 months	1-5 years	More than 5
	month				years
	€ million	€ million	€ million	€ million	€ million
Securities held for trading	-	-	-	5	12
-Fixed coupon bonds	-	-	-	5	12
Investment securities & Senior notes	116	85	306	3,643	4,191
-Fixed coupon bonds	95	25	172	1,155	3,394
-Variable coupon bonds	21	25	-	-	2
-Senior Notes (Cairo & Pillar)	-	35	134	2,488	795
Debt issued (Third parties)	-	(594)	-	-	(950)
-Fixed coupon subordinated notes (Tier 2)	-	-	-	-	(950)
-Variable coupon securitisations	-	(594)	-	-	-
Derivatives ⁽¹⁾	389	(199)	1,408	1,274	(2,902)

⁽¹⁾ For linear interest rate derivatives, notional amounts are shown in the appropriate time band, aggregated across all currencies. For non-linear interest rate derivatives, delta equivalent notional amounts are shown in the appropriate time band, aggregated across all currencies.

Notes to the Financial Statements

(ii) Foreign exchange risk

The following tables present the Bank's exposure to foreign currency exchange risk as at 31 December 2021 and 2020:

	31 December 2021							
	USD	CHF	RON	RSD	BGN	OTHER	EUR	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
ASSETS								
Cash and balances with central banks	8	1	-	-	-	5	8,359	8,373
Due from credit institutions	103	6	23	0	3	42	2,923	3,100
Securities held for trading	3	-	-	-	-	0	47	50
Derivative financial instruments	40	1	-	50	0	0	1,868	1,959
Loans and advances to customers	2,199	2,102	11	-	0	10	24,570	28,892
Investment securities	413	-	-	-	-	102	8,479	8,994
Other assets ⁽¹⁾	15	0	45	233	189	1	9,688	10,171
Assets of disposal groups classified as held for sale (note 29)	-	-	-	-	6	-	59	65
Total Assets	2,781	2,110	79	283	198	160	55,993	61,604
LIABILITIES								
Due to central banks and credit institutions	295	2	1	0	0	40	13,371	13,709
Derivative financial instruments	44	0	0	182	0	0	2,188	2,414
Due to customers	2,678	21	0	0	0	164	34,358	37,221
Debt securities in issue	38	-	-	-	-	-	2,552	2,590
Other Liabilities	7	0	15	0	-	1	1,163	1,186
Liabilities of disposal group classified as held for sale (note 29)	-	-	-	-	-	-	37	37
Total Liabilities	3,062	23	16	182	0	205	53,669	57,157
Net on balance sheet position	(281)	2,087	63	101	198	(45)	2,324	4,447
Derivative forward foreign exchange position	80	(2,086)	(23)	-	(506)	43	2,479	(13)
Total Foreign Exchange Position	(201)	1	40	101	(308)	(2)	4,803	4,434
31 December 2020 restated								
	USD	CHF	RON	RSD	BGN	OTHER	EUR	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
ASSETS								
Cash and balances with central banks	4	1	-	-	-	4	3,726	3,736
Due from credit institutions	109	9	21	0	0	33	3,401	3,573
Securities held for trading	0	-	-	-	-	0	22	22
Derivative financial instruments	44	2	-	-	0	0	2,560	2,606
Loans and advances to customers	1,550	2,483	18	-	0	17	25,193	29,261
Investment securities	360	-	-	-	-	18	6,085	6,463
Other assets (note 2.3) ⁽¹⁾	17	0	45	233	189	0	9,449	9,932
Assets classified as held for sale (note 29)	-	-	-	-	-	-	36	36
Total Assets	2,083	2,495	84	233	189	72	50,472	55,629
LIABILITIES								
Due to central banks and credit institutions	493	2	-	-	-	29	10,845	11,369
Derivative financial instruments	60	0	0	-	0	1	2,876	2,937
Due to customers	2,154	17	0	0	0	148	32,129	34,448
Debt securities in issue	-	-	-	-	-	-	1,544	1,544
Other Liabilities (note 2.3)	7	1	21	-	-	0	1,122	1,151
Total Liabilities	2,714	20	21	0	0	178	48,517	51,449
Net on balance sheet position	(631)	2,475	63	233	189	(107)	1,955	4,180
Derivative forward foreign exchange position	429	(2,475)	(18)	-	(506)	64	2,499	(8)
Total Foreign Exchange Position	(202)	(0)	45	233	(317)	(42)	4,454	4,172

⁽¹⁾ Other assets include Investments in associates and joint ventures, Property and equipment, Investment property, Intangible assets, Deferred tax assets and Other assets.

Notes to the Financial Statements

5.2.3 Liquidity risk

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

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

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

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

Liquidity Risk Management Framework

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

- Board Risk Committee's role is to approve all strategic liquidity risk management decisions and to 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 Bank's risk appetite, and to review at least monthly the overall liquidity position of the Bank;
- Group Treasury is responsible for the implementation of the Bank's liquidity strategy, the daily management of the Bank's liquidity and for the preparation and monitoring of the Bank's liquidity budget; and
- Group Market and Counterparty Risk Sector is responsible for measuring, monitoring and reporting the liquidity risk of the Bank.

The main items related to liquidity risk that are monitored on a periodic basis as summarized as follows:

- The analysis of liquidity buffer held on Group level per asset type and per subsidiary;
- Liquidity stress test scenarios. These scenarios evaluate the impact of a number of stress events on the Group's liquidity position;
- Market sensitivities affecting liquidity;
- The Liquidity Coverage Ratio (LCR) both in solo and group level;
- The Net Stable Funding Ratio (NSFR) both in solo and group level;
- The Additional Liquidity Monitoring Metrics (ALMM) both in solo and group level;
- The Asset Encumbrance (AE) both in solo and group level.

Maturity analysis of assets and assets held for managing liquidity risk

The following tables present maturity analysis of Bank assets as at 31 December 2021 and 2020, based on their carrying values. Loans without contractual maturities are presented in the 'less than 1 month' time bucket. The Bank has established credit risk mitigation contracts with its interbank counterparties (ISDA/CSA). Under these contracts the Bank has posted or received collateral, which covers the corresponding net liabilities or net assets from derivative transactions. The collateral posted is not presented in the below tables. For derivative assets not covered by ISDA/CSA agreements the positive valuation is presented at fair value in the 'over 1 year' time bucket.

Notes to the Financial Statements

	31 December 2021				
	Less than 1 month	1 - 3 months	3 months to 1 year	Over 1 year	Total
	€ million	€ million	€ million	€ million	€ million
- Cash and balances with central banks	8,373	-	-	-	8,373
- Due from credit institutions	205	317	243	442	1,207
- Loans and advances to customers	1,581	363	2,659	24,289	28,892
- Debt Securities	170	29	602	8,118	8,919
- Equity Securities	-	-	-	125	125
- Derivative financial instruments	-	-	-	101	101
- Other assets ⁽¹⁾	72	19	10	10,070	10,171
- Assets of disposal groups classified as held for sale (note 29)	-	6	59	-	65
Total	10,401	734	3,573	43,145	57,853

	31 December 2020 restated				
	Less than 1 month	1 - 3 months	3 months to 1 year	Over 1 year	Total
	€ million	€ million	€ million	€ million	€ million
- Cash and balances with central banks	3,736	-	-	-	3,736
- Due from credit institutions	467	95	221	366	1,149
- Loans and advances to customers	1,722	569	2,892	24,078	29,261
- Debt Securities	120	-	176	6,102	6,398
- Equity Securities	-	-	-	87	87
- Derivative financial instruments	-	-	-	147	147
- Other assets (note 2.3) ⁽¹⁾	70	19	9	9,834	9,932
- Assets of disposal groups classified as held for sale	-	-	36	-	36
Total	6,115	683	3,334	40,614	50,746

⁽¹⁾ Other assets include shares in subsidiaries, Investments in associates and joint ventures, Property and equipment, Investment property, Intangible assets, Deferred tax assets and Other assets.

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

- (a) Cash and balances with central banks;
- (b) Eligible bonds and other financial assets for collateral purposes; and
- (c) Current accounts with banks and interbank placings maturing within one month.

Maturity analysis of liabilities

The amounts disclosed in the tables below are the contractual undiscounted cash flows for the years 2021 and 2020. Liabilities without contractual maturities (sight and saving deposits) are presented in the 'less than 1 month' time bucket. The Bank has established credit risk mitigation contracts with its interbank counterparties (ISDA/CSA). Due to these contracts the Bank has already posted collateral which covers the valuation of its net liabilities from interbank derivatives. For derivative liabilities not covered by ISDA/CSA agreements the negative valuation is presented at fair value in the 'less than 1 month' time bucket.

It should be noted that this table represents the worst case scenario since it is based on the assumption that all liabilities will be paid earlier than expected (all term deposits are withdrawn at their contractual maturity). The recent experience shows that even in a period of a systemic financial crisis the likelihood of such an event is remote.

Notes to the Financial Statements

Non-derivative liabilities:

- Due to central banks and credit institutions
- Due to customers
- Debt securities in issue
- Lease liabilities
- Other liabilities
- Liabilities of disposal group classified as held for sale (note 29)

31 December 2021				
Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Gross nominal (inflow)/ outflow € million
1,672	826	1,857	9,244	13,599
31,989	2,531	2,700	4	37,224
31	1	60	2,737	2,829
2	5	20	152	179
212	330	473	-	1,015
-	-	37	-	37
33,906	3,693	5,147	12,137	54,883
17	-	-	-	17

Derivative financial instruments:

Off-balance sheet items

- Credit related commitments
- Contractual commitments ⁽¹⁾
- Total**

Less than 1 year € million	Over 1 year € million
1,033	4,895
27	-
1,060	4,895

Non-derivative liabilities:

- Due to central banks and credit institutions
- Due to customers
- Debt securities in issue
- Lease liabilities
- Other liabilities (note 2.3)

31 December 2020 restated				
Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Gross nominal (inflow)/ outflow € million
2,258	1,409	31	7,581	11,279
27,045	3,230	4,060	121	34,456
-	166	121	1,712	1,999
2	5	18	122	147
137	300	577	-	1,014
29,442	5,110	4,807	9,536	48,895
9	-	-	-	9

Derivative financial instruments:

Off-balance sheet items

- Credit related commitments
- Contractual commitments ⁽¹⁾
- Total**

Less than 1 year € million	Over 1 year € million
940	4,126
29	-
969	4,126

⁽¹⁾ It refers to contractual commitments for the purchase of own used and investment property and intangible assets (note 41).

5.2.4 Interest Rate Benchmark reform – IBOR reform

Global regulators undertook a fundamental review of major interest rate benchmarks and convened working groups in various jurisdictions to identify and promote the use of risk-free reference rates based on liquid underlying market transactions, as alternatives to the existing Interbank Offered Rates (IBORs). In this context, the European Money Market Institute, the administrator of EONIA and EURIBOR, decided the permanent cessation of EONIA on 3 January 2022, while, the regulatory supervisor of ICE

Notes to the Financial Statements

Benchmark Administration, which is the administrator of LIBOR, announced that all non USD LIBOR rates and the 1-week and 2-month USD LIBOR rates would cease to be published on 31 December 2021. The remaining USD LIBOR rates will permanently cease immediately after 30 June 2023. Moreover, the financial instruments referencing EURIBOR rate, that has been reformed and continues to be used, will not need to transition.

Following the global regulators' decision to phase out existing IBORs and replace them with alternative risk-free rates (new RFRs), the Bank has established an internal Benchmark Reform Working Committee (the "Working Committee") consisting of representatives from competent business units across the Bank (e.g. Economic Analysis and Research, Group Market and Counterparty Risk, Legal, Group Organization & Business Analysis, Group Finance and IT) led by the Global Markets Unit, in order to manage the transition to the new RFRs, mitigate the operational impact and any financial and non-financial risks associated with the transition and comply with the regulatory requirements of the EU Benchmarks Regulation.

During 2021, the Working Committee continued working towards the Bank's operational preparedness to facilitate benchmark transition, with a focus on assessing the Bank's exposures to the various IBORs per type of financial instrument, in order to ensure their successful conversion to the RFR rates in advance of the respective IBORs cessation date, as well as set the necessary specifications in its systems and proceed with the amendment of the contractual arrangements with counterparties, when required. Furthermore, the Bank in cooperation with market participants ensured the successful migration to RFR rates for centrally cleared and bilateral derivative transactions and adhered to the ISDA 2020 fallback protocol with reference to the appropriate fallback mechanisms.

As at 31 December 2021, the Bank has exposure to financial instruments such as derivatives held for trading or hedging purposes, loans to customers and deposit contracts referencing the IBOR rates that cease after 31 December 2021 (1W and 2M USD, CHF, GBP, JPY, Euro Libor rates) and will transition to the new RFRs on their first roll date in 2022. The remaining USD Libor legacy contracts will transition to the new RFRs after 30 June 2023, the planned USD Libor cessation date. Derivative contracts referencing the EONIA, that are not part of hedge accounting relationships, transitioned to €STR during 2021.

Moreover, the Bank is exposed to a number of interest rate benchmarks within its hedge accounting relationships that mature after 31 December 2021 or 30 June 2023 for specific USD LIBOR hedges. The Bank considers that the existing hedge relationships will continue to qualify for hedge accounting and has identified the required changes in the hedging documentation to reflect the amended hedge designations following the transition of IBOR rates to the new RFRs. Finally, the IBOR reform transition does not necessitate any changes to the Bank's risk management approach and strategy.

The table below presents the Bank's exposure to significant interest benchmarks subject to reform that will transition to new RFRs in 2022 or after 30 June 2023 for specific USD LIBORs at 31 December 2021. In addition, the table excludes exposures to USD LIBORs that have a contractual maturity date before their planned cessation date:

As at 31 December 2021				
Benchmark rates Impacted by IBOR reform				
	USD LIBOR	CHF LIBOR	JPY LIBOR	EURO LIBOR
	€ million	€ million	€ million	€ million
Non-derivative financial assets⁽¹⁾				
Loans & Advances to customers	1,823	2,090	5	5
	1,823	2,090	5	5
Non-derivative financial liabilities⁽²⁾				
Due to customers	33	-	-	-
	33	-	-	-
Derivative financial instruments^{(3),(4)}				
Derivatives designated in hedges	347	1,646	-	-
Trading derivatives	1,550	-	-	-
	1,897	1,646	-	-

⁽¹⁾ Balances provided are the gross carrying amounts (excl. ECL)

⁽²⁾ Balance provided is at amortized cost

⁽³⁾ Balances provided are the notional amounts

⁽⁴⁾ As at December 2021, the Bank held certain currency swaps (1 month CHF Libor to 1 month USD Libor) subject to IBOR reform for which only the CHF Libor leg will change after 31 December 2021. For these currency swaps, both legs are included in the table.

Notes to the Financial Statements

5.2.5 Climate-related risk

The Bank has recognized climate change as a material risk and, based on its supervisory guidelines, is in the process of adapting its policies and methodologies for identifying and monitoring the relevant risks.

Climate-related and environmental risks are commonly understood to comprise two main risk drivers:

- Physical risk refers to the financial impact of a changing climate, resulting mainly from more frequent extreme weather events and gradual changes in climate; and
- Transition risk refers to an institution's financial loss that can result, directly or indirectly, from the process of adjustment towards a lower-carbon and more environmentally sustainable economy

The Bank is establishing an effective oversight of climate related & environmental (CR&E) risks with the design and approval of a governance structure on the process for the allocation of roles and responsibilities with regard to climate risk management (both for transition risk and physical risk) across its three lines of defense (i.e. Corporate, Retail, Risk, Compliance, Internal Audit functions).

In that context, in line with the Bank's approved governance structure, a dedicated Climate Risk Division for the integration of CR&E risks into the Bank's risk management framework, has been established. The Climate Risk Division will operate as Project office for the implementation of the Climate related and Environmental risks roadmap, with a coordinating and supervisory role on all related project streams to ensure alignment with the Bank's business strategy and the regulatory authorities' expectations.

Moreover, in 2021, the Bank established a bank-wide program, aiming to integrate Environmental Social Governance ('ESG') and climate risks, including Taxonomy related considerations in the organization's strategy, risk management procedures, products/ financings and operating model.

In January 2022, the European Central Bank (ECB) launched a supervisory climate risk stress test to assess how prepared banks are for dealing with financial and economic shocks stemming from climate risk. The exercise will be conducted in the first half of 2022 after which the ECB will publish aggregate results (note 4).

Eurobank is adopting a strategic approach towards sustainability and climate change risk identification and risk management, signifying the great importance that is given in the risks and opportunities arising from the transitioning to a low-carbon and more circular economy.

5.3 Fair value of financial assets and liabilities

Fair value is the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants in the principal (or most advantageous) market at the measurement date under current market conditions (i.e. an exit price). When a quoted price for an identical asset or liability is not observable, fair value is measured using another valuation technique that is appropriate in the circumstances and maximizes the use of relevant observable inputs and minimizes the use of unobservable inputs. Observable inputs are developed using market data, such as publicly available information about actual events or transactions, and reflect assumptions that market participants would use when pricing financial instruments, such as quoted prices in active markets for similar instruments, interest rates and yield curves, implied volatilities and credit spreads.

The Bank's financial instruments measured at fair value or at amortized cost for which fair value is disclosed are categorized into the three levels of the fair value hierarchy based on whether the inputs to the fair values are observable or unobservable, as follows:

- Level 1-Financial instruments measured based on quoted prices (unadjusted) in active markets for identical financial instruments that the Bank can access at the measurement date. A market is considered active when quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency and represent actually and regularly occurring transactions. Level 1 financial instruments include actively quoted debt instruments held or issued by the Bank, equity and derivative instruments traded on exchanges, as well as mutual funds that have regularly and frequently published quotes.
- Level 2-Financial instruments measured using valuation techniques with inputs, other than level 1 quoted prices, that are observable either directly or indirectly, such as: i) quoted prices for similar financial instruments in active markets, ii) quoted prices for identical or similar financial instruments in markets that are not active, iii) inputs other than quoted prices that are directly or indirectly observable, mainly interest rates and yield curves observable at commonly quoted intervals, forward exchange rates, equity prices, credit spreads and implied volatilities obtained from internationally recognized market data providers and iv) other unobservable inputs which are insignificant to the entire fair value measurement. Level 2 financial instruments include over the counter (OTC) derivatives, less liquid debt instruments held or issued by the Bank and equity instruments.

Notes to the Financial Statements

(c) Level 3-Financial instruments measured using valuation techniques with significant unobservable inputs. When developing unobservable inputs, best information available is used, including own data, while at the same time market participants' assumptions are reflected (e.g. assumptions about risk). Level 3 financial instruments include unquoted equities or equities traded in markets that are not considered active, certain OTC derivatives, loans and advances to customers including securitized notes of loan portfolios originated by the Bank and recognized in financial assets and debt securities issued by the Bank.

