EUROBANK

EUROBANK S.A.

FINANCIAL STATEMENTS

FOR THE YEAR ENDED

31 DECEMBER 2023

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Balance Sheet

	Note	31 December 2023 € million	2022 € million
ASSETS			
Cash and balances with central banks	15	**6,362**	9,712
Due from credit institutions	17	**2,547**	2,177
Securities held for trading	18	**227**	69
Derivative financial instruments	19	**891**	1,215
Loans and advances to customers	20	**30,609**	30,619
Investment securities	22	**11,715**	10,487
Shares in subsidiaries	23	**2,188**	2,514
Investments in associates and joint ventures	24	**213**	39
Property and equipment	25	**541**	527
Investment property	26	**1,033**	936
Intangible assets	27	**203**	189
Deferred tax assets	14	**3,986**	4,154
Other assets	28	**1,601**	1,805
Assets of disposal groups classified as held for sale	29	**205**	81
Total assets		**62,321**	64,524
LIABILITIES			
Due to central banks	30	**3,771**	7,927
Due to credit institutions	31	**4,482**	4,058
Derivative financial instruments	19	**1,457**	1,696
Due to customers	32	**40,740**	40,256
Debt securities in issue	33	**4,951**	3,665
Other liabilities	34	**865**	1,339
Total liabilities		**56,266**	58,941
EQUITY			
Share capital	36	**3,941**	3,941
Corporate law reserves	37	**142**	98
Special reserves	37	**299**	564
Other reserves	37	**60**	27
Retained earnings	37	**1,613**	953
Total equity		**6,055**	5,583
Total equity and liabilities		**62,321**	64,524

Notes on pages 6 to 129 form an integral part of these financial statements.

Income Statement

	Note	Year ended 31 December 2023 € million	2022 € million
Interest income		**3,735**	1,845
Interest expense		**(2,257)**	(763)
Net interest income	6	**1,478**	1,082
Banking fee and commission income		**366**	366
Banking fee and commission expense		**(80)**	(91)
Net banking fee and commission income	7	**286**	275
Income from non banking services	8	**76**	67
Dividend income	9	**140**	204
Net trading income/(loss)	10	**65**	719
Gains less losses from investment securities	10	**53**	0
Other income/(expenses)	11	**(41)**	392
Operating income		**2,057**	2,739
Operating expenses	12	**(630)**	(614)
Profit from operations before impairments, risk provisions and restructuring costs		**1,427**	2,125
Impairment losses relating to loans and advances to customers	21	**(282)**	(173)
Other impairments, risk provisions and related costs	13	**(165)**	(125)
Restructuring costs	13	**(25)**	(87)
Profit before tax		**955**	1,740
Income tax	14	**(161)**	(352)
Net profit		**794**	1,388

Notes on pages 6 to 129 form an integral part of these financial statements.

Statement of Comprehensive Income

	Year ended 31 December			
	2023		2022	
	€ million		€ million	
Net profit		**794**		1,388
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	**19**		5	
- transfer to net profit, net of tax	**(21)**	**(2)**	(5)	0
Debt securities at FVOCI				
- changes in fair value, net of tax (note 22)	**141**		(452)	
- transfer to net profit, net of tax (note 22)	**(96)**	**45**	193	(259)
		43		(259)
Items that will not be reclassified to profit or loss:				
- Gains/(losses) from equity securities at FVOCI, net of tax		**18**		24
- Actuarial gains/ (losses) on post employment benefit obligations,net of tax		**(2)**		1
		16		25
Other comprehensive income		**59**		(234)
Total comprehensive income		**853**		1,154

Notes on pages 6 to 129 form an integral part of these financial statements.

Statement of Changes in Equity

	Share capital € million	Reserves and retained earnings € million	Total € million
Balance at 1 January 2022	3,941	506	4,447
Net profit	-	1,388	1,388
Other comprehensive income	-	(234)	(234)
Total comprehensive income for the year ended 31 December 2022	-	1,154	1,154
Merger with Hellenic Post Credit S.A.	-	(22)	(22)
Share options plan	-	4	4
	-	(18)	(18)
Balance at 31 December 2022	3,941	1,642	5,583
Balance at 1 January 2023	**3,941**	**1,642**	**5,583**
Net profit	-	794	**794**
Other comprehensive income	-	59	**59**
Total comprehensive income for the year ended 31 December 2023	**-**	**853**	**853**
Merger with certain subsidiaries (note 23.1)	-	22	**22**
Share options plan (note 38)	-	7	**7**
Dividend paid	-	(410)	**(410)**
	-	**(381)**	**(381)**
Balance at 31 December 2023	**3,941**	**2,114**	**6,055**
	Note 36	Note 37	

Notes on pages 6 to 129 form an integral part of these financial statements.

Cash Flow Statement

	Note	Year ended 31 December 2023 € million	2022 € million
Cash flows from operating activities			
Profit before income tax		**955**	1,740
Adjustments for :			
Impairment losses relating to loans and advances to customers	21	**282**	173
Other impairments, risk provisions and restructuring costs	13	**190**	212
Depreciation and amortisation	12	**91**	91
Other (income)/losses on investment securities	16	**(88)**	(40)
(Gain)/loss on sale of subsidiaries, associates and joint ventures	11	**3**	(36)
Dividends from subsidiaries, associates and joint ventures	9	**(139)**	(203)
Valuation of investment property	11	**(17)**	(32)
Other adjustments	16	**64**	(251)
		1,341	1,654
Changes in operating assets and liabilities			
Net (increase)/decrease in cash and balances with central banks		**98**	(149)
Net (increase)/decrease in securities held for trading		**(173)**	(3)
Net (increase)/decrease in due from credit institutions		**(144)**	869
Net (increase)/decrease in loans and advances to customers		**(503)**	(2,027)
Net (increase)/decrease in derivative financial instruments		**(38)**	587
Net (increase)/decrease in other assets		**171**	271
Net increase/(decrease) in due to central banks and credit institutions		**(3,752)**	(1,725)
Net increase/(decrease) in due to customers		**485**	3,055
Net increase/(decrease) in other liabilities		**(384)**	146
		(4,240)	1,024
Income tax paid		**(3)**	(4)
Net cash from/(used in) operating activities		**(2,902)**	2,674
Cash flows from investing activities			
Acquisition of fixed and intagible assets	25,26,27	**(100)**	(109)
Proceeds from sale of fixed and intangible assets	25,26	**19**	109
(Purchases)/sales and redemptions of investment securities		**(954)**	(2,399)
Acquisition of subsidiaries, associates, joint ventures and participation in capital increases	23,24	**(859)**	(769)
Proceeds from disposal/liquidation/capital decrease of holdings in subsidiaries, associates and joint ventures	23,24	**915**	334
Dividends from investment securities, subsidiaries, associates and joint ventures	9	**140**	204
Net cash from/(used in) investing activities		**(839)**	(2,630)
Cash flows from financing activities			
(Repayments)/proceeds from debt securities in issue	16	**1,127**	1,133
Repayment of lease liabilities	40	**(30)**	(25)
Dividend paid	37	**(410)**	-
Net cash from/(used in) financing activities		**687**	1,108
Net increase/(decrease) in cash and cash equivalents		**(3,054)**	1,152
Cash and cash equivalents at beginning of year	16	**9,658**	8,506
Cash and cash equivalents at end of year	16	**6,604**	9,658

Notes on pages 6 to 129 form an integral part of these financial statements.

1. General information

Eurobank S.A. (the Bank) is a wholly owned subsidiary of Eurobank Ergasias Services and Holdings S.A. (the "Parent Company"). The Bank, which along with its subsidiaries form the Eurobank S.A. Group (the Group), 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 28 March 2024. The Independent Auditor's Report of the Financial Statements is included in the section B.I of the Annual Financial Report.

2. Basis of preparation and material accounting policies

The financial statements of the Bank have been prepared on a going concern basis and in accordance with the material 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 International Accounting Standards Board (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 2023 and 2022, after taking into account the amendments in IFRSs as described in section 2.1.1 (a) "New and amended standards adopted by the Bank as of 1 January 2023". 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 conditions, 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:

Despite the fragile international environment, the economies of Greece, Bulgaria and Cyprus remained in expansionary territory in 2023, overperforming their European Union (EU) peers. More specifically, according to provisional data by the Hellenic Statistical Authority (ELSTAT), the Greek economy expanded by 2% on an annual basis in 2023 (2022: 5.6%), driven by increases in exports of goods and services, household consumption, and fixed investment. According to its Winter Economic Forecast (February 2024), the European Commission (EC) expects a GDP growth rate of 2.3% in 2024 and 2025. Amid strong base effects and easing energy prices, the inflation rate, as measured by the annual change in the Harmonized Index of Consumer Prices (HICP) decelerated to 4.2% in 2023 from 9.3% in 2022 according to ELSTAT, with the EC forecasting further de-escalation to 2.7% in 2024, and 2% in 2025. The average quarterly unemployment rate decreased to 11.1% from 12.4% in 2022, with the International Monetary Fund forecasts for 2024 and 2025 standing at 9.2% and 8.5% in 2024 and 2025 respectively, according to its January 2024 Art. IV Country Report. On the fiscal front, according to the 2024 State Budget, the general government primary balance is expected to post primary surpluses of 1.1% and 2.1% of GDP in 2023 and 2024 respectively, up from 0.1% of GDP in 2022. The gross public debt-to-GDP ratio, having declined significantly to 172.6% in 2022 due to the strong economic recovery and the effect of the high inflation on nominal GDP, is expected to decline further to 160.3% in 2023 and 152.3% in 2024.

According to EC's winter economic forecasts (February 2024), the real GDP in Bulgaria is expected to grow by 1.9% and 2.5% in 2024 and 2025, respectively (2023: 2%), while the HICP is forecast to decrease to 3.4% in 2024 and 2.9% in 2025 (2023: 8.6%). In Cyprus,

the real GDP growth is forecast at 2.8% and 3% in 2024 and 2025, respectively (2023: 2.5%), while the HICP is estimated at 2.4% in 2024 and 2.1% in 2025 (2023: 3.9%).

Growth in Greece as well as in Bulgaria and Cyprus is expected to receive a significant boost from EU-funded investment projects and reforms. Greece shall receive € 36 billion (€ 18.2 billion in grants and € 17.7 billion in loans) up to 2026 through the Recovery and Resilience Facility (RRF), Next Generation EU (NGEU)'s largest instrument, out of which € 14.7 billion (€ 7.4 billion in grants and € 7.3 billion in loans) has already been disbursed by the EU. A further € 40 billion is due through EU's long-term budget (MFF), out of which € 20.9 billion is to fund the National Strategic Reference Frameworks (ESPA 2021–2027). Moreover, following the September 2023 floods in the Thessaly region, Greece could benefit from EU support of up to € 2.65 billion, according to the EC President.

On the monetary policy front, the Governing Council of the ECB, in line with its strong commitment to its price stability mandate, proceeded with ten rounds of interest rate hikes in 2022 and in 2023 (the most recent one in September 2023), raising the three key ECB interest rates by 450 basis points on aggregate. Furthermore, although net bond purchases under the temporary Pandemic Emergency Purchase Programme (PEPP) ended in March 2022, as scheduled, the ECB will continue to reinvest principal from maturing securities at least until the end of 2024, including purchases of Greek Government Bonds (GGBs) over and above rollovers of redemptions.

In 2023, the Greek government issued or re-opened twelve bonds of various maturities (from 5 to 19 years) through the Public Debt Management Agency (PDMA), raising a total of € 11.45 billion from the international financial markets. In February 2024, the PDMA raised an additional € 4.4 billion through a new 10-year bond issue and the reopening of two past issues. Following a series of sovereign rating upgrades in the second half of 2023, Greek government's long-term debt securities were considered investment grade by four out of the five Eurosystem-approved External Credit Assessment Institutions (Fitch, Scope, S&P: BBB-, stable outlook; DBRS: BBB(low), stable outlook), and one notch below investment grade by the fifth one, Moody's (Ba1, stable outlook) as of March 2024.

Regarding the outlook for the next 12 months, the major macroeconomic risks and uncertainties in Greece and our region are associated with: (a) the open war fronts in Ukraine and the Middle East, their implications regarding regional and global stability and security, and their repercussions on the global and the European economy, including the disruption in global trade caused by the recent attacks on trading vessels in the Red Sea, (b) a potential prolongation of the ongoing inflationary wave and its impact on economic growth, employment, public finances, household budgets, firms' production costs, external trade and banks' asset quality, as well as any potential social and/or political ramifications these may entail, (c) the timeline of the anticipated interest rate cuts by the ECB and the Federal Reserve Bank, as persistence on high rates for longer may keep exerting pressure on sovereign and private borrowing costs and certain financial institutions' balance sheets, but early rate cuts entail the risk of a rebound in inflation, (d) the prospect of Greece's and Bulgaria's major trade partners, primarily the euro area, remaining stagnant or even facing a temporary downturn, (e) the persistently large current account deficits that have started to become once again a structural feature of the Greek economy, (f) the absorption capacity of the NGEU and MFF funds and the attraction of new investments in the countries of presence, especially in Greece, (g) the effective and timely implementation of the reform agenda required to meet the RRF milestones and targets and to boost productivity, competitiveness, and resilience and (h) the exacerbation of natural disasters due to the climate change and their effect on GDP, employment, fiscal balance and sustainable development in the long run.

Materialization of the above risks, 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, asset quality, solvency and profitability of the Greek banking sector. In this context, the Group's Management and Board are continuously monitoring the developments on the macroeconomic, financial and geopolitical fronts as well as the evolution of the Group's asset quality and liquidity KPIs and have increased their level of readiness, so as to accommodate decisions, initiatives and policies to protect the Group's capital, asset quality and liquidity standing as well as the fulfilment, to the maximum possible degree, of its strategic and business goals in accordance with the business plan for 2024 - 2026.

Eurobank S.A. Group, which comprises the major part of Eurobank Holdings Group, is not separately supervised for capital adequacy purposes. As at 31 December 2023, the Total Adequacy Ratio (total CAD) and Common Equity Tier 1 (CET1) ratios of Eurobank Holdings Group, stood at 19.4% (31 December 2022: 19.2%) and 16.9% (31 December 2022: 16%) respectively. Pro-forma with the completion of projects "Solar" and "Leon" and the issuance of Subordinated Tier II debt instruments in January 2024, the total CAD and CET1 ratios would be 20.2% and 17% 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 19,2% (31 December 2022: 18.9%) and 16,1% (31 December 2022: 15.1%) respectively. The Eurobank Holdings Group completed successfully the 2023 EU-wide stress test (ST), which was coordinated by the European Banking Authority (EBA) in cooperation with the ECB and the European Systemic Risk Board (ESRB) (note 4 in the consolidated financial statements of Eurobank Holdings). On 9 October 2023, the Company completed the buy back of all of its issued

shares held by HFSF. Accordingly, the Company and the Bank are no longer subject to Law 3864/2010 and to the special rights of HFSF provided for in the law (note 37 in the consolidated financial statements of Eurobank Holdings).

With regard to asset quality, as at 31 December 2023, the Eurobank Holdings Group 's NPE stock, following the classification of the loan portfolio of project 'Leon' as held for sale, the sale of Eurobank Direktna a.d. disposal group, and the write-offs during the year, stood at € 1.5 billion, (Bank: € 1.2 billion) (31 December 2022: € 2.3 billion, Bank: € 1.9 billion), driving the NPE ratio to 3.5% (31 December 2022: 5.2%), while the NPE coverage ratio improved to 86.4% (31 December 2022: 74.6%). The Eurobank S.A. Group's net profit attributable to shareholders for the year ended 31 December 2023 amounted to € 1,148 million (2022: € 1,353 million, restated), while the Bank's after tax result amounted to a profit of € 794 million (2022: € 1,388 million).

In terms of liquidity, as at 31 December 2023, following the completion of the sale of Eurobank Direktna a.d. disposal group, the Eurobank Holdings Group deposits stood at € 57.4 billion (31 December 2022: € 57.2 billion), while the funding from the ECB refinancing operations amounted to € 3.8 billion (31 December 2022: € 8.8 billion) (Bank: € 3.8 billion) (note 30). During the year, the Bank proceeded with the issuance of two preferred senior notes of € 500 million each. More recently, in January 2024, the Parent Company completed the issuance of a € 300 million Subordinated Tier II debt instrument (note 33). The rise in high quality liquid assets of the Eurobank Holding Group led the respective Liquidity Coverage ratio (LCR) to 178.6% (31 December 2022: 173%). In the context of the 2024 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 regarding the short term (1 month), the 3-month and the medium-term horizon (1 year). Information on the interest rate and liquidity risk exposures of the Bank is included in notes 5.2.2 and 5.2.3.

Going concern assessment

The Board of Directors, acknowledging the geopolitical, macroeconomic and financial risks to the economy and the banking system and taking into account the above factors relating to (a) the idiosyncratic growth opportunities in Greece and the region for this and the next years, also underpinned by the mobilisation of the already approved EU funding mainly through the RRF, and (b) the Group's pre-provision income generating capacity, asset quality, capital adequacy and liquidity position, has been satisfied that the financial statements of the Bank can be prepared on a going concern basis.

2.1.1 New and amended standards and interpretations

(a) New and amended standards adopted by the Bank as of 1 January 2023

The following standards and amendments to existing standards as issued by the IASB and endorsed by the EU, apply as of 1 January 2023:

IFRS 17, Insurance Contracts

IFRS 17, which supersedes IFRS 4 "Insurance Contracts" provides a comprehensive and consistent accounting model for insurance contracts. It applies to all types of insurance contracts as well as certain guarantees and financial instruments with discretionary participating features. 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 core general model, the 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.

In December 2021, the IASB issued a narrow-scope amendment to the transition requirements of IFRS 17 for entities that first apply IFRS 17 and IFRS 9 "Financial Instruments" at the same time.

The Bank has not issued contracts within the scope of IFRS 17; therefore, the adoption of the standard had no impact to the financial statements.

IAS 8, Amendments, Definition of Accounting Estimates

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 how accounting policies and accounting estimates relate to each other by (i) explaining that accounting estimates are developed if the application of accounting policies requires items in the financial statements to be measured in a way that involves a measurement uncertainty and (ii) replacing the definition of a change in accounting estimates with the definition of accounting estimates, where accounting estimates are defined as "monetary amounts in financial statements that are subject to measurement uncertainty". In addition, the amendments clarify that selecting an estimation or valuation technique and choosing the inputs to be used constitutes development of an accounting estimate and that the effects of a change in an input or technique used to develop an accounting estimate are changes in accounting estimates, if they do not result from the correction of prior period errors.

The adoption of the amendments had no impact on the financial statements.

Amendments to IAS 1 Presentation of Financial Statements and IFRS Practice Statement 2: Disclosure of Accounting policies

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

The adoption of the amendments had no impact on the financial statements. The Bank took into account the amendments in disclosing its material accounting policies (note 2.2).

IAS 12, Amendments, Deferred Tax related to Assets and Liabilities arising from a Single Transaction

The amendments clarify that the exemption on initial recognition 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 had no impact on the financial statements.

IAS 12, Amendment, International Tax Reform – Pillar Two Model Rules

The amendments introduce a mandatory temporary exception (*relief*) from the recognition and disclosure of deferred taxes arising from the implementation of the Organisation for Economic Co-operation and Development's (OECD) Pillar Two model rules ("the Pillar Two Income taxes") that are applicable as of 1 January 2024.

Additionally, the amendments require an entity to disclose that it has applied the above exception related to Pillar Two income taxes, while in the periods in which the legislation is (substantively) enacted but not yet effective, an entity is required to disclose of known or reasonably estimable information that helps users of financial statements understand the entity's exposure arising from Pillar Two income taxes. Subsequently, in the periods when the legislation is effective it is required to separately disclose its current tax expense (income) related to Pillar Two income taxes.

The adoption of the amendments had no impact on the financial statements.

(b) New and amended standards not yet adopted by the Bank

A number of amendments to existing standards are effective after 2023, as they have not yet been endorsed by the EU or have not been early applied by the Bank. Those that may be relevant to the Bank are set out below:

IAS 1, Amendments, Classification of Liabilities as Current or Non-Current (effective 1 January 2024)

The amendments, published in January 2020, introduce a definition of 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 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 classified as equity.

In October 2022, the IASB issued *Non-current Liabilities with Covenants (Amendments to IAS 1)* with respect to liabilities for which an entity's right to defer settlement for at least 12 months is subject to the entity complying with conditions after the reporting period. The amendments specify that covenants to be complied with after the reporting date do not affect the classification of debt as current or non-current at the reporting date. Instead, the amendments require a company to disclose information about these covenants in the notes to the financial statements.

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

IFRS 16, Amendment, Lease Liability in a Sale and Leaseback (effective 1 January 2024)

The amendment requires a seller-lessee to subsequently measure lease liabilities arising in a sale and leaseback transaction in a way that it does not recognise any amount of the gain or loss that relates to the right of use it retains. Any gains and losses relating to the full or partial termination of a lease continue to be recognised when they occur. The amendment does not change the accounting for leases unrelated to sale and leaseback transactions.

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

IAS 21, Amendments, Lack of Exchangeability (effective 1 January 2025, not yet endorsed by EU)

The amendments to IAS 21 "The Effects of Changes in Foreign Exchange Rates", specify how an entity can determine whether a currency is exchangeable into another currency at the measurement date, and the spot exchange rate to use when it is not. In addition, when a currency is not exchangeable an entity should disclose information that would enable users of its financial statements to understand the related effects and risks as well as the estimated rates and techniques used.

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

2.2 Material 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. 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.

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.

Forward contracts to buy/sell an entity that will result in a business combination at a future date, which do not exceed the normally necessary period to complete the transaction, including obtaining the required approvals, are not accounted for by the Bank as derivatives but as executory contracts.

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.

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 that mainly include foreign exchange contracts, forward currency agreements, currency and interest rate options (both written and purchased), as well as currency and interest rate swaps are initially recognized in the balance sheet at fair value, on the date on which the derivative contracts are 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.

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 the 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, such as bonds issued by the Bank, are treated as separate derivatives when their risks and characteristics are assessed not to be 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 separated in the balance sheet and treated similarly to stand-alone derivatives measured at fair value with changes in fair value recognized in the income statement.

Derivatives held for hedge accounting

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

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

The objectives of hedging with derivative financial instruments include:

- Reduce interest rate exposure that is in excess of the Bank's appetite;
- Manage efficiently interest rate risk and achieve optimization and normalization of the evolution of net interest margin and net interest income by tracking the evolution of interest rates and spreads and hedging the changes to movements of the benchmark interest rates represented by the prevailing reference rates;
- Reduce variability arising from the fair value changes of derivatives embedded in financial assets;
- Manage future variable cash flows;
- Reduce foreign currency risk or inflation 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, as endorsed by the European Union (IAS 39 "carve out''). In 2023, the Bank introduced a new risk management strategy which is the fair value hedging of the core deposits held in Greece and Cyprus from both retail and wholesale portfolios. Accordingly, the Bank applied for the first time the provisions of IAS 39 carve-out that enables entities to designate core deposits as hedged items in a portfolio hedge of interest rate risk, as further described in the sections below. Under the EU carve-out version of IAS 39, certain requirements related to hedge accounting were removed, in order to facilitate (a) the application of fair value hedge accounting to the macro-hedges used for structural hedges including demand deposits and (b) the hedge effectiveness assessment by permitting the use of bottom layer approach for the determination of the fair value of hedged item, attributable to interest rate risk.

For hedge accounting purposes, the Bank forms a hedging relationship between a hedging instrument or group of hedging instruments and a related item or group of items to be hedged. A hedging instrument is a designated derivative or group of derivatives, 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 or group of items. Specifically, the Bank designates certain derivatives as: (a) hedges of the exposure to changes in fair value of recognized assets or liabilities on a single or portfolio basis or unrecognized firm commitments (fair value hedging), (b) hedges of the exposure to variability in cash flows of recognized assets or liabilities or highly probable forecasted transactions (cash flow hedging).

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 qualifying hedge relationships, 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 is not applied. The said derivative instruments are classified along with those held for trading purposes.

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 is inherent in each of the items in the group.

The Bank applied the Phase 1 and Phase 2 IBOR reform amendments to IFRS 9, IAS 39 and IFRS 7, that provided temporary reliefs on hedging relationships during the period before the replacement of the existing interest rate benchmarks with alternative risk-free rates (RFRs), assumed no change at its hedging relationship as a result of the IBOR reform, and amended accordingly its hedging documentation.

The Bank has implemented its IBOR reform transition program, on the outstanding exposures that referenced the above rates, mainly referring to loans to customers and derivatives and therefore, the relative reliefs ceased to apply.

(i) Fair value hedging

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

Hedged items

The items that qualify for fair value hedge accounting include financial assets and liabilities such as:

- fixed rate investment securities measured at AC or FVOCI,
- fixed rate term deposits and debt securities in issue measured at amortized cost;
- portfolios of floating-rate loans and investment securities with embedded interest rate options (such as purchased interest rate floors) measured at AC;
- portfolios of fixed rate amortizing loans (macro hedging) including securitized notes issued and held by the Bank measured at AC.
- portfolios of liabilities (macro hedging) and more specifically demand deposits with interest rates determined by the Bank and announced on its pricing list (sight/savings deposit rate) that are identified as interest rate-insensitive liabilities measured at AC. More specifically, demand deposits (sight or savings) are liabilities with no contractual maturity that the customers have the flexibility to withdraw at any time. Despite their contractual terms, and due to their nature, part of the demand deposits behaves as a portfolio of longer-term fixed rate liabilities, as they remain insensitive to interest rate movements. This part of demand deposits represents the core deposits.

Hedge effectiveness assessment

The Bank uses the dollar-offset method at inception (prospective measurement) and on an ongoing basis (retrospective measurement), in order to assess the effectiveness of fair value hedges on a single or portfolio basis. 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. The above comparison constitutes the dollar-offset ratio and should be within the range of 80% -125% for the hedge to be highly effective.

The Bank may also use the hypothetical derivative method, an approach to the dollar offset method, mainly applied in portfolio hedges that carry embedded derivatives, where the hedged risk is modelled through hypothetical derivatives, which replicate the embedded derivative. The fair value of the hypothetical derivative is used as a proxy for the net present value of the hedged future cash flows against which changes in value of the actual hedging instrument are compared to assess effectiveness and measure ineffectiveness. 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 as well as differences between expected and actual cash flows.

In addition, for hedging relationships where the critical terms of the hedged item match the ones of the hedging instrument such as coupon, maturity, and payment frequency, it is presumed that by construction, effectiveness is expected to be highly effective.

The Bank has identified the following sources of ineffectiveness:

- Differences in the repricing frequency of the hedged items and hedging instruments
- The use of different interest rate curves applied to discount the hedged items and hedging instruments.

Fair value hedging adjustments and discontinuation of hedge accounting

Changes in the fair value of derivatives that are designated and qualify as fair value hedges are recorded in the income statement line “net trading income/(loss)” together with the changes in the fair value of the hedged assets or liabilities that are attributable to the hedged risk (fair value hedging adjustments). Fair value hedging adjustments to the hedged items measured at amortised cost are recorded as part of their carrying value in the balance sheet, with the exception of hedging adjustments for portfolios of fixed rate assets in the context of macro-hedging (see below).

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 in the income statement line "interest income" over the remaining period to maturity with amortization commencing no later than when the hedged item ceases to be adjusted for changes in its fair value attributable to the risk being hedged. If the hedged item is derecognised, the unamortised fair value adjustment is recognised immediately in the income statement.

Portfolio hedging of interest rate risk (macro-hedging)

With reference to portfolio hedging of interest rate risk, a dynamic hedging strategy is applied according to which the Bank voluntarily designates and de-designates the hedge relationship on a monthly basis.