Financial instruments carried at fair value

The fair value hierarchy categorization of the Bank's financial assets and liabilities measured at fair value is presented in the following tables:

31 December 2021			
Level 1	Level 2	Level 3	Total
€ million	€ million	€ million	€ million
Securities held for trading	50	-	50
Investment securities at FVTPL	29	15	82
Derivative financial instruments	-	1,959	1,959
Investment securities at FVOCI	4,753	227	4,980
Loans and advances to customers mandatorily at FVTPL	-	23	23
Financial assets measured at fair value	4,832	2,201	7,094
Derivative financial instruments	-	2,414	2,414
Trading liabilities	43	-	43
Financial liabilities measured at fair value	43	2,414	2,457

31 December 2020			
Level 1	Level 2	Level 3	Total
€ million	€ million	€ million	€ million
Securities held for trading	22	-	22
Investment securities at FVTPL	26	14	90
Derivative financial instruments	0	2,605	2,606
Investment securities at FVOCI	4,233	41	4,274
Loans and advances to customers mandatorily at FVTPL	-	20	20
Financial assets measured at fair value	4,281	2,660	7,012
Derivative financial instruments	0	2,937	2,937
Trading liabilities	19	-	19
Financial liabilities measured at fair value	19	2,937	2,956

The Bank recognizes transfers into and out of the fair value hierarchy levels at the beginning of the quarter in which a financial instrument's transfer was effected. There were no material transfers between levels during the year ended 31 December 2021.

Reconciliation of Level 3 fair value measurements

	2021	2020 ⁽²⁾
	€ million	€ million
Balance at 1 January	71	79
Transfers into Level 3	0	2
Transfers out of Level 3	(0)	(2)
Additions, net of disposals and redemptions ⁽¹⁾	(10)	(2)
Total gain/(loss) for the year included in profit or loss	2	(7)
Foreign exchange differences and other	(2)	1
Balance at 31 December	61	71

⁽¹⁾ Including capital returns on equity instruments.

⁽²⁾ In the comparative period, the Level 3 movement is presented from 1 April 2020, onwards

Notes to the Financial Statements

Bank's valuation processes and techniques

The Bank's processes and procedures governing the fair valuations are established by the Group Market Counterparty Risk Sector in line with the Bank's accounting policies. The Bank uses widely recognized valuation models for determining the fair value of common financial instruments that are not quoted in an active market, such as interest and cross currency swaps, that use only observable market data and require little management estimation and judgment. Specifically, observable prices or model inputs are usually available in the market for listed debt and equity securities, exchange-traded and simple over-the-counter derivatives. Availability of observable market prices and model inputs reduces the need for management judgment and estimation and also reduces the uncertainty associated with determining fair values.

Where valuation techniques are used to determine the fair values of financial instruments that are not quoted in an active market, they are validated against historical data and, where possible, against current or recent observed transactions in different instruments, and periodically reviewed by qualified personnel independent of the personnel that created them. All models are certified before they are used and models are calibrated to ensure that outputs reflect actual data and comparative market prices. Fair values' estimates obtained from models are adjusted for any other factors, such as liquidity risk or model uncertainties, to the extent that market participants would take them into account in pricing the instrument. Fair values also reflect the credit risk of the instrument and include adjustments to take account of the credit risk of the Bank and the counterparty, where appropriate.

Valuation controls applied by the Bank may include verification of observable pricing, re-performance of model valuations, review and approval process for new models and/or changes to models, calibration and back-testing against observable market transactions, where available, analysis of significant valuation movements, etc. Where third parties' valuations are used for fair value measurement, these are reviewed in order to ensure compliance with the requirements of IFRS 13.

The fair values of OTC derivative financial instruments are estimated by discounting expected cash flows using market interest rates at the measurement date. Counterparty credit risk adjustments and own credit risk adjustments are applied to OTC derivatives, where appropriate. Bilateral credit risk adjustments consider the expected cash flows between the Bank and its counterparties under the relevant terms of the derivative instruments and the effect of the credit risk on the valuation of these cash flows. As appropriate in circumstances, the Bank considers also the effect of any credit risk mitigating arrangements, including collateral agreements and master netting agreements on the calculation of credit risk valuation adjustments (CVAs). CVA calculation uses probabilities of default (PDs) based on observable market data such as credit default swaps (CDS) spreads, where appropriate, or based on internal rating models. The Bank applies similar methodology for the calculation of debit-value-adjustments (DVAs), when applicable. Where valuation techniques are based on internal rating models and the relevant CVA is significant to the entire fair value measurement, such derivative instruments are categorized as Level 3 in the fair value hierarchy. A reasonably possible change in the main unobservable input (i.e. the recovery rate), used in their valuation, would not have a significant effect on their fair value measurement.

The Bank determines fair values for debt securities held using quoted market prices in active markets for securities with similar credit risk, maturity and yield, quoted market prices in non active markets for identical or similar financial instruments, or using discounted cash flows method.

Unquoted equity instruments at FVTPL under IFRS 9 are estimated mainly (i) using third parties' valuation reports based on investees' net assets, where management does not perform any further significant adjustments, and (ii) net assets' valuations, adjusted where considered necessary.

Loans and advances to customers including securitized notes of loan portfolios originated by the Bank with contractual cash flows that do not represent solely payments of principal and interest (SPPI failures), are measured mandatorily at fair value through profit or loss. Quoted market prices are not available as there are no active markets where these instruments are traded. Their fair values are estimated on an individual loan basis by discounting the future expected cash flows over the time period they are expected to be recovered, using an appropriate discount rate or by reference to other comparable assets of the same type that have been transacted during a recent time period. Expected cash flows, which incorporate credit risk, represent significant unobservable input in the valuation and as such, the entire fair value measurement is categorized as Level 3 in the fair value hierarchy.

Notes to the Financial Statements

Financial instruments not measured at fair value

The fair value hierarchy categorization of the Bank's financial assets and liabilities not measured at fair value on the balance sheet, is presented in the following tables:

31 December 2021				
Level 1 € million	Level 2 € million	Level 3 € million	Fair value € million	Carrying amount € million
Loans and advances to customers	-	28,381	28,381	28,869
Investment securities at amortized cost	2,127	1,433	3,559	3,932
Financial assets not measured at fair value	2,127	28,381	31,940	32,801
Debt securities in issue	962	1,063	2,574	2,590
Financial liabilities not measured at fair value	962	1,063	2,574	2,590

31 December 2020				
Level 1 € million	Level 2 € million	Level 3 € million	Fair value € million	Carrying amount € million
Loans and advances to customers	-	29,088	29,088	29,241
Investment securities at amortized cost	1,005	933	1,938	2,099
Financial assets not measured at fair value	1,005	29,088	31,026	31,340
Debt securities in issue held by third party investors	-	932	1,523	1,544
Financial liabilities not measured at fair value	-	932	1,523	1,544

The assumptions and methodologies underlying the calculation of fair values of financial instruments not measured at fair value, are in line with those used to calculate the fair values for financial instruments measured at fair value. Particularly:

- Loans and advances to customers including securitized notes of loan portfolios originated by the Bank: quoted market prices are not available as there are no active markets where these instruments are traded. The fair values are estimated by discounting future expected cash flows over the time period they are expected to be recovered, using appropriate risk-adjusted rates. Loans are grouped into homogenous assets with similar characteristics, as monitored by Management, such as product, borrower type and delinquency status, in order to improve the accuracy of the estimated valuation outputs. In estimating future cash flows, the Bank makes assumptions on expected prepayments, product spreads and timing of collateral realization. The discount rates for loans to customers incorporate inputs for expected credit losses and interest rates, as appropriate;
- Investment securities measured at amortized cost: the fair values are determined using prices quoted in an active market when these are available. In other cases, fair values are determined using quoted market prices for securities with similar credit risk, maturity and yield, quoted market prices in non active markets for identical or similar financial instruments, or by using the discounted cash flows method; and
- Debt securities in issue: the fair values are determined using quoted market prices, if available. If quoted prices are not available, fair values are determined based on third party valuations, quotes for similar debt securities or by discounting the expected cash flows at a risk-adjusted rate, where the Bank's own credit risk is determined using inputs indirectly observable, i.e. quoted prices of similar securities issued by the Bank or other Greek issuers.

For other financial instruments, which are short term or re-price at frequent intervals (cash and balances with central banks, due from credit institutions, due to central banks, due to credit institutions and due to customers), the carrying amounts represent reasonable approximations of fair values.

Notes to the Financial Statements

6. Net interest income

	2021 € million	Period 20 March - 31 December 2020 € million
Interest income		
Customers	854	705
- measured at amortized cost	853	704
- measured at FVTPL	1	1
Banks and other assets ^{(1) (3)}	18	13
Securities	130	125
- measured at amortized cost	31	34
- measured at FVOCI	97	90
- measured at FVTPL	2	1
Derivatives (hedge accounting)	40	23
Derivatives (no hedge accounting)	409	303
	1,451	1,167
Interest expense		
Customers ⁽¹⁾	(35)	(52)
Banks ^{(1) (2) (3)}	37	(9)
Debt securities in issue ⁽¹⁾	(81)	(69)
Derivatives (hedge accounting)	(58)	(30)
Derivatives (no hedge accounting)	(374)	(270)
Lease liabilities - IFRS 16	(2)	(2)
	(513)	(432)
Total	938	735

⁽¹⁾ Measured at amortized cost.

⁽²⁾ For the year 2021, it includes a benefit of € 83 million that is attributable to the targeted longer-term refinancing operations (TLTRO III) of the European Central Bank (2020: € 19.1 million) (note 30).

⁽³⁾ Interest from financial assets with negative rates is recorded in interest expense.

Interest income recognized by quality of Loans and Advances and Product Line is further analyzed below:

	31 December 2021		
	Interest income on non-impaired loans and advances € million	Interest income on impaired loans and advances € million	Total € million
Retail lending	401	43	444
Wholesale lending ⁽¹⁾	380	30	410
Total interest income from customers	781	73	854

	Period 20 March - 31 December 2020		
	Interest income on non-impaired loans and advances € million	Interest income on impaired loans and advances € million	Total € million
Retail lending	326	43	369
Wholesale lending ⁽¹⁾	311	25	336
Total interest income from customers	637	68	705

⁽¹⁾ Including interest income on loans and advances to Public Sector.

Notes to the Financial Statements

7. Net banking fee and commission income

The following tables include net banking fees and commission income from contracts with customers in the scope of IFRS 15, disaggregated by major type of services and operating segments.

	31 December 2021				
	Retail € million	Corporate € million	Global, Capital Markets & Asset Mngt € million	Other and Elimination center € million	Total € million
Lending related activities	11	54	10	5	80
Mutual funds and assets under management	16	1	26	6	49
Network activities and other ⁽¹⁾	54	6	24	(6)	78
Capital markets	-	5	(0)	(2)	3
Total	81	66	60	3	210

	Period 20 March - 31 December 2020				
	Retail € million	Corporate € million	Global, Capital Markets & Asset Mngt € million	Other and Elimination center € million	Total € million
Lending related activities	7	35	4	0	46
Mutual funds and assets under management	(0)	1	25	-	26
Network activities and other ⁽¹⁾	34	5	16	(4)	50
Capital markets	(0)	3	15	1	19
Total	41	44	60	(3)	141

⁽¹⁾ Including income from credit cards related services.

8. Income from non banking services

Income from non banking services includes rental income of € 65.3 million (2020: € 49.7 million) from real estate properties and other income of € 2.2 million (2020: € 1.0 million) from IT services provided by the Bank.

9. Dividend income

During the year, the Bank recognized dividend income mainly resulting from shares in subsidiaries amounting to € 200 million (2020: € 3 million).

The analysis of the aforementioned dividends per entity for the year ended 2021 is as follows:

	31 December 2021 € million
Eurobank Private Bank Luxembourg S.A.	20
Eurobank Fund Management Company (Luxembourg) S.A.	5
ERB New Europe Holding B.V.	58
Eurobank Direktna a.d.	59
Eurobank Factors Single Member S.A.	20
Eurobank Asset Management Mutual Fund Mngt Company Single Member S.A.	9
Cloud Hellas Single Member Ktimatiki S.A.	8
Eurolife FFH Insurance Group Holdings S.A.	17
doValue Greece Loans and Credits Claim Management S.A.	3
Other	1
Total	200

Notes to the Financial Statements

10. Net trading income and gains less losses from investment securities

	2021 € million	Period 20 March - 31 December 2020 € million
Debt securities of which:	97	805
- measured at amortized cost ⁽¹⁾	-	154
- measured at FVOCI	99	650
- measured at FVTPL	(2)	1
Equity securities measured at FVTPL	6	8
Gains/(losses) on derivative financial instruments (hedge accounting)	22	(382)
Gains/(losses) on derivative financial instruments (no hedge accounting)	(56)	(2)
Revaluation on foreign exchange positions	6	2
Total	75	431

⁽¹⁾ In 2020, following a GGBs swap transaction offered by the Public Debt Management Agency, the Bank recognized a gain of € 139 million, net of any hedging effect. Further information is provided in note 22.

11. Other income/ (expenses)

	2021 € million	Period 20 March - 31 December 2020 restated € million
Gain/(loss) from change in fair value of investment property (note 26)	33	8
Gain/(loss) on disposal/liquidation of the holdings in subsidiaries, associates and joint ventures (notes 2.3 and 24)	1	178
Derecognition gain/ (loss) on loans measured at amortised cost	(0)	(2)
Fee expense related to the deferred tax credits (note 14)	(6)	(5)
Other	0	(0)
Total	28	179

In the period ended 31 December 2020, the Bank had disposed of 80% of its former subsidiary Eurobank FPS Loans and Credits Claim Management S.A. (renamed to doValue Greece Loans and Credits Claim Management S.A.). Following the retrospective application of the IFRIC agenda decision regarding the employee benefits' attribution over the period of service (note 2.3), including the employees of Eurobank FPS, the resulting gain on disposal that was recognized in "Other income/(expenses)" was restated/decreased by € 1.5 million and amounted to € 156.4 million.

12. Operating expenses

	2021 € million	Period 20 March - 31 December 2020 € million
Staff costs	(297)	(231)
Administrative expenses	(166)	(127)
Contributions to resolution and deposit guarantee funds	(59)	(44)
Depreciation of real estate properties and equipment	(31)	(22)
Depreciation of right of use assets	(28)	(21)
Amortisation of intangible assets	(26)	(18)
Total	(607)	(463)

Notes to the Financial Statements

Contributions to resolution and deposit guarantee funds

In 2016, the Single Resolution Mechanism (SRM), which is one of the pillars of the Banking Union in the euro area alongside the Single Supervisory Mechanism (SSM), became fully operational. The Single Resolution Fund (SRF) was established by the SRM Regulation (EU) No 806/2014 in order to ensure uniform practice in the financing of resolutions within the SRM and it is owned by the Single Resolution Board (SRB). The SRM provides that the SRF will be built up over a period of eight years with 'ex-ante' contributions from the banking industry, which may include irrevocable payment commitments as a part of the total amount of contributions (note 41).

Staff costs

	2021 € million	Period 20 March - 31 December 2020 € million
Wages, salaries and performance remuneration	(212)	(162)
Social security costs	(45)	(39)
Additional pension and other post employment costs	(9)	(5)
Other	(31)	(25)
Total	(297)	(231)

The average number of employees of the Bank during the year, was 6,351 (2020: 7,037). As at 31 December 2021, the number of branches and business/private banking centers of the Bank amounted to 321 (2020: 324).

13. Other impairments, restructuring costs and provisions

	2021 € million	Period 20 March - 31 December 2020 restated € million
Impairments and provisions/reversal related to shares in subsidiaries (notes 29 and 34)	47	7
Impairment and valuation losses on real estate properties	(14)	(9)
Other impairment losses and provisions ⁽¹⁾	(21)	(14)
Impairment losses/ reversal on bonds	(5)	(2)
Other impairment losses and provisions	7	(18)
Voluntary exit schemes and other related costs (notes 2.3 and 34)	(10)	(133)
Other restructuring costs	(7)	(7)
Restructuring costs	(17)	(140)
Total	(10)	(158)

⁽¹⁾ Includes impairment losses on equipment and software, other assets and provisions on litigations and other operational risk events.

For the year ended 2021, the Bank recognized € 14 million impairment and valuation losses on real estate properties, of which € 9 million relate to the properties' portfolios classified as held for sale (note 29).

Additionally, during 2021, the Bank recognized € 21 million other impairment losses and provisions, of which € 16 million relate to impairment losses on computer software and other intangible assets (note 27).

In addition, for the year ended 31 December 2021, the Bank recognized € 7 million restructuring costs, mainly related to its transformation plan.

Finally, following the retrospective application of the IFRIC agenda decision regarding the employee benefits' attribution over the period of service (note 2.3), including the employees that participated in voluntary exit schemes, the amount of "Voluntary exit schemes and other related costs" presented above for the period ended 31 December 2020, was restated/increased by € 1.8 million and reached € 133 million (related to the VESs launched by the Bank in September 2020 and in 2019).

Notes to the Financial Statements

14. Income tax

	2021 € million	Period 20 March - 31 December 2020 restated € million
Current tax	(1)	(11)
Deferred tax (note 2.3)	(109)	(291)
Total income tax	(110)	(302)

According to Law 4172/2013 currently in force, the nominal Greek corporate tax rate for credit institutions that fall under the requirements of article 27A of Law 4172/2013 regarding eligible DTAs/deferred tax credits (DTCs) against the Greek State is 29%. According to Law 4799/2021 which was enacted in May 2021 and amended Law 4172/2013, the Greek corporate tax rate for legal entities other than the aforementioned credit institutions decreased from 24% to 22% from the tax year 2021 onwards. In addition, the withholding tax rate for dividends distributed, other than intragroup dividends, is 5%. In particular, the intragroup dividends under certain preconditions are relieved from both income and withholding tax.

Tax certificate and open tax years

The Bank has two open tax years. For fiscal years starting from 1 January 2016 onwards, an 'Annual Tax Certificate' on an optional basis, is provided for the Greek entities, with annual financial statements audited compulsorily, pursuant to the Law 4174/2013, which is issued after a tax audit is performed by the same statutory auditor or audit firm that audits the annual financial statements. The Bank will continue to obtain such certificate.

The tax certificate, which has been obtained by the Bank is unqualified for the open tax year 2020. For the year ended 31 December 2021, the tax audit from external auditors is in progress.

In accordance with the Greek tax legislation and the respective Ministerial Decisions issued, additional taxes and penalties may be imposed by the Greek tax authorities following a tax audit within the applicable statute of limitations (i.e. in principle five years as from the end of the fiscal year within which the relevant tax return should have been submitted), irrespective of whether an unqualified tax certificate has been obtained from the tax paying company.