For portfolios of financial assets, the Bank determines the designated hedged amount by identifying portfolios of homogenous fixed rate assets based on their contractual interest rates, maturity and other risk characteristics. Assets within the identified portfolios are allocated into repricing time periods based on their repricing/maturity dates or interest payment dates with assumptions made for expected prepayments and capital repayments. The hedging instruments are groups of interest rate swaps replicating in aggregate the amortization profile of the assets and designated appropriately to their repricing time periods. Following the above allocation into time buckets, the designated hedged principal and the resulting percentage of the asset portfolio hedged (hedge ratio) for each time bucket are determined.

For the core deposits' portfolios, the Bank determines their aggregated balances and allocation into time buckets by applying a modelled approach that is based on regulatory standards. More specifically, the portfolio of core deposits to be hedged is determined by an internal designated behavioral model that utilizes a number of assumptions regarding the behavior and evolution of demand deposits balances, which are assessed, monitored and documented in accordance with the Bank's risk management framework. The approach involves the allocation of demand deposits in sub-categories considering their nature, i.e. retail and wholesale, their idiosyncratic behavioral analysis per portfolio, their sensitivity on interest rates and their withdrawal patterns and expected maturity profile analyzed in time buckets for a maximum period of ten years. Furthermore, the model performs a capacity check per time bucket to ensure that there is sufficient hedge capacity on the hedged item amortizing profile, compared to the hedging instruments' profile in order to ensure that there is no over hedge.

Against this modelled interest rate exposure, the Bank then uses groups of interest rate swaps with maturity up to ten years, designated as hedging instruments, that receive fixed interest rate and pay floating interest rate based on the benchmark rate hedged. The groups of swaps are staggered to cover different periods in time replicating in aggregate the estimated amortization profile of the hedged core deposits per time bucket. Additionally, their volume is re-assessed on a monthly basis. Following the above allocation into time buckets, the designated hedged principal and the resulting percentage of the portfolio hedged (hedge ratio) for each time bucket are determined.

For hedge effectiveness assessment purposes, the dollar-offset method also applies to portfolio hedging of interest rate risk and hedge effectiveness is measured on a monthly basis. For prospective effectiveness measurement, the dollar-offset method involves a comparison of the sensitivity of fair value to a change of 1 basis point in interest rates (Dollar Value of a basis point - DV01) between the hedging instruments and the hedged assets or liabilities. A DV01 offset within the threshold of 80% to 125% demonstrates that the hedge is expected to be highly effective. Retrospective effectiveness is measured by comparing fair value changes of the designated portion of the portfolio of assets or liabilities attributable to the hedged risk, estimated as the present value of the future cash flows using discount factors based on the applicable benchmark interest rate at the inception and reporting date, against the fair value changes of the derivatives, to ensure that they are within an 80% to 125% range.

Fair Value hedging adjustments do not affect the carrying amount of the hedged assets or liabilities pool, but instead they are presented as a separate line item within balance sheet lines loans and advances to customers and due to customers respectively. Considering the designation and de-designation process for a portfolio hedging of interest rate risk is performed on a monthly basis, the hedging adjustments are recorded in the income statement line "net trading income/(loss)" and begin amortization on the month they occur over the expiration of the designated time periods on a straight line basis.

Furthermore, the pool of hedging instruments is managed dynamically and therefore when new derivatives are added in the pool of hedging instruments, they are included in the next period's hedge assessment and consequently the change in fair value in the month of their inception affects the P&L. Similarly, when existing swaps are de-designated, either to improve expected hedge effectiveness or to be liquidated, the respective change in fair value from de-designation up to the next designation or liquidation date, affects the P&L.

(ii) Cash flow hedging

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 as it is described in section (i) above.

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 line “net trading income/(loss)”.

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).

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 hedged cash flows affect 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 and risk management policies 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 them 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 are 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 future 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 fees and points paid or received that are an integral part of the effective interest rate, transaction costs, and 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 are presented separately in the income statement for all interest bearing financial instruments within net interest income.

(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 measured at cost less accumulated depreciation and any 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, and subsequently at fair value with any change therein recognized in income statement line ''other income / (expenses)''. 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. Such expenditure includes enhancements that increase the value of the asset and its future income-earning potential, as well as costs to comply with environmental and other legal requirements. Repairs and maintenance costs are recognized to the income statement during the financial period in which they are incurred.

Any gain or loss on disposal (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.

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 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.

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 is tested for impairment annually or more frequently if there are any indications that impairment may have occurred. 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. 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 on initial recognition 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.

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. Derivative financial instruments are measured at FVTPL with changes in fair value recognized in the income statement, unless they are designated as effective hedging instruments, where hedge accounting requirements under IAS 39 apply (as described in note 2.2.3 above).

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. Financial assets classified within this business model include investment securities, due from banks and loans and advances to customers including securitized notes issued by special purpose entities established by the Bank and recognized in its balance sheet, which are measured at amortized cost. Sales within this model are monitored per financial asset class 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.

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. Financial assets classified within this business model include investment securities which are measured at FVOCI, subject to meeting the SPPI assessment criteria.

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 asset 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. For the purpose of this assessment principal is defined as the fair value of the asset at initial recognition and interest as the consideration for the time value of money, credit risk, other basic lending risks and a profit margin.

More specifically, at 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. 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, terms that introduce leverage including index linked payments, as well as environmental, social and governance linked features (ESG) where the contractual interest rate is adjusted if the borrower meets, or fail to meet specific sustainability performance targets. 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.

In addition, 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.

Moreover, for the securitized notes issued by special purpose entities 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 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 non-recourse loans, 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.

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 entities, either established by the Bank or third parties, and held by the Bank, and debt securities the assessment is performed on an individual basis.

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 purpose entities, 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. Substantial modifications resulting in derecognition may include among others change in borrower, change in the asset's denomination currency, debt consolidation of unsecured exposure into a single new secured asset. The Bank records the modified asset as a 'new' financial asset at fair value plus any eligible transaction costs 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.

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.

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 FVTPL 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 the fair value of liabilities designated at fair-value-through-profit-or-loss 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.

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.

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 entities established by the Bank, lease receivables, debt securities, as well as financial guarantee contracts and loan commitments. 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-month 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.
- 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 directly from the market or through a business combination, 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 triggers, 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 trigger 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.

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. 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, where the level of their expected cash flows is compared to the carrying amount of the securitized notes. In addition, the 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 trigger 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 triggers, 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.

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 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 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 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, inflation, 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).

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).

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 liability to the counterparty is included in amounts due to other banks or due to customers, as appropriate, and measured at amortized cost. Securities purchased under agreements to resell (reverse repos)

are recorded as loans and advances to other banks or customers, as appropriate, and measured at amortized cost. 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 against the receipt of a fee continue to be recognized 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

The Bank enters into leases either as a lessee or as a lessor. At inception of a contract, the Bank assesses whether a contract is, or contains, a lease.

(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.

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.

The Bank has elected not to recognise right-of-use assets and lease liabilities for leases of low-value assets and short-term leases. The Bank recognises the lease payments associated with these leases as an expense on a straight-line basis over the lease term.

(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 whether the lease transfers substantially all of the risks and rewards incidental to the ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not, then it is an operating lease. As part of this assessment, the Bank considers certain indicators such as whether the lease is for the major part of the economic life of the asset.

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 and the tax rate enacted at the reporting date, 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 and accounting write-offs 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 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 debt 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 a) 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 b) the level of remuneration at the date of retirement, if they remain in the employment of the Bank until normal retirement age. In addition, the Bank provides termination benefits mainly in respect of the Voluntary Exit Schemes (VES), which have been implemented through either lump-sum payments or long-term leaves during which the employees will be receiving a percentage of a monthly salary, or a combination thereof. Provision has been made for the actuarial value of the lump sum payable on retirement (SLSRI) and termination benefits using the projected unit credit method. Under this method the cost of providing retirement indemnities and termination benefits is charged to the income statement so as to spread the cost over the period of service of the employees, in accordance with the respective actuarial valuations, which are performed every year.

The SLSRI and termination benefits 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 and termination benefit obligations. Actuarial gains and losses that arise in calculating the Bank's SLSRI and termination benefits 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.

Interest cost on the staff retirement indemnity and termination benefits obligations, as well as service cost, consisting of current service cost, past service cost and gains or losses on settlement are recognized in the income statement.

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 VES 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. Any reversals of the SLRSI obligation arising from employees that are included in the long-term leaves scheme are accounted for as a curtailment gain recognized in the income statement. 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.

(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 an equal credit in equity, i.e. 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.

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;

(e) fellow subsidiaries;

(f) post-employment benefit plans established for the benefit of the Bank's employees.

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 and contingent liabilities

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 a 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.

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.

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 Bank'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 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 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 is its 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, such assets or disposal groups 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; or

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 that are all carried at amortised cost and other short-term highly liquid investments with original maturities of three months or less that are held for trading.

2.2.27 Government grants

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.

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. 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.

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

On the back of the international economic environment, that remains volatile, Greek economy remained in expansionary territory in 2023. More specifically, Greek economy expansion is mainly driven by the increase in household consumption export of goods and services, as well as its strong performance in tourism (note 2). Moreover, the Bank's asset quality continued to strengthen in 2023, as evidenced by the level of its credit quality indicators at year end 2023 that outperformed the expected levels in terms of NPE ratio and NPE coverage that maintained their improving trend.

The Bank, remains cautious for any developments in the macroeconomic trends and geopolitical front and closely monitors all loan portfolios, so as to revise, if needed, the respective estimates and assumptions.

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.

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 (note 2.2.14). More stringent criteria could significantly increase the number of instruments migrating to stage 2.

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, origination year, product type as well as per origination PD level. In 2023, the Bank, recalibrated its SICR thresholds, by segregating further its retail exposures based on their disbursement year, with a view to aligning the comparison between the origination and residual lifetime PD to the remaining maturity of the loans. Accordingly, performing lending exposures close to maturity exhibit lower origination PDs and therefore are associated with higher SICR thresholds, while higher origination PDs corresponding to exposures of longer maturity are associated with lower SICR thresholds. The impact in ECL and SICR assessment, resulting from the above recalibration of SICR thresholds, was insignificant.

As at 31 December 2023 and 2022, the upper PD thresholds based on the above segmentation, that trigger the allocation to stage 2 for Greece's retail exposures are set out below:

Retail exposures	31 December 2023	31 December 2022
	Upper SICR threshold	
Mortgage	170%	50%
Home Equity	80%	80%
SBB	130%	65%
Consumer	100%	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 2023 and 2022, the credit rating deterioration thresholds per rating bands for Greece's wholesale lending exposures that trigger allocation to stage 2 are set out below. In particular, as per the Bank's 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:

Wholesale internal rating bands	Minimum SICR threshold range
1	Five notches
2	Four notches
3	Three notches
4	Two notches
5-8	One notch

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 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 2023 and 2022, 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.

The baseline scenario assumes no escalation of the open war fronts, no change in EU sanctions against Russia, continuation of ECB's monetary policy trajectory as well as Greek government's fiscal support measures. Core inflation for Greece is assumed to gradually de-escalate suggesting a moderate economic growth path, employment is assumed to contribute to lower unemployment path given the capacity constraints stemming from demographic factors, real estate prices show signs of slowing down for 2023 and 2024 compared to 2022 but will remain on a positive range and inflation rate is forecasted to decrease slightly implying stable price levels. Additionally, the economies' short-term prospects are supported by the: (a) strong tourist season expected, (b) Recovery and Resilience Facility, Multiannual Financial Framework and European Investment Bank funds, (c) ample liquidity (deposits and state cash buffer) and (d) fiscal measures implemented to mitigate the impact of energy costs.

The optimistic and adverse scenarios originate from forecasts that are, respectively, more positive, or more negative regarding real GDP growth, inflation, and unemployment rates, in comparison to the baseline scenario. The forecasts for these macroeconomic variables in the adverse/optimistic scenarios of the IFRS9 probability-weighted framework are produced using a Vector Auto Regression (VAR) model. This model uses historical data on real GDP growth, inflation, and unemployment rates to generate its forecasts. In more detail regarding the adverse and optimistic forecasted scenarios:

- The adverse scenario paints a more challenging picture compared to the baseline scenario. The real GDP growth from a low start of 0.6% in 2024, contracts to -0.5% in 2025, and improves slightly in 2026 and 2027 reaching 0.2% and 0.5%, respectively. Unemployment is anticipated to remain high, while the inflation rate remains relatively higher than in the base line scenario, although it shows a slight downward trend.
- In contrast, the optimistic scenario suggests a buoyant economic outlook, with real GDP growth from 4.0% in 2024 to 3.7% and 3.1% in 2026 and 2027 respectively. The unemployment rate is forecasted to fall significantly indicating a robust job market compared to the baseline scenario. The inflation rate is expected to be lower compared to the baseline scenario, signifying well-contained price increases.

Forward-looking information

The Bank ensures that impairment estimates and macroeconomic forecasts, as provided by Economic Analysis & Research Unit, applicable for business and regulatory purposes are fully consistent. Accordingly, the IFRS 9 baseline scenario applied in the ECL calculation coincides with the one used for ICAAP and business planning purposes. 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 annual forecasts per macroeconomic scenario 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 2023 and 2022, are set in the following table:

Key macroeconomic indicator	31 December 2023 Average (2024-2027) annual forecast			31 December 2022 Average (2023-2026) annual forecast		
	Optimistic	Base	Adverse	Optimistic	Base	Adverse
Gross Domestic Product growth	3.91%	2.05%	0.19%	3.67%	2.42%	-0.10%
Unemployment Rate	7.60%	9.09%	10.60%	9.21%	10.50%	12.84%
Residential property prices' index	6.14%	3.90%	1.66%	5.23%	4.06%	1.50%
Commercial property prices' index	5.37%	1.47%	-2.42%	4.75%	3.67%	1.73%
Inflation rate	1.75%	2.10%	2.44%	2.40%	2.98%	4.03%

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.

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 macroeconomic variables, such as GDP, unemployment etc. and portfolio specific variables such as seasonal flag etc., which are used as independent variables for optimum predictive capability. Additionally, the PD models involve industry specific macro variables in corporate borrowers, as well as the application of interest rate and inflation scalars in the estimation of retail customers' debt to income ratio. More specifically, in the latter case, the borrowers' instalments are estimated with the use of the projected interest rates, while the income model, also takes into account the projected inflation on top of the projected GDP and unemployment ratio.

The ECL 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.

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. Such adjustments are governed by the Bank's IFRS9 ECL Model Adjustments' framework which aims to ensure timely identification of non-modeled risks, if any, that may have an impact on lending portfolios, as well as sufficient quantification of such risks based on sound methodologies and processes. For 2023, the Bank reassessed the need for overlay, considering the current geopolitical developments and taking into account the macroeconomic uncertainty resulting this time mainly from persistent inflationary pressures, high interest rates and open war fronts, Management incorporated in the ECL calculations as a post model adjustment, an estimation for potentially non modeled risks of € 18 million (2022: € 66 million), focusing now on corporate borrowers that are considered more sensitive to any negative macro environment developments in the foreseeable future.

The risk models are governed by the Bank's validation framework which aims to ensure their independent verification. The risk models as well as the management adjustments, if any, are approved by the Board Risk Committee (BRC) as per the internal approval processes.

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 is applied in the modeled ECL output and assumes a favorable and an adverse shift in the scenario weighting, compared to the one applied in the ECL measurement. As at 31 December 2022 and 2023, the favorable shift assumes an increase in the weighting of the optimistic scenario at 50% and a stable weighting of the baseline scenario at 50%, while the adverse shift assumes an increase in the weighting of the adverse scenario at 50% and a stable weighting of the baseline scenario at 50%.

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 (2024-2028 and 2023-2027, respectively):

As at 31 December 2023				As at 31 December 2022			
Sensitivity scenario				Sensitivity scenario			
Key macroeconomic indicators	Combined change %			Key macroeconomic indicators	Combined change %		
	Positive change	Adverse change			Positive change	Adverse change	
GDP growth	42%	-42%	change of annual forecasts	GDP growth	41%	-41%	change of annual forecasts
Unemployment Rate	-11%	11%	change of annual forecasts	Unemployment Rate	-11%	11%	change of annual forecasts
Inflation rate	-1%	1%	change of annual forecasts	Inflation rate	-2%	2%	change of annual forecasts
Residential property prices' index	4%	-4%	change of index adjusted real estate collateral market values	Residential property prices' index	4%	-4%	change of index adjusted real estate collateral market values
Commercial property prices' index	9%	-9%	change of index adjusted real estate collateral market values	Commercial property prices' index	4%	-4%	change of index adjusted real estate collateral market values

	Estimated effect per stage as at 31 December 2023							
	Positive change				Adverse change			
	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2023	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2023
Impact in € million	(12)	(24)	(17)	(53)	11	29	18	58
Impact in % allowance	-11.52	-8.67	-3.01	-5.63	10.76	10.43	3.15	6.16

	Estimated effect per stage as at 31 December 2022							
	Positive change				Adverse change			
	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2022	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2022
Impact in € million	(9)	(32)	(17)	(58)	6	38	18	62
Impact in % allowance	-6.85	-10.36	-1.55	-3.76	4.94	12.19	1.65	4.05

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.

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 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 based on the measurement category for debt securities. However, further disaggregation may be performed by business strategy or region.

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 and debt securities by considering all the features which might potentially lead to SPPI failure. The above assessment may be particularly challenging for more complex instruments with contractual terms including leverage, prepayment or extension options, securitizations where the cash flows are linked to the underlying assets, non-recourse arrangements, as well as environmental, social and governance linked features (sustainability linked). Judgment is applied by the responsible business units when considering whether certain contractual features significantly affect future cash flows, are de-minimis or not genuine.

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 entities, either established by the Bank or third parties, 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). For the SPPI assessment of sustainability linked instruments that include features that may change the contractual cash flows, by reducing or increasing the interest rate depending on whether the borrower meets or fails to meet predetermined ESG targets, the Bank considers whether such targets are specific to the borrower, as well as whether the related contractual cash flows' change introduces compensation for non-basic lending risks (information about the Bank's exposure in sustainability linked instruments is provided in note 20). 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 taxes. 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 regarding the Bank's future financial performance. 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 deferred tax assets recognized by the Bank and the assessment for their recoverability 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 change in these assumptions impacts the carrying amount of the 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 and certified valuators on an annual basis, or more frequently if deemed appropriate upon assessment of any relevant circumstances. The primary valuation method applied in determining the fair value of the Bank's investment properties is the Discounted Cash Flow (DCF) method which is considered the most appropriate in cases of income generating assets. This method is based on discounting the net future cash flows generated by a property over the assumed holding period, by using an appropriate market derived discount rate.

Accordingly, the main factors underlying the determination of fair value under the DCF method, are related with rental income from current leases and assumptions about its future growth in the light of current market conditions, including CPI indexation that is based on CPI predictions for the next 10 years, as well as exit yields that are determined based on each property's characteristics/use and future prospects of the economy and property market in general as forecasted by the IMF or other internationally recognized institutions. In addition, potential legal or other restrictions on the aforementioned rental income levels are taken into account, where applicable. To the above projected net cash flows series, an appropriate, market-derived discount rate is applied to establish the present value of each property. Such discount rate is calculated by taking into consideration the initial yield of the investment property, the expected return, the real rental growth and annual obsolescence of the property.

Other assumptions incorporated in the valuations include future vacancy rates and periods, the level of future maintenance and other operating costs, as well as sustainability issues, where applicable.

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 is provided in note 26.

3.7 Provisions and contingent liabilities

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 including primarily legal advice, the progress 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.

3.8 Share-based payments

The Parent Company of the Bank (Eurobank Ergasias Services and Holdings S.A.) grants shares and share options to its employees as a common feature of employee remuneration. IFRS 2 requires the recognition of an expense for those shares and share options at their 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 Bank estimates the fair value of the equity instruments granted 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 and 29.

4. Capital Management

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

	31 December 2023 € million	31 December 2022 € million
Total equity	**6,055**	5,583
Add: Adjustment due to IFRS 9 transitional arrangements	**-**	214
Less: Other regulatory adjustments	**(472)**	(330)
Common Equity Tier 1 Capital	**5,583**	5,467
Total Tier 1 Capital	**5,583**	5,467
Tier 2 capital-subordinated debt	**1,075**	1,250
Add: Other regulatory adjustments	**-**	117
Total Regulatory Capital	**6,658**	6,834
Risk Weighted Assets	**34,669**	36,108
Ratios:	**%**	%
Common Equity Tier 1	**16.1**	15.1
Pro-forma Common Equity Tier 1 (1)	**16.2**	15.1
Total Capital Adequacy Ratio	**19.2**	18.9
Pro-forma Total Capital Adequacy Ratio (1)	**20.2**	18.8

(1) Pro-forma with the completion of the projects "Solar" (for 31/12/2022 and 31/12/2023 ratios) and "Leon" (for 31/12/2023) (note 29), as well as accounting for the impact from the completion of the issuance of Subordinated Tier 2 debt instruments in January 2024 (note 33).

Notes:

a) The profit of € 794 million for the year ended 31 December 2023 (31 December 2022: profit of € 1,388 million) has been included in the calculation of the above capital ratios.

b) As of 31 December 2023, the increase in CET1 ratio, compared to 31 December 2022, is mainly attributed to the organic profitability for the year ended 31 December 2023 Wave IV securitization (note 20), and the decrease of the RWAs due to the reversion from the Internal Ratings Based Approach (IRB) to the Standardized Approach (STD) (see below) mainly due to Shares in subsidiaries and partly offset by i) the new production of loans, loan commitments and letters of guarantee and ii) the impact on regulatory capital from the ending on 1 January 2023 of the 5-year period of the IFRS 9 transitional adjustments according to the Regulation (EU) 2017/2395 and the FVOCI prudential treatment specified in Article 468 of the CRR, amended by the Regulation (EU) 2020/873.

On 1 March 2023, the Bank received approval from ECB to revert to the Standardized approach (STD) for all credit risk exposures. The Bank's decision to move to a less sophisticated method for capital requirements calculation was based on the fact that the historical data and performance on which Internal Ratings Based (IRB) models are calibrated is considered to be of limited representativeness taking into account the recent economic developments. The Bank intends to continue utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS 9 provisions and risk monitoring.

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) along with the Regulation No 575/2013/EU (known as CRR), as they are in force. The above Directive has been transposed into Greek legislation by Law 4261/2014, as in force. Furthermore, the CRR as amended by the Regulation 2020/873 (CRR quick fix) provides, among others, for the extension by two years of the ability of the banks to add back to their regulatory capital any increase in provisions for (stage 1 and stage 2) expected losses compared to those that they have recognized on 1 January 2020 for their financial assets, which have not been defaulted. The relief which is applicable for 2023 and for 2024 is 50% and 25%, respectively.

Supplementary to the above, 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.

According to the 2022 SREP decision, as of 31 December 2023, the Bank was required to meet on an individual basis a Common Equity Tier 1 Ratio of at least 9.71% (including AT1 capital shortfall) and a Total Capital Adequacy Ratio of at least 11.71% (Overall Capital Requirement or OCR) including Combined Buffer Requirement of 3.71%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

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

	31 December 2023	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	**4.50%**	**8.00%**
Pillar 2 Requirement (P2R) [(1)]	-	-
Total SREP Capital Requirement (TSCR)	**4.50%**	**8.00%**
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCoB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.21%	0.21%
Other systemic institutions buffer (O-SII)	1.00%	1.00%
Overall Capital Requirement (OCR), excluding shortfall	**8.21%**	**11.71%**
AT1 capital shortfall	1.50%	-
Overall Capital Requirement (OCR), including shortfall	**9.71%**	**11.71%**

[(1)] As of 1st of March 2022, the P2R is not applicable for the Bank.

In accordance with the regulatory framework in force, the above CET1 requirement of 8.21% is under the assumption that the Bank would have Additional Tier 1 (AT1) capital of 1.50%. As at 31 December 2023, the Bank had no AT1 capital. Adding the shortfall of 1.50% of AT1, the CET1 requirement increases and stands at 9.71%.

In 2024, the O-SII buffer for the Bank remains at 1%, in accordance with the Executive Committee Act 221/1/17.10.2023 of the Bank of Greece. The countercyclical capital buffer is updated on a quarterly basis in accordance with the countercyclical capital buffer rates applicable in each country to which the Bank has exposures.

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 2023 on the Bank's website.

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

Under the Directive 2014/59 (Bank Recovery and Resolution Directive) as in force, which was transposed into the Greek legislation pursuant to Law 4335/2015 as in force, European banks are required to meet the minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board (SRB) has determined Eurobank S.A. as Eurobank Holding's 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 S.A. for the year ended 31 December 2023.

2023 EU – wide EBA Stress Test

In January 2023, the European Banking Authority (EBA) launched the 2023 EU-wide Stress Test exercise which was designed to provide valuable input for assessing the resilience of the European banking sector in the current uncertain and changing macroeconomic environment.

This exercise was coordinated by the EBA in cooperation with the ECB and national supervisory authorities and was conducted according to the EBA's methodology and scenarios provided by the European Systemic Risk Board (ESRB). Eurobank Holdings Group participated in the EBA-led stress test.

Further information about the 2023 EU-wide stress test and stress test results is included in the consolidated financial statements of Eurobank Holdings for the year ended 31 December 2023.

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, operational and other non-financial risks, as well as to climate risk. 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 all material risks it is exposed to, 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 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.

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

The identification and the assessment of all risks is the cornerstone for 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.

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 in line with regulatory requirements and an adequate and robust risk appetite framework.

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 a risk management framework with appropriate methodologies, modelling tools and data sources, as well as sufficient and competent staff to identify, assess, monitor and mitigate risks. Moreover, BRC is conferred with certain approval authorities.

The BRC consists of five (5) 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 its main responsibility is to oversee the risk management framework of the Group. As part of its responsibilities, the MRC facilitates reporting to the BRC on the range of risk-related topics under its purview. The MRC supports the Group Chief Risk Officer to identify material risks, to promptly escalate them to the BRC and to ensure that the necessary policies and procedures are in place to prudently manage risks and to comply with regulatory requirements.

Group Risk Management

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

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.

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 Operational targets

In line with the regulatory framework and Single Supervisory Mechanism's (SSM) requirements for Non-Performing Exposures' (NPE) management, the Group's new NPE Management Strategy for 2024-2026, along with the annual NPE stock targets at both Bank and Group level envisages the decrease of the Eurobank Holdings group's NPE ratio at 3.2% in 2026.

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 mainly for domestic groups in the existing credit limits, in accordance with their credit approval authority, depending on total limit amount of the customer/group and risk category (i.e. high, medium or low), as well as the value and type of security;
- Special Handling Credit Committees 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
- International Special Handling Committees established for handling distressed wholesale borrowers of the Group's international bank subsidiaries.

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

Group Credit (GC)

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

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

1. <u>Corporate Credit</u>

(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, Hotels & Leisure, Project Finance, M&A Financing) and Private Banking. Major tasks of the respective workstream and involved credit units pertain to the following:
  - Evaluation of credit applications and issuance of an independent Risk Opinion when required according to internal procedures, which includes:
    (i) assessment of the customer credit profile based on 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 Units.
- Preparation of specialised reports to Management on a regular basis, with regards to the Top 25 largest, in terms of total exposure, borrower Groups, statistics on the new approved financings and leveraged transactions.