In reference to its total uncertain tax positions, the Bank assesses all relevant developments (e.g. legislative changes, case law, ad hoc tax/legal opinions, administrative practices) and raises adequate provisions.

Deferred tax

Deferred tax is calculated on all deductible temporary differences under the liability method as well as for unused tax losses at the rate in effect at the time the reversal is expected to take place.

The movement on deferred tax is as follows:

	2021 € million	Period 20 March - 31 December 2020 restated € million
Opening balance	4,508	4,832
Restatement due to change in accounting policy (note 2.3)	-	(7)
Opening balance, as restated	4,508	4,825
Income statement credit/(charge) (note 2.3)	(109)	(291)
Investment securities at FVOCI	30	(30)
Cash flow hedges	(15)	6
Actuarial gain/(losses) (note 2.3)	(0)	(1)
Other	-	(1)
Balance at 31 December	4,414	4,508

Notes to the Financial Statements

Deferred income tax (charge)/credit is attributable to the following items:

	2021 € million	Period 20 March - 31 December 2020 restated € million
Impairment/ valuation relating to loans, disposals and write-offs ⁽¹⁾	18	(203)
Tax deductible PSI+ losses	(50)	(50)
Carried forward debit difference of law 4831/2021	73	-
Change in fair value and other temporary differences (note 2.3)	(150)	(38)
Deferred income tax (charge)/credit	(109)	(291)

⁽¹⁾ In 2020, it includes € 160 million write-down of deferred tax assets (DTA) on Bank's loan losses.

Deferred tax assets/ (liabilities) are attributable to the following items:

	31 December 2021 € million	31 December 2020 restated € million
Impairment/valuation relating to loans and accounting write-offs ⁽¹⁾	1,029	1,598
PSI+ tax related losses	1,001	1,051
Losses from disposals and crystallized write-offs of loans ⁽¹⁾	2,365	1,778
Carried forward debit difference of law 4831/2021	73	-
Other impairments/ valuations through the income statement	(37)	157
Costs directly attributable to equity transactions	5	8
Cash flow hedges	5	20
Defined benefit obligations (note 2.3)	5	4
Real estate properties, equipment and intangible assets	(33)	(51)
Investment securities at FVOCI	(112)	(142)
Other ⁽²⁾	113	85
Net deferred tax	4,414	4,508

⁽¹⁾ The crystallization for tax purposes of impairment losses and write-offs relating to the project "Mexico" (note 20.1) resulted in the significant increase of the deferred tax on the category "Losses from disposals and crystallized write-offs of loans" against a decrease in the category "Impairment/valuation relating to loans and accounting write-offs".

⁽²⁾ It includes, among others, DTA on deductible temporary differences relating to a) operational risk provisions and b) as of 31 December 2021, the leasing operations following the completion of the demerger of Eurobank Ergasias Leasing Single Member S.A. (note 23.1).

Further information, in relation to the aforementioned categories of deferred tax assets as at 31 December 2021, as follows:

- (a) € 1,029 million refer to deductible temporary differences arising from impairment/ valuation relating to loans including the accounting debt write-offs according to the Greek tax law 4172/2013, as in force. These temporary differences can be utilized in future periods with no specified time limit and according to current tax legislation;
- (b) € 1,001 million refer to losses resulted from Eurobank Ergasias S.A. participation in PSI+ and the Greek's state debt buyback program which are subject to amortization for tax purposes over a thirty-year period, i.e. 1/30 of losses per year starting from year 2012 onwards(see below – DTCs section);
- (c) € 2,365 million refer to the unamortized part of the crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period (see below – DTCs section);
- (d) € 73 million refer to the unutilized part of the amortization of the aforementioned crystallized tax losses (debit difference) that can be carried forward for offsetting over a twenty-year period according to Law 4831/2021 (see below).

Assessment of the recoverability of deferred tax assets

The recognition of the above presented deferred tax assets is based on management's assessment that the Bank will have sufficient future taxable profits, against which the deductible temporary differences and the unused tax losses can be utilized. The deferred tax assets are determined on the basis of the tax treatment of each deferred tax asset category, as provided by the applicable tax legislation and the eligibility of carried forward losses for offsetting with future taxable profits. Additionally, the Bank's assessment on the recoverability of recognized deferred tax assets is based on (a) the future performance expectations (projections of operating results) and growth opportunities relevant for determining the expected future taxable profits, (b) the expected timing of reversal of the deductible and taxable temporary differences, (c) the probability that the Bank will have sufficient taxable profits in the future,

Notes to the Financial Statements

in the same period as the reversal of the deductible and taxable temporary differences or in the years into which the tax losses can be carried forward, and (d) the historical levels of Bank's performance in combination with the previous years' tax losses caused by one off or non-recurring events.

In particular, for the year ended 31 December 2021, the Bank has conducted a deferred tax asset (DTA) recoverability assessment based on the three-year Business Plan of the Group of its parent company (mainly comprises Eurobank S.A. Group) that was approved by the Board of Directors of Eurobank Holdings in December 2021, for the period up to the end of 2024, and was submitted to the Single Supervisory Mechanism (SSM). For the years beyond 2024, the forecast of operating results was based on the management projections considering the growth opportunities of the Greek economy, the banking sector and the Group of the Parent Company. Specifically, the management projections for the Bank's future profitability adopted in the Business Plan, have considered, among others, (a) the macroeconomic growth in Greece and the region underpinned by the Recovery and Resilience Fund (RRF) grants and loans, (b) the increase in loan volumes and investment securities, (c) the higher fee and commission income mostly from assets under management, bancassurance, network and capital markets, (d) the discipline in operating expenses' targets, (e) the gradual reduction of cost of risk and (f) the expected sale in first half of 2022 of Eurobank's merchant acquiring business (note 29). The major initiatives introduced in the context of the Eurobank Holdings Group's transformation plan "Eurobank 2030", will contribute to the achievement of the above financial objectives. In addition, Management has taken into account Law 4831/2021 provisions (see below) relating to the DTA on loan losses.

The Bank closely monitors and constantly assesses the developments on the macroeconomic and geopolitical front (note 2) and their effect on the assumptions used in its plans and the projections for future profitability and will continue to update its estimates accordingly.

Deferred tax credit against the Greek State and tax regime for loan losses

As at 31 December 2021, pursuant to the Law 4172/2013, as in force, the Bank's eligible DTAs/deferred tax credits (DTCs) against the Greek State amounted to € 3,547 million (2020: € 3,691 million). The DTCs are accounted for on: (a) the unamortised losses from the Private Sector Involvement (PSI) and the Greek State Debt Buyback Program, which are subject to amortisation over a thirty-year period and (b) on the sum of (i) the unamortized 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 the Law 4831/2021 (article 125), which was enacted in September 2021 and amended Law 4172/2013, the amortization of the PSI tax related losses is deducted from the taxable income at a priority over that of the crystallized tax losses (debit difference) arising from write-offs and disposals of loans. In addition, the amount of the annual tax amortization of the above crystallized tax losses is limited to the amount of the annual taxable profits, calculated before the deduction of such losses and following the annual tax deduction of the PSI tax related losses. The unutilized part of the annual tax amortization of the crystallized loan losses can be carried forward for offsetting over a period of 20 years. If at the end of the 20-year utilization period, there are balances that have not been offset, these will qualify as a tax loss, which is subject to the 5-year statute of limitation. The above provisions apply as of 1 January 2021 and cover the crystallized tax losses that have arisen from write-offs and disposals of loans as of 1 January 2016 onwards.

Taking into account the tax regime in force, including the above development in September 2021, the recovery of the Bank's deferred tax asset recorded on loans and advances to customers and the regulatory capital structure are further safeguarded, contributing substantially to the achievement of NPE management targets through write-offs and disposals, in line with the regulatory framework and SSM requirements (note 5.2).

According to tax Law 4172/2013 as in force, an annual fee of 1.5% is imposed on the excess amount of deferred tax assets guaranteed by the Greek State, stemming from the difference between the current tax rate for the eligible credit institutions (i.e. 29%) and the tax rate applicable on 30 June 2015 (i.e. 26%). For the year ended 31 December 2021, an amount of € 6.1 million has been recognized in "Other income/(expenses)".

Notes to the Financial Statements

Income tax reconciliation and unused tax losses

The tax on the Bank's profit before tax differs from the theoretical amount that would arise using the applicable tax rates as follows:

	2021 € million	Period 20 March - 31 December 2020 restated € million
Profit/(loss) before tax (note 2.3)	579	315
Tax at the applicable tax rate (note 2.3)	(168)	(91)
Tax effect of:		
- income not subject to tax and non deductible expenses	43	(27)
- write-down of DTA on loan losses	-	(160)
- other	15	(24)
Total tax (charge)/income	(110)	(302)

As at 31 December 2021, the Bank has not recognised deferred tax asset (DTA) on unused tax losses amounting to € 138 million (2020: € 80 million) which can be utilized until 2025.

15. Cash and balances with central banks

	31 December 2021 € million	31 December 2020 € million
Cash in hand	326	272
Balances with central banks	8,047	3,464
Total	8,373	3,736

The Bank is required to hold a minimum level of deposits (minimum reserve requirement - MRR) with the Bank of Greece (BoG) on an average basis over maintenance periods (i.e. six week periods); these deposits are calculated as 1% of certain Bank's liabilities, mainly customers' deposits, and can be withdrawn at any time provided that the MRR is met over the determined period of time. As at 31 December 2021, the whole amount of the deposit with the BoG is considered cash equivalent, as its average balance over the maintenance period exceeds the MRR.

In 2019, the European Central Bank (ECB) decided to introduce a two-tier system for eligible credit institutions' reserve remuneration, which exempts part of excess liquidity holdings (i.e. reserve holdings in excess of MRR) from negative deposit facility rate. The exempted part is determined as a multiple of an institution's MRR (current multiplier has been set at 6).

The excess liquidity resulting, among others, from the increase in customers' deposits and ECB funding as well as the medium-term notes issued by the Bank (notes 32, 30 and 33), contributed to the increase in balances with central banks in 2021.

16. Cash and cash equivalents and other information on cash flow statement

For the purpose of the cash flow statement, cash and cash equivalents comprise the following balances with original maturities of three months or less:

	31 December 2021 € million	31 December 2020 € million
Cash and balances with central banks (excluding mandatory and collateral deposits with central banks) (note 15)	8,374	3,736
Due from credit institutions	132	280
Total	8,506	4,016

Notes to the Financial Statements

Other (income)/losses on investment securities presented in operating activities are analyzed as follows:

	31 December 2021 € million	31 December 2020 € million
Amortisation of premiums/discounts and accrued interest	11	(48)
(Gains)/losses from investment securities	(100)	(418)
Dividends	(1)	(3)
Total	(90)	(469)

Changes in liabilities arising from financing activities

During the year ended 31 December 2021, changes in the Bank's liabilities arising from financing activities, other than lease liabilities (note 40), are attributable to: a) debt issuance amounting to € 1,182 million (2020: € 303 million), (net of issuance costs), b) debt repayment amounting to € 146 million (2020: € 1,152 million) and c) accrued interest and amortisation of debt issuance costs amounting to € 10.2 million (2020: € 8 million).

17. Due from credit institutions

	31 December 2021 € million	31 December 2020 € million
Pledged deposits with banks	2,610	3,212
Placements and other receivables from banks	390	281
Current accounts and settlement balances with banks	100	80
Total	3,100	3,573

Included in due from credit institutions were unsubordinated amounts due from:
-subsidiary undertakings

	904	625
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Included in due from credit institutions were subordinated amounts due from:
-subsidiary undertakings

	67	-
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As at 31 December 2021, the pledged deposits with banks mainly include: a) € 588 million cash collaterals for guarantees relating to the lending activities of banking subsidiaries, b) € 1,984 million cash collaterals on risk mitigation contracts for derivative transactions and repurchase agreements (CSAs, GMRA's), and c) € 37 million cash collateral relating to the sale of former Romanian subsidiaries.

The Bank's exposure arising from credit institutions, as categorized by counterparty's geographical region, is presented in the following table:

	31 December 2021 € million	31 December 2020 € million
Greece	5	3
Other European countries	3,046	3,547
Other countries	49	23
Total	3,100	3,573

Notes to the Financial Statements

18. Securities held for trading

	31 December 2021 € million	31 December 2020 € million
Debt securities (note 5.2.1.3)	50	22
Total	50	22

19. Derivative financial instruments and hedge accounting

The Bank uses derivative financial instruments both for hedging and non-hedging purposes.

The table below presents the fair values of the Bank's derivative financial instruments by product type and hedge relationship along with their notional amounts. The notional amounts of derivative instruments provide a basis for comparison with instruments recognized on the balance sheet but do not necessarily indicate the amounts of future cash flows involved or the current fair value of the instruments and, therefore, are not indicative of the Bank's exposure at the reporting date.

	31 December 2021			31 December 2020		
	Contract/ notional amount € million	Fair values		Contract/ notional amount € million	Fair values	
		Assets € million	Liabilities € million		Assets € million	Liabilities € million
Derivatives for which hedge accounting is not applied/ held for trading						
- Interest rate swaps	30,354	1,748	1,362	29,298	2,486	2,032
- Interest rate options	3,599	41	97	4,440	37	109
- Cross currency interest rate swaps	63	3	3	118	4	4
- Currency forwards/currency swaps	4,765	52	40	4,064	57	49
- Currency options	645	3	3	1,157	8	5
- Commodity derivatives	16	1	0	308	7	6
- Credit default swaps	66	1	1	175	-	2
- Other (see below)	62	0	-	5	0	0
		1,849	1,506		2,599	2,207
Derivatives designated as fair value hedges						
- Interest rate swaps	3,443	80	797	2,890	3	623
- Cross currency interest rate swaps	-	-	-	4	0	0
		80	797		3	623
Derivatives designated as cash flow hedges						
- Interest rate swaps	1,852	30	54	1,727	1	77
- Cross currency interest rate swaps	1,632	0	57	1,682	3	30
		30	111		4	107
Total derivatives assets/liabilities		1,959	2,414		2,606	2,937

Other derivative contracts include warrants and exchange traded equity options.

Information on the fair value measurement and offsetting of derivatives is provided in notes 5.3 and 5.2.1.4, respectively.

The Bank uses certain derivatives and other financial instruments, designated in a qualifying hedge relationship, to reduce its exposure to market risks. The hedging practices applied by the Bank, as well as the relevant accounting treatment are disclosed in note 2.2.3. In particular:

(a) Fair value hedges

The Bank hedges a proportion of its existing interest rate risk resulting from any potential change in the fair value of fixed rate debt securities held or fixed rate loans, denominated both in local and foreign currencies, using interest rate swaps and cross currency interest rate swaps. In 2021, the Bank recognized a loss of € 68 million (2020: € 155 million gain) from changes in the carrying amount

Notes to the Financial Statements

of the hedging instruments, used as the basis of recognizing hedge ineffectiveness and € 76 million gain (2020: € 142 million loss) from changes in the carrying amount of the hedged items attributable to the hedged risk. The amount of hedge ineffectiveness recognized for 2021 in income statement was € 8 million gain (2020: € 13 million gain).

(b) Cash flow hedges

The Bank hedges a proportion of its existing interest rate and foreign currency risk resulting from any cash flow variability on floating rate performing customer loans or floating rate deposits, denominated both in local and foreign currency, or unrecognized highly probable forecast transactions, using interest rate and cross currency interest rate swaps. For the year ended 31 December 2021, an amount of € 51 million gain was recognised in other comprehensive income in relation to derivatives designated as cash flow hedges (2020: € 21 million loss). Furthermore, in 2021, the ineffectiveness recognized in the income statement that arose from cash flow hedges was nil (2020: nil).

In addition, the Bank uses other derivatives, not designated in a qualifying hedge relationship, to manage its exposure primarily to interest rate and foreign currency risks. Non qualifying hedges are derivatives entered into as economic hedges of assets and liabilities for which hedge accounting was not applied. The said derivative instruments are monitored and have been classified for accounting purposes along with those held for trading.

The Bank's exposure in derivative financial assets, as categorized by counterparty's geographical region and industry sector, is presented in the following tables:

	31 December 2021			
	Greece	Other European countries	Other countries	Total
	€ million	€ million	€ million	€ million
Sovereign	1,105	-	-	1,105
Banks	3	480	261	744
Corporate	109	(0)	1	110
Total	1,217	480	262	1,959

	31 December 2020			
	Greece	Other European countries	Other countries	Total
	€ million	€ million	€ million	€ million
Sovereign	1,637	-	-	1,637
Banks	0	455	313	768
Corporate	142	55	4	201
Total	1,779	510	317	2,606

At 31 December 2021 and 2020, the maturity profile of the nominal amount of the financial instruments designated by the Bank in hedging relationships is presented in the tables below:

	31 December 2021								
	Fair Value Hedges					Cash Flow Hedges			
	1 - 3 months	3 - 12 months	1-5 years	Over 5 years	Total	3 - 12 months	1-5 years	Over 5 years	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Interest rate swaps	9	13	475	2,946	3,443	19	728	1,105	1,852
Cross currency interest rate swaps	-	-	-	-	-	48	1,584	-	1,632
Total	9	13	475	2,946	3,443	67	2,312	1,105	3,484

Notes to the Financial Statements

	31 December 2020								
	Fair Value Hedges					Cash Flow Hedges			
	1 - 3 months € million	3 - 12 months € million	1-5 years € million	Over 5 years € million	Total € million	3 - 12 months € million	1-5 years € million	Over 5 years € million	Total € million
Interest rate swaps	-	100	415	2,375	2,890	-	647	1,080	1,727
Cross currency interest rate swaps	-	-	4	-	4	461	1,090	131	1,682
Total	-	100	419	2,375	2,894	461	1,737	1,211	3,409

(a) Fair value hedges

The following tables present data relating to the hedged items under fair value hedges for the years ended 31 December 2021 and 2020:

	31 December 2021		
	Carrying amount € million	Accumulated amount of FV hedge adjustments related to the hedged item € million	Change in value as the basis for recognising hedge ineffectiveness € million
Loans and advances to customers	470	16	(5)
Debt securities AC	2,111	525	182
Debt securities FVOCI	2,362	97	(101)
Total	4,943	638	76

	31 December 2020		
	Carrying amount € million	Accumulated amount of FV hedge adjustments on the hedged item € million	Change in value as the basis for recognising hedge ineffectiveness € million
Loans and advances to customers	270	21	(2)
Debt securities AC	1,412	342	105
Debt securities FVOCI	2,394	198	(245)
Total	4,076	561	(142)

At 31 December 2021, the accumulated amount of fair value hedge adjustments remaining in the balance sheet for any items that have ceased to be adjusted for hedging gains and losses was € 190 million (2020: € 162 million).

(b) Cash flow hedges

The cash flow hedge reserves for continuing hedges as at 31 December 2021 were € 3 million gain (2020: € 48 million loss), of which € 4 million gain (2020: € 4 million gain) relates to loans and advances to customers and € 1 million loss to deposits (2020: € 52 million loss).