(b) International Subsidiaries' portfolio: The GC through its specialized International Corporate Credit Unit (IC) 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 and portion of the loan portfolio of Luxemburg (and London). Moreover, the respective unit's tasks and responsibilities are highlighted below:

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

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

2. <u>Retail Credit</u>

The scope of the Retail Credit is the assessment of credit applications submitted by Retail Business Units, in relation to Borrowers of the retail credit portfolio (SBB loans and Individual Banking). The main tasks of Retail Credit function are outlined below:

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

(b) Credit risk monitoring

Group Credit Control

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

The main responsibilities of the GCC 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;
- monitor the proper EBA classifications in accordance with the relevant provisions and guidelines;
- participate in the approval of new credit policies and new loan products;
- participate in the Troubled Asset Committee;
- attend meetings of Credit Committees and Special Handling Committees, without voting right;
- formulate the Group's credit impairment policy and measure the provisions of the Greek loan portfolios along with the relevant reporting to Management;

- regularly review the adequacy of provisions of all of the Group's loan portfolios;
- formulate, in collaboration with the responsible lending Units the credit policy manuals for performing borrowers;
- provide guidance and monitor the process of designing and reviewing credit policies before approved by Management.
- Through field / thematic reviews on a sample basis monitor the proper application of Real Estate collaterals' valuation, as per the Banks' Collateral Valuation policy and procedures;
- monitor the supervisory, regulatory developments, emerging trends and best practices within its purview in order to keep Management abreast and propose required actions;

Group Credit Risk Capital Adequacy Control

The Group Credit Risk Capital Adequacy Control develops and maintains the credit risk assessment models for the loans portfolio of the Group, performs capital adequacy calculations and assessment for the loan portfolios of the group, conducts internal & external stress test exercises as well as well as forecasting of risk parameters. The Sector reports directly to the GCRO.

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

- control, measure and monitor the capital requirements arising from the Group's loan portfolio along with the relevant reporting to Management and regulators (ECB/SSM);
- manage the models development, implementation, monitoring of the internal risk based models and IFRS9 models of Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) for evaluating credit risk;
- measure and monitor the risk parameters (PD, LGD, EAD) for the purposes of internal capital adequacy assessment, as well as, the estimation of risk related parameters (such as forecast 12-m PD, forecast lifetime PD) for IFRS 9 impairment calculation purposes;
- review the grouping of lending exposures and ensuring their homogeneity in accordance with the Group's IFRS accounting policies
- re-development and monitoring of the significant increase in credit risk (SICR) thresholds under IFRS9 standard;
- prepare monthly capital adequacy calculations (Pillar 1) and relevant management, as well as, regulatory reports (COREPs, SREP) on a quarterly basis;
- projection of asset quality and capital requirements for the loan book (projected impairments and RWAs), in the context of the business plan, ICAAP and recovery plan and participation in the relevant committees;
- perform stress tests, both internal and external (EBA/SSM), and maintain the credit risk stress testing infrastructure;
- coordinate the stress testing exercises for the loan portfolios at Group Level;
- prepare the credit risk analyses for Internal Capital Adequacy Assessment (ICAAP)/ Pillar 2 purposes;
- 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), forbearance reporting, vintage analysis and default / redefault statistics portfolios forward looking analysis and new disbursements quality.
- guide, monitor and supervise the Credit Risk divisions of the subsidiaries on modelling, credit stress testing and other credit risk related regulatory issues.
- monitor and guide Group's international subsidiaries on credit risk related ICAAP, stress testing and other regulatory credit risk related issues, based on Group standards. Review of local credit risk stress test exercises;
- support the business units in the use of credit risk models in business decisions, for funding purposes, in the capital impact assessment of strategic initiatives and the development and usage of risk related metrics such as risk adjusted pricing, Risk Adjusted Return on Capital (RAROC) etc.; and
- assist Remedial Servicing Strategy in the risk assessment and risk impact of various programs and products.

Group Model Validation and Governance

The Group Model Validation and Governance 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 Unit are outlined as follows:

- Prepare and update the Group's Models Framework (to include model definition, roles involved per model, model classification principles and methodology, model validation principles, materiality classifications and thresholds, models' registry governance, etc.);
- Establish and update the Group's Models Registry;
- Review models' classification, in accordance with the methodology provided in the Group Models Framework;
- 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.

Group Market and Counterparty Risk

Group Market and Counterparty Risk (GMCR) 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, GMCR monitors, controls and regularly reports country limits, exposures and escalates breaches to the Management and to Committees. GMCR 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.).

GMCR 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 GMCR on a daily basis. Risk mitigation contracts are taken into account for the calculation of the final exposure.

Also, GMCR ensures that the exposure arising from counterparties complies with the approved country limits framework. The GMCR'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, GMCR 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.

GMCR 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, GMCR provides support and guidance for implementation of the limits' guidelines and policies.

Furthermore, GMCR 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.

(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.
- Slotting rating models are employed in view of assessing the risk of specialized exposures, which are part of the Specialized Lending corporate portfolio.
- Transactional Rating model ("TR") has been developed in order to assess the risk of transactions taking into consideration their collaterals/guarantees.
- 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 company'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, including the company's transaction behavior towards the Bank, 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. Unlikeliness 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 unlikeliness 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).

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.

In the context of IFRS 9 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 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 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 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.

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. The Bank has an approved list of independent and qualified appraisers, which is updated on an annual basis or at shorter intervals if necessary. 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 of the Bank of Greece. The index has been created by the Real Estate Market Analysis Section of BoG using detailed information collected from all Credit Institutions and Real Estate Investment Companies (REIC) operating in Greece. 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.

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. 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.

5.2.1.1 Maximum exposure to credit risk before collateral held

	2023 € million		2022 € million	
Credit risk exposures relating to on-balance sheet assets are as follows:				
Due from credit institutions	2,548		2,177	
Less: Impairment allowance	(1)	**2,547**	(0)	2,177
Debt securities held for trading		**227**		69
Derivative financial instruments		**891**		1,215
Loans and advances to customers at amortised cost:				
- Wholesale lending [(1)]	19,216		19,010	
- Mortgage lending	7,849		8,224	
- Consumer lending	1,642		1,687	
- Small business lending	2,863		3,165	
Less: Impairment allowance	(992)	**30,579**	(1,320)	30,766
Fair value changes of loans in portfolio hedging of interest rate risk		**15**		(163)
Loans and advances to customers measured at FVTPL		**15**		16
Investment securities:				
- Debt securities measured at amortised cost	9,111		7,779	
Less: Impairment allowance	(16)	**9,095**	(22)	7,757
Debt securities measured at FVOCI		**2,431**		2,556
Investment securities at FVTPL		**189**		174
Other financial assets [(2)]	173		162	
Less: Impairment allowance	(17)	**156**	(17)	145
Credit risk exposures relating to off-balance sheet items (note 41):				
- Loan commitments		**6,152**		5,821
- Financial guarantee contracts and other commitments		**3,712**		3,219
Total		**56,008**		53,751

[(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 2023 and 31 December 2022 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 credit risk exposures presented above, include revocable loan commitments to extend credit of € 2.5 billion (2022: € 2.6 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, as updated by the Bank in order to comply with 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'. 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.

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.

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

Quantitative information

The following quantitative analysis presents information about the total gross carrying amount of loans and advances including securitization notes issued by special purpose entities established by the Bank and the nominal amount of credit related commitments, that are classified as non-impaired (stage 1 and stage 2) and those classified as credit-impaired (stage 3 and POCI). It also presents 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 which is capped to the respective gross loan amount. In particular, the following four tables for 2023 and 2022 provide:

- a summary of the credit quality of lending exposures and credit related commitments, presenting product line, stage allocation, respective impairment allowance and collateral held
- the classification of lending exposures and credit related commitments into the internal credit rating categories,
- the movement of the gross carrying amounts for loans and advances to customers by product line and stage,
- the ageing analysis of credit impaired (Stage 3 and POCI) loans and advances to customers

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.

The following tables present summary information about the credit quality (stage analysis, impairment allowance and collateral held per product line) of loans and advances to customers carried at amortised cost and credit related commitments. In addition, they include the fair value changes of loans in portfolio hedging of interest rate risk and the loans and advances to customers carried at FVTPL for the purpose of reconciliation with the total carrying amount of loan and advances to customers:

	31 December 2023										
			Lifetime ECL - Stage 3 and POCI [(1)]			Impairment allowance					
								Lifetime ECL - Stage 3 and POCI [(1)]			
	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	Carrying amount € million	Value of collateral € million
Retail Lending	**8,271**	**3,390**	**46**	**647**	**12,354**	**(64)**	**(234)**	**(28)**	**(323)**	**11,705**	***8,715***
- Mortgage	4,922	2,559	15	352	7,849	(19)	(151)	(13)	(162)	7,504	
Value of collateral	*4,695*	*2,181*	*10*	*299*							*7,184*
- Consumer	854	131	-	53	1,038	(21)	(20)	-	(48)	949	
Value of collateral	*0*	*0*	-	*0*							*0*
- Credit card	546	43	0	16	605	(7)	(3)	(0)	(14)	580	
Value of collateral	-	-	-	-							-
- Small business	1,949	657	31	226	2,863	(17)	(60)	(15)	(99)	2,673	
Value of collateral	*857*	*507*	*20*	*145*							*1,530*
Wholesale Lending	**18,095**	**546**	**403**	**154**	**19,198**	**(56)**	**(46)**	**(150)**	**(90)**	**18,855**	***10,636***
- Large corporate	12,473	254	185	22	12,935	(40)	(26)	(71)	(10)	12,787	
Value of collateral	*5,174*	*135*	*109*	*7*							*5,424*
- SMEs	1,356	291	218	132	1,997	(17)	(20)	(79)	(80)	1,802	
Value of collateral	*505*	*210*	*152*	*78*							*945*
- Securitized notes [(2)]	4,266	-	-	-	4,266	(0)	-	-	-	4,266	
Value of collateral	*4,266*	-	-	-							*4,266*
Public Sector	**18**	**-**	**-**	**0**	**18**	**(0)**	**-**	**-**	**(0)**	**18**	***1***
- Greece	18	-	-	0	18	(0)	-	-	(0)	18	
Value of collateral	*1*	-	-	*0*						-	*1*
- Other countries	-	-	-	-		-	-	-	-	-	
Value of collateral	-	-	-	-							-
Fair value changes of loans in portfolio hedging of interest rate risk										**15**	
Loans and advances to customers at FVTPL										**15**	**15**
Total	**26,385**	**3,936**	**449**	**801**	**31,570**	**(121)**	**(280)**	**(178)**	**(413)**	**30,609**	**19,366**
Total value of collateral	**15,497**	**3,034**	**291**	**529**							
Credit related commitments	**9,593**	**211**	**40**	**20**	**9,863**	**(17)**	**(1)**	**(29)**	**(6)**		
Loan commitments	5,989	162	-	-	6,152	(10)	(1)	-	-		
Financial guarantee contracts and other commitments	3,603	49	40	20	3,712	(7)	(1)	(29)	(6)		
Value of collateral	*940*	*33*	*18*	*8*							

	31 December 2022										
						Impairment allowance					
			Lifetime ECL - Stage 3 and POCI [1]					Lifetime ECL - Stage 3 and POCI [1]			
	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	Carrying amount € million	Value of collateral € million
Retail Lending	8,465	3,582	51	978	13,076	(56)	(248)	(28)	(486)	12,257	*9,070*
- Mortgage	5,048	2,708	17	451	8,224	(19)	(155)	(13)	(164)	7,873	
Value of collateral	*4,773*	*2,266*	*10*	*364*							*7,414*
- Consumer	754	177	0	126	1,057	(16)	(23)	(0)	(102)	916	
Value of collateral	*0*	*0*	-	*2*							*3*
- Credit card	543	51	0	36	630	(5)	(5)	(0)	(33)	587	
Value of collateral	-	-	-	-							-
- Small business	2,120	646	34	365	3,165	(16)	(65)	(15)	(187)	2,882	
Value of collateral	*952*	*488*	*21*	*192*							*1,653*
Wholesale Lending	17,278	875	670	162	18,985	(51)	(62)	(290)	(98)	18,484	*10,765*
- Large corporate	11,106	482	219	14	11,821	(32)	(23)	(121)	(9)	11,636	
Value of collateral	*4,475*	*273*	*112*	*7*							*4,867*
- SMEs	1,554	393	451	149	2,547	(19)	(39)	(169)	(90)	2,231	
Value of collateral	*627*	*262*	*311*	*80*							*1,280*
- Securitized notes [2]	4,618	-	-	-	4,618	(0)	-	-	-	4,618	
Value of collateral	*4,618*	-	-	-							*4,618*
Public Sector	25	-	-	0	25	(0)	-	-	(0)	24	*0*
- Greece	*25*	-	-	*0*	*25*	*(0)*	-	-	*(0)*	*24*	
Value of collateral	*0*	-	-	*0*	-		-			-	*0*
- Other countries	-	-	-	-	-	-	-	-	-	-	
Value of collateral	-	-	-	-	-						-
Fair value changes of loans in portfolio hedging of interest rate risk										*(163)*	
Loans and advances to customers at FVTPL										16	*16*
Total	25,768	4,457	721	1,140	32,086	(108)	(310)	(318)	(584)	30,619	19,851
Total value of collateral	15,446	3,290	455	644							
Credit related commitments	8,589	191	44	216	9,039	(16)	(2)	(33)	(170)		
Loan commitments	5,710	109	2	-	5,821	(11)	(1)	(1)	-		
Financial guarantee contracts and other commitments	2,879	82	42	216	3,219	(5)	(2)	(32)	(170)		
Value of collateral	*770*	*24*	*18*	*5*		-	-	-	-		

[1] As at 31 December 2023, total gross carrying amount of credit impaired loans includes POCI loans of € 13 million and carry an impairment allowance of € 1 million (2022: € 8 million gross carrying amount which carry an immaterial impairment allowance).

[2] 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).

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:

	31 December 2023				31 December 2022			
Internal credit rating	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	Total gross carrying amount € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	Total gross carrying amount € million
Retail Lending								
- Mortgage								
PD<2.5%	4,611	1,282	-	5,893	4,758	1,166	-	5,924
2.5%<=PD<4%	193	68	-	262	231	283	-	514
4%<=PD<10%	98	873	-	971	24	426	-	450
10%<=PD<16%	14	191	-	205	19	519	-	537
16%<=PD<99.99%	7	144	-	151	16	315	-	330
100%	-	-	367	367	-	-	468	468
- Consumer								
PD<2.5%	14	0	-	14	8	7	-	15
2.5%<=PD<4%	335	21	-	356	331	32	-	363
4%<=PD<10%	420	28	-	449	380	122	-	502
10%<=PD<16%	54	73	-	127	31	5	-	36
16%<=PD<99.99%	30	9	-	38	4	11	-	15
100%	-	-	53	53	-	-	126	126
- Credit card								
PD<2.5%	181	0	-	181	285	3	-	288
2.5%<=PD<4%	338	24	-	362	258	40	-	298
4%<=PD<10%	27	14	-	40	-	-	-	-
10%<=PD<16%	-	-	-	-	-	-	-	-
16%<=PD<99.99%	-	5	-	5	-	9	-	9
100%	-	-	16	16	-	-	36	36
- Small business								
PD<2.5%	817	14	-	831	1,194	28	-	1,222
2.5%<=PD<4%	704	161	-	866	468	62	-	530
4%<=PD<10%	400	380	-	780	271	39	-	310
10%<=PD<16%	1	64	-	65	47	161	-	208
16%<=PD<99.99%	26	38	-	64	141	356	-	497
100%	-	-	257	257	-	-	398	398
Wholesale Lending								
- Large corporate								
Strong	9,592	-	-	9,592	8,494	-	-	8,494
Satisfactory	2,824	151	10	2,984	2,487	317	-	2,804
Watch list	58	104	-	161	124	165	-	290
Impaired (Defaulted)	-	-	197	197	-	-	233	233
- SMEs								
Strong	431	-	-	431	488	0	-	488
Satisfactory	825	73	-	898	873	143	-	1,016
Watch list	100	219	-	319	194	250	-	444
Impaired (Defaulted)	-	-	349	349	-	-	599	599
-Securitized notes								
Strong	4,266	-	-	4,266	4,618	-	-	4,618
Public Sector								
All countries								
Strong	17	-	-	17	25	-	-	25
Satisfactory	1	-	-	1	-	-	-	-
Watch list	-	-	-	-	-	-	-	-
Impaired (Defaulted)	-	-	0	0	-	-	*0*	*0*
Total	**26,385**	**3,936**	**1,249**	**31,570**	25,768	4,457	1,861	32,086

Internal credit rating	31 December 2023 12-month ECL-Stage 1 € million	31 December 2023 Lifetime ECL - Stage 2 € million	31 December 2023 Lifetime ECL- Stage 3 and POCI € million	31 December 2023 Total nominal amount € million	31 December 2022 12-month ECL-Stage 1 € million	31 December 2022 Lifetime ECL-Stage 2 € million	31 December 2022 Lifetime ECL-Stage 3 and POCI € million	31 December 2022 Total nominal amount € million
Credit Related Commitments								
Retail Lending								
Loan commitments								
PD<2.5%	575	3	-	577	1,073	11	-	1,084
2.5%<=PD<4%	1,350	39	-	1,389	1,013	62	-	1,075
4%<=PD<10%	476	95	-	572	419	23	-	442
10%<=PD<16%	47	16	-	62	33	1	-	34
16%<=PD<99.99%	-	9	-	9	-	7	-	7
100%	-	-	-	-	-	-	-	-
Financial guarantee contracts and other commitments								
PD<2.5%	2	-	-	2	63	0	-	63
2.5%<=PD<4%	136	0	-	136	75	1	-	75
4%<=PD<10%	29	1	-	30	21	-	-	21
10%<=PD<16%	5	0	-	6	-	-	-	-
16%<=PD<99.99%	1	-	-	1	-	-	-	-
100%	-	-	2	2	-	-	1	1
Wholesale Lending								
Loan commitments								
Strong	3,014	-	-	3,014	2,410	-	-	2,410
Satisfactory	523	-	-	523	757	5	-	762
Watch list	4	1	-	5	6	-	-	6
Impaired (Defaulted)	-	-	-	-	-	-	2	2
Financial guarantee contracts and other commitments								
Strong	2,249	-	-	2,249	2,005	-	-	2,005
Satisfactory	1,161	21	-	1,182	674	36	-	710
Watch list	20	27	-	47	41	46	-	87
Impaired (Defaulted)	-	-	58	58	-	-	*256*	256
Total	**9,593**	**211**	**60**	**9,863**	8,589	191	259	9,039

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:

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

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 years from 1 January 2023 to 31 December 2023 and 1 January 2022 to 31 December 2022:

	2023												
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3 and POCI	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3 and POCI	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3 and POCI	12-month ECL-Stage 1	Lifetime ECL-Stage 2	Lifetime ECL-Stage 3 and POCI	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Gross carrying amount at 1 January	**17,303**	**875**	**832**	**5,048**	**2,708**	**468**	**1,296**	**228**	**162**	**2,120**	**646**	**398**	**32,086**
New loans and advances originated or purchased	4,230	-	-	263	-	-	350	-	-	372	-	-	**5,215**
Transfers between stages													
-to 12-month ECL	303	(298)	(5)	464	(453)	(10)	42	(33)	(9)	87	(80)	(6)	-
-to lifetime ECL	(148)	262	(114)	(370)	461	(91)	(27)	43	(16)	(143)	191	(48)	-
-to lifetime ECL credit-impaired loans	(27)	(144)	171	(53)	(159)	212	(29)	(24)	53	(52)	(73)	125	-
Loans and advances derecognised / reclassified as held for sale during the year	-	-	(209)	(34)	(1)	(163)	(9)	(1)	(70)	(14)	(0)	(146)	**(646)**
Amounts written-off [(1)]	-	-	(186)	-	-	(38)	-	-	(42)	-	-	(56)	**(322)**
Repayments	(3,457)	(151)	(105)	(681)	(171)	(41)	(263)	(49)	(41)	(499)	(60)	(31)	**(5,550)**
Foreign exchange differences and other movements	(91)	2	173	286	175	30	39	9	31	78	34	21	**788**
Gross Carrying amount at 31 December	**18,114**	**546**	**557**	**4,922**	**2,559**	**367**	**1,400**	**174**	**68**	**1,949**	**657**	**257**	**31,571**
Impairment allowance	(57)	(46)	(240)	(19)	(151)	(175)	(28)	(23)	(62)	(17)	(60)	(113)	**(992)**
Carrying amount at 31 December	**18,057**	**500**	**317**	**4,903**	**2,408**	**192**	**1,372**	**151**	**6**	**1,932**	**597**	**144**	**30,579**

	2022												
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	Total € million
Gross carrying amount at 1 January	14,913	925	1,410	5,372	2,640	407	1,285	149	173	2,096	657	422	30,448
New loans and advances originated or purchased	5,465	-	8	310	-	-	303	-	-	486	-	-	6,573
Arising from merger (note 23.1)	-	-	-	-	-	-	75	10	94	-	-	-	180
Transfers between stages													
-to 12-month ECL	268	(268)	(0)	298	(287)	(12)	45	(38)	(7)	117	(106)	(11)	-
-to lifetime ECL	(451)	465	(15)	(444)	545	(101)	(155)	177	(22)	(127)	177	(50)	-
-to lifetime ECL credit-impaired loans	(18)	(54)	72	(57)	(146)	203	(46)	(25)	71	(34)	(71)	105	-
Loans and advances derecognised / reclassified as held for sale during the year	-	(0)	(271)	-	-	-	-	-	-	-	-	(1)	(272)
Amounts written-off [1]	-	-	(84)	-	-	(7)	-	-	(126)	-	-	(44)	(262)
Repayments	(3,025)	(194)	(289)	(618)	(166)	(36)	(235)	(59)	(39)	(506)	(44)	(29)	(5,239)
Foreign exchange differences and other movements	150	(0)	1	186	121	14	24	14	20	88	34	7	658
Gross Carrying amount at 31 December	17,303	875	832	5,048	2,708	468	1,296	228	162	2,120	646	398	32,086
Impairment allowance	(51)	(62)	(388)	(19)	(155)	(177)	(21)	(28)	(135)	(16)	(65)	(202)	(1,320)
Carrying amount at 31 December	17,252	813	444	5,028	2,553	291	1,275	200	28	2,104	581	196	30,766

[1] The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2023 and that are still subject to enforcement activity is € 254 million (2022: € 82 million).

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

Note 2: "Loans and advances derecognised / reclassified as held for sale during the year" presents loans derecognized due to a) substantial modifications of the loans' contractual terms, b) sale transactions, including for 2023 the disposal of the loan to the former Bank's subsidiary IMO Property Investments Sofia E.A.D (note 23), c) debt to equity transactions and those that have been reclassified as held for sale during the year (notes 20 and 29).

Credit impaired loans and advances to customers

The following tables present the ageing analysis of credit impaired (Stage 3 and POCI) 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 2023							
	Retail lending				**Wholesale lending**		**Public**	
	Mortgage € million	**Consumer € million**	**Credit card € million**	**Small business € million**	**Large corporate € million**	**SMEs € million**	**Greece € million**	**Lifetime ECL credit-impaired € million**
up to 90 days	151	26	4	124	156	123	0	**585**
90 to 179 days	30	9	5	19	26	5	-	**93**
180 to 360 days	72	11	4	32	0	36	-	**155**
more than 360 days	114	7	3	83	26	185	0	**417**
Total gross carrying amount	**367**	**53**	**16**	**257**	**207**	**349**	**0**	**1,250**
Impairment allowance	(175)	(48)	(14)	(113)	(81)	(159)	(0)	**(591)**
Carrying amount	**192**	**5**	**1**	**144**	**126**	**191**	**0**	**659**
Value of Collateral	**309**	**0**	**-**	**166**	**116**	**230**	**0**	**820**

	31 December 2022							
	Retail lending				Wholesale lending		Public sector	
	Mortgage € million	Consumer € million	Credit card € million	Small business € million	Large corporate € million	SMEs € million	Greece € million	Lifetime ECL credit-impaired € million
up to 90 days	160	38	6	107	102	220	0	632
90 to 179 days	34	11	6	17	10	23	-	100
180 to 360 days	80	24	7	44	1	44	-	199
more than 360 days	195	54	18	230	120	313	0	930
Total gross carrying amount	468	126	36	398	233	599	0	1,861
Impairment allowance	(177)	(102)	(33)	(202)	(130)	(258)	(0)	(902)
Carrying amount	291	24	3	196	103	341	0	959
Value of Collateral	374	2	-	213	119	391	-	1,099

Note: As at 31 December 2023, total gross carrying amount of credit impaired loans includes POCI loans of € 13 million (2022: € 8 million).

(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:

	2023 € million	2022 € million
Mortgages		
Less than 50%	**2,175**	2,223
50%-70%	**1,737**	1,715
71%-80%	**1,290**	1,228
81%-90%	**713**	791
91%-100%	**648**	804
101%-120%	**500**	556
121%-150%	**389**	421
Greater than 150%	**397**	486
Total exposure	**7,849**	8,224
Average LTV	**58.02%**	60.80%

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

	31 December 2023				
	Value of collateral received				Guarantees received[(1)]
	Real Estate	Financial	Other	Total	
	€ million	€ million	€ million	€ million	€ million
Retail Lending	**8,329**	**229**	**156**	**8,715**	**545**
Wholesale Lending	**2,623**	**77**	**7,935**	**10,636**	**458**
Public sector	**-**	**1**	**0**	**1**	**-**
Total	**10,952**	**307**	**8,091**	**19,351**	**1,003**

	31 December 2022				
	Value of collateral received				Guarantees received[(1)]
	Real Estate	Financial	Other	Total	
	€ million	€ million	€ million	€ million	€ million
Retail Lending	8,665	289	115	9,070	705
Wholesale Lending	2,784	42	7,938	10,765	663
Public sector	-	0	0	0	-
Total	11,449	332	8,054	19,835	1,368

[(1)] In addition to the above presented guarantees, (i) from 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 € 1.1 billion as at 31 December 2023 (31 December 2022: € 1.4 billion) (ii) from December 2022, into the financial guarantees contract 'Wave III' related to the portfolio of performing shipping loans of € 1.4 billion as at 31 December 2023 (31 December 2022: € 1.6 billion) and (iii) from December 2023, into the financial guarantees contract 'Wave IV' related to the portfolios of performing SBB and large corporate loans of € 1.5 billion as at 31 December 2023 (note 20).

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).

Repossessed 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 2023, the carrying amount of repossessed assets which are included in "Other assets" amounted to € 474 million (31 December 2022: € 536 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 repossesses against repayment or reduction of the outstanding loan is real estate. The below table presents the movement of repossessed 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).

	2023			2022		
	Real estate			Real estate		
	Residential	Commercial	Total	Residential	Commercial	Total
	€ million	€ million	€ million	€ million	€ million	€ million
Balance at 1 January	**209**	**325**	**534**	205	341	546
Additions [(1)]	**9**	**13**	**22**	11	20	31
Transfers to investment property	**-**	**-**	**-**	-	(7)	(7)
Disposals	**(14)**	**(25)**	**(39)**	(3)	(20)	(23)
Valuation losses	**(3)**	**(11)**	**(14)**	(3)	(8)	(11)
Held for sale (note 29)	**(8)**	**(24)**	**(32)**	-	-	-
Other	**-**	**1**	**1**	(1)	(1)	(2)
Balance at 31 December	**193**	**279**	**472**	209	325	534

[(1)] The carrying amount of the real estate properties obtained during the year and held at the year ended 31 December 2023 amounted to € 22 million (31 December 2022: € 31 million).

In addition, the Bank repossesses 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").