As at 31 December 2021, the balances remaining in the cash flow hedge reserve from any cash flow hedging relationships for which hedge accounting is no longer applied was € 19 million loss (2020: € 21 million loss).

The reconciliation of the components of Bank's special reserves including cash flow hedges is provided in note 37.

Notes to the Financial Statements

20. Loans and advances to customers

	31 December 2021 € million	31 December 2020 € million
Loans and advances to customers at amortised cost		
- Gross carrying amount	30,449	32,124
- Impairment allowance	(1,580)	(2,882)
Carrying Amount	28,869	29,241
Loans and advances to customers at FVTPL	23	20
Total	28,892	29,261

The table below presents the carrying amount of loans and advances to customers per business unit and per stage as at 31 December 2021:

	31 December 2021				2020
	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	Total amount € million	Total amount € million
Loans and advances to customers at amortised cost					
Mortgage lending:					
- Gross carrying amount	5,372	2,640	407	8,419	10,207
- Impairment allowance	(16)	(133)	(122)	(271)	(796)
Carrying Amount	5,356	2,507	285	8,148	9,411
Consumer lending:					
- Gross carrying amount	1,285	149	173	1,607	2,027
- Impairment allowance	(26)	(24)	(133)	(183)	(546)
Carrying Amount	1,259	125	40	1,424	1,481
Small Business lending:					
- Gross carrying amount	2,096	657	422	3,175	3,870
- Impairment allowance	(35)	(54)	(195)	(284)	(575)
Carrying Amount	2,061	603	227	2,891	3,296
Wholesale lending ⁽¹⁾⁽²⁾:					
- Gross carrying amount	14,913	925	1,410	17,248	16,019
- Impairment allowance	(54)	(66)	(722)	(842)	(965)
Carrying Amount	14,859	859	688	16,406	15,054
Total loans and advances to customers at AC					
- Gross carrying amount	23,666	4,371	2,412	30,449	32,124
- Impairment allowance	(131)	(277)	(1,172)	(1,580)	(2,882)
Carrying Amount	23,535	4,094	1,240	28,869	29,241
Loans and advances to customers at FVTPL					
Carrying Amount ⁽³⁾				23	20
Total				28,892	29,261

⁽¹⁾ Includes a) € 1,057 million related to the senior note of the Pillar securitization and b) € 2,104 million and € 1,621 million related to the senior notes of the Cairo and the Mexico securitizations respectively, which are under the Hellenic Asset Protection Scheme. The notes have been categorized in Stage 1.

⁽²⁾ Includes loans to public sector.

⁽³⁾ Includes € 9.9 million related to the mezzanine notes of the Pillar, Cairo and Mexico securitizations.

Loans and advances to customers – Project Wave

In December 2021, the Bank, proceeded with the execution of two synthetic risk transfer transactions (projects 'Wave I' and 'Wave II'), in the form of a financial guarantee, of a portfolio of performing SMEs and large corporate loans of € 1.7 billion (reference

Notes to the Financial Statements

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

NPE securitizations

The ultimate parent company's Group (Eurobank Holdings Group, former Eurobank Ergasias S.A. Group, note 1), in the context of the achievement of its NPE reduction targets has entered into the securitization of various classes of primarily NPE through the issue of senior, mezzanine and junior notes, which resulted, as described below, in the derecognition of the underlying loan portfolios and the recognition of the retained notes.

'Cairo' securitization

In June 2019, Eurobank Holdings Group, through the special purpose financing vehicles (SPVs) 'Cairo No. 1 Finance Designated Activity Company', 'Cairo No. 2 Finance Designated Activity Company' and 'Cairo No. 3 Finance Designated Activity Company', issued senior, mezzanine and junior notes of total face value of ca. € 7.5 billion, via a securitization of a mixed portfolio consisting primarily of non-performing loans (NPE) ("Cairo securitization"). In December 2019, the Eurobank Holdings Group announced that it has entered into a binding agreement with doValue S.p.A. for the sale of 20% of the mezzanine and 50.1% of the junior notes of "Cairo securitization".

In the context of Law 4649/2019 ('Hercules' – Hellenic Asset Protection Scheme) voted by the Greek parliament on 16 December 2019, the "Cairo" SPVs opted in for the state guarantee scheme. Specifically, the applications submitted by the Eurobank Holdings Group to the Ministry of Finance were approved on 23 July 2020 while the Guarantee deed was signed on 25 February 2021.

As of 20 March 2020, following the hive down of Eurobank Ergasias S.A. banking's sector (note 1), the Eurobank S.A. Group recognised on its balance sheet 100% of the senior notes and 5% of mezzanine and junior notes of "Cairo securitization" with carrying amount € 2,432 million at 31 December 2021 of which € 2,108 million are held by the Bank (2020: € 2,444 million held by the Bank).

In June 2020, the above sale from Eurobank Holdings of 20% of the mezzanine and 50.1% of the junior notes was completed and, as a result, the Eurobank Holdings Group ceased to control the Cairo SPVs on the basis that it does not have the power to direct their relevant activities. Furthermore, in June 2020, Eurobank Holdings proceeded to the contribution of the retained Cairo notes, i.e. 75% of the mezzanine and 44.9% of the junior notes, to its Cyprus-based subsidiary Mairanus Ltd, renamed to 'Cairo Mezz Plc', in exchange for the newly-issued shares of the aforementioned subsidiary, which were distributed to Eurobank Holdings' shareholders.

In September 2020, following the completion of the distribution of the Cairo Mezz Plc shares, the underlying loan portfolio and the related assets and liabilities were derecognized from Eurobank Holdings Group balance sheet, on the basis that at that time the Group transferred substantially all risks and rewards of the portfolio's ownership and ceased to have control over the securitized portfolio. In addition, the Eurobank Holdings Group also recognized the aforementioned retained notes, i.e. 100% of the senior notes, 5% of mezzanine and junior notes, on its balance sheet.

'Pillar' securitization

In June 2019, Eurobank Holdings Group, through the special purpose financing vehicle (SPV) 'Pillar Finance Designated Activity Company' issued senior, mezzanine and junior notes of total value of ca. € 2 billion, via a securitization of residential mortgage primarily NPE. In September 2019, Eurobank Holdings Group sold 95% of the above-mentioned mezzanine and junior notes to Celidoria S.A R.L. Upon the completion of the sale, the Eurobank Holdings Group ceased to control the SPV and derecognized the underlying loan portfolio in its entirety, on the basis that it transferred substantially all the risks and rewards of the underlying loan portfolio's ownership. In addition, the Eurobank Holdings Group recognized the retained notes, i.e. 100% of the senior, 5% of the mezzanine and junior notes, on its balance sheet. The said notes are also recognised on the balance sheet of Eurobank S.A. with carrying amount € 1,060 million at 31 December 2021 (2020: € 1,061 million).

20.1 Project "Mexico" – loans' derecognition

In line with the regulatory framework and Single Supervisory Mechanism (SSM) requirements for the non-performing loans (NPE) management, the Bank contemplated another significant NPE securitization transaction (project 'Mexico') in order to decrease

Notes to the Financial Statements

further its NPE ratio and strengthen its balance sheet de-risking. The project “Mexico” represents the continuation of the NPE reduction plan that was successfully completed in 2020, where NPE are transferred to Eurobank Holdings (parent company), the group company responsible for the overall management and supervision of the Group’s NPE. The project “Mexico” was included under the Hellenic Asset Protection Scheme (HAPS) thus became entitled to the Greek State’s guarantee which was subject to the accounting derecognition of the underlying loan portfolio from the Group’s balance sheet.

In particular, in May 2021, the Bank, through its special purpose financing vehicle ‘Mexico Finance Designated Activity Company’ (SPV), issued senior (Class A), mezzanine (Class B) and junior (Class C) notes of total nominal amount of ca. € 5.2 billion, via a securitization of a mixed portfolio comprising primarily NPE of total principle amount due of ca. € 5.2 billion and gross carrying amount of ca. € 3.2 billion, which were fully retained by the Bank (note 33). The control of the SPV resides with the majority holder of the Class B notes. Accordingly, the Group, being the sole holder of the issued notes, controlled the SPV and the related real estate company ‘Mexico Estate Single Member S.A.’, and continued recognizing the underlying loan portfolio on its balance sheet on the basis that it retained substantially all risks and rewards of the portfolio’s ownership.

On 1 June 2021, the General Shareholders’ Meeting of the Bank (GM), following the relevant decision of its Board of Directors (BoD), approved the distribution of the 95% of the mezzanine and junior notes of Mexico securitization to its parent company through the decrease in kind of the Bank’s share capital. The aforementioned GM’s approval for the Bank’s share capital reduction and the relevant amendment of its articles of association were subject to the regulator’s approval. In August 2021, the Bank was granted the required regulatory approval by the European Central Bank (ECB) and the relevant amendments of its articles of association were subsequently approved by the Ministry of Developments and Investments and registered to the General Electronic Commercial Registry (G.E.M.I.).

The distribution in kind of the Bank to its parent company though a share capital reduction constitutes a common control transaction within the scope of IAS 32 ‘Financial Instruments: Presentation’. However, the above accounting standard does not shed light on the various issues arising in non cash distributions, such as the amount to be recorded in equity as well as whether recording of the transaction should be performed in fair values or book values. On the other hand, IFRIC 17 ‘Distributions of Non-cash Assets to Owners’, that specifies the use of fair values in specific types of distributions, does not apply to common control transactions, which are explicitly excluded from its scope. Considering the scope limitation of IFRIC 17, the Bank applied the use of book values in intercompany distributions of non-cash assets, consistently with the accounting policies already applied in other types of common control transactions. Therefore, the reduction of the Bank’s total equity of € 118 million was determined by the book value of the assets distributed.

The settlement of the aforementioned distribution in kind of the Bank to its parent company, that took place in September 2021, resulted in the de-recognition of the underlying loan portfolio and the related assets and liabilities from the Bank’s balance sheet, on the basis that the latter transferred substantially all risks and rewards of the portfolio’s ownership and relinquished its control over it. Accordingly, as of the distribution’s settlement date, the Bank (a) derecognized the underlying loan portfolio of carrying amount € 1,589 million, comprising loans with gross carrying amount of € 3,050 million which carried an impairment allowance of € 1,460 million, the related securitization’s receivables and payables of € 124 million and € 33 million respectively, and the impairment allowance of the letters of guarantee of € 1 million included in the underlying portfolio and (b) recognized the retained notes, ie. 100% of the senior and 5% of the mezzanine and junior notes of Mexico securitization, at fair value. In addition, the Bank ceased to control the SPV and the related real estate company, which resides with the majority stake of Class B noteholders.

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

Further information about the NPE securitisation transaction (Project “Mexico”) is provided in the note 20.1 of the consolidated financial statements of Eurobank Holdings for the year end 31 December 2021.

Notes to the Financial Statements

21. Impairment allowance for loans and advances to customers

The following tables present the movement of the impairment allowance on loans and advances to customers (expected credit losses – ECL):

	31 December 2021												
	Wholesale			Mortgage			Consumer			Small business			Total
	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
Impairment allowance as at 1 January	68	88	809	22	150	624	28	47	470	29	113	432	
New loans and advances originated or purchased	14	-	-	0	-	-	12	-	-	4	-	-	30
Arising from acquisitions	0	5	202	-	-	-	-	-	-	0	0	68	275
Transfers between stages													
- to 12-month ECL	9	(9)	(0)	16	(15)	(1)	17	(14)	(3)	36	(35)	(1)	-
- to lifetime ECL	(5)	8	(3)	(6)	76	(70)	(1)	17	(16)	(2)	22	(20)	-
- to lifetime ECL credit-impaired loans	(0)	(21)	21	(1)	(16)	17	(1)	(12)	13	(2)	(18)	20	-
Impact of ECL net remeasurement	(32)	(3)	107	(16)	(31)	185	(28)	(13)	111	(30)	(4)	100	346
Recoveries from written - off loans	-	-	1	-	-	0	-	-	6	-	-	2	9
Loans and advances derecognised during the year ⁽²⁾	0	(3)	(228)	(0)	(34)	(561)	(0)	(1)	(304)	(0)	(25)	(310)	(1,466)
Amounts written off ⁽³⁾	-	-	(152)	-	-	(70)	-	-	(100)	-	-	(76)	(398)
Unwinding of Discount	-	-	(17)	-	-	(7)	-	-	(5)	-	-	(8)	(37)
Foreign exchange and other movements	(0)	1	(18)	1	3	5	(1)	(0)	(40)	0	1	(13)	(61)
Impairment allowance as at 31 December	54	66	722	16	133	122	26	24	132	35	54	194	1,580

Notes to the Financial Statements

Period 20 March - 31 December 2020													
Wholesale			Mortgage			Consumer			Small business			Total € million	
12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL-Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		
50	68	928	11	158	627	26	36	588	15	93	454	3,053	
19	-	-	1	-	-	3	-	-	15	-	-	37	
8	(8)	(0)	19	(19)	(1)	8	(6)	(2)	15	(15)	(1)	-	
(13)	21	(8)	(1)	73	(73)	(2)	22	(20)	(2)	17	(15)	-	
(0)	(3)	3	(0)	(7)	7	(0)	(5)	6	(0)	(5)	5	-	
4	10	84	(10)	(54)	162	(6)	1	31	(12)	22	76	307	
-	-	5	-	-	0	-	-	1	-	-	0	6	
-	-	(0)	(0)	-	(0)	(0)	(0)	(0)	(0)	-	(0)	(1)	
-	-	(161)	-	-	(72)	-	-	(116)	-	-	(76)	(425)	
-	-	(15)	-	-	(9)	-	-	(5)	-	-	(9)	(38)	
2	(0)	(27)	2	(1)	(17)	(1)	(0)	(12)	(1)	(0)	(2)	(57)	
68	88	809	22	150	624	28	47	470	29	113	432	2,882	

⁽¹⁾ The movement of impairment allowance is presented from 1 April, onwards

⁽²⁾ It represents the impairment allowance of loans derecognized due to a) securitization and sale transactions (note 20) and b) substantial modifications of the loans' contractual terms.

⁽³⁾ The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2021 and that are still subject to enforcement activity is € 186 million (2020: € 424 million).

Notes to the Financial Statements

The impairment losses relating to loans and advances to customers recognized in the Bank's income statement for the year ended 31 December 2021 amounted to € 323 million (2020: € 444 million) and are analyzed as follows:

	2021 € million	Period 20 March - 31 December 2020 € million
Impairment loss on loans and advances to customers	(376)	(345)
Modification gain/(loss) on loans and advances to customers	21	(4)
Impairment (loss)/ reversal for credit related commitments	32	(96)
Total	(323)	(444)

22. Investment securities

	31 December 2021 € million	31 December 2020 € million
Investment securities at FVOCI	4,980	4,274
Investment securities at amortized cost	3,932	2,099
Investment securities at FVTPL	82	90
Total	8,994	6,463

Note: Information on debt securities of the investment portfolio is presented in note 5.2.1.3.

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

Hellenic Bank is one of the largest financial institutions in Cyprus, active in personal, business and international banking. The above investment is aligned with the overall strategy of the Group to further strengthen its presence in all key markets in which retains a strategic interest and thus has been designated at FVOCI. Its fair value as at 31 December 2021 amounted to € 44 million.

GGBs swap transaction

In December 2020, the Public Debt Management Agency (PDMA) proceeded to an offer to repurchase specific Greek government bonds (GGBs) held by the Bank of face value € 1.2 billion held at the amortised cost portfolio, against a cash consideration of € 1.5 billion equal to their market value. At the same time, the PDMA proceeded to the re-opening of a GGB of face value € 0.5 billion that was offered to the Bank against cash consideration of € 0.8 billion, equal to its market value.

Accordingly, the original bonds were derecognized from the Bank's balance sheet with a resulting gain of € 139 million, net of any hedging effect. The new GGB was also classified within the hold-to-collect portfolio measured at amortised cost.

In December 2021, the Hellenic Republic, in the context of its Liability Management, invited all holders of specific Greek Government Bonds (GGBs) issued under the PSI in 2012 with maturities ranging from 2023 to 2042 ("Designated securities") to offer to exchange these securities for specified series of GGBs ending in 2027, 2033, 2037 and 2042 ("Benchmark securities"), aiming to substitute the old PSI bonds that presented low trading activity in the market with significantly liquid GGBs that were issued in the context of the Hellenic Republic's Liability Management Exercise in 2017.

Pursuant to the above invitation, the Bank offered for exchange GGBs of face value € 108 million recognized under the amortised cost portfolio. The exchange was accounted for as a modification of the Designated Securities with no significant impact, as the terms of the Benchmark securities were not considered to be substantially different than those of the Designated Securities.

Notes to the Financial Statements

22.1 Movement of investment securities

The tables below present the movement of the carrying amount of investment securities per measurement category and per stage:

	31 December 2021					Total € million
	Debt securities at FVOCI		Investment securities at AC	Investment securities at FVTPL	Equity securities at FVOCI	
	12-month ECL- Stage 1	Lifetime ECL - Stage 2	12-month ECL- Stage 1			
	€ million	€ million	€ million	€ million	€ million	
Gross carrying amount at 1 January	4,264	10	2,103	90	-	6,467
Additions, net of disposals and redemptions	755	-	1,619	(12)	41	2,403
Transfers between stages	2	(2)	-	-	-	-
Net gains/(losses) from changes in fair value for the year	(112)	1	-	3	3	(105)
Amortisation of premiums/discounts and interest	(11)	(0)	(0)	0	-	(11)
Changes in fair value due to hedging	-	-	183	-	-	183
Exchange adjustments and other movements	29	0	33	1	-	63
Gross carrying amount at 31 December	4,927	9	3,938	82	44	9,000
Impairment allowance	-	-	(6)	-	-	(6)
Net carrying amount at 31 December	4,927	9	3,932	82	44	8,994

	20 March - 31 December 2020					Total € million
	Debt securities at FVOCI		Investment securities at AC	Investment securities at FVTPL		
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	12-month ECL- Stage 1			
	€ million	€ million	€ million	€ million	€ million	
Gross carrying amount - Opening balance	5,125	-	1,792	82	-	6,999
Additions, net of disposals and redemptions	(1,353)	-	190	0	-	(1,163)
Transfers between stages	(10)	10	-	-	-	-
Net gains/(losses) from changes in fair value for the period	505	1	-	8	-	514
Amortisation of premiums/discounts and interest	34	0	14	0	-	48
Changes in fair value due to hedging	-	-	105	-	-	105
Exchange adjustments and other movements	(37)	(1)	2	0	-	(35)
Gross carrying amount at 31 December	4,264	10	2,103	90	-	6,468
Impairment allowance	-	-	(4)	-	-	(4)
Net carrying amount at 31 December	4,264	10	2,099	90	-	6,464

Notes to the Financial Statements

22.2 Movement of ECL

The table below presents the ECL movement per portfolio, including ECL movement analysis per stage:

	31 December 2021			20 March - 31 December 2020		
	Measured at	Measured	Total	Measured at	Measured at	Total
	amortised cost	at FVOCI		amortised cost	FVOCI	
	€ million	€ million	€ million	€ million	€ million	€ million
Opening Balance	4	9	13	5	9	14
New financial assets purchased	8	7	15	3	3	6
- of which 12-month ECL - Stage 1	8	7	15	3	3	6
Transfers between stages						
- (from)/to 12-month ECL	-	0	0	-	(1)	(1)
- (from)/to lifetime ECL - Stage 2	-	(0)	(0)	-	1	1
Remeasurement due to change in ECL risk parameters	(6)	(5)	(11)	(2)	(1)	(3)
- of which 12-month ECL - Stage 1	(6)	(5)	(11)	(2)	(1)	(3)
- of which lifetime ECL - Stage 2	-	(0)	(0)	-	(0)	(0)
Financial assets disposed during the year	(0)	(1)	(1)	(2)	(2)	(4)
- of which 12-month ECL - Stage 1	(0)	(1)	(1)	(2)	(2)	(4)
Financial assets redeemed during the year	-	(0)	(0)	-	(0)	(0)
Foreign exchange and other movements	-	0	0	-	(0)	(0)
Balance as at 31 December	6	10	16	4	9	13

22.3 Equity reserve: revaluation of the investment securities at FVOCI

Gains and losses arising from the changes in the fair value of investment securities at FVOCI are recognized in a corresponding revaluation reserve in equity. The movement of the reserve is as follows:

	31 December 2021 € million	Period 20 March - 31 December 2020 € million
Opening Balance	347	273
Net gains/(losses) from changes in fair value	(109)	506
Tax (expense)/benefit	32	(147)
	(77)	360
Net (gains)/losses transferred to net profit on disposal	(99)	(650)
ECL transferred to net profit	2	3
Tax (expense)/benefit on net (gains)/losses transferred to net profit on disposal	29	189
Tax (expense)/benefit on ECL transferred to net profit	(1)	(1)
	(69)	(459)
Net (gains)/losses transferred to net profit from fair value hedges	101	245
Tax (expense)/benefit	(29)	(71)
	72	174
Balance at 31 December	273	347

Notes to the Financial Statements

23. Shares in subsidiaries

The following is a listing of the Bank's subsidiaries (percentage holdings held directly by the Bank) as at 31 December 2021:

<u>Name</u>	<u>Note</u>	<u>Percentage holding</u>	<u>Country of incorporation</u>	<u>Line of business</u>
Eurobank Asset Management Mutual Fund Mngt Company Single Member S.A.		100.00	Greece	Mutual fund and asset management
Eurobank Equities Investment Firm Single Member S.A.		100.00	Greece	Capital markets and advisory services
Eurobank Leasing Single Member S.A.	23.1	100.00	Greece	Leasing
Eurobank Factors Single Member S.A.		100.00	Greece	Factoring
Hellenic Post Credit S.A.		50.00	Greece	Credit card management and other services
Herald Greece Single Member Real Estate development and services S.A. 1		100.00	Greece	Real estate
Herald Greece Single Member Real Estate development and services S.A. 2		100.00	Greece	Real estate
Standard Single Member Real Estate S.A.	g	100.00	Greece	Real estate
Cloud Hellas Single Member Ktimatiki S.A.		100.00	Greece	Real estate
Piraeus Port Plaza 1 Single Member Development S.A.		100.00	Greece	Real estate
(Under liquidation) Real Estate Management Single Member S.A.		100.00	Greece	Real estate services
(Under liquidation) Anchor Hellenic Investment Holding Single Member S.A.		100.00	Greece	Real estate
Vouliagmeni Residence Single Member S.A.		100.00	Greece	Real estate
Athinaiki Estate Investments Single Member S.A.		100.00	Greece	Real estate
Piraeus Port Plaza 2 Development S.A.		49.00	Greece	Real estate
Piraeus Port Plaza 3 Development S.A.		49.00	Greece	Real estate
Tenberco Properties Development and Exploitation Single Member S.A.		100.00	Greece	Real estate
Value Touristiki S.A.	c	49.00	Greece	Real estate
Village Roadshow Operations Hellas S.A. ⁽¹⁾		100.00	Greece	Cinema entertainment services
Eurobank Bulgaria A.D.		56.14	Bulgaria	Banking
IMO 03 E.A.D. ⁽¹⁾	b	100.00	Bulgaria	Real estate services
ERB Hellas (Cayman Islands) Ltd		100.00	Cayman Islands	Special purpose financing vehicle
Berberis Investments Ltd		100.00	Channel Islands	Holding company
NEU Property Holdings Ltd	j	100.00	Cyprus	Holding company
Staynia Holdings Ltd		100.00	Cyprus	Holding company
Sagiol Ltd		100.00	Cyprus	Holding company
Macoliq Holdings Ltd		100.00	Cyprus	Holding company
Senseco Trading Limited	c	100.00	Cyprus	Holding company
Eurobank Private Bank Luxembourg S.A.		100.00	Luxembourg	Banking
Eurobank Fund Management Company (Luxembourg) S.A.		99.99	Luxembourg	Fund management
ERB New Europe Funding B.V.		100.00	Netherlands	Finance company
ERB New Europe Holding B.V.		100.00	Netherlands	Holding company
ERB IT Shared Services S.A.	i	0.30	Romania	Informatics data processing
Eliade Tower S.A.		99.99	Romania	Real estate
Retail Development S.A.		99.99	Romania	Real estate
Seferco Development S.A.		99.99	Romania	Real estate
Eurobank Direktna a.d.	e	46.89	Serbia	Banking
ERB Leasing A.D. Beograd-in Liquidation		17.51	Serbia	Leasing
Reco Real Property A.D. Beograd		100.00	Serbia	Real estate
ERB Istanbul Holding A.S. in liquidation	h	100.00	Turkey	Holding company
ERB Hellas Plc		99.99	United Kingdom	Special purpose financing vehicle
Karta II Plc		-	United Kingdom	Special purpose financing vehicle
Astarti Designated Activity Company		-	Ireland	Special purpose financing vehicle
ERB Recovery Designated Activity Company		-	Ireland	Special purpose financing vehicle

⁽¹⁾ The company has been classified as a held for sale subsidiary (note 29).

In addition, the following entities are controlled by the Bank:

(i) the Bank's special purpose financing vehicles and the related holding entities, which are dormant and/or are under liquidation: Themeleion III Holdings Ltd, Themeleion IV Holdings Ltd, Themeleion Mortgage Finance Plc, Themeleion II Mortgage Finance Plc, Themeleion III Mortgage Finance Plc, Themeleion IV Mortgage Finance Plc, Themeleion V Mortgage Finance Plc, Themeleion VI Mortgage Finance Plc, Anaptyxi APC Ltd, Byzantium II Finance Plc and Maximus Hellas Designated Activity Company.

Notes to the Financial Statements

(ii) the holding entity of Karta II Plc: Karta II Holdings Ltd.

(iii) dormant entity: Enalios Real Estate Development S.A.

(iv) entities controlled by the Bank pursuant to the terms of the relevant share pledge agreements: Finas S.A., Rovinvest S.A., Provet S.A. and Promivet S.A.

(a) Grivalia New Europe S.A., Luxembourg

In January 2021, the liquidation of the company was completed.

(b) IMO 03 E.A.D., Bulgaria

In March 2021, the Bank signed an agreement with NEU 03 Property Holdings Ltd, a company indirectly controlled by the Bank, for the transfer of the shares held in IMO 03 E.A.D. to the Bank. Consequently, as of March 2021, the whole of the issued share capital of the company was held directly by the Bank. In addition, in the second quarter of 2021, the share capital of IMO 03 E.A.D. increased by € 15.8 million.

(c) Senseco Trading Ltd, Cyprus and Value Touristiki S.A., Greece

In April 2021, the Bank acquired 100% of the shares and voting rights of Senseco Trading Limited which held 51% of the shares and voting rights of the Bank's joint venture Value Touristiki S.A. for a cash consideration of € 6.7 million. Consequently, as of April 2021, Value Touristiki S.A. became subsidiary of the Bank.

(d) Special purpose financing vehicle for the securitization of Bank's loans and related real estate company

In May 2021, in the context of the management of its non performing exposures (NPE) the Bank, through its special purpose financing vehicle Mexico Finance Designated Activity Company, proceeded with the securitization of a mixed assets portfolio of primarily NPE and established the related real estate company Mexico Estate Single Member S.A. On 1 June 2021, the General Shareholders' Meeting of the Bank (GM), approved the distribution of the 95% of the mezzanine and junior notes of Mexico securitization to its parent company through the decrease in kind of the Bank's share capital. Following the settlement of the aforementioned distribution in kind of the Bank to its parent company, that took place in September 2021, the Bank ceased to control the special purpose financing vehicle Mexico Finance Designated Activity Company and the related real estate company Mexico Estate Single Member S.A. (note 20.1).

(e) Eurobank A.D. Beograd, Serbia

On 1 July 2021, the Bank announced that it has concluded an agreement with the shareholders of Direktna Banka a.d. Kragujevac ("Direktna"), for the merger of Direktna with Eurobank's subsidiary in Serbia, Eurobank a.d. Beograd ("Eurobank Serbia") (the "Transaction"), with absorption of Direktna by Eurobank Serbia. Additionally, in August 2021 the Bank acquired the shares from the remaining shareholders of Eurobank Serbia, which accounted for 0.01% of the company's share capital, for a cash consideration of € 0.03 million and accordingly, the Bank's direct participation in Eurobank Serbia increased from 55.80% to 55.81%. In December 2021, the Transaction was concluded, following the receipt of the relevant customary approvals by the competent regulatory and supervisory authorities and the combined bank was renamed to Eurobank Direktna a.d. Part of the Transaction was the payment of a dividend/capital return to the Bank of € 132 million, and a share capital increase of € 16 million. As a result of the merger, the Bank's percentage holding in Eurobank Direktna a.d. was decreased to 46.89%. Further information about the Transaction is provided in note 23.2 of the consolidated financial statements for the year ended 31 December 2021.

(f) Eurobank Holding (Luxembourg) S.A. under liquidation, Luxembourg

In September 2021, the liquidation of the company was decided and its dissolution was completed in December 2021.

(g) Standard Single Member Real Estate S.A., Greece

In October 2021, following the demerger of Eurobank Ergasias Leasing Single Member S.A., the percentage holding of the Demerged Entity in Standard Real Estate S.A. was transferred to the Bank. Accordingly, the Bank's direct participation to the company increased from 1.25% to 94.10%. In addition, in December 2021, the Bank signed a shares sale and purchase agreement with the other shareholder of Standard Real Estate S.A. for the acquisition of the remaining shares (5.90%) in the company for a cash consideration of € 0.1 million. As a result, Standard Real Estate S.A. became a wholly owned subsidiary of the Bank. In January 2022, following the above transaction, the name of the company was amended with the inclusion of the term "Single member".

(h) ERB Istanbul Holding A.S. in liquidation, Turkey

In December 2021, the liquidation of the company was decided and accordingly its name was amended to ERB Istanbul Holding A.S. in liquidation.

Notes to the Financial Statements

(i) ERB IT Shared Services S.A., Romania

In December 2021, the share capital increase of the company by € 4 million was fully covered by the Bank's subsidiary ERB New Europe Holding BV. Accordingly, the Bank's direct participation to the company decreased from 0.45% to 0.30%.

(j) NEU Property Holdings Ltd, Cyprus

In December 2021, the share capital of NEU Property Holdings Ltd increased by € 7 million.

Post balance sheet events

Piraeus Port Plaza 2 Development S.A., Piraeus Port Plaza 3 Development S.A. and Value Touristiki S.A., Greece

In January and February 2022, the Bank signed agreements with its subsidiaries Sagiol Ltd, Macoliq Holdings Ltd and Senseco Trading Limited for the transfer of the shares of Piraeus Port Plaza 2 Development S.A. (PPP2), Piraeus Port Plaza 3 Development S.A. (PPP3) and Value Touristiki S.A. held by Sagiol Ltd, Macoliq Holdings Ltd and Senseco Trading Limited, respectively, to the Bank. Accordingly, the Bank's direct participations to PPP2, PPP3 and Value Touristiki increased from 49% to 100%.

(Under liquidation) Real Estate Management Single Member S.A., Greece

In February 2022, the liquidation of the company was completed.

Hellenic Post Credit S.A., Greece

In February 2022, the Bank reached an agreement with the other shareholder for the acquisition of the remaining 50% of the share capital of Hellenic Post Credit S.A.

IMO-II Property Investments S.A., Romania

In March 2022, the share capital increase of IMO-II Property Investments S.A., a company indirectly controlled by the Bank, was fully covered by the Bank. Accordingly, the Bank's direct participation to the company reached 99.12%.

23.1 Demerger of Eurobank Ergasias Leasing Single Member S.A.

In June 2021, in the context of the optimization of the Group's organizational structure and the enhancement of its competitiveness in the leasing market, the Extraordinary General Shareholders' Meetings of the Bank and its wholly owned subsidiary Eurobank Ergasias Leasing Single Member S.A. resolved the approval of the demerger of Eurobank Ergasias Leasing Single Member S.A. ("Demerged Entity") through (i) the transfer of part of its assets and liabilities to the Bank and (ii) the establishment of a new company through the transfer of the remaining part of the assets and liabilities of the Demerged Entity.

The aforementioned demerger was completed in October 2021, after receiving the required approvals by the competent Authorities, while a new company "Eurobank Leasing Single Member S.A" was established for this purpose, as described above. Moreover, the deregistration of the demerged entity "Eurobank Ergasias Leasing Single Member S.A." from the General Commercial Registry was completed.

In line with the Bank's accounting policy for legal mergers that involve the combination of the Bank with one or more of its subsidiaries, the transfer of the Demerged Entity's assets and liabilities to the Bank was performed at their pre-combination carrying amounts under the pooling of interests method.

Notes to the Financial Statements

The assets and liabilities of the Demerged Entity that were transferred to the Bank along with the effect on Bank's reserves resulting from the aforementioned demerger are presented in the below table.

	€ million
Assets	
Loans and advances to customers	268
<i>of which intercompany balances with the Group</i>	22
Investment property	40
Other assets	93
<i>of which repossessed assets</i>	85
<i>of which Real estate properties classified as held for sale</i>	3
<i>of which intercompany balances with the Bank</i>	2
Total assets	401
Liabilities	
Due to credit institutions	515
<i>of which intercompany balances with the Bank</i>	515
Other liabilities	2
Total liabilities	517
Net assets	(116)
Plus:	
Investment cost in the new company	
"Eurobank Leasing Single Member S.A"	66
Net effect on Bank's equity	(50)

24. Investments in associates and joint ventures

The following is the listing of the Bank's associates and joint ventures (percentage holdings held directly by the Bank) as at 31 December 2021:

<u>Name</u>	<u>Note</u>	<u>Country of incorporation</u>	<u>Line of business</u>	<u>Percentage Holding</u>
Femion Ltd		Cyprus	Special purpose investment vehicle	66.45
(Under liquidation) Tefin S.A.		Greece	Dealership of vehicles and machinery	50.00
Sinda Enterprises Company Ltd		Cyprus	Special purpose investment vehicle	48.00
Global Finance S.A.		Greece	Investment financing	9.91
Odyssey GP S.a.r.l.		Luxembourg	Special purpose investment vehicle	20.00
Eurolife FFH Insurance Group Holdings S.A.		Greece	Holding company	20.00
Alpha Investment Property Commercial Stores S.A.		Greece	Real estate	30.00
Peirga Kythnou P.C.		Greece	Real estate	50.00
Grivalia Hospitality S.A.	b	Luxembourg	Real estate	25.00
Information Systems Impact S.A	e	Greece	Information systems services	23.50
doValue Greece Loans and Credits Claim Management S.A.	a	Greece	Loans and Credit Claim Management	20.00
Perigenis Business Properties S.A.		Greece	Real estate	18.90
Intertech S.A. - International Technologies ⁽¹⁾		Greece	Trade - import of electrical and electronic products	29.36

⁽¹⁾ The holding in the company has been classified as held for sale (note 29).

(a) doValue Greece Loans and Credits Claim Management S.A., Greece

On 31 March 2021, the Board of Directors of "doValue Greece Loans and Credits Management S.A." ("doValue Greece") approved the draft terms of the merger by way of absorption of "doValue Hellas Credit and Loan Servicing S.A." by doValue Greece, in accordance with the provisions of Law 4601/2019, Law 4548/2018, article 54 of Law 4172/2013 and article 16 par. 18 of Law 2515/1997, as in force. The merger was approved by the General Meetings of the shareholders of each of the merging companies and by the competent authorities in July and August 2021, respectively. Upon completion of the merger in August 2021, and based on the exchange ratio agreed by the merging companies pursuant to acceptable valuation methods, doValue SpA, as the sole shareholder of doValue Hellas, received 1,418,880 new common shares of doValue Greece in exchange for the shares of doValue

Notes to the Financial Statements

Hellas. As a result, the Bank's shareholding in doValue Greece was initially reduced to 19.791% and was subsequently restored to 20% through the acquisition of 283,776 shares of the company.

(b) Grivalia Hospitality S.A., Luxembourg

In the first quarter of 2021, the Bank participated in the share capital increase of the company with an amount of € 6.25 million.

(c) Value Touristiki S.A., Greece

As of April 2021, Value Touristiki S.A. ceased to be a Bank's joint venture and became a subsidiary of the Bank (note 23).

(d) Famar S.A., Luxembourg

In the year ended 31 December 2021, the liquidation of Famar S.A. was completed.

(e) Information Systems Impact S.A., Greece

In November 2021, following the exercise of a call option, the Bank signed a shares sale and purchase agreement for the acquisition of an additional 8.5% in the share capital of Information Systems Impact S.A. for a cash consideration of € 1.05 million. Following the above transaction the Bank's percentage holding in Information Systems Impact S.A. was increased from 15% to 23.50%.

(f) Alpha Investment Property Kefalariou S.A., Greece

In December 2021, the Bank signed a shares sale and purchase agreement for the disposal of its participation interest of 41.67% in Alpha Investment Property Kefalariou S.A. to a third party for a cash consideration of € 6.35 million. The resulting loss from the transaction of € 1.2 million was recognized in "Other income/(expenses)".

Post balance sheet event

Grivalia Hospitality S.A., Luxembourg

On 24 March 2022 the Bank signed a Share Purchase Agreement for the disposal of a 5.1% shareholding in its joint venture Grivalia Hospitality S.A. for a total consideration of € 15.9 million. As a result of the transaction, the Bank's shareholding in Grivalia Hospitality S.A. decreased from 25% to 19.9% and in combination with the terms of the revised Shareholders' Agreement signed with the other shareholders on the same date, the Bank ceased to have joint control over the entity and hence has discontinued the use of the equity method of accounting. Following the aforementioned sale, the retained interest in the entity will be carried at FVTPL with any change in the carrying amount to be recognized in the income statement.