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 2023											
	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 and POCI € million	Impairment allowance € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	Impairment allowance € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI € million	Impairment allowance € million
Retail Lending	**8,220**	**3,361**	**687**	**(635)**	**51**	**29**	**6**	**(14)**	**-**	**-**	**-**	**-**
-Mortgage	*4,871*	*2,531*	*361*	*(331)*	*51*	*29*	*6*	*(14)*	-	-	-	-
-Consumer	*854*	*131*	*53*	*(89)*	*0*	*0*	*0*	*(0)*	-	-	-	-
-Credit card	*546*	*43*	*16*	*(25)*	-	-	-	-	-	-	-	-
-Small business	*1,949*	*657*	*257*	*(190)*	*0*	*0*	-	*(0)*	-	-	-	-
Wholesale Lending	**11,303**	**542**	**548**	**(334)**	**4,450**	**3**	**7**	**(7)**	**2,343**	**-**	**1**	**(2)**
-Commerce and services [2]	*5,036*	*214*	*259*	*(166)*	*4,296*	*1*	*6*	*(5)*	-	-	*0*	*(0)*
-Manufacturing	*2,028*	*96*	*176*	*(101)*	*5*	-	-	*(1)*	-	-	-	-
-Shipping	*4*	-	-	*(0)*	*149*	-	-	*(0)*	*2,343*	-	*1*	*(2)*
-Construction	*1,245*	*29*	*42*	*(37)*	-	*2*	*1*	*(1)*	-	-	-	-
-Tourism	*950*	*204*	*67*	*(22)*	-	-	-	-	-	-	-	-
-Energy	*2,038*	*0*	*4*	*(7)*	-	-	-	-	-	-	-	-
-Other	*0*	-	*1*	*(1)*	-	-	-	-	-	-	-	-
Public Sector	**18**	**-**	**0**	**(0)**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Total	***19,541***	***3,904***	***1,235***	***(969)***	***4,501***	***32***	***14***	***(21)***	***2,343***	**-**	***1***	***(2)***
Credit related Commitments	**8,109**	**206**	**49**	**(44)**	**1,160**	**5**	**10**	**(10)**	**324**	**-**	**0**	**(0)**
-Loan commitments	*5,705*	*162*	-	*(11)*	*7*	-	-	*(0)*	*277*	-	-	-
-Financial guarantee contracts and other commitments	*2,404*	*44*	*49*	*(33)*	*1,153*	*5*	*10*	*(10)*	*47*	-	*0*	*(0)*

	31 December 2022											
	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 and POCI [(1)] € million	Impairment allowance € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	Impairment allowance € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	Impairment allowance € million
Retail Lending	8,407	3,551	1,023	(804)	58	31	5	(14)	-	-	-	-
-Mortgage	*4,990*	*2,677*	*463*	*(337)*	*57*	*31*	*5*	*(14)*	-	-	-	-
-Consumer	*754*	*177*	*126*	*(141)*	*0*	*0*	*0*	*(0)*	-	-	-	-
-Credit card	*543*	*51*	*36*	*(43)*	-	-	-	-	-	-	-	-
-Small business	*2,120*	*646*	*398*	*(283)*	*0*	*0*	*0*	*(0)*	-	-	-	-
Wholesale Lending	10,216	870	792	(464)	4,855	5	31	(29)	2,208	-	9	(8)
-Commerce and services [(2)]	*4,536*	*262*	*397*	*(234)*	*4,647*	*1*	*12*	*(10)*	*121*	-	*5*	*(5)*
-Manufacturing	*2,156*	*261*	*115*	*(88)*	*5*	-	*3*	*(2)*	-	-	-	-
-Shipping	-	*2*	*44*	*(44)*	*195*	-	*15*	*(16)*	*2,087*	-	*4*	*(3)*
-Construction	*1,258*	*50*	*57*	*(46)*	*8*	*3*	*1*	*(2)*	-	-	-	-
-Tourism	*862*	*296*	*176*	*(48)*	-	-	-	-	-	-	-	-
-Energy	*1,405*	*1*	*2*	*(3)*	-	-	-	-	-	-	-	-
-Other	*0*	-	*1*	*(1)*	-	-	-	-	-	-	-	-
Public Sector	25	0	(0)	(0)	-	-	-	-	-	-	-	-
Total	*18,647*	*4,422*	*1,816*	*(1,268)*	*4,913*	*35*	*37*	*(44)*	*2,208*	-	*9*	*(8)*
Credit related Commitments	7,440	183	51	(48)	878	7	209	(174)	271	-	0	(0)
-Loan commitments	*5,427*	*108*	*2*	*(12)*	*43*	*1*	-	*(0)*	*240*	-	-	*(0)*
-Financial guarantee contracts and other commitments	*2,014*	*75*	*49*	*(36)*	*835*	*7*	*209*	*(174)*	*31*	-	*0*	*(0)*

[(1)] Includes POCI loans of € 13 million held by operations in Greece (2022: € 8 million).

[(2)] The operations in Rest of Europe include € 4,266 million related to the notes of the Pillar, Cairo and Mexico securitizations (2022: € 4,618 million).

As at 31 December 2023, the carrying amount of Bank's loans measured at FVTPL of € 15 million was included in Wholesale lending portfolio, which was held by operations in Greece (2022: € 16 million).

(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.

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 2023, there were no equity positions acquired by the Bank and held as of 31 December 2023. In 2022, equity positions acquired by the Bank and held as of 31 December 2022, related to the participation of 3% in Kalogirou S.A. for trade of footwear, apparel and leather goods for a nil consideration.

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 2023, the carrying amount of Bank's forborne loans measured at FVTPL was nil (2022: nil).

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 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 forborne activities:

	2023 € million	2022 € million
Forbearance measures:		
Split balance	**147**	234
Loan term extension	**587**	860
Arrears capitalisation	**72**	136
Reduced payment below interest owed	**27**	65
Interest rate reduction	**100**	125
Reduced payment above interest owed	**44**	65
Arrears repayment plan	**94**	127
Interest only	**1**	1
Grace period	**30**	20
Debt/equity swaps	**-**	8
Partial debt forgiveness/Write-down	**1**	1
Operational restructuring	**13**	14
Other	**20**	27
Total gross carrying amount	**1,137**	1,684
Less: cumulative impairment allowance	**(245)**	(341)
Total carrying amount	**892**	1,343

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

	31 December 2023		
	Total loans & advances at amortised cost € million	Forborne loans & advances € million	% of Forborne loans & advances
Gross carrying amounts:			
12-month ECL-Stage 1	**26,385**	**-**	**-**
Lifetime ECL-Stage 2	**3,936**	**624**	**16**
Lifetime ECL-Stage 3 and POCI	**1,250**	**513**	**41**
Total Gross Amount	**31,571**	**1,137**	**4**
Cumulative ECL Loss allowance:			
12-month ECL-Stage 1	**(121)**	**-**	
Lifetime ECL-Stage 2	**(280)**	**(43)**	
Lifetime ECL-Stage 3 and POCI of which:	**(591)**	**(202)**	
- Individually assessed	*(178)*	*(70)*	
- Collectively assessed	*(413)*	*(132)*	
Total carrying amount	**30,579**	**892**	**3**
Collateral received	**19,351**	**892**	

	31 December 2022		
	Total loans & advances at amortised cost € million	Forborne loans & advances € million	% of Forborne loans & advances
Gross carrying amounts:			
12-month ECL-Stage 1	25,768	-	-
Lifetime ECL-Stage 2	4,457	931	21
Lifetime ECL-Stage 3 and POCI	1,861	753	40
Total Gross Amount	32,086	1,684	5
Cumulative ECL Loss allowance:			
12-month ECL-Stage 1	(108)	-	
Lifetime ECL-Stage 2	(310)	(75)	
Lifetime ECL-Stage 3 and POCI of which:	(902)	(266)	
- Individually assessed	*(318)*	*(129)*	
- Collectively assessed	*(584)*	*(137)*	
Total carrying amount	30,766	1,343	4
Collateral received	19,835	1,289	

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

	2023 € million	2022 € million
Gross carrying amount at 1 January	**1,684**	2,586
Arising from merger (note 23.1)	-	16
Forbearance measures in the year	198	208
Forborne loans derecognised/ reclassified as held for sale during the year [1]	(42)	(54)
Write-offs of forborne loans	(45)	(19)
Repayment of loans	(169)	(194)
Loans & advances that exited forbearance status [2]	(537)	(921)
Other	47	62
Less: cumulative impairment allowance	(245)	(341)
Carrying amount at 31 December	**892**	1,343

[1] "Forborne loans derecognised/ reclassified as held for sale during the year" presents loans derecognized during the year due to a) sale transactions and b) substantial modifications of the loans' contractual terms and those that have been reclassified as held for sale during the year (notes 20 and 29).
[2] In 2023, an amount of € 68 million loans and advances that exited forbearance status refers to loans that were denounced (2022: € 74 million).

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

	2023 € million	2022 € million
Retail Lending	**685**	1,037
- Mortgage	*433*	*711*
- Consumer	*42*	*55*
- Credit card	*5*	*16*
- Small business	*206*	*256*
Wholesale Lending	**451**	647
-Large corporate	*131*	*185*
-SMEs	*320*	*462*
Total gross carrying amount	**1,137**	1,684
Less: cumulative impairment allowance	**(245)**	(341)
Total carrying amount	**892**	1,343

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

	2023 € million	2022 € million
Greece	**1,108**	1,647
Rest of Europe	**29**	37
Other countries	**0**	0
Total gross carrying amount	**1,137**	1,684
Less: cumulative impairment allowance	**(245)**	(341)
Total carrying amount	**892**	1,343

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	2023 € million	2022 € million
Loans modified during the year with loss allowance measured at an amount equal to lifetime ECL		
Gross carrying amount at 31 December	262	350
Modification gain/(loss)	9	3
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	343	336

In the year ended 31 December 2023, 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 € 234 million (2022: € 333 million).

5.2.1.3 Debt Securities

The following tables present an analysis of debt securities by external credit rating agency designation at 31 December 2023 and 2022, based on Moody's ratings or their equivalent:

	31 December 2023			
	12-month ECL-Stage 1 € million	**Lifetime ECL-Stage 2 € million**	**Lifetime ECL-Stage 3 € million**	**Total € million**
Debt securities at amortised cost				
Aaa	**1,902**	**-**	**-**	**1,902**
Aa1 to Aa3	**17**	**-**	**-**	**17**
A1 to A3	**100**	**4**	**-**	**104**
Lower than A3	**6,895**	**3**	**-**	**6,898**
Unrated	**158**	**-**	**32**	**190**
Gross Carrying Amount	**9,072**	**7**	**32**	**9,111**
Impairment Allowance	**(9)**	**(0)**	**(7)**	**(16)**
Carrying Amount	**9,063**	**7**	**25**	**9,095**
Debt securities at FVOCI				
Aaa	**155**	**-**	**-**	**155**
Aa1 to Aa3	**100**	**-**	**-**	**100**
A1 to A3	**186**	**8**	**-**	**194**
Lower than A3	**1,864**	**40**	**-**	**1,904**
Unrated	**63**	**-**	**-**	**63**
Carrying Amount	**2,368**	**48**	**-**	**2,416**

	31 December 2022			
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 € million	Total € million
Debt securities at amortised cost				
Aaa	1,821	-	-	1,821
Aa1 to Aa3	17	-	-	17
A1 to A3	91	-	-	91
Lower than A3	5,737	6	7	5,750
Unrated	74	-	26	100
Gross Carrying Amount	7,740	6	33	7,779
Impairment Allowance	(12)	(0)	(10)	(22)
Carrying Amount	7,728	6	23	7,757
Debt securities at FVOCI				
Aaa	150	-	-	150
Aa1 to Aa3	116	-	-	116
A1 to A3	192	-	-	192
Lower than A3	1,874	71	-	1,945
Unrated	58	-	-	58
Carrying Amount	2,390	71	-	2,461

	31 December 2023	
	Debt securities held for trading € million	Debt securities measured at FVTPL € million
Debt securities at FVTPL		
Aaa	55	-
A1 to A3	15	-
Lower than A3	157	0
Unrated	-	26
Carrying Amount	227	26

	31 December 2022	
	Debt securities held for trading € million	Debt securities measured at FVTPL € million
Debt Securities at FVTPL		
Lower than A3	69	0
Carrying Amount	69	0

The carrying amount of debt securities rated lower than A3, amounting to € 8,951 million (2022: € 7,750 million), is analyzed as follows:

	2023		2022	
	Sovereign € million	Banks and Corporate € million	Sovereign € million	Banks and Corporate € million
Debt securities				
Greece	6,015	1,169	5,413	915
Other Eurozone members	363	508	275	459
Other EU members	284	63	159	22
Other countries	194	355	173	334
Carrying Amount	6,856	2,095	6,020	1,730

Following a series of sovereign rating upgrades in the second half of 2023, Greek government's long-term debt securities were considered investment grade by four out of the five Eurosystem-approved External Credit Assessment Institutions (Fitch, Scope, S&P: BBB-, stable outlook; DBRS: BBB(low), stable outlook), and one notch below investment grade by the fifth one, Moody's (Ba1, stable outlook) as of March 2024.

The carrying amount of unrated debt securities of € 271 million (2022: € 151 million) mainly comprise € 181 million Greek corporate bonds (2022: € 132 million) and € 68 million Cyprus corporate bonds (2022: € nil).

As at 31 December 2023, the nominal value of the Bank's Russian debt exposures, which have been classified as credit impaired, amounted to € 36 million, with an impairment allowance of € 5 million.

For the year ended 31 December 2023, the Bank proceeded with the disinvestment of debt securities measured at amortized cost of face value of € 204 million, mainly for risk concentration management purposes, resulting in a derecognition gain of € 0.2 million approximately.

GGBs swap transaction

In July 2023, the Public Debt Management Agency (PDMA) proceeded to a transaction, which included a switch and tender offer on specific Greek government bonds (GGB) maturing in 2024 and 2025 with coupons 3.45% and 3.375%, respectively, at the repurchase price of 100.15 for each of the notes, against a new GGB, maturing in 2038 with a coupon of 4.375%, at a final offer price of 99.042.

Pursuant to the above, the Bank offered GGBs of face value € 469 million, of which € 466 million held at the amortized cost portfolio and acquired an equal face amount of the new GGB, of which € 459 million were classified at amortized cost portfolio and € 10 million within trading portfolio. Accordingly, the original bonds were derecognized from the Bank's balance sheet with a resulting loss of € 19 million.

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

	31 December 2023							
	Greece		Other European countries			Other countries		
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Total € million
Debt securities at amortised cost								
Sovereign	4,966	-	544	-	-	831	-	6,341
Banks	856	-	293	-	-	-	-	1,149
Corporate	326	5	775	3	27	481	4	1,621
Gross Carrying Amount	6,148	5	1,612	3	27	1,312	4	9,111
Impairment Allowance	(6)	(2)	(2)	(0)	(5)	(1)	(0)	(16)
Net Carrying Amount	6,142	3	1,610	3	22	1,311	4	9,095
Debt securities at FVOCI								
Sovereign	909	-	218	-	-	184	-	1,311
Banks	-	-	94	-	-	-	-	94
Corporate	172	-	510	40	-	281	8	1,011
Carrying Amount	1,081	-	822	40	-	465	8	2,416

	31 December 2022							
	Greece		Other European countries			Other countries		
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Total € million
Debt securities at amortised cost								
Sovereign	4,379	-	200	-	-	830	-	5,409
Banks	685	-	93	-	-	-	-	778
Corporate	241	7	798	3	26	514	3	1,592
Gross Carrying Amount	5,305	7	1,091	3	26	1,344	3	7,779
Impairment Allowance	(9)	(3)	(2)	(0)	(7)	(1)	(0)	(22)
Net Carrying Amount	5,296	4	1,089	3	19	1,343	3	7,757
Debt securities at FVOCI								
Sovereign	976	-	234	48	-	205	-	1,463
Banks	-	-	86	3	-	-	-	89
Corporate	163	-	446	15	-	280	5	909
Carrying Amount	1,139	-	766	66	-	485	5	2,461

	31 December 2023			
	Greece € million	Other European countries € million	Other countries € million	Total € million
Debt securities at FVTPL				
Banks	0	26	-	26
Corporate	0	-	-	0
Carrying amount	0	26	-	26
Debt held for trading				
Sovereign	142	-	55	197
Corporate	-	27	3	30
Carrying amount	142	27	58	227

	31 December 2022		
	Greece € million	Other European countries € million	Total € million
Debt securities at FVTPL			
Corporate	0	-	0
Carrying amount	0	-	0
Debt securities held for trading			
Sovereign	63	6	69
Carrying amount	63	6	69

5.2.1.4 Offsetting of financial assets and financial liabilities

Financial assets and financial liabilities are offset according to IAS 32 'Financial Instruments and the net amount is presented in the balance sheet when, there is a legally enforceable right to set off the recognized amounts and there is an intention to settle on a net basis, or to realize the asset and settle the liability simultaneously (the offsetting criteria), as also set out in Bank's accounting policy 2.2.4.

Financial instruments that meet the offsetting criteria include the eligible repos and reverse repos under global master repurchase agreements (GMRAs) and the CCP (Central Counterparty) cleared OTC derivative financial instruments. Regarding the latter, the Bank has assessed the terms of the clearing agreements for the derivatives entered into with Clearing Members and has concluded that the offsetting criteria are met, in respect of the cash accounts used for variation margin purposes for such derivatives, which are also used for the settlement of all payments thereunder. Accordingly, derivative assets of € 752 million (2022: € 1,376 million) and derivative liabilities of € 492 million (2022: € 444 million) (note 19) were offset against € 317 million (2022: € 932 million) cash collateral received (note 31) and € 57 million (2022: nil) cash collateral pledged (note 17).

Financial instruments under master netting arrangements and similar agreements that do not meet the criteria for offsetting in the balance sheet include derivatives (bilateral agreements) as well as repos and reverse repos, for which a) the right of set-off is enforceable only following an event of default, insolvency or bankruptcy of the Bank or the counterparties or following other predetermined events and/or b) the Bank and its counterparties may not intend to settle on a net basis or to realize the assets and settle the liabilities simultaneously.

The following tables present financial assets and financial liabilities that meet the criteria for offsetting and thus are presented 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 offsetting criteria mentioned above are not satisfied. In respect of the latter, the Bank may receive and provide collateral in the form of marketable securities and cash that are included in the tables below under columns 'financial instruments' and 'cash collateral'.

	31 December 2023					
				Related amounts not offset in the BS		
	Gross amounts of recognised financial assets € million	Gross amounts of recognised financial liabilities offset in the balance sheet € million	Net amounts of financial assets presented in the balance sheet € million	Financial instruments (incl. non-cash collateral) € million	Cash collateral received € million	Net amount € million
Financial Assets						
Reverse repos with banks	**1,317**	**(1,210)**	**107**	**(107)**	**-**	**-**
Derivative financial instruments	**1,629**	**(752)**	**877**	**(684)**	**(63)**	**130**
Deposits to banks pledged as collateral	**1,096**	**(57)**	**1,039**	**(343)**	**-**	**696**
Total	**4,042**	**(2,019)**	**2,023**	**(1,134)**	**(63)**	**826**

	31 December 2023					
				Related amounts not offset in the BS		
	Gross amounts of recognised financial liabilities € million	Gross amounts of recognised financial assets offset in the balance sheet € million	Net amounts of financial liabilities presented in the balance sheet € million	Financial instruments (incl. non-cash collateral) € million	Cash collateral pledged € million	Net amount € million
Financial Liabilities						
Repurchase agreements with banks	4,943	(1,210)	3,733	(3,733)	-	-
Derivative financial instruments	1,919	(492)	1,427	(943)	(343)	141
Deposits from banks received as collateral	441	(317)	124	(63)	-	61
Total	7,303	(2,019)	5,284	(4,739)	(343)	202

	31 December 2022					
				Related amounts not offset in the BS		
	Gross amounts of recognised financial assets € million	Gross amounts of recognised financial liabilities offset in the balance sheet € million	Net amounts of financial assets presented in the balance sheet € million	Financial instruments (incl. non-cash collateral) € million	Cash collateral received € million	Net amount € million
Financial Assets						
Reverse repos with banks	116	(114)	2	(2)	-	-
Derivative financial instruments	2,582	(1,376)	1,205	(721)	(235)	249
Total	2,698	(1,490)	1,207	(723)	(235)	249

	31 December 2022					
				Related amounts not offset in the BS		
	Gross amounts of recognised financial liabilities € million	Gross amounts of recognised financial assets offset in the balance sheet € million	Net amounts of financial liabilities presented in the balance sheet € million	Financial instruments (incl. non-cash collateral) € million	Cash collateral pledged € million	Net amount € million
Financial Liabilities						
Repurchase agreements with banks	2,569	(114)	2,455	(2,455)	-	-
Derivative financial instruments	2,081	(444)	1,638	(721)	(239)	678
Deposits from banks received as collateral	1,237	(932)	305	(235)	-	70
Total	5,887	(1,490)	4,398	(3,411)	(239)	748

Derivative financial assets and liabilities not under master netting arrangements and similar agreements of carrying value of € 14 million and € 29 million, respectively, (2022: € 9 million and € 59 million, respectively) are not presented in the above tables.

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 Unit (GMCRU).

GMCRU is responsible for the measurement, monitoring, control and reporting of all market risks, including the interest rate risk in the Banking Book (IRRBB) and the credit spread risk in the Banking Book (CSRBB) of the Bank. In particular, the Bank in response to the regulatory developments and requirements (EBA/GL/2022/14), has further enhanced its infrastructure, governance and limit

structure accordingly, so as to measure and monitor its CSRBB, via a dedicated stress testing framework. The Unit reports to the GCRO and its main responsibilities include:

- Monitoring of all key market, IRRBB and CSRBB risk indicators;
- Implementation of Stress Testing methodologies for market risk, IRRBB and CSRBB (historical and hypothetical);
- Monitoring and reporting of market IRRBB and CSRBB 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.

(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 BoD and Board Risk Committee set 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 2023 and 2022

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 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)]

	2023 (Average) € million	2023 € million	2022 (Average) € million	2022 € million
Interest Rate Risk	7	8	21	8
Foreign Exchange Risk	0	0	0	0
Equities Risk	2	0	2	4
Total VaR	7	8	22	10

[(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 2023 is materially decreased, as compared to the average VaR of 2022, following the reduced volatility observed in the markets, after the initial turmoil mainly caused by the geopolitical tension (war in Ukraine) in 2022.

(ii) Interest rate gap and sensitivity

The following table provides the interest rate repricing gap of the Bank, which analyses the structure of interest rate mismatches within the balance sheet. The Bank's financial assets/liabilities are included at their notional/outstanding amounts and categorized based on either (i) the next contractual repricing date if floating rate or (ii) the maturity/call date (whichever is first) if fixed rate. The below analysis provides an approximation of the interest rate risk exposure since transactions with different duration are aggregated together per time bucket.

	31 December 2023 [(2)]				
	Less than 1 month € million	1-3 months € million	3-12 months € million	1-5 years € million	More than 5 years € million
Balances with central banks	5,850	-	-	-	-
Due from credit institutions	1,809	1,124	362	340	60
Debt securities[(1)]	611	339	643	3,805	5,552
Loans and advances to customers	13,220	4,168	7,783	3,204	2,757
	21,490	5,631	8,788	7,349	8,369
Due to central banks	(3,665)	-	-	-	-
Due to credit institutions	(1,484)	(4,146)	-	(250)	-
Due to customers	(31,333)	(4,110)	(4,645)	(592)	-
Debt securities in issue	-	-	(100)	(4,027)	(740)
	(36,482)	(8,256)	(4,745)	(4,869)	(740)
Derivative financial instruments	1,914	2,390	57	1,204	(5,594)
Interest rate gap	(13,078)	(235)	4,100	3,684	2,035

	31 December 2022 (2)				
	Less than 1 month € million	1-3 months € million	3-12 months € million	1-5 years € million	More than 5 years € million
Balances with central banks	9,371	-	-	-	-
Due from credit institutions	1,290	318	230	80	60
Debt securities(1)	28	67	142	3,835	5,402
Loans and advances to customers	13,456	5,443	7,574	2,412	2,478
	24,144	5,827	7,945	6,327	7,940
Due to central banks	(8,015)	-	-	-	-
Due to credit institutions	(2,486)	(1,346)	(200)	-	-
Due to customers	(35,326)	(2,485)	(1,981)	(74)	-
Debt securities in issue	(2)	-	(5)	(2,025)	(1,700)
	(45,828)	(3,831)	(2,186)	(2,099)	(1,700)
Derivative financial instruments	4,898	(138)	(414)	95	(4,401)
Interest rate gap	(16,786)	1,859	5,346	4,324	1,840

(1) *Including short positions in debt securities (note 34)*
(2) *Amounts are before offsetting (note 5.2.1.4).*

The Bank performs a sensitivity analysis to assess the impact on net interest income (NII) and on other comprehensive income (OCI), to a hypothetical change in the market interest rates.

The impact on NII is calculated under the scenario of an instantaneous parallel shift of all interest rates by +/- 100 bps, for a 1-year period, assuming a static balance sheet approach. As at 31 December 2023 the impact on NII, under the scenario of a parallel shift in the yield curves, stands at € 138 million (+100 bps) and € -130 million (-100 bps) (31 December 2022: € 157 million and € -192 million, respectively).

The impact on OCI is calculated as the fair value movement of all financial assets measured at FVOCI, net of hedging and of any hedging instruments designated in qualifying cash flow hedge relationships. As at 31 December 2023 the impact on OCI, under the scenario of a parallel shift in the yield curves, stands at € -47 million (+100bps) and € 50 million (-100bps) (31 December 2022: € -29 million and € 30 million, respectively).

(ii) Foreign exchange risk

The following tables present the Bank's exposure to foreign currency exchange risk as at 31 December 2023 and 2022:

	31 December 2023						
	USD	CHF	RON	BGN	OTHER	EUR	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
ASSETS							
Cash and balances with central banks	9	2	-	-	5	6,346	6,362
Due from credit institutions	49	24	24	1	38	2,411	2,547
Securities held for trading	55	-	-	-	0	172	227
Derivative financial instruments	18	0	-	0	2	871	891
Loans and advances to customers	2,597	1,873	7	0	5	26,127	30,609
Investment securities	909	-	-	-	286	10,520	11,715
Other assets [(1)]	3	0	59	801	12	8,890	9,765
Assets of disposal groups classified as held for sale (note 29)	0	59	-	-	-	146	205
Total Assets	**3,640**	**1,958**	**90**	**802**	**348**	**55,483**	**62,321**
LIABILITIES							
Due to central banks and credit institutions	481	13	3	0	23	7,733	8,253
Derivative financial instruments	17	2	0	0	1	1,437	1,457
Due to customers	3,151	24	0	0	204	37,361	40,740
Debt securities in issue	76	-	-	-	0	4,875	4,951
Other Liabilities [(2)]	15	0	19	-	3	828	865
Total Liabilities	**3,740**	**39**	**22**	**0**	**231**	**52,234**	**56,266**
Net on balance sheet position	**(100)**	**1,919**	**68**	**802**	**117**	**3,249**	**6,055**
Derivative forward foreign exchange position	**(5)**	**(1,925)**	**(7)**	**(204)**	**(138)**	**2,150**	**(130)**
Total Foreign Exchange Position	**(105)**	**(6)**	**61**	**598**	**(21)**	**5,399**	**5,925**

	31 December 2022							
	USD	CHF	RON	RSD	BGN	OTHER	EUR	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
ASSETS								
Cash and balances with central banks	9	1	-	-	-	6	9,696	9,712
Due from credit institutions	145	4	23	76	0	25	1,904	2,177
Securities held for trading	-	-	-	-	-	-	69	69
Derivative financial instruments	29	0	0	50	-	0	1,136	1,215
Loans and advances to customers	2,472	1,981	8	-	0	7	26,151	30,619
Investment securities	974	-	-	-	-	264	9,249	10,487
Other assets [(1)]	7	74	61	160	189	5	9,668	10,164
Assets classified as held for sale (note 29)	-	-	-	-	-	-	81	81
Total Assets	3,636	2,060	92	286	189	307	57,954	64,524
LIABILITIES								
Due to central banks and credit institutions	491	1	2	0	0	37	11,454	11,985
Derivative financial instruments	33	1	0	129	0	1	1,532	1,696
Due to customers	3,288	23	0	0	0	171	36,774	40,256
Debt securities in issue	73	73	-	-	-	5	3,514	3,665
Other Liabilities [(2)]	3	-	15	0	-	0	1,321	1,339
Total Liabilities	3,888	98	17	129	0	214	54,595	58,941
Net on balance sheet position	(252)	1,962	75	157	189	93	3,359	5,583
Derivative forward foreign exchange position	19	(1,962)	(15)	-	(507)	(104)	2,507	(62)
Total Foreign Exchange Position	(233)	0	60	157	(318)	(11)	5,866	5,521

[(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.

[(2)] Other liabilities include liabilities of disposal group classified as held for sale (note 29).