25. Property and equipment

	31 December 2021				
	Land, buildings, leasehold improvements	Furniture, equipment, motor vehicles	Computer hardware, software	Right of use assets (RoU) ⁽¹⁾	Total
	€ million	€ million	€ million	€ million	€ million
Cost:					
Balance at 1 January	513	137	405	185	1,240
Arising from demerger (note 23.1)	-	1	-	-	1
Transfers	(12)	(0)	13	-	1
Additions	9	6	23	26	64
Disposals, write-offs & adjustment to RoU ⁽²⁾	(7)	(3)	(1)	31	20
Impairment	(2)	(0)	(1)	-	(3)
Held for sale (note 29)	(1)	-	-	-	(1)
Balance at 31 December	500	141	439	242	1,322
Accumulated depreciation:					
Balance at 1 January	(174)	(118)	(349)	(50)	(691)
Arising from demerger (note 23.1)	-	(1)	-	-	(1)
Transfers	2	0	-	-	2
Disposals, write-offs and adjustment to RoU ⁽²⁾	7	3	1	3	14
Charge for the year	(9)	(4)	(18)	(28)	(59)
Balance at 31 December	(174)	(120)	(366)	(75)	(735)
Net book value at 31 December	326	21	73	167	587

Notes to the Financial Statements

	Period 20 March - 31 December 2020				
	Land, buildings, leasehold improvements € million	Furniture, equipment, motor vehicles € million	Computer hardware, software € million	Right of use assets (RoU) ⁽¹⁾ € million	Total € million
Cost:					
Opening balance	541	136	387	158	1,222
Transfers	(25)	(0)	1	-	(24)
Additions	5	2	18	6	31
Disposals, write-offs & adjustment to RoU ⁽²⁾	(0)	(1)	(1)	21	19
Held for sale (note 29)	(8)	-	-	-	(8)
Balance at 31 December	513	137	405	185	1,240
Accumulated depreciation:					
Balance at 20 March	(169)	(116)	(338)	(32)	(655)
Transfers	2	0	-	-	2
Disposals, write-offs and adjustment to RoU ⁽²⁾	(1)	1	-	2	2
Charge for the period	(8)	(3)	(11)	(20)	(42)
Held for sale (note 29)	2	-	-	-	2
Balance at 31 December	(174)	(118)	(349)	(50)	(691)
Net book value at 31 December	339	19	56	135	549

⁽¹⁾ The respective lease liabilities are presented in "other liabilities" (note 34).

⁽²⁾ It refers to termination, modifications and remeasurements of RoU. It includes the remeasurement from revised estimates of the lease term during the year, considering all facts and circumstances that affect the Bank's housing needs.

As at 31 December 2021, the RoU assets amounting to € 167 million (2020: € 135 million) refer to leased office and branch premises, ATM locations, residential properties of € 163 million (2020: € 130 million) and motor vehicles of € 4 million (2020: € 5 million). Leasehold improvements relate to premises occupied by the Bank for its own activities.

26. Investment property

The Bank applies the fair value model regarding the measurement of Investment Property according to IAS 40 "Investment property".

The movement of investment property is as follows:

	31 December 2021 € million	Period 20 March - 31 December 2020 € million
Opening balance	914	872
Arising from demerger (note 23.1)	40	-
Other transfers	10	24
Additions	2	10
Disposals	(3)	-
Held for Sale (note 29)	(12)	-
Net gain / (loss) from fair value adjustments	33	8
Balance at 31 December	984	914

Changes in fair values of investment property are recognized as gains/(losses) in profit or loss and included in the "Other Income/(expense)" (note 11). All gains/(losses) are unrealized.

During the year ended 31 December 2021, an amount of € 63 million (2020: € 48 million) was recognized as rental income from investment property in income from non banking services (note 8). As at 31 December 2021, the contractual obligations in relation to investment property amounted to approximately € 5.5 million, of which € 4.2 million is associated with property redevelopment.

Notes to the Financial Statements

The main classes of investment property have been determined based on the nature, the characteristics and the risks of the Bank's properties. The fair value measurements of the Bank's investment property, which are categorized within level 3 of the fair value hierarchy, are presented in the below table.

	2021	2020
	€ million	€ million
Residential	1	-
Commercial	968	908
Land Plots	12	6
Industrial	3	-
Total	984	914

The basic methods used for estimating the fair value of the Bank's investment property are the income approach (income capitalization/discounted cash flow method), and the comparative method, which are also used in combination depending on the class of property being valued.

The discounted cash flow method is used for estimating the fair value of the Bank's commercial investment property. Fair value is calculated through the projection of a series of cash flows using explicit assumptions regarding the benefits and liabilities of ownership (income and operating costs, vacancy rates, income growth), including the residual value anticipated at the end of the projection period. To this projected cash flows series, an appropriate, market-derived discount rate is applied to establish its present value.

Under the income capitalization method, also used for the commercial class of investment property, a property's fair value is estimated based on the normalized net operating income generated by the property, which is divided by the capitalization rate (the investor's rate of return).

The comparative method is used for the commercial and land plot classes of investment property. Fair value is estimated based on data for comparable transactions, by analyzing either real transaction prices of similar properties, or by asking prices after performing the necessary adjustments.

The Bank's investment property valuations are performed taking into consideration the highest and best use of each asset that is physically possible, legally permissible and financially feasible.

The main method used to estimate the fair value of the Bank's Investment property portfolio as at 31 December 2021, is the discounted cash flow method. Significant unobservable inputs used in the fair value measurement of the relevant portfolio are the rental income growth and the discount rate. Increase in rental income growth would result in increase in the carrying amount while an increase in the discount rate would have the opposite result. The discount rate used ranges from 7% to 12%. As at 31 December 2021, an increase or decrease of 5% in the discount rate used in the DCF analysis, would result in a downward or upward adjustment of the carrying value of the respective investment properties of € 23 million and € 24 million, respectively.

The Covid-19 outbreak in the past two years affected significantly the economic activity in Greece, as well as Internationally, particularly the sectors of shopping centers, high street retail (excluding hypermarkets) and hospitality. Even though the pandemic seems to come to an end, the full scope of its economic impact on the real estate properties remains uncertain.

However, the activity shown during 2021 in some real estate sectors, such as grade A office buildings in good locations, with several transactions taking place, has resulted in a sufficient volume of comparative data that have been considered in the respective properties' valuations. On the other hand, the retail sector, excluding big boxes and supermarkets, is still under pressure due to the pandemic, whereas the lack of sufficient data in the market does not allow the quantification of any effects relevant to the pandemic.

The Bank's investment property portfolio demonstrated significant resilience to the pressures from the covid-19 pandemic, mainly due to its composition, as it primarily consists of office and big box/supermarket properties, as well as its particular characteristics in terms of the tenant's quality and the terms of the lease contracts, that were taken into account by the valuers in determining the fair value of the Bank's investment properties.

Due to the lower levels of transactional activity in certain real estate market classes, as mentioned above, a high degree of judgment has been applied in determining the estimated cash flows used in the assessment of the fair value of investment properties. Many valuations therefore continue to be reported by professional valuers as being subject to 'material valuation uncertainty' in line with International Valuation Standards, with a higher degree of caution attached to them.

Notes to the Financial Statements

The Bank will continue to monitor closely the effect of the economic environment on the valuation of its investment properties.

27. Intangible assets

The movement of intangible assets referring to purchased or developed software is as follows:

	31 December 2021 € million	Period 20 March - 31 December 2020 € million
Cost:		
Opening Balance	387	358
Additions	54	42
Transfers	(13)	0
Disposals and write-offs	-	(12)
Impairment	(16)	(1)
Balance at 31 December	412	387
Accumulated amortisation:		
Opening Balance	(214)	(203)
Amortization charge for the year	(26)	(18)
Disposals and write-offs	-	7
Balance at 31 December	(240)	(214)
Net book value at 31 December	172	173

During the year ended 31 December 2020, the Bank recognized an impairment loss of € 160 million against the goodwill. As a result, the said goodwill asset was reduced to nil and the carrying amount of the Investment Property was reduced to its recoverable amount, reflecting the fair value of the underlying assets.

28. Other assets

	2021 € million	2020 € million
Receivable from Deposit Guarantee and Investment Fund	706	708
Reposessed properties and relative prepayments	571	491
Pledged amount for a Greek sovereign risk financial guarantee	235	237
Deferred costs and accrued income	78	81
Income tax receivable ⁽¹⁾	23	16
Other guarantees	87	72
Other assets	290	160
Total	1,990	1,765

⁽¹⁾ Includes withholding taxes, net of provisions.

As at 31 December 2021, other assets net of provisions, amounting to € 290 million include, among others, receivables related to (a) prepayments to suppliers, (b) public entities, (c) property management activities, (d) legal cases and (e) settlement balances with customers.

Notes to the Financial Statements

29. Disposal groups classified as held for sale

	2021 € million	2020 € million
Assets of disposal groups		
Real estate properties	29	36
Shares in subsidiaries ⁽¹⁾	6	-
Investments in associates and joint ventures ⁽²⁾	2	-
Credit card acquiring - project Triangle	28	-
Total	65	36
Liabilities of disposal groups		
Credit card acquiring - project Triangle	37	-
Total	37	-

⁽¹⁾ It relates to "Village Roadshow Operations Hellas S.A." and "IMO 03 E.A.D., Bulgaria"

⁽²⁾ It relates to "Intertech S.A."

Real estate properties

At the end of 2019, the Bank, in the context of its strategy for the active management of its real estate portfolio (repossessed, investment properties and own used properties) classified as held for sale (HFS) three pools of real estate assets of total value ca. € 46 million, after their remeasurement in accordance with IFRS 5 requirements. The sale of the aforementioned real estate properties, along with certain additions of real estate assets, has been extended beyond the initially estimated period due to the extraordinary conditions related to Covid-19 pandemic and is currently expected to be completed up to the end of 2022. The Bank remains committed to its plan to sell the aforementioned assets, which continue to be actively marketed for sale, while a number of sales of individual items within the portfolios have already taken place. As at 31 December 2021, the carrying amount of these assets amounted to approximately € 20 million.

In addition, in September 2021, the Bank classified as HFS a real estate portfolio consisting primarily of repossessed, as well as investment properties with a total carrying amount of € 24 million, after their remeasurement in accordance with IFRS 5 requirements, on the basis that their disposal was determined to be highly probable. The portfolio's remeasurement resulted in the recognition of an impairment loss of € 9 million, which was included in the income statement line "Other impairment losses and provisions" (note 13). Following the sale of a significant bulk of real estate assets included in this portfolio, its carrying amount was reduced to approximately € 9 million as at 31 December 2021, while the sale of the remaining real estate assets is expected to be concluded within 2022.

The above non-recurring fair value measurements were categorized as Level 3 of the fair value hierarchy due to the significance of the unobservable inputs used, with no change occurring up to 31 December 2021.

Village Roadshow Operations Hellas S.A. and Intertech S.A. – International Technologies

In the third quarter of 2021, the Bank acquired 100% of the shares and voting rights of Village Roadshow Operations Hellas S.A. for a cash consideration of € 1 million; and 29.48% of the shares and voting rights of Intertech S.A. – International Technologies for a cash consideration of € 2 million. The acquisitions took place following the enforcement of collaterals on the companies' shares under Bank's lending arrangements.

Village Roadshow Operations Hellas S.A. was accounted for as a subsidiary acquired with a view to sale, accordingly, as at 31 December 2021, the Bank's investment in Village Roadshow Operations Hellas S.A. has been classified as held for sale and was measured at its carrying amount of € 1 million, which is considered equal to the fair value of the entity's net assets less costs to sell by reference to the transaction price.

Moreover, as of the acquisition date, the Bank's holding in Intertech S.A. – International Technologies, which is a listed company in Athens Stock Exchange, has been classified as held for sale and was measured at the lower of its carrying amount of € 2 million and fair value less costs to sell based on the market value of the company's shares. In the fourth quarter of 2021, the Bank's shareholding in the company decreased from 29.48% to 29.36% following the sale of shares through the Athens Stock Exchange.

Notes to the Financial Statements

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

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

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

As at 31 December 2021, on the basis of the binding agreement signed between the Bank and Worldline, Eurobank Merchant Acquiring business has been classified as held for sale and measured at the lower of its carrying amount and fair value less costs to sell, in accordance with IFRS 5. Consequently, the associated assets with a carrying amount of € 28 million (mainly relating to due from banks) and the associated liabilities with a carrying amount of € 37 million (mainly relating to credit card transactions under settlement), have been classified as held for sale.

The Transaction is expected to be completed by the second quarter of 2022, subject to obtaining the relevant regulatory approvals.

IMO 03 E.A.D., Bulgaria

In December 2021, the Bank signed an agreement for the sale of its participation interest of 100% in IMO 03 E.A.D. to a third party for a cash consideration of € 5.8 million. The completion of the transaction was subject to terms and conditions provided for in the aforementioned agreement.

Following the above, as of 31 December 2021, the Bank's investment in IMO 03 E.A.D. was classified as held for sale. Hence, the Bank's investment cost was measured in accordance with IFRS 5 requirements at the lower of its carrying amount and fair value less costs to sell, resulting in the recognition of an impairment loss of € 10 million, and reached € 5.8 million.

Post balance sheet event

In February 2022, the sale of IMO 03 E.A.D. was completed.

30. Due to central banks

	2021 € million	2020 € million
Secured borrowing from ECB	<u>10,813</u>	<u>7,231</u>

In the face of the Covid-19 pandemic's outbreak, the European Central Bank (ECB) introduced a number of modifications to the terms of the targeted longer-term refinancing operations (TLTRO III) in order to support the continuous access of households and firms to bank credit.

In particular, the interest rate on TLTRO III facilities was reduced to -0.50% for the period from June 2020 to June 2021, while for the banks subject to meeting the required lending thresholds for the reference period ended 31 March 2021, the interest rate for the abovementioned period is capped at -1% (i.e. the minimum of the average deposit facility rate minus 0.5% and the rate of -1%). Additionally, based on the ECB's decision in January 2021, the reduction of interest rate to -0.5% is extended to the period from June 2021 to June 2022 (also capped at -1%), provided that certain net lending thresholds for the additional observation period ended 31 December 2021 are met.

The Bank increased the borrowing from the TLTRO III- refinancing program by € 3.7 billion from 31 December 2020, reaching € 10.9 billion at the year-end 2021.

The Bank assessed the terms of the program and concluded that TLTRO III contains a significant benefit in comparison to the market's pricing for other similarly collateralized borrowings available to the Group and accounts this benefit as a government grant under IAS 20. Consequently, the Bank considers that the grant is intended to compensate for its funding costs incurred over the term of each TLTRO-III facility and therefore, the benefit is allocated systematically under interest expense.

As at 31 December 2021, the recognized benefit from TLTRO III program amounted to € 83 million, including the benefit resulted from the program's more favorable interest rates for which the Bank has reasonable assurance that it will receive it.

Notes to the Financial Statements

31. Due to credit institutions

	2021 € million	2020 € million
Secured borrowing from credit institutions	2,051	3,225
Borrowings from international financial and similar institutions	434	470
Interbank takings	326	269
Current accounts and settlement balances with banks	85	174
Total	2,896	4,138

As at 31 December 2021, secured borrowing from credit institutions refers mainly to transactions with foreign institutions, which were conducted with collateralized debt securities and covered bonds issued and held by the Bank (notes 5.2.1.3 and 33). As at 31 December 2021, borrowings from international financial and similar institutions include borrowings from European Investment Bank and other similar institutions.

32. Due to customers

	2021 € million	2020 € million
Savings and current accounts	29,374	23,027
Term deposits	7,677	11,251
Repurchase agreements	170	170
Total	37,221	34,448

Under the Law 4151/2013, the dormant deposits accounts balances are statute barred for the benefit of the Greek State after the 20-year lapse of the last transaction. Accordingly, in 2021 the amount that the Bank transferred to the Greek State was approximately € 2 million (2020: € 1 million).

33. Debt securities in issue

	2021 € million	2020 € million
Securitizations	552	594
Subordinated notes (Tier 2)	950	950
Medium-term notes (EMTN)	1,088	-
Total	2,590	1,544

Securitisations

On 22 February 2021 the Bank proceeded with the early termination of the Maximus Hellas DAC securitization.

In addition, on 22 March 2021 the Bank proceeded with the restructuring of ASTARTI securitization upsizing the Class A notes held by an international institutional investor to € 250 million while the Class B notes, retained by the Bank, were decreased from € 219 million to € 98 million.

The carrying value of the class A asset backed securities issued by the Bank's special purpose vehicle Karta II plc as at 31 December 2021, amounted to € 302 million.

In May 2021, the Bank, through its special purpose financing vehicle (SPV) 'Mexico Finance Designated Activity Company' issued asset backed securities (notes) of total nominal value of ca € 5.2 billion, collateralized by a mixed assets portfolio of primarily non performing loans of total principle amount due of ca € 5.2 billion and gross carrying amount of ca. € 3.2 billion. The securitization notes consisted of € 1,550 million senior issued at par, € 200 million mezzanine of issue price € 107 million and € 3,402 million junior of issue price € 1.

Notes to the Financial Statements

In May 2021, in the context of Law 4649/2019 as currently in force ('Hercules' – Hellenic Asset Protection Scheme), the SPV opted in for the Greek state's guarantee scheme by submitting the relevant application to the Ministry of Finance. The relevant Ministerial Decision for the Greek state's guarantee on the Mexico senior note was received in December 2021.

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

Further information for loans originated by the Bank is provided in note 20.

Tier 2 Capital instruments

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

In the context of the hive down (note 1), considering that the obligations of Eurobank Ergasias ('Demerged Entity') arising from the Tier 2 Subordinated capital instruments were not transferred to Eurobank SA ('the Beneficiary'), the latter pursuant to the terms of the Draft Demerger Deed has explicitly and irrevocably undertaken to fulfil the relevant obligations. Accordingly, on 20 March 2020, the Beneficiary issued a subordinated instrument of equivalent terms with those of TIER 2 mentioned above which was fully subscribed by the Demerged Entity. As at 31 December 2021, the carrying amount of the subordinated instrument issued amounted to € 950 million.

Covered bonds

During the year, the Bank proceeded with covered bonds' issues of net face value of € 450 million, fully retained by the Bank.

Financial disclosures required by the Act 2620/28.08.2009 of the Bank of Greece in relation to the covered bonds issued, are available at the Bank's website (Investor Report for Covered Bonds Programs).