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 drawdowns 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, taking into account the latest funding plan and for the daily management of the Bank’s liquidity;
- Group Market and Counterparty Risk Sector is responsible for measuring, controlling monitoring and reporting the liquidity risk of the Bank.

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

- The analysis of liquidity buffer held on Group level per asset type and per subsidiary;
- The Liquidity Coverage Ratio (LCR) both in solo and group level;
- The Net Stable Funding Ratio (NSFR) both in solo and group level;
- 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 Additional Liquidity Monitoring Metrics (ALMM) both in solo and group level;
- The Asset Encumbrance (AE) both in solo and group level;
- Monitoring and implementation of the funding plan.

Maturity analysis of assets and assets held for managing liquidity risk

The following tables present maturity analysis of Bank assets as at 31 December 2023 and 2022, based on their carrying values. 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.

	31 December 2023				
	Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Total € million
- Cash and balances with central banks	6,362	-	-	-	6,362
- Due from credit institutions	297	89	24	1,078	1,488
- Loans and advances to customers	1,469	985	2,800	25,355	30,609
- Debt Securities	-	11	327	11,426	11,764
- Equity Securities	-	-	-	178	178
- Derivative financial instruments	-	-	-	13	13
- Other assets[(1)]	69	18	9	9,669	9,765
- Assets of disposal groups classified as held for sale (note 29)	-	-	205	-	205
Total	**8,197**	**1,103**	**3,365**	**47,719**	**60,384**

	31 December 2022				
	Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Total € million
- Cash and balances with central banks	9,712	-	-	-	9,712
- Due from credit institutions	218	514	57	644	1,433
- Loans and advances to customers	1,614	618	2,533	25,854	30,619
- Debt Securities	55	68	142	10,022	10,287
- Equity Securities	-	-	-	268	268
- Derivative financial instruments	-	-	-	9	9
- Other assets [(1)]	72	19	10	10,063	10,164
- Assets of disposal groups classified as held for sale (note 29)	-	-	81	-	81
Total	11,671	1,219	2,823	46,860	62,573

[(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 2023 and 2022. 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 at maturity and they will not be rolled over (e.g. 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.

	31 December 2023				
	Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Gross nominal (inflow)/ outflow € million
Non-derivative liabilities:					
- Due to central banks and credit institutions	1,087	3,877	2,994	362	8,320
- Due to customers	31,653	4,776	4,394	3	40,826
- Debt securities in issue	75	593	245	4,986	5,899
- Lease liabilities	2	4	18	104	128
- Other liabilities	280	274	189	-	743
	33,097	9,524	7,840	5,455	55,916
Derivative financial instruments:	9	-	-	-	9

Off-balance sheet items

	Less than 1 year € million	Over 1 year € million
Credit related commitments	2,407	7,457
Contractual commitments [(1)]	22	-
Total	2,429	7,457

	31 December 2022				
	Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Gross nominal (inflow)/ outflow € million
Non-derivative liabilities:					
- Due to central banks and credit institutions	1,714	2,005	4,420	4,250	12,389
- Due to customers	35,621	2,583	1,996	76	40,276
- Debt securities in issue	37	7	141	4,395	4,579
- Lease liabilities	2	5	21	105	133
- Other liabilities	601	280	330	-	1,211
	37,975	4,880	6,908	8,826	58,588
Derivative financial instruments:	23	-	-	-	23

Off-balance sheet items

	Less than 1 year € million	Over 1 year € million
Credit related commitments	3,503	5,536
Contractual commitments [(1)]	26	-
Total	3,529	5,536

[(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

Following the cessation of the remaining USD LIBOR tenors (overnight, 1-, 3-, 6-, 12-month) on 30 June 2023, the Bank has successfully implemented its IBOR reform transition program, on the outstanding exposures that referenced the above rates, mainly referring to loans to customers and derivatives. Specifically, within 2023, loans to customers have transitioned to the new alternative benchmark rates (SOFR) on their first roll date after cessation date, whilst derivative contracts have transitioned to the appropriate fallback rates either as a result of the application of the ISDA IBOR Protocol or following bilateral renegotiations. Furthermore, the Bank considered those hedge accounting relationships that mature after the cessation date of the aforementioned USD LIBOR tenors, to continue to qualify for hedge accounting.

The Bank continuously monitors any developments about further market initiatives on interest rate benchmark reform, in order to ensure compliance where required.

5.2.5 Climate-related and environmental risks

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

Specifically, climate related and environmental risks are defined as the risks deriving from potential loss or negative impact to the Bank, including loss/damage to physical assets, disruption of business or system failures, transition expenditures and reputational effects from the adverse consequences of climate change and environmental degradation.

Climate-related and environmental risks include the following:

- Climate related and environmental physical risk: Physical risk refers to the financial impact of a changing climate, including more frequent extreme weather events and gradual changes in climate, as well as the impact of environmental degradation.
- Climate related and environmental transition risk: Transition risk refers to financial loss that can result, directly or indirectly, from the process of adjustment towards a lower-carbon and more environmentally sustainable economy.
- Environmental risk: Risk of actual or potential threat associated with the dependency on nature and nature impacts and/or the misalignment between the Group's strategy and the changing regulatory, policy, or societal landscape in which it operates. Environmental risk excludes the impacts from climate change.

The Bank is adopting a strategic approach towards sustainability, 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. In this context, the Bank has approved and implements its Financed Impact Strategy, which focuses on:

- Clients' engagement and awareness to adapt their business so as to address climate change challenges
- Actions for supporting clients in their transition efforts towards a more ESG-friendly economic environment
- Enablers and tools such as frameworks and products to underpin Sustainable Financing
- The assessment and management of climate-related risk of exposures

To facilitate the classification of sustainable/green financing opportunities in a structural manner, the Bank has developed its Sustainable Finance Framework (SFF). Through its SFF, the Bank is able to classify sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing (eligible green and social assets).

Furthermore, the Bank has updated its governance structure by introducing and defining the roles and responsibilities in relation to ESG and climate related & environmental (CR&E) risks, embedding regulatory guidelines and market practices, involving various key stakeholders (i.e. Business functions, Units, and Committees). The Group applies a model of defined roles and responsibilities regarding the management of CR&E risks across the 3 Lines of Defense.

In this context and taking into account the significant impact of climate-related and environmental (CR&E) risks both on financial institutions and on the global economy, the Group developed and approved its CR&E Risks Management Policy which aims at fostering a holistic understanding of the effects of CR&E risks on its business model, as well as support decision-making regarding these matters and provide a robust governance under its Risk Management Framework.

The Group Risk Management Strategy Planning Operations & Climate Risk (GRMSPO&CR) has the overall responsibility for overseeing, monitoring, and managing CR&E risks. Specifically, the Unit operates as the Project office responsible for the implementation of the Climate related and Environmental risks roadmap, ("Program Field") 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. In this context, the Unit ensures the implementation of corresponding environmental and sustainability initiatives (frameworks, policies, procedures and products) and compliance with relevant existing and upcoming regulations, under an ongoing bank-wide program, in line with the supervisory agreed roadmap, which is accelerated where possible. Also, the Unit is responsible for coordinating with Business and other Risk Units, preparing and submitting for approval of the Financed Impact Strategy, as well for monitoring its implementation. Furthermore, the GCRD leads the 2nd Line of Defense independent sustainable lending re-assessment process. Specifically, in the context of implementing the approved Sustainable Finance Framework (SFF), the Unit is responsible for assessing the sustainability features of new loans and products according to the criteria set within the SFF. Going forward the role of Unit will be expanded, covering the management of ESG risks. Further information on ESG risks is provided in the Consolidated Pillar 3 Report on the Parent Company's website.

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:

(a) 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.

(b) 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.

(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 certain debt securities held or 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 2023			
	Level 1 € million	Level 2 € million	Level 3 € million	Total € million
Securities held for trading	**227**	**0**	**-**	**227**
Investment securities at FVTPL	**72**	**19**	**98**	**189**
Derivative financial instruments[(1)]	**-**	**891**	**0**	**891**
Investment securities at FVOCI	**2,164**	**257**	**10**	**2,431**
Loans and advances to customers mandatorily at FVTPL	**-**	**-**	**15**	**15**
Financial assets measured at fair value	**2,463**	**1,167**	**123**	**3,753**
Derivative financial instruments[(1)]	**-**	**1,457**	**-**	**1,457**
Trading liabilities	**121**	**-**	**-**	**121**
Financial liabilities measured at fair value	**121**	**1,457**	**-**	**1,578**

	31 December 2022			
	Level 1 € million	Level 2 € million	Level 3 € million	Total € million
Securities held for trading	69	-	-	69
Investment securities at FVTPL	34	13	127	174
Derivative financial instruments[(1)]	0	1,209	6	1,215
Investment securities at FVOCI	2,387	169	-	2,556
Loans and advances to customers mandatorily at FVTPL	-	-	16	16
Financial assets measured at fair value	2,490	1,391	149	4,030
Derivative financial instruments[(1)]	0	1,696	-	1,696
Trading liabilities	419	-	-	419
Financial liabilities measured at fair value	419	1,696	-	2,115

[(1)] Amounts are presented after offsetting € 752 million and € 492 million level 2 derivative financial assets and liabilities, respectively, against cash collateral received/pledged (2022: after offsetting € 1,376 million and € 444 million derivative financial assets and liabilities, respectively) (note 5.2.1.4).

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. During the year ended 31 December 2023, the Bank transferred OTC derivative instruments of € 7 million from Level 3 to Level 2 following the assessment on the significance of the CVA adjustment to their entire fair value measurement, calculated based on internal rating models. In addition, certain Greek and Cypriot government bonds measured at AC and FVOCI, respectively and fair value at the beginning of the fourth quarter of € 849 million and € 89 million, were transferred from level 1 to level 2 as their market was not considered active.

Reconciliation of Level 3 fair value measurements

	2023 € million	2022 € million
Balance at 1 January	**149**	61
Transfers into Level 3	**1**	9
Transfers out of Level 3	**(7)**	(0)
Additions, net of disposals and redemptions (note 43) [(1)]	**(21)**	87
Total gain/(loss) for the year included in profit or loss	**2**	(9)
Foreign exchange differences and other	**(1)**	1
Balance at 31 December	**123**	149

[(1)] Including capital returns on equity instruments.

Bank's valuation processes and techniques

The Bank's processes and procedures governing the fair valuations are established by the Group Market Counterparty Risk Unit 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, included in Level 3, are estimated using mainly (i) 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.

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 2023				
	Level 1 € million	Level 2 € million	Level 3 € million	Fair value € million	Carrying amount € million
Loans and advances to customers	-	-	31,085	31,085	30,594
Investment securities at amortized cost	5,700	1,840	1,044	8,584	9,095
Financial assets not measured at fair value	5,700	1,840	32,129	39,669	39,689
Debt securities in issue	2,548	1,810	554	4,912	4,951
Financial liabilities not measured at fair value	2,548	1,810	554	4,912	4,951

	31 December 2022				
	Level 1 € million	Level 2 € million	Level 3 € million	Fair value € million	Carrying amount € million
Loans and advances to customers	-	-	30,864	30,864	30,603
Investment securities at amortized cost	5,083	634	1,042	6,758	7,757
Financial assets not measured at fair value	5,083	634	31,906	37,622	38,360
Debt securities in issue	1,350	1,606	553	3,509	3,665
Financial liabilities not measured at fair value	1,350	1,606	553	3,509	3,665

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:

(a) 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 (i.e., discounted expected cash flows technique). More specifically, loans to customers are grouped into homogenous assets with similar characteristics, as monitored by Management, such as lending business unit, products' characteristics, and performing/nonperforming status, in order to improve the accuracy of the estimated valuation outputs. In estimating the future cash flows of lending portfolios, the Bank makes assumptions on expected prepayments, products' spreads over risk-free interest rates, where applicable. The discount rates applied for the discounting of loans' expected cash flows incorporate inputs that would be taken into account by independent market participants, such as risk-free interest rates, expected credit losses, cost of equity requirements and funding. For credit impaired-loans, the timing of collateral realization is taken into account for the estimation of the future cash flows which are discounted by non-credit risk adjusted rates. In addition, the fair value of securitized senior notes of loan portfolios originated by the Group is estimated by discounting the expected cash flows using appropriate market interest rates of other comparable assets with similar quality and duration.

(b) 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. In addition, for certain high quality corporate bonds for which quoted prices are not available, fair value is determined using prices that are derived from reliable data management platforms while part of them is verified by market participants (e.g. brokers). In certain cases, prices are implied by liquidity agreements (e.g. repos, pledges) with other financial institutions; and

(c) 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.

6. Net interest income

	2023 € million	2022 € million
Interest income		
Customers	**1,541**	947
- measured at amortized cost	*1,540*	*946*
- measured at FVTPL	*1*	*1*
Banks and other assets [(1) (3)]	**360**	75
Securities	**356**	223
- measured at amortized cost	*254*	121
- measured at FVOCI	*89*	92
- measured at FVTPL	*13*	10
Derivatives (hedge accounting)	**527**	94
Derivatives (no hedge accounting)	**951**	506
	3,735	1,845
Interest expense		
Customers [(1)]	**(301)**	(53)
Banks [(1) (2) (3)]	**(371)**	(17)
Debt securities in issue [(1)]	**(232)**	(119)
Derivatives (hedge accounting)	**(430)**	(89)
Derivatives (no hedge accounting)	**(921)**	(483)
Lease liabilities - IFRS 16	**(2)**	(2)
	(2,257)	(763)
Total	**1,478**	1,082

[(1)] *Measured at amortized cost.*
[(2)] *For the year 2023, it includes interest expense of € 174 million relating to the funding from the European Central Bank (ECB). In the comparative year, it includes net income of € 50 million that is attributable to the targeted longer-term refinancing operations (TLTRO III) of ECB (note 30).*
[(3)] *Interest from financial assets with negative rates, which were applied until June of 2022, was recorded in interest expense.*

In 2023, the increase of 36.6% in the interest income against the comparative year was mainly driven by higher interest rates, the organic loans' growth and the increased positions in investment bonds, partly offset by higher debt issued and deposits cost.

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

	31 December 2023		
	Interest income on non-impaired loans and advances **€ million**	**Interest income on impaired loans and advances** **€ million**	**Total** **€ million**
Retail lending	**641**	**30**	**671**
Wholesale lending[(1)]	**836**	**34**	**870**
Total interest income from customers	**1,477**	**64**	**1,541**

	31 December 2022		
	Interest income on non-impaired loans and advances € million	Interest income on impaired loans and advances € million	Total € million
Retail lending	438	20	458
Wholesale lending[(1)]	460	29	489
Total interest income from customers	898	49	947

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

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 2023				
	Retail € million	Corporate € million	Global, Capital Markets & Asset Mngt € million	Other [2] € million	Total € million
Lending related activities	**9**	**100**	**16**	**7**	**132**
Mutual funds and assets under management	**17**	**2**	**23**	**3**	**45**
Network activities and other [1]	**62**	**7**	**31**	**3**	**103**
Capital markets	**-**	**7**	**(1)**	**(1)**	**6**
Total	**88**	**116**	**69**	**12**	**286**

	31 December 2022				
	Retail € million	Corporate € million	Global, Capital Markets & Asset Mngt € million	Other [2] € million	Total € million
Lending related activities	8	87	14	6	115
Mutual funds and assets under management	13	1	26	4	44
Network activities and other [1]	70	7	32	0	109
Capital markets	0	8	0	(1)	7
Total	91	103	72	9	275

[1] Including income from credit cards related services.
[2] Includes "Remedial and Servicing Strategy" and "Other and elimination center" segments.

8. Income from non banking services

Income from non banking services includes rental income of € 75 million (2022: € 65.2 million) from real estate properties and other income of € 0.8 million (2022: € 2.2 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 € 140 million (2022: € 204 million).

The analysis of the aforementioned dividends per entity for the year ended 2023 is as follows:

	31 December 2023 € million	31 December 2022 € million
ERB New Europe Holding B.V.	**119**	160
Berberis Investments Ltd	**8**	-
Eurolife FFH Insurance Group Holdings S.A.	**7**	14
doValue Greece Loans and Credits Claim Management S.A.	**5**	5
Other	**1**	24
Total	**140**	204

10. Net trading income and gains less losses from investment securities

	2023 € million	2022 € million
Net trading income/(loss)		
Debt securities, including short positions	**(24)**	100
Derivative financial instruments	**84**	619
Revaluation on foreign exchange positions	**5**	0
Total	**65**	719
Gains less losses from investment securities		
Debt securities	**38**	(18)
- measured at FVOCI [(1)]	*57*	*(20)*
- measured at AC [(2)]	*(18)*	*2*
- measured at FVTPL	*(1)*	*(0)*
Equity securities	**15**	18
Total	**53**	0

[(1)] It includes termination fees from related derivatives in single hedging relationships amounting to € 6 million income (2022: € 4 million income).
[(2)] Mainly refers to the swap transaction of Greek government bonds (note 5.2.1.3).

Trading results of € 24 million loss related to debt securities, include € 1 million loss (2022: € 7 million loss) from trading securities and € 23 million loss (2022: € 107 million gain) on short positions on debt instruments entered into the context of the Bank's economic hedging strategies (note 34).

Gains from derivative financial instruments of € 84 million comprise mainly a) € 35 million loss resulting from fair value changes of derivatives not designated in hedge accounting relationships and b) € 124 million gains from portfolio hedging of interest rate risk (macro hedging), of which € 4 million gains arise from hedge ineffectiveness and € 120 million gains from fair value changes of the hedging derivatives that occur as part of the dynamic management of the pool of hedging instruments on a monthly basis, and include fair value changes before initial designation or after de-designation as well as realized gains of the liquidated positions following de-designation (notes 2.2.3i and 19).

11. Other income/ (expenses)

	2023 € million	2022 € million
Sale of merchant acquiring business - Project Triangle	**-**	325
Gain/(loss) from change in fair value of investment property (note 26)	**17**	34
Gain/(loss) on disposal/liquidation of subsidiaries, associates and joint ventures (notes 23 and 24)	**(3)**	36
Derecognition gain/ (loss) on loans measured at amortised cost (note 20)	**1**	0
Loss on loans' modifications and related adjustments	**(49)**	-
Fee expense related to the deferred tax credits (note 14)	**(6)**	(6)
Gains/(losses) on loans at FVTPL	**(0)**	3
Total	**(41)**	392

In the context of the increased interest rates environment, the Bank has assessed the probability of prepayment on its floating rate loans, focusing on retail portfolios of long-term loans that are expected to exhibit higher, than historically observed, prepayment rates, depending on their particular contractual terms. Accordingly, for performing retail loans that their contractual interest rate spread is scheduled to increase (step-up) over the next few years, the Bank has assessed that the combined increase of the reference interest rates and the pre-determined client spreads, increase the probability of the borrowers' prepaying or refinancing their loans at prevailing market rates earlier than their contractual maturity. Therefore, a prepayment probability was incorporated in the specific loans' expected cash flows, resulting in a loss of ca. € 35 million with a corresponding adjustment on their gross carrying amount.

In April 2023, the Bank announced the launch of a reward initiative for housing loan clients under floating rate loans, that introduced "a cap" in the loans' applicable base rates for a period of 12 months, with a view to protect borrowers against reference rates' increase. The above initiative resulted in a modification loss of ca. € 8 million (note 20).

The aforementioned items are included in "Loss on loans' modification and related adjustments" of the above table.

Eurobank merchant acquiring business -Project 'Triangle'

On 30 June 2022, following the agreement with Worldline B.V. and after receiving all necessary approvals, the sale of the Bank's merchant acquiring business was completed for a cash consideration of € 254 million. The resulting gain from the transaction that was recognised in "Other income/(expenses)", amounted to ca. € 325 million before tax (ca. € 231 million after tax), including the costs directly attributable to the transaction. Further relevant information is provided in note 30 of the consolidated financial statements for the year ended 31 December 2022.

12. Operating expenses

	2023 € million	2022 € million
Staff costs	**(323)**	(293)
Administrative expenses	**(186)**	(175)
Contributions to resolution and deposit guarantee funds	**(17)**	(55)
Depreciation of real estate properties and equipment	**(32)**	(34)
Depreciation of right of use assets	**(27)**	(28)
Amortisation of intangible assets	**(32)**	(29)
Contribution to restoration initiatives after natural disasters	**(14)**	-
Total	**(630)**	(614)

In the third quarter of 2023, the Bank recognized a provision of € 13.5 million for its contribution to the restoration of damages following the recent natural disasters in Greece. This is mainly relating to the destructive floods in Thessaly and the relevant initiative of the four Greek systemic banks, in the context of their corporate social responsibility, to contribute € 50 million to the restoration effort, which will be allocated and provided mostly for infrastructure, in collaboration with the related ministries, the local administration and social and economic institutions of the region.

Contributions to resolution and deposit guarantee funds

In November 2023, the Bank was informed by the Hellenic Deposit and Investment Guarantee Fund (HDIGF) that no contributions are required for 2023 and onwards for the Resolution Scheme of HDIGF, in accordance with the article 36 of law 4370/2016, as in force (2022: € 32 million).

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 (SRMR) 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 SRMR provided that the SRF would be built up over a period of eight years with 'ex-ante' contributions from the banking industry, which could include irrevocable payment commitments (IPC) as a part of the total amount of contributions (for further information on the IPC of the Bank, refer to note 41).

According to its press release of 15 February 2024, the SRB confirmed that the financial means available in the SRF as at 31 December 2023 had reached the target level of at least 1% of covered deposits held in the Member States participating in the SRM as set out in the SRMR. As such, no regular annual contributions will be collected in 2024 from the institutions falling within the scope of SRF.

Staff costs

	2023 € million	2022 € million
Wages, salaries and performance remuneration	**(235)**	(208)
Social security costs	**(44)**	(43)
Additional pension and other post employment costs	**(11)**	(9)
Other	**(33)**	(33)
Total	**(323)**	(293)

The average number of employees of the Bank during the year was 5,990 (2022: 6,179). As at 31 December 2023, the number of branches and business/private banking centers of the Bank amounted to 294 (2022: 300).

13. Other impairments, risk provisions and restructuring costs

	2023 € million	2022 € million
Impairments and provisions/reversal related to shares in subsidiaries	**(103)**	(29)
Impairment and valuation losses on real estate properties	**(20)**	(13)
Impairment losses on computer hardware and software (notes 25, 27)	**(14)**	(21)
Impairment (losses)/reversal on bonds (note 5.2.1.3)	**3**	(19)
Other impairments, litigation and conduct-related provisions and costs	**(31)**	(43)
Other impairments, risk provisions and related costs	**(165)**	(125)
Voluntary exit schemes and other related costs	**(19)**	(59)
Other restructuring costs	**(6)**	(28)
Restructuring costs	**(25)**	(87)
Total	**(190)**	(212)

In the year ended 31 December 2023, the Bank recognized € 6 million other restructuring costs which mainly relate to the Bank's transformation projects and initiatives (2022: € 28 million).

In the year ended 31 December 2022, an amount of € 48 million for employee termination benefits was included in restructuring costs in respect of the Voluntary Exit Scheme (VES) that was launched by the Bank in February 2022 for eligible units in Greece.

14. Income tax

	2023 € million	2022 € million
Current tax	**(5)**	3
Deferred tax	**(156)**	(355)
Total income tax	**(161)**	(352)

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 deferred tax assets (DTAs)/deferred tax credits (DTCs) against the Greek State is 29%. The Greek corporate tax rate for legal entities other than the aforementioned credit institutions is 22%. 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

Following the completion in 2023, of the tax audit of the Bank by the tax authorities for the tax years 2020 and 2021, the Bank's open tax years are 2022-2023. For fiscal years starting from 1 January 2016 onwards, pursuant to the Tax Procedure Code, an 'Annual Tax Certificate' on an optional basis, is provided for the Greek entities, with annual financial statements audited compulsorily, 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 has opted to obtain such certificate.

The tax certificate which has been obtained by the Bank is unqualified for the open tax year 2022. For the year ended 31 December 2023, 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:

	2023 € million	2022 € million
Balance at 1 January	**4,154**	4,414
Income statement credit/(charge)	**(156)**	(355)
Investment securities at FVOCI	**(8)**	96
Cash flow hedges	**1**	(0)
Actuarial gain/(losses)	**1**	(1)
Other [(1)]	**(6)**	-
Balance at 31 December	**3,986**	4,154

[(1)] *It includes DTL of € 7 million on deductible temporary differences in relation to real estate properties, which has been transferred to the Bank, following its merger with its subsidiaries Cloud Hellas Single Member Ktimatiki S.A. and Standard Single Member Real Estate S.A. (note 23.1).*

Deferred income tax (charge)/credit is attributable to the following items:

	2023 € million	2022 € million
Impairment/ valuation relating to loans, disposals and write-offs	**(211)**	(128)
Tax deductible PSI+ losses	**(50)**	(50)
Carried forward debit difference of law 4831/2021	**39**	(73)
Change in fair value and other temporary differences	**66**	(104)
Deferred income tax (charge)/credit	**(156)**	(355)

Deferred tax assets/ (liabilities) are attributable to the following items:

	2023 € million	2022 € million
Impairment/valuation relating to loans and accounting write-offs	**934**	1,023
PSI+ tax related losses	**901**	951
Losses from disposals and crystallized write-offs of loans	**2,120**	2,242
Carried forward debit difference of law 4831/2021	**39**	-
Other impairments/ valuations through the income statement	**(48)**	(120)
Cash flow hedges	**6**	5
Defined benefit obligations	**7**	5
Real estate properties, equipment and intangible assets	**(69)**	(46)
Investment securities at FVOCI	**(23)**	(15)
Other [(1)]	**119**	109
Net deferred tax	**3,986**	4,154

[(1)] *It includes, among others, DTA on deductible temporary differences relating to operational risk provisions and the leasing operations.*

Further information, in relation to the aforementioned categories of deferred tax assets as at 31 December 2023, is as follows:

(a) € 934 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) € 901 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) € 2,120 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;

Assessment of the recoverability of deferred tax assets

The recognition of the 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, 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 2023, 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 February 2024, for the period up to the end of 2026 (also submitted to the Single Supervisory Mechanism -SSM-). For the years beyond 2026, the forecast of operating results was based on the management projections considering the growth opportunities of the Greek and European 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 gradual decrease of interest rates in 2024 onwards, (b) the sustainable increase in loan volumes with pressure in business lending spreads and the growth, at a relatively lower pace, of customer deposits with gradually higher betas, (c) the increase in fee and commission income mostly driven by assets under management, bancassurance, network and lending related activities, cards' issuing and investment property rentals, (d) the discipline to operating expenses' targets taking into account the sustained - albeit easing inflationary pressures, (e) the further decrease of NPE ratio, (f) the resilient asset quality with lower cost of risk, which is expected to carry the effect from the improved macroeconomic outlook driven by the resilient growth of Greek economy, above European average, as well as the unemployment rate at single digit levels, close to historical lows and (g) the fulfilment of interim MREL targets throughout the plan period. The major initiatives introduced in the context of the Eurobank Holdings Group's transformation plan "Eurobank 2030", will contribute to meeting its financial objectives.

The Bank closely monitors and constantly assesses the developments on the macroeconomic and geopolitical front (note 2) including the inflationary pressures and their potential effect on the achievement of its Business Plan targets in terms of asset quality and 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 2023, pursuant to the Law 4172/2013, as in force, the Bank's eligible DTAs/deferred tax credits (DTCs) against the Greek State amounted to € 3,212 million (31 December 2022: € 3,402 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 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, 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.

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 2023, an amount of € 5.6 million has been recognized in "Other income/(expenses) (31 December 2022: € 5.9 million).

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 Bank's applicable tax rate of 29% as follows:

	2023 € million	2022 € million
Profit before tax	**955**	1,740
Tax at the applicable tax rate	**(277)**	(505)
Tax effect of:		
- income not subject to tax and non deductible expenses	**48**	62
- tax deductible losses for which DTA had not been recognised	**63**	66
- other	**5**	25
Total tax (charge)/income	**(161)**	(352)

For the year ended 31 December 2023, the Bank's effective tax rate reached 17%, mainly driven by its impairment losses relating to loans accounted in prior years, for which a DTA amounting to € 45 million had not been recognised, which became deductible for tax purposes in 2023 upon the disposal of Bank's subsidiary IMO Property Investments Sofia E.A.D. (note 23) (20% in the comparative period, including the effect of the offsetting of a part of the Bank's carried forward tax losses, for which DTA had not been recognised against the taxable profit for the year ended 31 December 2022).

As at 31 December 2023, the Bank has not recognised deferred tax asset (DTA) on unused tax losses amounting to € 84 million (31 December 2022: € 90 million) which can be utilized until 2025.

15. Cash and balances with central banks

	2023 € million	2022 € million
Cash in hand	**389**	340
Balances with central banks	**5,973**	9,372
Total	**6,362**	9,712

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 2023, the mandatory reserves with the BoG amounted to € 47 million (31 December 2022: € 149 million). MRR deposits placed to the European Central Bank (ECB) were remunerated at the ECB's deposit facility rate (DFR) until September 2023 and at zero (0%) thereafter.

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:

	2023 € million	2022 € million
Cash and balances with central banks (excluding mandatory and collateral deposits with central banks) (note 15)	**6,311**	9,563
Due from credit institutions	**292**	79
Securities held for trading	**0**	16
Total	**6,604**	9,658

Other (income)/losses on investment securities presented in operating activities are analyzed as follows:

	2023 € million	2022 € million
Amortisation of premiums/discounts and accrued interest	**(34)**	(39)
(Gains)/losses from investment securities	**(53)**	(0)
Dividends	**(1)**	(1)
Total	**(88)**	(40)

In the year ended 31 December 2023, other adjustments of € 64 million presented in the cash flow statement mainly include € 53 million from debt securities in issue (see below) and € 7 million from share options plan (note 38) (31 December 2022: € 251 million mainly include € 325 million gain resulting from the sale of Eurobank's merchant acquiring business to Worldline B.V. , note 11).

Changes in liabilities arising from financing activities

During the year ended 31 December 2023, changes in the Bank's liabilities arising from financing activities, other than lease liabilities (note 40), are attributable to: a) debt issuance amounting to € 1,162 million (2022: € 1,145 million), (net of issuance costs), b) debt repayment amounting to € 16 million (2022: € 12 million) and c) accrued interest and amortisation of debt issuance costs amounting to € 53 million (2022: € 58 million).

17. Due from credit institutions

	2023 € million	2022 € million
Pledged deposits with banks [1]	**1,356**	1,402
Placements and other receivables from banks [1]	**1,042**	693
Current accounts and settlement balances with banks	**149**	82
Total	**2,547**	2,177

[1] *The amounts presented are after offsetting (note 5.2.1.4).*

	2023 € million	2022 € million
Included in due from credit institutions were unsubordinated amounts due from:		
-subsidiary undertakings	**904**	1,121
Included in due from credit institutions were subordinated amounts due from:		
-subsidiary undertakings	**110**	67

As at 31 December 2023, the pledged deposits with banks include: a) € 318 million cash collaterals for guarantees relating to the lending activities of banking subsidiaries, b) € 1,001 million mainly cash collaterals on risk mitigation contracts for derivative transactions and repurchase agreements (CSAs, GMRAs) 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:

	2023 € million	2022 € million
Greece	**21**	5
Other European countries	**2,519**	2,149
Other countries	**7**	23
Total	**2,547**	2,177

18. Securities held for trading

	2023 € million	2022 € million
Debt securities (note 5.2.1.3)	**227**	69
Total	**227**	69

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 2023			31 December 2022		
	Contract/ notional amount	Fair values		Contract/ notional amount	Fair values	
		Assets	Liabilities		Assets	Liabilities
	€ million	€ million	€ million	€ million	€ million	€ million
Derivatives for which hedge accounting is not applied/ held for trading						
- Interest rate swaps	**34,614**	**1,227**	**1,070**	36,404	1,817	1,408
- Interest rate options [(1)]	**9,268**	**69**	**71**	3,616	74	96
- Cross currency interest rate swaps	**23**	**1**	**-**	24	-	-
- Foreign exchange contracts [(2)]	**3,796**	**27**	**26**	5,035	92	71
- Other [(3)]	**324**	**4**	**39**	107	1	1
		1,328	**1,206**		1,984	1,576
Derivatives designated as fair value hedges						
- Interest rate swaps	**8,097**	**304**	**449**	6,824	425	431
- Interest rate swaps/ portfolio hedging	**6,414**	**11**	**94**	4,792	180	-
- Interest rate floors	**6,447**	**-**	**53**	7,791	-	55
		315	**596**		605	486
Derivatives designated as cash flow hedges						
- Cross currency interest rate swaps	**1,579**	**-**	**147**	1,646	2	78
		-	**147**		2	78
Offsetting (note 5.2.1.4)						
- Interest rate swaps		**(752)**	**(492)**		(1,376)	(444)
Total derivatives assets/liabilities		**891**	**1,457**		1,215	1,696

[(1)] Interest rate options include interest rate caps and floors and swaptions.
[(2)] It includes currency swaps, forwards and options
[(3)] It includes credit default swaps, warrants, commodity derivatives, futures 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 portion of its existing interest rate risk resulting from any potential change in the fair value of fixed rate debt securities, held or issued, or fixed rate loans, denominated both in local and foreign currencies, using interest rate swaps whereby the fixed legs represent the economic risks of the hedged items. The Bank uses pay fixed/receive floating interest rate swaps to hedge its fixed rate debt securities held and loans and pay floating/receive fixed interest rate swaps to hedge its fixed rate liabilities. In 2023, the Bank recognized a loss of € 156 million (2022: € 831 million gain) from changes in the carrying amount of the hedging instruments and € 153 million gain (2022: € 806 million loss) from changes in the fair value of the hedged items attributable to the hedged risk. The amount of hedge ineffectiveness recognized for 2023 in "Net trading income/(loss)" was € 3 million loss (2022: € 25 million gain).

(b) Fair value hedges – portfolios of assets and liabilities

The Bank hedges a portion of its existing interest rate risk resulting from any potential change in the fair value of a portfolio of fixed rate loans including securitized notes initially issued and subsequently held by the Bank (macro-hedging), using a group of interest rate swaps. The Bank primarily designates the change in fair value attributable to changes in the benchmark interest rate as the hedged risk, including also, assumptions for prepayment risk and, accordingly, enters into interest rate swaps whereby the fixed legs represent the economic risks of the hedged items. In 2023, the Bank recognized a loss of € 139 million (2022: € 180 million gain) from changes in the carrying amount of the hedging instruments and € 145 million gain (2022: € 159 million loss) from changes in the fair value of the designated hedged items attributable to the hedged risk. Accordingly the amount of hedge ineffectiveness recognized for 2023 in "Net trading income/(loss)" was € 6 million gain (2022: € 21 million gain).

The Bank also hedges the variability deriving from the fair value changes of purchased interest rate floors embedded in portfolios of floating rate loans and debt securities by writing the floors in the market. In 2023, the Bank recognized a gain of € 45 ths (2022: € 20 million gain) from changes in the carrying amount of the hedging instruments, and € 45 ths loss (2022: € 20 million loss) from changes in the fair value of the hedged items attributable to the hedged risk.

Finally, similar to portfolio hedging of interest rate risk for assets, the Bank hedges part of its interest rate exposure of demand deposit portfolios attributable to changes in the benchmark interest rates (macro-hedging). Despite their contractual terms and due to their nature, part of the demand deposits are interest rate-insensitive and hence behave similarly to fixed interest rate liabilities. Accordingly, the Bank enters into a group of interest rate swaps that receives fixed interest rate and pays floating interest rate based on the benchmark rate and its volume is re-assessed on a monthly basis. In 2023, the Bank recognized a loss of € 12 million from changes in the carrying amount of the hedging instruments and € 10 million gain from changes in the fair value of the designated hedged items attributable to the hedged risk. Accordingly, the amount of hedge ineffectiveness recognized for 2023 in "Net trading income/(loss)" was € 2 million loss.

(c) Cash flow hedges

The Bank hedges a portion of its existing interest rate and foreign currency risk resulting from any cash flow variability due to changes in market interest rates on floating rate loans, denominated in foreign currency, using cross currency interest rate swaps, where the variable legs are based on the benchmark rates of the hedged items. The interest rate risk with respect to the benchmark reference rate - swap curve of such items, which share the same benchmark interest rate risk may be hedged on a single item or group basis using interest rate swaps of similar maturity. For the year ended 31 December 2023, an amount of € 3 million loss was recognised in other comprehensive income in relation to derivatives designated as cash flow hedges (2022: € 19 million gain). Furthermore, in 2023, the ineffectiveness recognized in the income statement that arose from cash flow hedges was nil (2022: 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 2023			
	Greece € million	Other European countries € million	Other countries € million	Total € million
Sovereign	227	-	-	227
Banks	12	245	335	592
Corporate	72	0	0	72
Total	311	245	335	891

	31 December 2022			
	Greece € million	Other European countries € million	Other countries € million	Total € million
Sovereign	248	-	-	248
Banks	12	334	570	916
Corporate	51	0	0	51
Total	311	334	570	1,215

As at 31 December 2023, the net carrying value of the derivatives with the Hellenic Republic amounted to a liability of € 260 million (31 December 2022: € 489 million liability).

At 31 December 2023 and 2022, 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 2023								
	Fair Value Hedges					**Cash Flow Hedges**			
	1 - 3 months € million	**3 - 12 months € million**	**1-5 years € million**	**Over 5 years € million**	**Total € million**	**1 - 3 months € million**	**3 - 12 months € million**	**1-5 years € million**	**Total € million**
Interest rate swaps [1]	**500**	**16**	**4,238**	**3,343**	**8,097**	**-**	**-**	**-**	**-**
Interest rate options	**-**	**-**	**800**	**5,647**	**6,447**	**-**	**-**	**-**	**-**
Cross currency interest rate swaps	**-**	**-**	**-**	**-**	**-**	**175**	**602**	**802**	**1,579**
Total	**500**	**16**	**5,038**	**8,990**	**14,544**	**175**	**602**	**802**	**1,579**

	31 December 2022							
	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	Total € million
Interest rate swaps [1]	255	24	2,710	3,835	6,824	-	-	-
Interest rate options	-	-	800	6,991	7,791	-	-	
Cross currency interest rate swaps	-	-	-	-	-	101	1,545	1,646
Total	255	24	3,510	10,826	14,615	101	1,545	1,646

[1] Nominal amount of interest rate swaps designated as fair value macro hedges is not included.

(a) Fair value hedges

The following tables present data relating to the hedged items under fair value hedges for the years ended 31 December 2023 and 2022:

	2023		
	Carrying amount / Exposure designated as hedged € million	**Accumulated amount of FV hedge adjustments related to the hedged item € million**	**Change in value as the basis for recognising hedge ineffectiveness € million**
Assets			
Loans and advances to customers [1]	**9,125**	**68**	**171**
Debt securities AC [1]	**4,412**	**157**	**151**
Debt securities FVOCI	**1,027**	**(54)**	**81**
Liabilities			
Debt securities in issue	**3,822**	**(15)**	**105**
Due to customers [1]	**1,400**	**17**	**(10)**

	2022		
	Carrying amount / Exposure designated as hedged € million	Accumulated amount of FV hedge adjustments on the hedged item € million	Change in value as the basis for recognising hedge ineffectiveness € million
Assets			
Loans and advances to customers [(1)]	12,680	(216)	(224)
Debt securities AC [(1)]	3,864	(2)	(410)
Debt securities FVOCI	1,054	(136)	(232)
Liabilities			
Debt securities in issue	2,373	(120)	(120)

[(1)] For loans and advances to customers hedges, debt securities at amortised cost included in portfolio hedges and due to customers hedges, the exposure designated as hedged is presented.

At 31 December 2023, the accumulated amounts of fair value hedge adjustments remaining in the balance sheet for any items that have ceased to be adjusted for hedging gains and losses were € 261 million assets for debt securities held at AC, € 3 million liabilities for debt issued and € 14 million liabilities for adjustments related to debt securities held at FVOCI (2022: € 279 million assets for debt securities held at AC, € 4 million liabilities for debt issued and € 15 million liabilities for adjustments related to debt securities at FVOCI). The respective fair value hedge adjustments relating to macro-hedging, amounted to € 57 million loss for loans (including securitized notes) and € 27 million gain for deposits.

(b) Cash flow hedges

The cash flow hedge reserves for continuing hedges as at 31 December 2023 were € 0.7 million gain (2022: € 4 million gain), which relate to loans and advances to customers.

As at 31 December 2023, the balances remaining in the cash flow hedge reserve from any cash flow hedging relationships for which hedge accounting is no longer applied was € 20 million loss (2022: € 20 million loss).

The reconciliation of the components of Bank's special reserves including cash flow hedges is provided in note 37.

20. Loans and advances to customers

	2023 € million	2022 € million
Loans and advances to customers at amortised cost		
- Gross carrying amount	31,571	32,086
- Impairment allowance	(992)	(1,320)
Carrying Amount	**30,579**	30,766
Fair value changes of loans in portfolio hedging of interest rate risk	**15**	(163)
Loans and advances to customers at FVTPL	**15**	16
Total	**30,609**	30,619

The table below presents the carrying amount of loans and advances to customers per product line and per stage as at 31 December 2023:

	31 December 2023				31 December 2022
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	Total amount € million	Total amount € million
Loans and advances to customers at amortised cost					
Mortgage lending:					
- Gross carrying amount	4,922	2,559	367	7,849	8,224
- Impairment allowance	(19)	(151)	(175)	(345)	(351)
Carrying Amount	4,903	2,408	192	7,504	7,873
Consumer lending:					
- Gross carrying amount	1,400	174	68	1,642	1,687
- Impairment allowance	(28)	(23)	(62)	(114)	(184)
Carrying Amount	1,372	151	6	1,529	1,503
Small Business lending:					
- Gross carrying amount	1,949	657	257	2,863	3,165
- Impairment allowance	(17)	(60)	(113)	(191)	(284)
Carrying Amount	1,932	597	144	2,673	2,882
Wholesale lending: [(2)(3)]					
- Gross carrying amount	18,114	546	557	19,216	19,010
- Impairment allowance	(57)	(46)	(240)	(343)	(502)
Carrying Amount	18,057	500	317	18,874	18,508
Total loans and advances to customers at AC					
- Gross carrying amount, of which:	26,385	3,936	1,250	31,571	32,086
Non Performing exposures (NPE)			*1,241*	*1,241*	*1,861*
- Impairment allowance	(121)	(280)	(591)	(992)	(1,320)
Carrying Amount	**26,264**	**3,656**	**659**	**30,579**	30,766
Fair value changes of loans in portfolio hedging of interest rate risk				**15**	(163)
Loans and advances to customers at FVTPL					
Carrying Amount [(4)]				**15**	16
Total				**30,609**	30,619

[(1)] As at 31 December 2023, POCI loans of € 13 million gross carrying amount (€ 10 million included in performing exposures and € 3 million in non performing exposures), which carried € 1 million impairment allowance, are presented in 'Lifetime ECL – Stage 3 and POCI' (31 December 2022: € 8 million gross carrying amount, which carried an immaterial impairment allowance).

[(2)] Includes € 4,266 million related to the senior notes of Pillar, Cairo and Mexico securitizations, which have been categorized in Stage 1.

[(3)] Includes loans to public sector.

[(4)] Includes € 9.9 million related to the mezzanine notes of the Pillar, Cairo and Mexico securitizations.

Sustainability linked loans

In line with its Sustainable Finance Framework, the Bank grants loans, which as part of their contractual terms, incentivize the borrower's achievement of predetermined sustainability performance targets (SPTs). Specifically, these SPTs consist of a list of environmental (E), social (S), and governance (G) targets, the fulfillment of which by the client is determined by meeting respective KPIs, i.e., metrics to quantify the client's performance, for example climate-related targets, such as reducing carbon emissions or social targets, such as increasing the level of diversity at Board level. As part of the terms of these loans, the contractual interest rate is increased if the borrower fails to meet specific targets linked to its activity.

The abovementioned loans held as of 31 December 2023 have been assessed, in line with the Bank's accounting policies (note 2) that their contractual cash flows are considered to fulfil the SPPI test. Their contractual terms are consistent with a basic lending arrangement, therefore they are held at amortized cost.

As at 31 December 2023, the carrying amount of the sustainability linked loans amounted to € 354 million (2022: € 432 million).

Project "Solar"

In the context of its NPE management strategy, the Bank has structured another NPE securitization transaction (project 'Solar'), as part of a joint initiative with the other Greek systemic banks (the Banks) initiated since 2018, in order to decrease further its NPE ratio and strengthen its balance sheet de-risking. In addition, the Bank targets to the prudential and accounting derecognition of the underlying corporate loan portfolio from its balance sheet by achieving a Significant Risk Transfer (SRT) and including 'Solar' securitization under the Hellenic Asset Protection Scheme (HAPS), thus the senior note of the securitization to become entitled to the Greek State's guarantee. The Management remains committed to its plan for the completion of the above transaction and has undertaken actions, along with the other participating banks, towards the disposal of the majority stake of the mezzanine and junior notes to be issued in the context of the above-mentioned securitization. More specifically, on 2 November 2023, the Bank announced the execution of a binding agreement between the Banks and Waterwheel Capital Management, L.P., with respect to the sale to the latter of 95% of the Mezzanine and Junior notes to be issued in the context of "Solar" securitization. The Banks will hold 100% of the Senior notes as well as 5% of the Mezzanine and Junior notes. The completion of the transaction is subject to the fulfillment of customary conditions for such transactions, including, among others, the HAPs guarantee and SRT approval mentioned above.

Since June 2022, the Bank classified the underlying corporate loan portfolio as held for sale and remeasured the portfolio's expected credit losses, in accordance with the Bank's accounting policy for the impairment of financial assets, which resulted in the recognition of impairment loss of € 12 million in the fourth quarter of 2023 (note 21). The aforementioned impairment loss was calculated by reference to the currently estimated fair value of the notes to be retained by the Bank, upon the completion of transaction, and the consideration expected to be received by the sale of mezzanine and junior notes. As at 31 December 2023, the carrying amount of the aforementioned loan portfolio reached € 48 million, comprising loans with gross carrying amount of € 246 million, which carried an impairment allowance of € 198 million. Furthermore, the impairment allowance of the letters of guarantee included in the underlying portfolio reached € 1 million (note 34).

Project "Leon"

In December 2023, the Bank, aiming to accelerate further its NPE reduction plan, initiated the sale process of a mixed NPE portfolio of total gross book value ca. € 400 million, engaging in parallel in negotiations with potential investors. The transaction is expected to be completed by the end of 2024.

Accordingly, as at 31 December 2023, the Bank classified the above loan portfolio as held for sale, remeasured the portfolio's expected credit losses, in accordance with the Bank's accounting policy for the impairment of financial assets and recognized an impairment loss of € 55 million (note 21), which was calculated by reference to the consideration expected to be received from its sale. As at 31 December 2023, the carrying amount of the aforementioned loan portfolio reached € 121 million, comprising loans with gross carrying amount of € 398 million, which carried an impairment allowance of € 277 million (note 29).

Project Wave

In December 2023, the Bank proceeded with the execution of another synthetic risk transfer transaction (project "Wave IV") in the form of a financial guarantee, providing credit protection over the mezzanine loss of a portfolio of performing SME and Large Corporate loans amounting to € 1.5 billion (the reference portfolio). Similarly to the previous synthetic risk transfer transactions of similar characteristics ('Wave' projects) , the Wave IV transaction was accounted for as a purchased financial guarantee contract that is 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 portfolios of Wave projects continued to be recognised on the Bank's Balance Sheet.

Support measures to customers

In April 2023, the Bank announced the launch of a reward initiative for housing loan clients under floating rate loans, disbursed until 31 December 2022, who had no delinquencies and met their financial obligations in a consistent manner. The reward program introduced “a cap” in the loans’ applicable base rates for a period of 12 months, with a view to protect borrowers against reference rates’ increase (note 11)

Post balance sheet event

In March 2024, the Bank announced that the aforementioned reward initiative will be extended with the same terms for another twelve months, in its effort to continue to support and reward its non-delinquent housing clients.

In the third quarter of 2023, the Bank, as a response to the unprecedented wildfires and floods that impacted several regions in Greece offered certain support measures to affected borrowers, owners of properties located in the affected areas or companies operating in the same regions, who had delinquencies up to 89 days and had filed a relevant application to the Bank. The above support measures include loans’ arrears capitalization, if any, payment holidays on an interest-bearing and for wildfire affected companies specifically, 50% spread reduction. These measures are accounted for as modifications with no impact in profit or loss.

Securitizations of loan portfolios originated by the Eurobank Holdings Group

The ultimate parent company’s Group (Eurobank Holdings Group, former Eurobank Ergasias S.A. Group), 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.

‘Mexico’ securitization

In May 2021, Eurobank Holdings Group, through its special purpose financing vehicle (SPV) ‘Mexico Finance Designated Activity Company’ issued senior, mezzanine and junior notes of total face value of ca. € 5.2 billion, via a securitization of a mixed portfolio comprising primarily NPE. Eurobank Holdings Group included ‘Mexico’ securitization under the Hellenic Asset Protection Scheme (HAPS) thus the senior note of the securitization became entitled to the Greek State’s guarantee.

In September 2021, the Bank derecognized the underlying loan portfolio, the related securitization’s receivables and payables, and the impairment allowance of the letters of guarantee included in the underlying portfolio, on the basis that it transferred substantially all risks and rewards of the portfolio’s ownership and relinquished its control over it and recognized the retained notes, i.e. 100% of the senior and 5% of the mezzanine and junior notes of Mexico securitization, at fair value, with carrying amount € 1,415 million at 31 December 2023 (31 December 2022: € 1,539 million). 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.

‘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. The Eurobank Holdings Group included “Cairo” securitization under the Hellenic Asset Protection Scheme (HAPS) thus the senior note of the securitization became entitled to the Greek State’s guarantee.

As of 20 March 2020, following the hive down of Eurobank Ergasias S.A. banking’s sector, 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 € 2,019 million at 31 December 2023 of which € 1,842 million are held by the Bank (31 December 2022: € 2,332 million of which € 2,049 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 € 1,020 million at 31 December 2023 (31 December 2022: € 1,039 million).

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):

	2023												
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [(1)] € million	Total € million
Impairment allowance as at 1 January	51	62	388	19	155	177	21	28	135	16	65	202	**1,320**
New loans and advances originated or purchased	19	-	-	0	-	-	9	-	-	3	-	-	32
Transfers between stages													
- to 12-month ECL	20	(18)	(2)	7	(6)	(1)	12	(5)	(7)	8	(6)	(2)	-
- to lifetime ECL	(4)	25	(21)	(3)	26	(22)	(1)	13	(13)	(2)	12	(10)	-
- to lifetime ECL credit-impaired loans	(0)	(8)	8	(0)	(11)	12	(1)	(4)	4	(1)	(10)	11	-
Impact of ECL net remeasurement	(35)	(15)	2	(4)	(16)	159	(8)	(10)	56	(7)	(3)	95	214
Recoveries from written - off loans	-	-	87	-	-	6	-	-	12	-	-	4	108
Loans and advances derecognised / reclassified as held for sale during the year [(2)]	-	-	(188)	(0)	(0)	(90)	(0)	(0)	(66)	(0)	(0)	(110)	(455)
Amounts written off [(3)]	-	-	(186)	-	-	(38)	-	-	(42)	-	-	(56)	(322)
Unwinding of Discount	-	-	(7)	-	-	(3)	-	-	(1)	-	-	(3)	(14)
Foreign exchange and other movements	5	(0)	160	0	4	(25)	(5)	0	(15)	0	1	(16)	110
Impairment allowance as at 31 December	**57**	**46**	**240**	**19**	**151**	**175**	**28**	**23**	**62**	**17**	**60**	**113**	**992**

	2022												
	Wholesale [4]			Mortgage			Consumer			Small business			
	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [1] € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [1] € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [1] € million	12-month ECL-Stage 1 € million	Lifetime ECL-Stage 2 € million	Lifetime ECL-Stage 3 and POCI [1] € million	Total € million
Impairment allowance as at 1 January	54	66	723	16	133	122	27	24	133	35	54	195	1,580
New loans and advances originated or purchased	24	-	-	0	-	-	7	-	-	3	-	-	34
Arising from merger (note 23.1)	-	-	-	-	-	-	3	1	82	-	-	-	86
Transfers between stages													
- to 12-month ECL	18	(18)	(0)	9	(8)	(1)	10	(5)	(5)	11	(8)	(3)	-
- to lifetime ECL	(10)	11	(0)	(4)	23	(19)	(4)	17	(13)	(5)	16	(11)	-
- to lifetime ECL credit-impaired loans	(1)	(6)	7	(0)	(8)	9	(1)	(4)	5	(1)	(6)	7	-
Impact of ECL net remeasurement	(31)	10	(50)	(1)	12	93	(14)	(5)	72	(27)	10	67	135
Recoveries from written - off loans	-	-	16	-	-	6	-	-	6	-	-	6	35
Loans and advances derecognised / reclassified as held for sale during the year [2]	-	(0)	(200)	-	-	-	-	-	-	-	-	(1)	(201)
Amounts written off [3]	-	-	(84)	-	-	(7)	-	-	(126)	-	-	(44)	(262)
Unwinding of Discount	-	-	(10)	-	-	(1)	-	-	(2)	-	-	(2)	(16)
Foreign exchange and other movements	(2)	0	(12)	0	3	(24)	(7)	(0)	(17)	0	0	(12)	(70)
Impairment allowance as at 31 December	51	62	388	19	155	177	21	28	135	16	65	202	1,320

(1) The impairment allowance for POCI loans of € 1 million is included in 'Lifetime ECL – stage 3 and POCI (2022: immaterial).

(2) It represents the impairment allowance of loans derecognized due to a) substantial modifications of the loans' contractual terms, b) sale transactions, including for 2023 the disposal of the loan to the former Bank's subsidiary IMO Property Investments Sofia E.A.D (note 23), c) debt to equity transactions, and those that have been reclassified as held for sale during the year (notes 20 and 29).

(3) The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2023 and that are still subject to enforcement activity is € 254 million (2022: € 82 million).

(4) For 2022, impairment loss on wholesale loans included a) the reversal of € 50 million provision in respect of loans to Hellenic Post Credit S.A. and the b) the reversal of € 21.5 million provision in respect of loans to Village Roadshow Operations Hellas S.A.

The impairment losses relating to loans and advances to customers recognized in the Bank's income statement for the year ended 31 December 2023 amounted to € 282 million, including € 67 million loss relating to the projects Solar and Leon (note 20) (2022: € 173 million) and are analyzed as follows:

	2023 € million	2022 € million
Impairment loss on loans and advances to customers	**(245)**	(169)
Net income / (loss) from financial guarantee contracts [1]	**(37)**	(22)
Modification gain/(loss) on loans and advances to customers	**9**	3
Impairment (loss)/ reversal for credit related commitments	**(8)**	15
Total	**(282)**	(173)

[1] It refers to purchased financial guarantee contracts, not integral to the guaranteed loans (projects Wave).

22. Investment securities

	2023 € million	2022 € million
Investment securities at FVOCI	**2,431**	2,556
Investment securities at amortized cost	**9,095**	7,757
Investment securities at FVTPL	**189**	174
Total	**11,715**	10,487

Note: Information on debt securities of the investment portfolio is presented in note 5.2.1.3

In April 2023, Attica Bank, a financial institution located in Greece, announced the completion of its share capital increase with the joint participation of Hellenic Financial Stability Fund (HFSF) and private investors. Eurobank participated in the above capital increase and designated its investment amounting to € 10 million at FVOCI. As at 31 December 2023, its fair value stood at € 8 million.