Medium-term notes (EMTN)

At the end of April 2021, the Bank proceeded with the issue of a preferred senior debt with a nominal value of € 500 million. The issue was over-subscribed by more than two times, which enabled the Bank to lower the interest rate by 25 basis points, from the 2.375% initially offered to the 2.125% re-offer yield. The notes, which are listed in the Luxembourg Stock Exchange's Euro MTF market, have a maturity of six years and are callable at par in five years, offering a coupon of 2% per annum that is resettable on 5 May 2026.

The transaction marks Eurobank's return to international capital markets, enhancing the diversification of the Bank's investor base, and is the first step on the medium term strategy of the Bank to meet its Minimum Required Eligible Liabilities (MREL) requirements (note 4). Further information about the issue is provided in the relevant announcement published in the Bank's website on 29 April 2021.

In September 2021, the Bank proceeded with the second consecutive € 500 million preferred senior debt issue. The issue was over-subscribed by more than 1.5 times, which enabled Eurobank to lower the interest rate by 12.5 basis points, from the 2.50% initially offered to the 2.375% re-offer yield. The notes, which are listed on the Luxembourg Stock Exchange's Euro MTF market, mature in six and a half years and are callable at par in five and a half years, offering a coupon of 2.25% per annum that is resettable on 14 March 2027.

This transaction is another step towards the implementation of Eurobank's medium term strategy to meet its MREL requirements (note 4) and reflects the Bank's ongoing commitment to the protection of depositors. The new issue also contributes to the further development of the Issuer's yield curve in the secondary market. Further information about this issue is provided in the relevant announcement published in the Bank's website on 8 September 2021.

The proceeds from both issues will be used for Eurobank's business purposes, including the financing of environmental projects that promote the use of energy from renewable sources.

In addition, during the year ended 31 December 2021, the Bank proceeded with the issue of medium term notes of face value of € 89 million which were designated for Group's customers.

Notes to the Financial Statements

34. Other liabilities

	2021	2020
	€ million	restated € million
Lease liabilities	171	138
Balances under settlement ⁽¹⁾	169	117
Deferred income and accrued expenses	103	78
ECL allowance for credit related commitments (note 5.2.1.2)	339	372
Standard legal staff retirement indemnity obligations (notes 2.3 and 35)	17	16
Employee termination benefits	63	97
Sovereign risk financial guarantee	36	38
Other provisions	81	145
Trading liabilities	43	19
Other liabilities	164	131
Total	1,186	1,151

⁽¹⁾ Includes settlement balances relating to bank cheques and remittances, credit card transactions and other banking activities.

As at 31 December 2021, other liabilities amounting to € 164 million mainly consist of payables relating with (a) suppliers and creditors, (b) contributions to insurance organizations and (c) duties and other taxes.

As at 31 December 2021, other provisions amounting to € 81 million (2020: € 145 million) mainly include: (a) € 52 million for outstanding litigations against the Bank (note 41), (b) € 27 million for other operational risk events, of which € 22 million is relating to the sale of former Romanian subsidiaries.

The movement of the Bank's other provisions, is presented in the following table:

	31 December 2021		
	Litigations and claims in dispute	Other	Total
	€ million	€ million	€ million
Balance at 1 January	52	93	145
Amounts charged	3	2	5
Amounts used	(1)	(2)	(3)
Amounts reversed ⁽¹⁾	(2)	(64)	(66)
Balance at 31 December	52	29	81

	Period 20 March - 31 December 2020		
	Litigations and claims in dispute	Other	Total
	€ million	€ million	€ million
Opening balance	50	94	144
Amounts charged	8	3	11
Amounts used	(2)	(1)	(3)
Amounts reversed	(4)	(3)	(7)
Foreign exchange and other movements	(0)	(0)	(0)
Balance at 31 December	52	93	145

⁽¹⁾ It refers mainly to € 64 million provisions for participation in future share capital increases of Bank's subsidiaries with negative net assets value (of which € 50 million relating to the Demerged entity Eurobank Ergasias Leasing Single Member S.A., note 23.1) that were reversed, as they were no longer required (note 13).

Notes to the Financial Statements

Post balance sheet event

In February 2022, Eurobank decided to launch a new VES for eligible units in Greece, which will be offered to employees over a specific age limit. The estimated cost of the new VES, which will be implemented through either lump-sum payments or long term leaves during which they will be receiving a percentage of a monthly salary, or a combination thereof, amounts to ca. € 41 million, pre-tax. The estimated saving in personnel expenses amounts to € 13 million on an annual basis.

35. Standard legal staff retirement indemnity obligations

The Bank provides for staff retirement indemnity obligation for its employees in Greece and abroad, who are entitled to a lump sum payment based on the number of years of service and the level of remuneration at the date of retirement, if they remain in the employment of the Bank until normal retirement age, in accordance with the local labor legislation. The above retirement indemnity obligations typically expose the Bank to actuarial risks such as interest rate risk and salary risk. Therefore, a decrease in the discount rate used to calculate the present value of the estimated future cash outflows or an increase in future salaries will increase the staff retirement indemnity obligations of the Bank.

The movement of the liability for standard legal staff retirement indemnity obligations is as follows:

	31 December 2021 € million	Period 20 March - 31 December 2020 restated € million
Opening balance	16	46
Restatement due to change in accounting policy (note 2.3)	-	(24)
Opening balance as restated	16	22
Current service cost (note 2.3)	3	2
Interest cost (note 2.3)	0	1
Past service cost and (gains)/losses on settlements (note 2.3)	37	54
Remeasurements:		
Actuarial (gains)/losses arising from changes in financial assumptions (note 2.3)	(1)	1
Actuarial (gains)/losses arising from changes in demographic assumptions	0	-
Actuarial (gains)/losses arising from experience adjustments (note 2.3)	0	(1)
Benefits paid	(38)	(63)
Balance at 31 December	17	16

The benefits paid by the Bank during 2021, in the context of the Voluntary Exit Scheme (VES) (note 34), amounted to € 37.8 million. The provision for staff retirement obligations of the staff that participated in the above scheme, amounted to € 0.3 million.

The significant actuarial assumptions (expressed as weighted averages) were as follows:

	31 December 2021 %	31 December 2020 %
Discount rate	0.5	0.1
Future salary increases	1.7	2.0

As at 31 December 2021, the average duration of the standard legal staff retirement indemnity obligation was 7 years (2020: 8 years).

A quantitative sensitivity analysis based on reasonable changes to significant actuarial assumptions as at 31 December 2021 is as follows:

An increase/(decrease) of the discount rate assumed, by 50 bps/(50 bps), would result in a (decrease)/increase of the standard legal staff retirement obligations by (€ 0.6 million)/ € 0.7 million.

An increase/(decrease) of the future salary growth assumed, by 0.5%/(0.5%) would result in an increase/(decrease) of the standard legal staff retirement obligations by € 0.7 million/(€ 0.6 million).

The above sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. In practice, this is unlikely to occur, and changes in some of the assumptions may be correlated.

Notes to the Financial Statements

The methods and assumptions used in preparing the above sensitivity analysis were consistent with those used to estimate the retirement benefit obligation and did not change compared to the previous year.

36. Share capital

By decision of the Extraordinary General Meeting of the Bank's Shareholders dated 1 June 2021, following the relevant decision of its Board of Directors (BoD), the share capital a) was reduced pursuant to paragraph 1 of article 31 of L. 4548/2018, by the amount of € 102,010,050.95, through the reduction of the nominal value of each common nominal share issued by the Bank, by € 0.0276957019308433, and the granting to the Bank's shareholder of bonds issued by the company under the name, "Mexico Finance Designated Activity Company" (note 20.1), of a total value which is equal to the reduction of the Bank's share capital in kind; and b) was further reduced by € 8,487,293.95, through the reduction of the nominal value of the shares issued by the Bank by € 0.00230429806915667, in order to establish special reserves of an equal amount, pursuant to paragraph 2 of article 31 of L. 4548/2018.

The Ministry of Development and Investments by virtue of its decision 92523/20-8-2021 approved the amendment of article 5 of the Bank's Articles of Association.

As at 31 December 2021, the total share capital of Eurobank S.A. amounted to € 3,941 million (2020: € 4,052 million) divided into 3,683,244,830 common voting shares of nominal value of € 1.07 each (2020: € 1.10). As at 31 December 2021, the total number of Eurobank shares was held by Eurobank Ergasias Services and Holdings S.A. ("Eurobank Holdings"), which is the sole shareholder of Eurobank.

37. Reserves and retained earnings/losses

	Corporate law reserves € million	Special reserves € million	Other reserves € million	Retained earnings/ (losses) € million	Total € million
Balance at 20 March 2020 ⁽¹⁾	-	-	238	(200)	38
Restatement due to change in accounting policy (note 2.3)	-	-	-	17	17
Net profit (note 2.3)	-	-	-	13	13
Transfer between reserves ⁽¹⁾	-	228	-	(228)	-
Debt securities at FVOCI	-	-	75	-	75
Cash flow hedges	-	-	(14)	-	(14)
Revaluation reserve of fixed assets	-	-	0	-	0
Actuarial gains/(losses) on post employment benefit obligations, net of tax (note 2.3)	-	-	-	(0)	(0)
Balance at 31 December 2020 ⁽¹⁾	-	228	299	(399)	128
Balance at 1 January 2021 ⁽¹⁾	-	228	299	(399)	128
Net profit	-	-	-	469	469
Transfers between reserves	14	140	-	(154)	-
Demerger of Eurobank Ergasias Leasing Single Member S.A. (note 23.1)	5	-	0	(55)	(50)
Distribution in kind through share capital decrease (notes 20.1 and 36)	-	-	-	(16)	(16)
Formation of a corporate law reserve (note 36)	9	-	-	-	9
Debt securities at FVOCI	-	-	(76)	-	(76)
Gain/(losses) from equity securities at FVOCI	-	-	2	-	2
Cash flow hedges	-	-	37	-	37
Revaluation reserve of fixed assets	-	-	0	-	0
Actuarial gains/(losses) on post employment benefit obligations, net of tax	-	-	-	1	1
Share-based payment:					
- Value of employee services (note 38)	-	-	-	2	2
Balance at 31 December 2021	28	368	263	(153)	506

⁽¹⁾ Change in the presentation of the comparative information (see below).

Notes to the Financial Statements

As of 31 December 2021, the Bank has proceeded to the change in the presentation of certain types of reserves after taking into account their nature and purpose in accordance with the applicable legal framework. In particular, a) reserves of € 368 million (€ 140 million of which were formed in 2021) relating to dividends and gains from the sale of participations, that were previously included within retained earnings are presented within the separate category “Special reserves” and b) the statutory and other corporate law reserves that were formed/acquired in 2021 are presented in the separate category “Corporate law reserves”. In addition, the fair value reserve is presented within category “Other reserves” and the actuarial gains/losses on post employment benefit obligations that were previously included in other reserves are presented in retained earnings. Comparative information has been adjusted in order to align with the aforementioned changes in the presentation of reserves and retained earnings.

As at 31 December 2021, other reserves mainly comprise a) € 273 million fair value reserve (2020: € 347 million) and b) € 12 million accumulated loss from cash flow hedging (2020: € 49 million accumulated loss).

Dividends

Under the provisions of the Tripartite Relationship Agreement between Eurobank Holdings, Eurobank and the HFSF (signed 23.3.2020 and amended on 3.2.2022) and article 10 par. 3 of Law 3864/2010 for the “establishment of a Hellenic Financial Stability Fund”, for as long the HFSF participates in the share capital of Eurobank Holdings, the amount of dividends that may be distributed to shareholders of either Eurobank Holdings or Eurobank cannot exceed 35% of the profits as provided in article 161 par. 2 of Company Law 4548/2018.

Pursuant to Article 149A of Law 4261/2014, by way of derogation from item c of par. 2 of article 160 and par. 2 of article 161 of law 4548/2018, the Bank is not subject to obligation to distribute a minimum dividend. Moreover, according to European Central Bank, banks should remain prudent when deciding on dividends, carefully considering the sustainability of their business model. They should also not underestimate the risk that additional losses may later have an impact on their capital trajectory as support measures expire. The ECB also asks banks to adopt a prudent and forward-looking approach when deciding on remuneration policies. As part of its supervisory review process, the ECB will continue to assess banks’ remuneration policies and the impact such policies may have on a bank’s ability to maintain a sound capital base.

Taking into the consideration all of the above, the Bank has decided the non-distribution of dividends to the Shareholders for the financial year 2021 and maintain its capital base.

38. Share options

The Annual General Meeting of the shareholders of Eurobank Holdings held on 28 July 2020 approved the establishment of a five year shares award plan, starting from 2021, in the form of share options rights by issuing new shares with a corresponding share capital increase, in accordance with the provisions of article 113 of law 4548/2018, awarded to executives and personnel of Eurobank Holdings and its affiliated companies according to article 32 of law 4308/2014. The maximum number of rights that can be approved was set at 55,637,000 rights, each of which would correspond to one new share (1.5% of the current paid share capital). The exercise price of each new share would be equal to its nominal value i.e. € 0.23. The Annual General Meeting authorized the Board of Directors of Eurobank Holdings to define the eligible staff and determine the remaining terms and conditions of the plan.

In June and July 2021, the Board of Directors approved the final terms and the implementation of the share options plan, which is a forward-looking long-term incentive aiming at the retention of key executives. In this respect, 12,374,561 stock options were allocated to key executives at an exercise price of € 0.23, with grant date in July 2021. The options are exercisable in portions, annually during the period from 2022 to 2025. Each portion may be exercised wholly or partly and converted into shares at the employees’ option, provided that they remain employed by the Group until the first available exercise date. A retention period of 1 year applies to the first portion of the share options vesting 1 year after the grant date. The corporate actions that adjust the number and the price of shares also adjust accordingly the share options. In addition, the exercise of 6,844,524 of the aforementioned share options allocated to certain key executives who are subject to variable and/or accumulated annual remuneration restrictions of Law 3864/2010 is conditional on the amendment of the specific provisions of the law during the exercise period, so that the respective restrictions are lifted, or the exit of the HFSF from the share capital of the Company.

Notes to the Financial Statements

The share options outstanding at the end of the period have the following expiry dates:

Expiry date	Share options
	31 December 2021
2022	3,607,200
2023	3,607,200
2024	4,634,321
2025	525,840
Weighted average remaining contractual life of share options outstanding at the end of the period	1.6

In accordance with the Bank's accounting policy on employees' share based payments, the grant date fair value of the options is recognized as an expense with a corresponding increase in equity over the vesting period.

The fair value at grant date is determined using an adjusted form of the Black-Scholes model for Bermudan equity options which takes into account the exercise price, the exercise dates, the term of the option, the share price at grant date and expected price volatility of the underlying share, the expected dividend yield and the risk-free interest rate for the term of the options.

Furthermore, the aforementioned additional condition on certain share options granted to key executives subject to the remuneration restrictions of Law 3864/2010, is treated as a non-vesting condition. Accordingly, the fair value measurement at grant date of such share options takes into consideration the probability that the relevant restrictions will be lifted, based on Management judgement, and is not subsequently revised regardless of whether the condition is eventually satisfied.

The weighted average fair value of the share options granted in July 2021 was € 0.42. The significant inputs into the model were the share price of € 0.7823 at the grant date, exercise price of € 0.23, annualized dividend yield of 3%, expected average annualized volatility of 68%, the expected option life ranging from 1 to 4 years, and the risk-free interest rate corresponding to the options' maturities, based on the EUR swap yield curve. The expected volatility is measured at the grant date of the options and is based on the average historical volatility of the share price over the last one and a half year.

39. Transfers of financial assets

The Bank enters into transactions by which it transfers recognized financial assets directly to third parties or to Special Purpose Entities (SPEs).

(a) The Bank sells, in exchange for cash, securities under an agreement to repurchase them (repos) and assumes a liability to repay to the counterparty the cash received. In addition, the Bank pledges, in exchange for cash, securities, covered bonds, as well as loans and receivables and assumes a liability to repay to the counterparty the cash received. The Bank may also transfer securities under securities lending agreements with no exchange of cash or pledging of other financial assets as collateral. For all the aforementioned transactions, the Bank has determined that it retains substantially all the risks, including associated credit and interest rate risks, and rewards of these financial assets and therefore has not derecognized them. As a result, the Bank is unable to use, sell or pledge the transferred assets for the duration of the transaction. The related liability, where applicable, is recognized in Due to central banks and credit institutions (notes 30 and 31), Due to customers (note 32) and Debt securities in issue (note 33), as appropriate.

The Bank enters into securitizations of various classes of loans (corporate, small and medium enterprise, consumer and various classes of non performing loans), under which it assumes an obligation to pass on the cash flows from the loans to the holders of the notes. The Bank has determined that it retains substantially all risks, including associated credit and interest rate risks, and rewards of these loans and therefore has not derecognized them. As a result of the above transactions, the Bank is unable to use, sell or pledge the transferred assets for the duration of their retention by the SPE. Moreover, the note holders' recourse is limited to the transferred loans. As at 31 December 2021, the securitizations' issues held by third parties amounted to € 552 million (2020: € 594 million) (note 33).

Notes to the Financial Statements

The table below sets out the details of Bank's financial assets that have been sold or otherwise transferred, but which do not qualify for derecognition:

	Carrying amount	
	2021	2020
	€ million	€ million
Securities held for trading	11	7
Loans and advances to customers	14,308	15,978
-securitized loans ⁽¹⁾	4,232	6,740
-pledged loans under covered bond program	4,360	3,707
-pledged loans with central banks	5,545	5,357
-other pledged loans	171	174
Investment securities	7,081	6,040
Total	21,400	22,025

⁽¹⁾ It includes securitized loans of issues held by the Bank, not used for funding.

(b) The Bank may sell or re-pledge any securities borrowed or obtained through reverse repos and has an obligation to return the securities. The counterparty retains substantially all the risks and rewards of ownership and therefore the securities are not recognized by the Bank. As at 31 December 2021, the Bank had obtained through reverse repos securities of face value of € 598 million, of which € 60 million sold under repurchase agreements and € 505 million pledged with central banks (2020: € 1,154 million face value of which € 1,038 million sold under repurchase agreements). Furthermore, as at 31 December 2021, the Bank had obtained Greek treasury bills as collaterals for derivatives transactions with the Hellenic Republic of face value of € 1,400 million, of which € 324 million sold under repurchase agreements (2020: € 1,735 million face value of which € 1,285 million, sold under repurchase agreements).

As at 31 December 2021, the cash value of the assets transferred or borrowed by the Bank through securities lending, reverse repo and other agreements (points a and b) amounted to € 14,410 million, while the associated liability from the above transactions amounted to € 14,179 million, of which € 591 million repo agreements offset in the balance sheet against reverse repo deals (notes 30, 31, 32, 33, and 5.2.1.4) (2020: cash value € 14,373 million and liability € 12,289 million, of which € 1,065 million repo agreements offset in the balance sheet). In addition, the Bank's financial assets pledged as collaterals for repos, derivatives, securitizations and other transactions other than the financial assets presented in the table above are provided in notes 17 and 28.