In November 2023, the Bank acquired a minority stake in Plum Fintech Limited ("Plum"), a fintech company based in the UK. Under the terms of the agreement, the Bank initially invested € 5 million in Plum and subject to the fulfillment of certain conditions, may invest another € 5 million in due time. The investment of the Bank in the aforementioned company was designated at FVOCI.

Sustainability linked bonds

As at 31 December 2023, the Bank holds positions in sustainability linked bonds with Sustainability Performance Targets (SPTs) (note 20) of carrying value of € 118 million, of which € 82 million measured at FVOCI and € 36 million at AC (2022: € 173 million, of which € 123 million at FVOCI and € 50 million at AC). The Bank has assessed the ESG features of the aforementioned debt instruments, in line with the Bank's accounting policies (note 2) and has concluded that they do not create exposure to risks that are inconsistent with a basic lending arrangement and therefore the SPPI criteria are met.

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:

	2023								
	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	Lifetime ECL - Stage 3	12-month ECL-Stage 1	Lifetime ECL - Stage 2	Lifetime ECL - Stage 3			Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Gross carrying amount at 1 January	**2,390**	**71**	**-**	**7,740**	**6**	**33**	**174**	**95**	**10,509**
Additions, net of disposals and redemptions	**(247)**	**-**	**-**	**1,193**	**-**	**(2)**	**(0)**	**17**	**961**
Transfers between stages	**26**	**(26)**	**-**	**(1)**	**1**	**-**	**-**	**-**	**-**
Net gains/(losses) from changes in fair value for the year	**195**	**3**	**-**	**-**	**-**	**-**	**14**	**7**	**219**
Amortisation of premiums/discounts and interest	**2**	**0**	**-**	**30**	**(0)**	**2**	**(0)**	**-**	**34**
Changes in fair value due to hedging [1]	**-**	**-**	**-**	**142**	**0**	**-**	**-**	**-**	**142**
Exchange adjustments and other movements [2]	**2**	**0**	**-**	**(32)**	**-**	**(1)**	**1**	**(104)**	**(134)**
Gross carrying amount at 31 December	**2,368**	**48**	**-**	**9,072**	**7**	**32**	**189**	**15**	**11,731**
Impairment allowance	**-**	**-**	**-**	**(9)**	**(0)**	**(7)**	**-**	**-**	**(16)**
Net carrying amount at 31 December	**2,368**	**48**	**-**	**9,063**	**7**	**25**	**189**	**15**	**11,715**

	2022								
	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	Lifetime ECL - Stage 3	12-month ECL-Stage 1	Lifetime ECL - Stage 2	Lifetime ECL - Stage 3			Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Gross carrying amount at 1 January	4,927	9	-	3,938	-	-	82	44	9,000
Additions, net of disposals and redemptions	(1,806)	(6)	(14)	4,204	-	-	70	17	2,465
Transfers between stages	(83)	69	14	(40)	6	34	-	-	-
Net gains/(losses) from changes in fair value for the year	(637)	(0)	(0)	-	-	-	18	34	(585)
Amortisation of premiums/discounts and interest	(28)	0	0	65	0	2	0	-	39
Changes in fair value due to hedging [1]	-	-	-	(428)	-	(4)	-	-	(432)
Exchange adjustments and other movements	17	(1)	-	1	-	1	4	-	22
Gross carrying amount at 31 December	2,390	71	-	7,740	6	33	174	95	10,509
Impairment allowance	-	-	-	(12)	(0)	(10)	-	-	(22)
Net carrying amount at 31 December	2,390	71	-	7,728	6	23	174	95	10,487

[1] Changes in fair value due to continued hedging relationships amount to € 159 million gain (2022: € 527 million loss)

[2] Other movements in equity securities at FVOCI mainly refer to Hellenic Bank which was accounted for as a Group's associate as of the second quarter of 2023 (note 24).

22.2 Movement of ECL

The table below presents the ECL movement per portfolio, including ECL movement analysis per stage:

	2023			2022		
	Measured at amortised cost € million	**Measured at FVOCI € million**	**Total € million**	Measured at amortised cost € million	Measured at FVOCI € million	Total € million
Balance at 1 January	**22**	**9**	**31**	6	10	16
New financial assets purchased	**2**	**1**	**3**	16	1	17
- of which 12-month ECL - Stage 1	*2*	*1*	*3*	*16*	*1*	*17*
Transfers between stages						
- (from)/to 12-month ECL	**0**	**1**	**1**	*(6)*	*(11)*	*(17)*
- (from)/to lifetime ECL-Stage 2	**(0)**	**(1)**	**(1)**	*0*	*0*	*0*
- (from)/to lifetime ECL-Stage 3	**-**	**-**	**-**	*6*	*11*	*17*
Remeasurement due to change in ECL risk parameters	**(7)**	**(3)**	**(10)**	3	12	15
- of which 12-month ECL - Stage 1	*(4)*	*(3)*	*(7)*	*(2)*	*9*	*7*
- of which lifetime ECL - Stage 2	*(0)*	*(0)*	*(0)*	*1*	*3*	*4*
- of which lifetime ECL - Stage 3	*(3)*	*-*	*(3)*	*4*	*-*	*4*
Financial assets disposed during the year	**(1)**	**(1)**	**(2)**	(3)	(4)	(7)
- of which 12-month ECL - Stage 1	*(1)*	*(1)*	*(2)*	*(3)*	*(3)*	*(6)*
Financial assets redeemed during the year	**(0)**	**(0)**	**(0)**	-	(10)	(10)
- of which lifetime ECL - Stage 3	*-*	*-*	*-*	*-*	*(10)*	*(10)*
Foreign exchange and other movements	**0**	**0**	**0**	-	0	0
Balance as at 31 December	**16**	**6**	**22**	22	9	31

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:

	2023 € million	2022 € million
Balance at 1 January	**38**	273
Net gains/(losses) from changes in fair value	**206**	(603)
Tax (expense)/benefit (note 14)	**(47)**	175
	159	(428)
Net (gains)/losses transferred to net profit on disposal	**(51)**	24
ECL transferred to net profit	**(2)**	2
Tax (expense)/benefit on net (gains)/losses transferred to net profit on disposal	**15**	(7)
Tax (expense)/benefit on ECL transferred to net profit	**0**	(1)
	(38)	18
Net (gains)/losses transferred to net profit from fair value hedges	**(82)**	246
Tax (expense)/benefit	**24**	(71)
	(58)	175
Revaluation reserve for the investment in Hellenic Bank transferred to R/E (note 24)	**(45)**	-
Balance at 31 December	**56**	38

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 2023:

Name	Note	Percentage holding	Country of incorporation	Line of business
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.		100.00	Greece	Leasing
Eurobank Factors Single Member S.A.		100.00	Greece	Factoring
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
Piraeus Port Plaza 1 Single Member Development S.A.		100.00	Greece	Real estate
(Under liquidation) Anchor Hellenic Investment Holding 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 Single Member Development S.A.		100.00	Greece	Real estate
Piraeus Port Plaza 3 Single Member Development S.A.		100.00	Greece	Real estate
Tenberco Real Estate Single Member S.A.		100.00	Greece	Real estate
Value Touristiki Single Member Development S.A.		100.00	Greece	Real estate
ADEXA Real Estate Single Member S.A	a	100.00	Greece	Real estate
Eurobank Ananeosimes Single Member S.A	b	100.00	Greece	Production and distribution of solar generated electric energy
Eurobank Bulgaria A.D.	c	99.99	Bulgaria	Banking
Berberis Investments Ltd		100.00	Channel Islands	Holding company
Eurobank Cyprus Ltd		100.00	Cyprus	Banking
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 Funding II B.V.	h	100.00	Netherlands	Finance company
ERB New Europe Holding B.V.	o	100.00	Netherlands	Holding company
ERB IT Shared Services S.A.	i	99.99	Romania	Informatics data processing
IMO Property Investments Bucuresti S.A.		99.99	Romania	Real estate services
Seferco Development S.A.		99.99	Romania	Real estate
ERB Leasing A.D. Beograd-in Liquidation	m	100.00	Serbia	Leasing
IMO Property Investments A.D. Beograd		100.00	Serbia	Real estate services
Reco Real Property A.D. Beograd		100.00	Serbia	Real estate
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

In addition, the following entities are also 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 and Byzantium II Finance Plc.

(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. and Promivet S.A.

(a) ADEXA Real Estate Single Member S.A., Greece

In June 2023, the Bank acquired 100% of the shares and voting rights of ADEXA Real Estate Single Member S.A. for a cash consideration of € 50.8 million. Additionally, in June 2023, the share capital of the company increased by € 1.5 million.

(b) Eurobank Ananeosimes Single Member S.A., Greece

In July 2023, the Bank established the wholly owned subsidiary Eurobank Ananeosimes Single Member S.A. to operate as a company in the area of the production and distribution of solar generated electric energy.

(c) Eurobank Bulgaria A.D., Bulgaria

On 9 December 2022, Eurobank Holdings announced that it had reached an agreement for the acquisition of BNP Paribas Personal Finance Bulgaria by Eurobank's subsidiary in Bulgaria, Eurobank Bulgaria A.D. ("Postbank"). The completion of the transaction took place in May 2023, following the receipt of the approvals by all competent regulatory authorities. Further relevant information is provided in note 23 of the Bank's consolidated financial statements for the year ended 31 December 2023.

Additionally, in November 2023, the Bank signed an agreement with its subsidiary ERB New Europe Holding B.V. for the transfer of the shares held in Eurobank Bulgaria A.D. to the Bank for a cash consideration of € 612 million. Accordingly, the Bank's direct participation to Eurobank Bulgaria A.D. reached 99.99%.

(d) IMO Property Investments Sofia E.A.D., Bulgaria

In May 2023, the sale of the Bank's participation interest of 100% in the company, along with the loan receivable from the company, was completed with a total cash consideration of € 15.5 million.

(e) ERB Hellas (Cayman Islands) Ltd, Cayman Islands

In December 2022, the liquidation of the company was decided. In February 2023, the return of the company's share capital to the Bank, through the repurchase of its own shares, was completed and the resulting loss of € 0.2 million was recognized in "Other income/(expenses)".

(f) ERB New Europe Funding III Ltd, NEU Property Holdings Ltd and NEU 03 Property Holdings Ltd, Cyprus

In June 2023, the Bank's cost of investment in ERB New Europe Funding III Ltd increased by € 103 million. In the third quarter of 2023, the liquidation of the aforementioned companies was decided and the distribution of their surplus assets to the Bank (their sole shareholder) was completed. The resulting loss from the liquidations of € 0.3 million was recognized in "Other income/(expenses)".

(g) Sagiol Ltd, Macoliq Holdings Ltd and Senseco Trading Ltd, Cyprus

In June 2023, the companies' liquidator resolved the distribution of their surplus assets to the Bank (their sole shareholder). The effect of the aforementioned liquidations was immaterial for the Bank.

(h) ERB New Europe Funding II B.V., Netherlands

In November 2023, the Bank signed an agreement with its subsidiary ERB New Europe Holding B.V. for the transfer of the shares held in ERB New Europe Funding II B.V. to the Bank with a cash consideration of € 16.8 million. Accordingly, the Bank's direct participation to the company reached 100%.

(i) ERB IT Shared Services S.A., Romania

In December 2023, the Bank signed an agreement with its subsidiary ERB New Europe Holding B.V. for the transfer of the majority of the shares held in ERB IT Shared Services S.A. to the Bank with a cash consideration of € 1.2 million. Accordingly, the Bank's direct participation to the company reached 99.99%.

(j) IMO-II Property Investments S.A., Romania

In May 2023, the liquidation of the company was decided. In December 2023, the distribution of the company's surplus assets to the shareholders was completed with immaterial effect on the Bank's income statement.

(k) Retail Development S.A., Romania

In February 2023, the Bank signed an agreement for the sale of its participation interest of 99.99% in Retail Development S.A., along with the loan receivable from the company, to a third party for a cash consideration of € 8.1 million. The resulting loss on disposal amounted to € 0.6 million and was recognized in "Other income/(expenses)".

(l) Eurobank Direktna a.d., Serbia

In February 2023, the Bank signed an agreement with its subsidiary Berberis Investments Ltd for the transfer of the shares held in Eurobank Direktna a.d. to the Bank with an immaterial cash consideration. Accordingly, the Bank's direct participation to Eurobank Direktna a.d. reached 46.9%. On 2 March 2023, the Bank announced that it has signed a binding agreement (share purchase agreement) with AIK Banka a.d. Beograd for the sale of its 70% shareholding (of which 46.9% held directly by the Bank) in Eurobank Direktna a.d. Therefore, the Bank's share in the company was classified as held for sale since 31 March 2023. On 2 November 2023, the sale was completed for a cash consideration of € 188.7 million, net of related costs (of which € 123.6 million was received by the Bank). The resulting loss on disposal amounted to € 4.3 million and was recognized in "Other income/(expenses)". Further information is provided in note 23 of the Bank's consolidated financial statements for the year ended 31 December 2023.

(m) ERB Leasing A.D. Beograd-in Liquidation, Serbia

In May 2023, the Bank signed an agreement with its former subsidiary, Eurobank Direktna a.d., for the transfer of the shares held in ERB Leasing A.D. Beograd to the Bank for a cash consideration of € 0.1 million. Additionally, in December 2023 the Bank signed an agreement with its subsidiary ERB New Europe Holding B.V. for the transfer of the shares held in ERB Leasing A.D. Beograd to the Bank with a cash consideration of € 0.1 million. Following the aforementioned transfers, the Bank's direct participation to the company reached 100%.

(n) ERB Hellas Plc, United Kingdom
In April 2023, the liquidation of the company was completed and the resulting gain of € 0.8 million was recognized in "Other income/(expenses)".

(o) ERB New Europe Holding B.V., Netherlands
In 2023, the share capital of ERB New Europe Holding B.V. decreased by € 768 million.

Post balance sheet event

Reco Real Property A.D. Beograd, Serbia

In February 2024, the Bank signed an agreement for the sale of its participation interest of 100% in Reco Real Property A.D. Beograd to a third party. The completion of the transaction is subject to the approval from the competent authority.

23.1 Merger of the Bank with certain subsidiaries

In December 2023, after receiving the required approvals from the competent authorities, the mergers of the Bank and its wholly owned subsidiaries Cloud Hellas Single Member Ktimatiki S.A. and Standard Single Member Real Estate S.A. were completed, by absorption of the latter by the former. The transactions were accounted for using the pooling of interests method (also known as merger accounting).

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 assets and liabilities of Cloud Hellas Single Member Ktimatiki S.A. and Standard Single Member Real Estate S.A. were transferred to the Bank at their pre-combination carrying amounts.

The carrying amounts of the major transferred assets and liabilities, as included in the Bank's consolidated financial statements as of the date of the legal merger, along with the effect on Bank's reserves resulting from the aforementioned mergers, are presented in the below tables.

	Cloud Hellas Ktimatiki S.A. € million
Assets	
Due from Credit Institutions	13
of which intercompany balances with the Bank	*13*
Investment Property	83
Other assets	2
Total assets	**98**
Liabilities	
Other liabilities	6
Total liabilities	**6**
Net assets	**92**
Minus:	
Investment cost in the company	**74**
Net effect on Bank's reserves	**18**

	Standard Real Estate S.A. € million
Assets	
Investment Property	27
Total assets	**27**
Liabilities	
Due to credit institutions	20
of which intercompany balances with the Bank	*20*
Other liabilities	2
Total liabilities	**22**
Net assets	**5**
Minus:	
Investment cost in the company	**1**
Net effect on Bank's reserves	**4**

24. Investments in associates and joint ventures

As at 31 December 2023, the carrying amount of the Bank's investments in associates and joint ventures amounted to € 213 million (31 December 2022: € 39 million). The following is the listing of the Bank's associates and joint ventures (percentage holdings held directly by the Bank) as at 31 December 2023:

Name	Country of incorporation	Line of business	Percentage Holding
Femion Ltd	Cyprus	Special purpose investment vehicle	66.45
Global Finance S.A.	Greece	Investment financing	33.82
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
doValue Greece Loans and Credits Claim Management S.A.	Greece	Loans and Credit Claim Management	20.00
Perigenis Business Properties S.A.	Greece	Real estate	18.90
Hellenic Bank Public Company Ltd	Cyprus	Banking	29.20

Note: In November 2023, the General Meeting of the Bank's joint venture Rosequeens Properties Ltd, resolved to proceed with the strike off procedure from the Cyprus registrar of companies.

Hellenic Bank Public Company Ltd, Cyprus

On 4 April 2023 the Bank announced that after the receipt of the relevant regulatory approvals, it has completed the acquisition of an additional 13.41% holding in Hellenic Bank Public Company Ltd ("Hellenic Bank"), a financial institution located in Cyprus and listed in the Cyprus Stock Exchange, for a consideration of € 73 million including related transaction costs. Following that, the total holding in Hellenic Bank, including the previously held participation of 15.8% (designated at FVOCI) with carrying value of € 103 million on the above date (including a revaluation amount of € 45 million), reached 29.2% and the Bank in accordance with the IFRS is considered to have significant influence over the entity.

Furthermore, in August 2023, the Bank announced that it has entered into share purchase agreements (SPAs) with certain shareholders of the Hellenic Bank, pursuant to which, it has agreed to acquire an additional total holding of 26.1% in the entity, for a total consideration of € 253.2 million *(announcements dated on August 23rd, 25th and 30th)*. The consideration for the said transactions is subject to possible adjustments depending inter alia on the timing of the completion and the terms of the mandatory tender offer, in accordance with the provisions of the Takeover Bids Law of 2007 in Cyprus. The completion of the acquisitions is subject to the receipt of all customary regulatory approvals. Following their completion, the total holding in Hellenic Bank will amount to 55.3%.

Post balance sheet event

On 5 February 2024, the Bank announced that the Commission for the Protection of Competition of the Republic of Cyprus ("Commission") in its meeting on 2 February 2024, approved the concentration arising from the increase of the Bank's holding in

Hellenic Bank share capital. Following the approval of the Commission, the acquisition of the additional total holding of 26.1% in Hellenic Bank, as per the aforementioned signed agreements with certain of its shareholders, is subject to the approvals of the Central Bank of Cyprus/European Central Bank and the Superintendent of Insurance of Cyprus.

Tefin S.A., Greece

In June 2023, the liquidation of the company was completed with the distribution of its surplus assets to the Bank amounting to € 2.7 million.

25. Property and equipment

	2023				
	Land, buildings, leasehold improvements € million	**Furniture, equipment, motor vehicles € million**	**Computer hardware, software € million**	**Right of use assets (RoU) [(1)] € million**	**Total € million**
Cost:					
Balance at 1 January	**484**	**145**	**455**	**226**	**1,310**
Transfers	**15**	**0**	**14**	**-**	**29**
Additions	**16**	**7**	**8**	**6**	**37**
Disposals, write-offs & adjustment to RoU [(1)]	**(1)**	**(19)**	**(185)**	**16**	**(189)**
Impairment	**-**	**(0)**	**(8)**	**-**	**(8)**
Balance at 31 December	**514**	**133**	**284**	**248**	**1,179**
Accumulated depreciation:					
Balance at 1 January	**(175)**	**(122)**	**(385)**	**(101)**	**(783)**
Transfers	**1**	**-**	**(1)**	**-**	**-**
Disposals, write-offs and adjustment to RoU [(1)]	**1**	**18**	**185**	**-**	**204**
Charge for the year	**(9)**	**(5)**	**(18)**	**(27)**	**(59)**
Balance at 31 December	**(182)**	**(109)**	**(219)**	**(128)**	**(638)**
Net book value at 31 December	**332**	**24**	**65**	**120**	**541**

	2022				
	Land, buildings, leasehold improvements € million	Furniture, equipment, motor vehicles € million	Computer hardware, software € million	Right of use assets (RoU) [(1)] € million	Total € million
Cost:					
Balance at 1 January	500	141	439	242	1,322
Transfers	(15)	0	5	-	(10)
Transfers from / to repossessed assets and/or held for sale	1	(2)	-	-	(1)
Additions	10	8	24	11	53
Disposals, write-offs & adjustment to RoU [(1)]	(7)	(2)	(2)	(27)	(38)
Impairment	(6)	(0)	(11)	-	(17)
Held for sale (note 29)	1	-	-	-	1
Balance at 31 December	484	145	455	226	1,310
Accumulated depreciation:					
Balance at 1 January	(174)	(120)	(366)	(75)	(735)
Transfers	1	-	-	-	1
Disposals, write-offs and adjustment to RoU [(1)]	6	2	2	3	13
Charge for the year	(8)	(4)	(21)	(29)	(62)
Balance at 31 December	(175)	(122)	(385)	(101)	(783)
Net book value at 31 December	309	23	70	125	527

[(1)] The respective lease liabilities are presented in "other liabilities" (note 34). Adjustment to RoU 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 2023, the RoU assets amounting to € 120 million (31 December 2022: € 125 million) refer to leased office and branch premises, ATM locations, residential properties of € 117 million (31 December 2022: € 121 million) and motor vehicles of € 3 million (31 December 2022: € 4 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:

	2023 € million	2022 € million
Balance at 1 January	**936**	984
Arising from merger (note 23.1)	**110**	-
Transfers from/to repossessed assets	**-**	10
Other transfers	**(15)**	14
Additions	**3**	4
Disposals	**(18)**	(108)
Net gain / (loss) from fair value adjustments	**17**	32
Balance at 31 December	**1,033**	936

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 2023, an amount of € 69 million (2022: € 61 million) was recognized as rental income from investment property in income from non banking services (note 8). As at 31 December 2023, the contractual obligations in relation to investment property amounted to approximately € 3.3 million, and are mainly associated with property enhancements.

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.

	2023 € million	2022 € million
Residential	**1**	1
Commercial	**1,019**	924
Land Plots	**13**	11
Total	**1,033**	936

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 (DCF) method is the primary method used for estimating the fair value of the Bank's investment property and is used mainly for the commercial class of investment property but also for other classes of investment property to a large extent, in conjunction with other methods. Under DCF method, the 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 residential, 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 2023, 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 13%. As at 31 December 2023, 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 by € 24 and € 26 million, respectively.

In the context of properties' valuation, sustainability and environmental matters encompass a wide range of physical, climate change, social, corporate responsibility and economic factors, including key environmental risks such as flooding, energy efficiency, as well as matters of design, configuration, accessibility and legislation, that impact their value. The Bank is gradually upgrading its real-estate portfolio, aiming to reduce its environmental footprint and shift towards high-end, modern, environmentally friendly buildings, given that such buildings are in high demand. In addition, the Bank has introduced "green" certifications to its real estate assets, validating their sustainability value and at the same time maximizing their return and market value. On the other hand, environmental risks are taken into account in properties' valuation in cases where there is an indication that the valued property is subject to physical risks, such as floods, is contaminated or is adversely affected by existing environmental laws/regulations.

On an annual basis, the Bank aims at the evaluation of an increased number of selected properties included in the investment property portfolio for their gradual certification in accordance with international standards, while actively investing to improve the energy efficiency of its properties' portfolio and its environmental profile.

27. Intangible assets

The movement of intangible assets referring to purchased or developed software is as follows:

	2023	2022
	€ million	€ million
Cost:		
Balance at 1 January	**459**	412
Arising from merger (note 23.1)	**-**	1
Additions	**65**	61
Transfers	**(13)**	(5)
Disposals and write-offs	**(134)**	-
Impairment	**(6)**	(10)
Balance at 31 December	**371**	459
Accumulated amortisation:		
Balance at 1 January	**(270)**	(240)
Arising from merger (note 23.1)	**-**	(1)
Transfers	**1**	
Amortization charge for the year	**(33)**	(29)
Disposals and write-offs	**134**	-
Balance at 31 December	**(168)**	(270)
Net book value at 31 December	**203**	189

28. Other assets

	2023 € million	2022 € million
Receivable from Deposit Guarantee and Investment Fund	**286**	495
Repossessed properties and relative prepayments	**488**	554
Pledged amount for a Greek sovereign risk financial guarantee	**236**	234
Deferred costs and accrued income	**62**	64
Income tax receivable [1]	**55**	23
Other guarantees	**174**	179
Other assets	**300**	256
Total	**1,601**	1,805

[1] *Includes withholding taxes, net of provisions.*

Pursuant to Law 4370/2016 as in force, the receivable from the Hellenic Deposit and Investment Guarantee Fund (HDIGF) referring to the "Supplementary Deposit Cover Fund" is refundable to the Greek credit institutions in three equal instalments, starting from 2022 and each year thereafter, subject to the provisions of the article 25a of the law. Following that, in December 2023, the second instalment of € 211 million was refunded to the Bank by HDIGF.

As at 31 December 2023, other assets net of provisions, amounting to € 300 million include, among others, receivables related to (a) prepayments to suppliers, (b) public entities, (c) property management activities, (d) legal cases and (e) the sale of the Bank's Merchant Acquiring Business in 2022.

29. Disposal groups classified as held for sale

	2023 € million	2022 € million
Assets of disposal groups		
Real estate properties	**36**	12
Loans portfolios (note 20)	**169**	69
Total	**205**	81
Liabilities of disposal groups		
Other liabilities related to loans portfolios (notes 20 and 34)	**1**	1
Total	**1**	1

Real estate properties

Starting from 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), has gradually classified as held for sale (HFS) certain pools of real estate assets of total remaining carrying amount ca. € 9 million as at 31 December 2023 (31 December 2022: € 12 million), after their remeasurement in accordance with the IFRS 5 requirements.

In addition, in the third quarter of 2023, the Bank initiated negotiations with potential investors for the disposal of a mixed portfolio of repossessed real estate assets of carrying amount ca. € 32 million and classified it as held for sale. Since the disposal group's fair value less cost to sell, based on the estimated selling price, was lower than its carrying amount, an impairment loss of ca. € 5 million was recognised in income statement line "Other impairments, risk provisions and related costs".

The Bank remains committed to its plan to sell the aforementioned assets, which are gradually being disposed, and undertakes all necessary actions towards this direction.

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 2023.

30. Due to central banks

	2023 € million	2022 € million
Secured borrowing from ECB	**3,771**	7,927

As at 31 December 2023, the Bank's outstanding principal under the TLTRO III refinancing program of the European Central Bank (ECB) amounted to € 3.7 billion (31 December 2022: € 8 billion outstanding principal under TLTRO III program).

31. Due to credit institutions

	2023 € million	2022 € million
Secured borrowing from credit institutions [(1)]	**3,721**	2,455
Borrowings from international financial and similar institutions	**362**	427
Deposits from banks received as collateral [(1)]	**124**	306
Interbank takings	**168**	824
Current accounts and settlement balances with banks	**107**	46
Total	**4,482**	4,058

[(1)] The amounts presented are after offsetting (note 5.2.1.4).

Borrowings from international financial and similar institutions include borrowings from European Investment Bank, European Bank for Reconstruction and Development and other similar institutions.

32. Due to customers

	2023 € million	2022 € million
Savings and current accounts	**27,189**	30,926
Term deposits	**13,561**	9,129
Repurchase agreements	**-**	201
Carrying amount	**40,750**	40,256
Fair value changes of deposits in portfolio hedging of interest rate risk	**(10)**	-
Total	**40,740**	40,256

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 2023 the amount that the Bank transferred to the Greek State was approximately € 3 million (31 December 2022: € 4 million).

33. Debt securities in issue

	2023 € million	2022 € million
Securitizations	**555**	553
Subordinated notes (Tier 2)	**1,298**	1,261
Medium-term notes (EMTN)	**3,098**	1,851
Total	**4,951**	3,665

Securitisations

As at 31 December 2023, the carrying value of the class A asset backed securities issued by the Bank's special purpose entities Karta II Plc and Astarti DAC, amounted to € 305 million and € 250 million, respectively.

Tier 2 Capital instruments

On 30 November 2022, the Parent Company announced the issuance of a € 300 million subordinated Tier II debt instrument which matures in December 2032, is callable in December 2027 offering a coupon of 10% per annum and is listed on the Luxembourg Stock

Exchange's Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Parent Company.

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.

The obligations arising from the Tier 2 Subordinated capital instruments were transferred to the Parent Company, while the Bank issued a subordinated instrument of equivalent terms which was fully subscribed by the Parent Company.

Covered bonds

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)

In January 2023, the Bank completed the issue of a € 500 million senior preferred note. The bond, which is listed on the Luxembourg Stock Exchange's Euro MTF market, matures in January 2029 and is callable at par in January 2028, offering a coupon of 7% per annum.

In November 2023, the Bank completed the issue of a € 500 million senior preferred note. The bond, which is listed on the Luxembourg Stock Exchange's Euro MTF market, matures in November 2029 and is callable at par in November 2028, offering a coupon of 5.875% per annum.

The proceeds from the above issues will support Parent Company's Group strategy to ensure ongoing compliance with its MREL requirements and will be used for the Bank's general funding purposes. Further information about the issues is provided in the relevant announcements published in the Parent Company's website on 20 January 2023 and 22 November 2023, respectively.

During the year ended 31 December 2023, the Bank proceeded with the issue of medium term notes of face value of € 170 million, which were designated for Group's customers.

Post balance sheet event

In January 2024, the Parent Company announced the issuance of a € 300 million subordinated Tier II debt instrument which matures in April 2034, is callable at par in April 2029 offering a coupon of 6.25% per annum and is listed on the Luxembourg Stock Exchange's Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Parent Company. The proceeds from the issue will support Eurobank Holding's Group strategy to ensure ongoing compliance with its total capital adequacy ratio requirements and will be used for the Bank's general funding purposes. Further information about the issue is provided in the relevant announcement published in the Parent Company's website on 19 January 2024.

34. Other liabilities

	2023	2022
	€ million	€ million
Lease liabilities	**123**	128
Balances under settlement [(1)]	**159**	182
Deferred income and accrued expenses [(2)]	**116**	96
ECL allowance for credit related commitments (note 5.2.1.2)	**54**	222
Standard legal staff retirement indemnity obligations and employee termination benefits (note 35)	**56**	77
Sovereign risk financial guarantee	**31**	33
Other provisions [(2)]	**96**	66
Trading liabilities	**121**	419
Other liabilities [(3)]	**108**	116
Total	**865**	1,339

[(1)] *Includes settlement balances relating to bank cheques and remittances, credit card transaction and other banking activities.*

[(2)] *Potential losses related to representations and warranties provided in the context of the Bank's NPE securitizations transactions (see below) have been presented within "Other Provisions"; comparative information has been adjusted accordingly.*

[(3)] *Includes € 1 million impairment allowance of the letters of guarantee related to the loans of Solar portfolio classified as held sale (note 20).*

As at 31 December 2023, other liabilities amounting to € 108 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 2023, trading liabilities amounted to € 121 million (31 December 2022: € 419 million) following the termination of the short positions in debt instruments, entered into in the context of the Bank's economic hedging strategies, aiming to manage on a pool basis market driven risks that derive from asset positions. For the year ended 31 December 2023, the loss recognized in net trading income from the aforementioned short positions amounted to € 23 million (31 December 2022: € 107 million gain).

In the context of its non-performing exposures (NPE) securitizations (Pillar, Cairo, Mexico), and as is customary for the seller in such types of transactions, the Bank has provided representation and warranties (R&Ws) to the investors in respect of the underlying loans, covering various areas such as legality, ownership and good title of the loans, accuracy of collateral data etc., time-barred up to three years from the transactions' date. Accordingly, as at 31 December 2023, the Bank has recognized a provision of ca. € 12 million for potential losses, in 2023 in expectation of such R&Ws realization (31 December 2022: € 9 million).

Considering that the substantiation and crystallization of potential amounts under dispute and final agreement between involved parties require significant time, the Bank continues to assess their impact as more information becomes available.

As at 31 December 2023, other provisions amounting to € 96 million (2022: € 66 million) mainly include: (a) € 30 million for claims in dispute and outstanding litigations against the Bank (note 41), (b) € 22 million relating to the sale of Bank's former subsidiaries, (c) € 12 million for R&Ws provided to investors in the context of the NPE securitization transactions, d) € 15 million for other operational risk events and e) € 13.3 million relating to contribution to restoration initiatives after natural disasters (note 12).

The movement of the Bank's other provisions, is presented in the following tables:

	31 December 2023		
	Litigations and claims in dispute € million	**Other € million**	**Total € million**
Balance at 1 January	**17**	**49**	**66**
Amounts charged during the year	**19**	**23**	**42**
Amounts used during the year	**(4)**	**(6)**	**(10)**
Amounts reversed during the year	**-**	**-**	**-**
Foreign exchange and other movements	**(2)**	**-**	**(2)**
Balance at 31 December	**30**	**66**	**96**

	31 December 2022		
	Litigations and claims in dispute € million	Other € million	Total € million
Balance at 1 January	52	29	81
Amounts charged during the year	8	19	27
Amounts used during the year	(42)	(0)	(42)
Amounts reversed during the year	(1)	(2)	(3)
Foreign exchange and other movements	0	3	3
Balance at 31 December	17	49	66

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

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.

In addition, the Bank has provided employee termination benefits mainly in respect of the Voluntary Exit Schemes (VES), which have been implemented through either lump-sum payments or long-term leaves during which the employees will be receiving a percentage of a monthly salary, or a combination thereof.

The table below presents the breakdown of defined benefit obligations.

	31 December 2023 € million	31 December 2022 € million	1 January 2022 € million
SLSRI obligation	19	16	17
Employee termination benefits	37	61	63
Total	**56**	77	80

The table below presents a reconciliation from the opening to the closing balance for staff retirement indemnity obligations and employee termination benefits. Comparative information has been adjusted to include employee termination benefits.

	2023 € million	2022 € million
Balance at 1 January	**77**	80
Current service cost	**2**	3
Interest cost	**2**	0
Past service cost and (gains)/losses on settlements	**4**	50
Remeasurements:		
Actuarial (gains)/losses arising from changes in financial assumptions	**(0)**	(2)
Actuarial (gains)/losses arising from changes in demographic assumptions	**0**	(0)
Actuarial (gains)/losses arising from experience and other adjustments	**3**	0
Benefits paid	**(32)**	(54)
Balance at 31 December	**56**	77

For SLSRI obligations the significant actuarial assumptions (expressed as weighted averages) were as follows:

	2023 %	2022 %
Discount rate	**3.6**	3.2
Future salary increases	**3.2**	2.9

As at 31 December 2023, the assumption for the price inflation (weighted average) is 2.3% (2022: 2.6%) and has been taken into account in determining the above actuarial assumptions for future salaries increases.

As at 31 December 2023, the average duration of the standard legal staff retirement indemnity obligation was 7 years (2022: 7 years).

A quantitative sensitivity analysis based on reasonable changes to significant actuarial assumptions as at 31 December 2023 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)/ € 0.6 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 € 0.6 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.

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.

For employee termination benefits, the discount rate (weighted average) is the significant actuarial assumption, which as at 31 December 2023 stood at 3.8% based on the applicable tenor of the liabilities. On the same date, an increase/(decrease) of the discount rate assumed, by 50 bps/(50 bps), would result in a (decrease)/increase of employee termination benefits by (€ 0.2 million)/ € 0.2 million.

Post balance sheet event

In February 2024, Eurobank decided to launch a new VES for eligible units in Greece, which will be offered mainly 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. € 125 million, pre-tax. The estimated saving in personnel expenses amounts to € 29 million on an annual basis.

36. Share capital

As at 31 December 2023 and 2022, the total share capital of Eurobank S.A. amounted to € 3,941,071,968.10 divided into 3,683,244,830 common voting shares of nominal value of € 1.07 each. The total number of Eurobank shares is held by Eurobank Holdings, which is the sole shareholder of Eurobank.

37. Reserves and retained earnings

	Corporate law reserves € million	Special reserves € million	Other reserves € million	Retained earnings € million	Total € million
Balance at 1 January 2022	28	368	263	(153)	506
Net profit	-	-	-	1,388	1,388
Transfers between reserves	69	195	-	(265)	-
Merger with Hellenic Post Credit	1	-	0	(23)	(22)
Debt securities at FVOCI	-	-	(259)	-	(259)
Gains/(losses) from equity securities at FVOCI	-	-	24	-	24
Cash flow hedges	-	-	0	-	0
Revaluation reserve of fixed assets	-	-	0	-	0
Actuarial gains/(losses) on post employment benefit obligations, net of tax	-	-	-	1	1
Share options plan	-	-	-	4	4
Other	-	-	-	1	1
Balance at 31 December 2022	98	564	27	953	1,642
Balance at 1 January 2023	**98**	**564**	**27**	**953**	**1,642**
Net profit	-	-	-	794	**794**
Transfers between reserves	40	145	(45)	(141)	**-**
Merger with certain subsidiaries (note 23.1)	3	-	16	3	**22**
Dividend paid	-	(410)	-	-	**(410)**
Debt securities at FVOCI	-	-	45	-	**45**
Gains/(losses) from equity securities at FVOCI	-	-	18	-	**18**
Cash flow hedges	-	-	(2)	-	**(2)**
Revaluation reserve of fixed assets	-	-	0	-	**0**
Actuarial gains/(losses) on post employment benefit obligations, net of tax	-	-	-	(2)	**(2)**
Share options plan (note 38)	-	-	-	7	**7**
Other	-	-	-	(1)	**(1)**
Balance at 31 December 2023	**142**	**299**	**60**	**1,613**	**2,114**

As at 31 December 2023, “Special reserves” of € 299 million relate to dividends and gains from the sale of participations (2022: € 564 million). In addition, the “Other reserves” mainly comprise a) € 56 million fair value reserve (2022: € 38 million) and b) € 14 million accumulated loss from cash flow hedging (2022: € 12 million accumulated loss).

Dividends/Distribution of Profits

Firstly, 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 the obligation to distribute a minimum dividend.

The Bank, taking into consideration that in 2023 has already distributed € 410 million to its parent entity Eurobank Holdings contributing to the Group's main target to distribute a cash dividend to the shareholders equivalent to at least 25% of the Group's adjusted net profits, intends to proceed also with the distribution of profits to the staff in accordance with the remuneration policy and assess in the future further distribution for the Group’s needs of the next financial year.

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. The exercise price of each new share would be equal to € 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.

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, are defined and approved annually by the Board of Directors in accordance with the applicable legal and regulatory framework, as well as the policies of the Bank and Group.

The options are exercisable in portions, annually during a period from one to five years. Each portion may be exercised wholly or partly and converted into shares at the employees' option, provided that they remain employed by the Bank until the first available exercise date. The corporate actions that adjust the number and the price of shares also adjust accordingly the share options.

The movement of share options during the year is analysed as follows:

Share options granted	2023	2022
Balance at 1 January	**22,268,322**	**12,374,561**
Options awarded during the year	12,101,092	11,654,117
Options canceled/expired during the year	(1,703,443)	(244,700)
Options exercised during the year	(5,802,269)	(1,515,656)
Balance at 31 December	**26,863,702**	**22,268,322**

In July 2023, the Eurobank Holdings group awarded to its executives 12,101,092 new share options, exercisable in annual portions up to 2028.

From the share options exercisable in 2023, a number of 5,802,269 options were exercised during the year, resulting in the issue of an equal number of new common voting shares.

The share options outstanding at the end of the year have the following expiry dates:

	Share options
Expiry date (1)	31 December 2023
2024	9,279,299
2025	5,345,228
2026	4,951,014
2027	4,951,014
2028	2,337,147
Weighted average remaining contractual life of share options outstanding at the end of the period	25 months

(1) *Based on the earliest contractual exercise date.*

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.

The weighted average fair value of the share options granted in July 2023 was € 1.13 (2022: € 0.63). The significant inputs into the model were a share price of € 1.442 (2022: € 1.021) at the grant date, exercise price of € 0.23, annualized dividend yield of 3% (2022: 3%), expected average volatility of 41% (2022: 38%), expected option life of 1-5 years, and a risk-free interest rate corresponding to the options' maturities, based on the Euro 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 2023, the carrying value of the securitizations' issues held by third parties amounted to € 555 million (31 December 2022: € 553 million) (note 33).

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	
	2023	2022
	€ million	€ million
Securities held for trading	**19**	44
Loans and advances to customers [1]	**12,885**	14,181
-securitized loans [2]	***2,163***	*3,411*
-pledged loans under covered bond program	***4,083***	*4,261*
-pledged loans with central banks	***6,310***	*6,309*
-other pledged loans	***329***	*200*
Investment securities	**3,420**	3,624
Total	**16,324**	17,849

[1] *Including loans classified as held for sale (note 29)*

[2] *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 2023, the Bank had obtained through reverse repos securities of face value of € 1,488 million (31 December 2022: € 134 million face value of which € 15 million sold under repurchase agreements and € 67 million pledged with central banks).

As at 31 December 2023, 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 € 10,245 million, while the associated liability from the above transactions amounted to € 9,257 million, of which € 1,210 million repo agreements offset in the balance sheet against reverse repo deals (notes 30, 31, 32, 33, and 5.2.1.4) (31 December 2022: cash value € 11,318 million and liability € 11,249 million, of which € 114 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, the lease term has been determined at an average of 7 years for the Bank, after considering all relevant facts and circumstances. For new or modified lease contracts with an indefinite life, that are effective from the fourth quarter of 2023 onwards, the estimated lease term has been revised to 5 years. Where applicable, 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 2023, the right-of-use assets included in property and equipment amounted to € 120 million (31 December 2022: € 125 million) (note 25).

Lease Liabilities

The lease liability included under other liabilities amounted to € 123 million as at 31 December 2023 (31 December 2022: € 128 million) (note 34). The maturity analysis of lease liabilities as at 31 December 2023, based on the contractual undiscounted cash flows, is presented in note 5.2.3.

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. € 0.6 million (2022: € 2 million).

The Bank had total cash outflows for leases of € 32 million in 2023 (2022: € 25 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:

	2023 **€ million**	2022 € million
Not later than 1 year	**132**	206
1-2 years	**19**	28
2-3 years	**36**	19
3-4 years	**11**	18
4-5 years	**8**	14
Later than 5 years	**62**	107
Lease payments	**268**	392
Gross investment in finance leases	**268**	392
Less: unearned finance income	**(20)**	(30)
Net investment in finance leases	**248**	362
Less: Impairment allowance	**(88)**	(133)
Total	**160**	229

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 leases 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:

	2023 € million	2022 € million
Not later than one year	**74**	63
One to two years	**66**	57
Two to three years	**60**	53
Three to four years	**52**	48
Four to five years	**49**	45
More than five years	**165**	184
Total	**466**	450

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:

	2023 € million	2022 € million
Financial guarantee contracts	**2,382**	1,980
Commitments to extend credit	**3,614**	3,245
Other credit related commitments	**1,022**	759
Total	**7,018**	5,984

As of 31 December 2023, the credit related commitments within the scope of IFRS 9 impairment requirements amounted to € 10 billion (2022: € 9 billion), including revocable loan commitments of € 2.5 billion (2022: € 2.6 billion) and guarantees of € 0.3 billion (2022: € 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 € 54 million (2022: € 222 million) are provided in the note 5.

In addition, the Bank has issued a sovereign risk financial guarantee of € 0.23 billion (31 December 2022: € 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 € 29 million as at 31 December 2023 (2022: € 24 million), representing 15% of its resolution contribution payment obligation to the Single Resolution Fund (SRF) for the years 2016-2022 and 22.5% for year 2023, whereas no annual resolution contributions will be required in 2024 (note 12). 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 IPC, in case of a call and demand for payment made by it, in relation to a resolution action taken for another European bank. The IPC has been accounted for as a contingent liability and the said cash collateral has been recognized as a financial asset measured at amortized cost in the Bank's balance sheet line "Other assets" (note 28).

By a ruling in October 2023, the General Court of the European Union dismissed the appeal of a French Credit institution against the Single Resolution Board (SRB) following the rejection, by the latter, of the request for return of collateral linked to ex-ante contributions provided in the form of IPC. The reimbursement of the collateral linked to the IPC, requested by the institution after the withdrawal of its license, had been refused by the SRB, arguing that the return of IPC collateral required the prior payment of the compulsory contribution for which the institution was liable.

The aforementioned decision is not final, as the institution concerned decided to appeal to the European Court of Justice against the ruling of the General Court of the European Union, therefore the Bank has not proceeded to any change in the accounting treatment described above for the purposes of these financial statements. Depending on the outcome of the case, any change in the accounting treatment that would require the reduction or non-recognition of the collateral amount of € 29 million currently recognized as a financial asset would only affect the Bank's accounting equity, as the total outstanding amount of IPC collateral is already deducted from regulatory capital and therefore the Bank's capital position would remain unaffected.

The Bank will continue to monitor any developments in the case and assess the potential impact on its financial statements.

(b) As at 31 December 2023, the contractual commitments for the acquisition of own used property, equipment and intangible assets amounted to € 22 million (2022: € 26 million).

In February 2023, the Bank signed a binding pre-agreement with a third party for the 100% acquisition of a Cypriot holding company, which indirectly owns an under-development office building in Marousi Attica and has proceeded with an advance payment of ca. € 22.3 million in total, in line with the agreement. The completion of the agreement is expected to take place in the fourth quarter of 2024.

Legal proceedings

As at 31 December 2023, the provisions for legal proceedings outstanding against the Bank amounted to € 30 million, including an amount of € 8 million provided for the below mentioned claim (note 34) (31 December 2022: € 18 million).

There are no significant judicial proceedings, inquiries, or cases under investigation by state or regulatory authorities which may have important repercussions for the Bank's operations. In respect of the Hellenic Competition Commission's (HCC) investigation for certain legal entities of the financial sector, including the Bank, in relation to issues concerning concerted practices (but not price fixing), the Bank decided to enter the dispute settlement procedure provided for in Art. 29A of the Competition Act 3959/2011. Negotiations subsequently took place which resulted in the settlement of the dispute in December 2023 on the basis of which the case was concluded. The Bank agreed to pay the amount of € 7,976,790.63 as a fine for which a respective provision has been recognized in the line "Other impairments, risk provisions and related costs" of the Income Statement. In addition, the HCC imposed a behavioral remedy ordering all financial institutions involved to reduce to a maximum level the Direct Access Fee (DAF) charged for 'off-us' ATM cash withdrawal transactions for a period of three years from the introduction of the measure (i.e. 1 January 2024). Eurobank reduced its DAF charge by € 0.70 (from € 2.50 to € 1.80 per transaction). In the Bank's view there has been no violation of the competition rules; nonetheless, the Bank opted for the settlement of the dispute since the alternative option would have led to a very lengthy trial. With this decision the Bank showed also its will to cooperate with the HCC. It is noted that no officer of the Bank has been held liable for violation of competition rules.

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, is closely monitoring the developments to the relevant cases and having considered the advice of Legal Services, does not expect that there will be an outflow of resources and therefore does not acknowledge the need for a provision.

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 5.2.1.3 – Debt Securities
Note 12 – Operating expenses
Note 20 – Loans and advances to customers
Note 23 – Shares in subsidiaries
Note 24 – Investments in associates and joint ventures
Note 33 – Debt securities in issue

Note 35 – Standard legal staff retirement indemnity obligations (SLSRI) and termination benefits
Note 41 – Contingent liabilities and other commitments

43. Related parties

Eurobank Ergasias Services and Holdings S.A. (Eurobank Holdings) is the parent company of Eurobank S.A. (the Bank).

The Board of Directors (BoD) of Eurobank Holdings is the same as the BoD of the Bank and part of the key management personnel (KMP) of the Bank provides services to Eurobank Holdings according to the terms of the relevant agreement between the two entities.

Fairfax Group, which holds 32.93% of Eurobank Holdings share capital as of 31 December 2023 (31 December 2022: 32.99%), is considered to have significant influence over Eurobank Holdings and accordingly over the Bank. In addition, following the completion of the acquisition of all of Eurobank Holdings shares held by the HFSF (i.e. 1.40% of Eurobank Holdings' ordinary shares with voting rights), on 9 October 2023, the HFSF is no longer considered to have significant influence over the Bank.

In January 2022, an occupational insurance fund ("Institution for occupational retirement provision-occupational insurance fund Eurobank's Group personnel" henceforth "the Fund") was established as a not-for-profit legal entity under Law 4680/2020, for the benefit of the employees of Eurobank Holdings, the Bank and certain other Greek entities of Eurobank Holdings Group, which constitute the sponsoring employers of the Fund. Accordingly, in line with IAS 24 Related Parties, the Fund is considered to be related party to the Bank.

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.

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) other related parties, as well as the relating income and expenses are as follows:

	31 December 2023				
	Eurobank Holdings [6] € million	Fairfax Group [3],[8] € million	Subsidiaries [2] € million	KMP [1] and Entities controlled or jointly controlled by KMP € million	Other Related Parties [7] € million
Due from credit institutions	-	-	1,013.98	-	-
Derivative financial instruments assets	-	-	19.21	-	-
Investment securities	-	-	-	-	52.54
Loans and advances to customers	30.55	115.06	1,188.92	5.24	25.55
Other assets [5]	0.57	12.57	20.39	0.54	85.16
Due to credit institutions	-	-	1,479.51	-	0.04
Derivative financial instruments liabilities	-	-	14.90	-	-
Due to customers	400.64	43.27	401.58	9.58	92.66
Debt securities in issue	1,278.73	82.85	192.19	2.01	103.56
Other liabilities	1.78	0.01	26.65	0.04	4.54
Net interest income	(91.83)	3.19	2.16	0.08	(1.70)
Net banking fee and commission income	(0.93)	0.03	21.69	-	16.49
Dividend income	-	-	126.50	-	12.00
Net trading income	-	-	(8.41)	-	-
Gains less losses from investment securities	-	-	-	-	0.57
Other operating income/(expenses)	(4.06)	5.38	1.20	(13.96)	(8.78)
Impairment losses relating to loans and advances and collectors' fees	(1.51)	(2.60)	(10.80)	-	(77.26)
Guarantees issued [4]	-	2.47	453.56	-	-
Guarantees received	-	-	-	-	-

	31 December 2022				
	Eurobank Holdings [6] € million	Fairfax Group[3] € million	Subsidiaries [2] € million	KMP [1] and Entities controlled or jointly controlled by KMP € million	Other Related Parties [7] € million
Due from credit institutions	-	-	1,187.93	-	-
Derivative financial instruments assets	-	-	44.11	-	-
Investment securities	-	-	-	-	-
Loans and advances to customers	-	69.93	1,015.67	5.68	0.14
Other assets [5]	0.67	0.04	19.37	-	87.05
Due to credit institutions	-	-	2,554.84	-	-
Derivative financial instruments liabilities	-	-	38.23	-	-
Due to customers	57.72	26.50	659.18	15.25	96.92
Debt securities in issue	1,277.68	81.98	110.65	1.27	102.47
Other liabilities	1.93	0.13	191.39	0.16	8.83
Net interest income	(63.16)	(0.69)	(0.26)	0.01	(4.70)
Net banking fee and commission income	(0.93)	0.01	21.89	-	15.68
Dividend income	-	-	183.89	-	19.27
Net trading income	-	-	(54.65)	-	0.01
Gains less losses from investment securities	-	-	-	-	-
Other operating income/(expenses)	(3.80)	4.08	1.37	(15.02)	(9.73)
Impairment losses relating to loans and advances and collectors' fees	(1.64)	(0.55)	92.79	-	(62.75)
Guarantees issued [4]	-	1.97	407.88	-	-
Guarantees received	-	-	-	0.01	-

[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 other related parties.

[4] Furthermore, as of 31 December 2023, € 0.3 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 2023, it includes € 15.36 million right of use assets (RoU) (31 December 2022: € 14.9 million).

[6] Includes also Eurobank S.A. fellow subsidiaries. Information about the distribution of € 410 million cash dividend by the Bank to Eurobank Holdings in 2023 is provided in note 37.

[7] Other related parties include associates (Hellenic Bank is included as of the second quarter of 2023, note 24), joint ventures and the Eurobank Group's personnel occupational insurance fund. In particular, as at 31 December 2023 the outstanding balances of transactions with the Fund refer mainly to deposits of € 1 million received from the Fund (31 December 2022: € 1 million).

[8] In January 2023, the Bank disposed of a 10.8% holding in Fairfax Group's subsidiary "Grivalia Hospitality S.A." to Eurolife FFH Insurance Group Holdings S.A for a cash consideration of € 48.3 million. Furthermore, in March and November 2023, the Bank participated in the share capital increase of "Grivalia Hospitality S.A." with an amount of € 8.6 and € 6.05 million respectively. As at 31 December 2023, the Bank's retained holding in the entity was 9.2%.

Following the assessment of the recoverable amount of the Bank's funding to its subsidiaries, associates and joint ventures, an impairment loss of € 11 million (31 December 2022: a reversal of impairment loss of € 92 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 2023, the respective impairment allowance amounted to € 11 million (2022: € 176 million).

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 € 7.29 million (2022: € 6.76 million) and long-term employee benefits of € 1.25 million (2022: € 1.13 million). Additionally, the Bank has recognised € 3.79 million (2022: € 1.8 million) expense relating with equity settled share based payments (note 38). Furthermore, as at 31 December 2023, the defined benefit obligation for the KMP amounts to € 1.77 million (2022: € 1.58 million), while the respective cost for the year through the income statement amounts to € 0.14 million (2022: € 0.12 million) and the other comprehensive income (actuarial loss) amounts to € 0.05 million (2022: € 0.07 million actuarial gain).

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's 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 principal independent auditor KPMG, for audit and other services provided are analyzed as follows:

	31 December 2023 € million	31 December 2022 € million
Statutory audit	**(1.4)**	(1.3)
Tax certificate	**(0.2)**	(0.2)
Other audit related assignments	**(0.5)**	(0.4)
Non audit assignments	**(0.0)**	(0.1)
Total	**(2.1)**	(2.0)

It is noted that the non-audit assignment fees of "KPMG Certified Auditors S.A." Greece, statutory auditor of the Bank, amounted to € 0.04 million.

45. Board of Directors

The Board of Directors (BoD) was elected by the Annual General Meeting of the Shareholders (AGM) held on 23 July 2021 for a three-year 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.

Further to that:

- The AGM held on 20 July 2023 approved the appointment of Mr. Burkhard Eckes and Mr. John Arthur Hollows as new independent non-executive members of Eurobank Holdings and Eurobank BoD, whose term of office will expire concurrently with the term of office of the other members of the BoD. On the same day the BoD decided its constitution.
- On 9 October 2023, Eurobank Holdings announced the acquisition of all of its issued shares held by the HFSF, namely 52,080,673 common registered shares. On the same day, the HFSF notified Eurobank Holdings that effective as of 11 October 2023, the HFSF will no longer have the special rights provided in law 3864/2010, including the right to appoint a representative in the Board of Directors and the Board Committees. Following these developments, the HFSF representative Mrs. Efthymia Deli, member of the Boards of Directors and of the Committees of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 26 October 2023 her resignation from the abovementioned positions, effective as of 7 November 2023.
- Mr. Andreas Athanasopoulos, Deputy CEO and Executive Member of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 31 October 2023 his resignation from the abovementioned positions, effective as of 31 December 2023.

Following the above, the BoD is as follows:

G. Zanias	Chairman, Non-Executive Member
G. Chryssikos	Vice Chairman, Non-Executive Member
F. Karavias	Chief Executive Officer
S. Ioannou	Deputy Chief Executive Officer
K. Vassiliou	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
B. Eckes	Non-Executive Independent Member
J. A. Hollows	Non-Executive Independent Member

Athens, 28 March 2024

Georgios P. Zanias	Fokion C. Karavias	Harris V. Kokologiannis
I.D. No AI -414343	I.D. No AI - 677962	I.D. No AN - 582334
CHAIRMAN OF THE BOARD OF DIRECTORS	CHIEF EXECUTIVE OFFICER	GENERAL MANAGER OF GROUP FINANCE CHIEF FINANCIAL OFFICER