40. Leases

Bank as a lessee

The Bank leases office and branch premises, ATM locations, residential properties for its personnel, and motor vehicles.

The majority of the Bank's property leases are under long term agreements (for a term of 12 years or more in the case of leased real estate assets), with options to extend or terminate the lease according to the terms of each contract and the usual terms and conditions of commercial leases, while motor vehicles generally have lease terms of up to 4 years. Extension options held by the Bank are included in the lease term when it is reasonably certain that they will be exercised based on its assessment. For contracts having an indefinite remaining life as at 1 January 2021, the lease term has been determined at an average of 7 years for the Bank, after considering all relevant facts and circumstances. Depending on the terms of each lease contract, lease payments are adjusted annually in line with the consumer Price Index, as published by the Greek Statistical Authority, plus an agreed fixed percentage.

Information about the leases for which the Bank is a lessee is presented below:

Right-of-Use Assets

As at 31 December 2021, the right-of-use assets included in property and equipment amounted to € 167 million (2020: € 135 million) (note 25).

Lease Liabilities

The lease liability included under other liabilities amounted to € 171 million as at 31 December 2021 (2020: € 138 million) (note 34). The maturity analysis of lease liabilities as at 31 December 2021, based on the contractual undiscounted cash flows, is presented in note 5.2.3.

Notes to the Financial Statements

Amounts recognised in profit or loss

Interest on lease liabilities is presented in note 6 and the lease expense relating to short term leases is ca. € 2 million (2020: € 2 million).

The Bank had total cash outflows for leases of € 29 million in 2021 (2020: € 28 million).

Bank as a lessor

Finance lease

The Bank leases out certain real estate properties and equipment under finance leases, in its capacity as a lessor.

The maturity analysis of finance lease receivables, based on the undiscounted lease payments to be received after the reporting date, is provided below:

	2021 € million	2020 € million
Not later than 1 year	5	1
1-2 years	5	1
2-3 years	4	0
3-4 years	3	0
4-5 years	3	0
Later than 5 years	8	1
Lease payments	28	3
Unguaranteed residual values	487	43
Gross investment in finance leases	515	46
Less: unearned finance income	(28)	(3)
Net investment in finance leases	487	43
Less: Impairment allowance	(212)	(28)
Total	275	15

Operating Leases

The Bank leases out its investment property under the usual terms and conditions of commercial leases. When such leases do not transfer substantially all of the risks and rewards incidental to the ownership of the leased assets, the Bank classifies these lease as operating leases. Information relating to operating leases of investment property, including the rental income recognised by the Bank during the year, is provided in note 26.

The maturity analysis of operating lease receivables, based on the undiscounted lease payments to be received after the reporting date, is provided below:

	2021 € million	2020 € million
Not later than one year	68	64
One to two years	62	59
Two to three years	59	55
Three to four years	56	52
Four to five years	52	50
More than five years	244	272
Total	541	552

In the context of the relief measures taken in response to the Covid-19 outbreak, the Bank as a lessor has granted certain rent concessions to its tenants directly affected by the Covid-19 pandemic. As at 31 December 2021, the unamortized balance of the above mentioned rent concessions, net of the reimbursement provided by the Greek government to lessors in 2021, amounted to approximately € 6 million before tax (2020: € 3.6 million), which will be gradually recognized in profit or loss over the remaining lease term of the respective contracts.

Notes to the Financial Statements

For the year ended 31 December 2021, the amount of the rent reduction recognized in “Income from non-banking services” amounted to approximately € 2 million (2020: 0.6 million).

The rent concessions granted to the Bank during 2021, as a direct consequence of the Covid-19 pandemic, were not significant.

41. Contingent liabilities and other commitments

The Bank presents the credit related commitments it has undertaken within the context of its lending related activities into the following three categories: a) financial guarantee contracts, which refer to guarantees and standby letters of credit that carry the same credit risk as loans (credit substitutes), b) commitments to extend credit, which comprise firm commitments that are irrevocable over the life of the facility or revocable only in response to a material adverse effect and c) other credit related commitments, which refer to documentary and commercial letters and other guarantees of medium and low risk according to the Regulation No 575/2013/EU.

Credit related commitments are analyzed as follows:

	2021 € million	2020 € million
Financial guarantee contracts	1,598	1,140
Financial guarantees contracts given to Bank SPVs' issuing EMTNs	6	30
Other credit related commitments	396	300
Commitments to extend credit	962	676
Total	2,962	2,146

As of 31 December 2021, the credit related commitments within the scope of IFRS 9 impairment requirements amounted to € 5.9 billion (2020: € 5 billion), including revocable loan commitments of € 2.4 billion (2020: € 2.4 billion) and guarantees of € 0.6 billion (2020: € 0.5 billion) relating to the lending activities of banking subsidiaries for which the equivalent pledged amount is presented within “Due from credit institutions”. The analyses per stage, according to IFRS 9, of the above credit related commitments and the corresponding allowance for impairment losses of € 339 million (2020: € 372 million) are provided in the note 5.

In addition, the Bank has issued a sovereign risk financial guarantee of € 0.24 billion (2020: € 0.24 billion) for which an equivalent amount has been deposited under the relevant pledge agreement (note 28).

Other commitments

(a) The Bank has signed irrevocable payment commitment and collateral arrangement agreements with the Single Resolution Board (SRB) amounting in total to € 20 million as at 31 December 2021 (2020: € 16 million), representing 15% of its resolution contribution payment obligation to the Single Resolution Fund (SRF) for the years 2016-2021.

According to the agreements, which are backed by cash collateral of an equal amount, the Bank undertook to pay to the SRB an amount up to the above irrevocable payment commitment, in case of a call and demand for payment made by it, in relation to a resolution action taken for another European bank. The said cash collateral has been recognized as a financial asset in the Bank's balance sheet (note 28).

(b) As at 31 December 2021, the contractual commitments for the acquisition of own used property, equipment and intangible assets amounted to € 27 million (2020: € 29 million).

Legal proceedings

As at 31 December 2021, a provision of € 52 million has been recorded for a number of legal proceedings outstanding against the Bank (2020: € 52 million). The said amount includes € 34 million for an outstanding litigation related to the acquisition of New TT Hellenic Postbank S.A. in 2013 (2020: € 34 million).

Furthermore, in the normal course of its business, the Bank has been involved in a number of legal proceedings, which are either at still a premature or at an advanced trial instance. The final settlement of these cases may require the lapse of a certain time so that the litigants exhaust the legal remedies provided for by the law. Management, having considered the advice of the Legal Services General Division, does not expect that there will be an outflow of resources and therefore does not acknowledge the need for a provision.

Notes to the Financial Statements

Following the completion of the banking sector's hive down of Eurobank Ergasias S.A. (Demerged entity) in 2020, the Beneficiary (i.e. Eurobank S.A., "Bank") substituted the Demerged Entity (currently Eurobank Holdings), by way of universal succession, to all the transferred assets and liabilities (note 1), while pending lawsuits where the Demerged entity was an involved party and are related to the hived down banking sector, will continue ipso jure by the Bank or against it.

Against the Bank various legal remedies and redresses have been filed amongst others in the form of individual lawsuits lodged by borrowers, a class action lodged by consumer protection unions, applications for injunction measures, motions to vacate payment orders and appeals in relation to the validity of clauses for the granting of loans in Swiss Francs. To date the vast majority of the judgments issued by the first instance and the appellate Courts have found in favour of the Bank's positions. As to certain aspects of Swiss Francs loans there was a lawsuit before the Supreme Court (Areios Pagos) at plenary session which was initiated from an individual lawsuit. The Decision issued on 18 April 2019 was in favour of the Bank.

For the class action, the Supreme Court issued on 20 July 2021, a decision in favour of the Bank, rejecting the petition of cassation filled by the consumer unions. In addition, the European Court of Human Rights has passed judgments which confirmed the legality of the loans in Swiss Francs granted by the Bank.

In any event, the Management of the Bank is closely monitoring the developments to the relevant cases so as to ascertain potential accounting implications in accordance with the Bank's accounting policies.

42. Post balance sheet events

Details of post balance sheet events are provided in the following notes:

- Note 2.1 – Basis of preparation
- Note 4 – Capital Management
- Note 5 – Financial risk management and fair value
- Note 23 – Shares in subsidiaries
- Note 24 – Investments in associates and joint ventures
- Note 29 – Disposal groups classified as held for sale
- Note 34 – Other liabilities
- Note 37 – Reserves and retained earnings/losses
- Note 43 – Related parties

43. Related parties

Following the completion of the demerger through the banking sector's hive down of Eurobank Ergasias S.A. (Demerged Entity) in March 2020, (note 1), "Eurobank Ergasias Services and Holdings S.A." (Eurobank Holdings) is the parent company of Eurobank S.A. In respect of the key management personnel (KMP) of the Demerged Entity it remained as Eurobank S.A.'s KMP. Furthermore, the Board of Directors (BoD) of Eurobank Holdings is the same as the BoD of Eurobank S.A. and part of the key management personnel (KMP) of Eurobank S.A. provides services to Eurobank Holdings according to the terms of the relevant agreement between the two entities. As at 31 December 2021, the percentage of Eurobank Holdings' ordinary shares with voting rights held by the Hellenic Financial Stability Fund (HFSF) stands at 1.40%. The HFSF is considered to have significant influence over Eurobank S.A. pursuant to the provisions of the Law 3864/2010, as in force, and the Tripartite Relationship Framework Agreement (TRFA) between Eurobank S.A., Eurobank Holdings and the HFSF signed on 23 March 2020 and amended on 3 February 2022. Further information in respect of the HFSF rights based on the aforementioned framework is provided in the section "Report of the Directors and Corporate Governance Statement" of the Annual Financial Report of Eurobank Holdings for the year ended 31 December 2021.

Fairfax Group is considered to have significant influence over Eurobank Holdings and, accordingly, over Eurobank S.A.. In July 2021, Eurolife FFH Insurance Group Holdings S.A. (note 24) became a subsidiary of Fairfax and the percentage of Eurobank Holdings voting rights held by Fairfax Group increased from 31.27% to 33%.

A number of banking transactions are entered into with related parties in the normal course of business and are conducted on an arm's length basis. These include loans, deposits and guarantees. In addition, as part of its normal course of business in investment banking activities, the Group at times may hold positions in debt and equity instruments of related parties.

Notes to the Financial Statements

The outstanding balances of the transactions with (a) the subsidiaries, (b) Eurobank Holdings, (c) Fairfax Group, (d) the key management personnel (KMP) and the entities controlled or jointly controlled by KMP and (e) the associates and joint ventures, as well as the relating income and expenses are as follows:

	31 December 2021					31 December 2020				
	Eurobank Holdings ⁽⁶⁾	Fairfax Group ⁽³⁾	Subsidiaries ⁽²⁾	KMP ⁽¹⁾ and Entities controlled or jointly controlled by KMP	Associates and joint ventures	Eurobank Holdings ⁽⁶⁾	Fairfax Group	Subsidiaries ⁽²⁾	KMP ⁽¹⁾ and Entities controlled or jointly controlled by KMP	Associates and joint ventures
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Due from credit institutions	-	-	970.63	-	-	-	-	624.66	-	-
Derivative financial instruments assets	-	-	13.72	-	-	-	0.10	58.00	-	-
Investment securities	-	-	-	-	-	-	-	3.05	-	-
Loans and advances to customers	-	0.01	1,011.81	4.94	24.33	-	9.02	1,335.92	4.69	16.44
Other assets ⁽⁵⁾	0.32	0.04	94.70	-	76.03	0.40	0.45	4.52	0.27	65.31
Due to credit institutions	-	-	2,133.95	-	-	-	-	2,940.77	-	-
Derivative financial instruments liabilities	-	-	22.73	-	-	-	-	1.85	-	-
Due to customers	63.63	0.24	178.59	15.29	79.28	15.89	0.15	283.17	17.97	106.44
Debt securities in issue	950.17	-	40.68	0.20	-	950.17	-	-	-	-
Other liabilities	1.44	-	316.68	0.11	39.14	1.60	-	375.63	0.55	18.70
Guarantees issued ⁽⁴⁾	-	-	736.42	0.01	4.65	-	-	680.64	0.01	2.00
Guarantees received	-	-	-	0.01	-	-	-	-	0.02	-
	Year ended 31 December 2021					Period 20 March - 31 December 2020				
Net interest income	(60.92)	0.21	13.58	0.01	(2.61)	(35.30)	0.12	13.28	-	(2.62)
Net banking fee and commission income	(0.90)	-	22.88	-	18.55	(0.52)	-	11.32	-	10.12
Dividend income	-	-	179.36	-	19.76	-	-	-	-	0.29
Net trading income	-	-	(1.12)	-	0.45	-	-	(0.85)	-	(0.02)
Other operating income/(expense)	(3.04)	3.04	0.85	(14.97)	(12.07)	(1.73)	2.68	3.18	(10.96)	(9.77)
Impairment losses relating to loans and advances and collectors' fees	(1.47)	0.02	12.48	-	(85.24)	(1.33)	(0.00)	(88.61)	-	(41.37)

⁽¹⁾ Includes the key management personnel of the Bank and their close family members.

⁽²⁾ Equity contributions and other transactions with subsidiaries, associates and joint ventures are presented in note 23 and note 24 respectively.

⁽³⁾ The balances with the Group's associate Eurolife FFH Insurance Group Holdings S.A., which is also a member of Fairfax Group are presented in the column associates and joint ventures.

⁽⁴⁾ Furthermore as of 31 December 2021, € 0.6 billion guarantees have been issued relating mainly to the lending activities of banking subsidiaries for which the equivalent pledged amount is included above in "Due from credit institutions".

⁽⁵⁾ For the year ended 31 December 2021, it includes € 16.5 million right of use assets (RoU).

⁽⁶⁾ Includes also Eurobank S.A. fellow subsidiaries. Information about the distribution in kind to Eurobank Holdings is presented in notes 20.1 and 36.

For the year ended 31 December 2021, there were no material transactions with the HFSF. In addition, following the completion of the project "Mexico" (note 20.1), as at 31 December 2021 the loans, net of provisions, granted to non consolidated entities controlled by the Bank pursuant to the terms of the relevant share pledge agreements have been derecognized (2020: € 0.3 million).

Following the assessment of the recoverable amount of the Bank's funding to its subsidiaries, associates and joint ventures, a reversal of impairment loss of € 12 million has been recognized in respect of the Bank's loans, receivables and the credit related commitments to its subsidiaries, associates and joint ventures, mainly to reflect the carrying values of their loan's portfolios. As at 31 December 2021, the respective impairment allowance amounted to € 374 million (2020: € 362 million).

Furthermore, in 2021 the Bank proceeded with the sale of senior notes of the Cairo securitization of carrying amount € 329 million to its subsidiaries "Eurobank Bulgaria A.D.", "Eurobank Cyprus Ltd" and "Eurobank Private Bank Luxembourg S.A.".

Key management compensation (directors and other key management personnel of the Bank)

Key management personnel are entitled to compensation in the form of short-term employee benefits of € 6.72 million (2020: € 4.63 million) and long-term employee benefits of € 1.08 million (2020: € 0.7 million). Additionally, the Bank has recognised € 0.46 million expense relating with equity settled share based payments (note 38). In addition, as at 31 December 2021, the defined benefit obligation for the KMP amounts to € 1.48 million (2020: € 1.41 million, as restated due to change in accounting policy, note 2.2.18),

Notes to the Financial Statements

while the respective cost for the year through the income statement amounts to € 0.12 million (2020: € 0.11 million as restated) and the other comprehensive income (actuarial gains) amounts to € 0.05 million (2020: € 0.02 million loss as restated).

Post balance sheet event

Grivalia Hospitality S.A.

Following the disposal of a 5.1% shareholding in the Bank's joint venture Grivalia Hospitality S.A. (note 24) and the revised terms of the amended Shareholders' Agreement signed with the other shareholders on the same date, the Bank ceased to have joint control over the entity and the retained interest will be carried at FVTPL. As a result, Grivalia Hospitality will no longer be a related party to the Bank.

44. External Auditors

The Bank has adopted a Policy on External Auditors' Independence which provides amongst others, for the definition of the permitted and non-permitted services the Bank auditors may provide further to the statutory audit. For any such services to be assigned to the Bank's auditors there are specific controlling mechanisms in order for the Bank's Audit Committee to ensure that a) the non-audit services assigned to "KPMG Certified Auditors S.A.", along with the KPMG network (KPMG), have been reviewed and approved as required and b) there is proper balance between audit and permitted non-audit work.

The total fees of the Bank's independent auditor KPMG, for audit and other services provided are analyzed as follows:

	31 December 2021 € million	Period 20 March - 31 December 2020 € million
Statutory audit ⁽¹⁾	(1.2)	(1.2)
Tax certificate	(0.2)	(0.2)
Other audit related assignments	(0.5)	(0.4)
Non audit assignments	(0.2)	(0.0)
Total	<u>(2.1)</u>	<u>(1.8)</u>

⁽¹⁾ Includes fees for statutory audit of the Bank's annual financial statements.

It is noted that the non-audit assignment fees of "KPMG Certified Auditors S.A." Greece, statutory auditor of the Bank, amounted to € 0.15 million.

Notes to the Financial Statements

45. Board of Directors

The Board of Directors (BoD) was elected by the Annual General Meeting (AGM) of the Shareholders held on 23 July 2021, for a three years term of office that will expire on 23 July 2024, prolonged until the end of the period the AGM for the year 2024 will take place.

Following the aforementioned AGM decision, the BoD was constituted as a body at the BoD meeting of 23 July 2021, as follows:

G. Zanias	Chairman, Non-Executive Member
G. Chrysikos	Vice Chairman, Non-Executive Member
F. Karavias	Chief Executive Officer
S. Ioannou	Deputy Chief Executive Officer
K. Vassiliou	Deputy Chief Executive Officer
A. Athanasopoulos	Deputy Chief Executive Officer
B. P. Martin	Non-Executive Member
A. Gregoriadi	Non-Executive Independent Member
I. Rouvitha- Panou	Non-Executive Independent Member
R. Kakar	Non-Executive Independent Member
J. Mirza	Non-Executive Independent Member
C. Basile	Non-Executive Independent Member
E. Deli	Non-Executive Member (HFSF representative under Law 3864/2010)

Athens, 5 April 2022

Georgios P. Zanias
I.D. No AI -414343
CHAIRMAN
OF THE BOARD OF DIRECTORS

Fokion C. Karavias
I.D. No AI - 677962
CHIEF EXECUTIVE OFFICER

Harris V. Kokologiannis
I.D. No AN - 582334
GENERAL MANAGER OF GROUP FINANCE
CHIEF FINANCIAL OFFICER