

PILLAR 3 REPORT

**FOR THE YEAR ENDED
31 DECEMBER 2023**

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Introduction – General Information

1. Introduction – General Information

Eurobank S.A. (the Bank) is a wholly owned subsidiary of Eurobank Ergasias Services and Holdings S.A. (the “Parent Company”), which is active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Bank is incorporated in Greece and operates mainly in Greece and through its subsidiaries in Central and Southeastern Europe.

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

1.1 Highlights

	Risk profile		
	31 December 2023 ^{(1) & (2)}	31 December 2023 ⁽¹⁾	31 December 2022
	€ million	€ million	€ million
Available own funds			
Common Equity Tier 1 (CET1) capital	5,583	5,583	5,467
Tier 1 capital	5,583	5,583	5,467
Total capital	6,958	6,658	6,834
Risk-weighted exposure amounts			
Total risk-weighted exposure amount	34,515	34,669	36,108
Capital ratios			
Common Equity Tier 1 ratio (%)	16.2%	16.1%	15.1%
Tier 1 ratio (%)	16.2%	16.1%	15.1%
Total capital ratio (%)	20.2%	19.2%	18.9%
Leverage ratio			
Leverage ratio	8.4%	8.4%	8.1%
Liquidity Ratios			
Liquidity coverage ratio (%)	191.1%	191.1%	180.5%
NSFR ratio (%)	113.4%	113.4%	114.6%

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023 .

⁽²⁾ Pro forma with the completion of Projects “Solar” (for 31/12/2022 and 31/12/2023 ratios) and “Leon” (for 31/12/2023), as well as the issuance of Subordinated Tier II debt instruments in January 2024.

1.2 NPE Operational targets

In line with the regulatory framework and Single Supervisory Mechanism (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 Group’s NPE ratio at 3.2% in 2026.

1.3 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 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.

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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.

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.

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

1.4 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 and the carrying amount reached € 121 million, comprising loans with gross carrying amount of € 398 million, which carried an impairment allowance of € 277 million.

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

1.5 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.

1.6 Eurobank Direktna a.d., Serbia

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 total shareholding of 70% in its subsidiary in Serbia, 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.

For further details, please refer to Financial Statements, Note 23.

1.7 Hellenic Bank Public Company Ltd, Cyprus

On 4 April 2023 the Bank announced that after the receipt of the relevant regulatory approvals, the Bank 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. Following that, the total holding in Hellenic Bank, including the previously held participation of 15.8% with carrying value of € 103 million on the above date, reached 29.2% and the Group in accordance with the IFRS is considered to have significant influence over the entity.

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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 customary regulatory approvals. Following their completion, the total holding in Hellenic Bank will amount to 55.3%.

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.

1.8 Hellenic Financial Stability Fund’s (HFSF) shares buy back

On 9 October 2023, the Company completed the buy back of all 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.

Further information is included in the consolidated Pillar III of Eurobank Holdings for the year ended 31 December 2023.

1.9 Dividends/Distribution of Profits

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.

1.10 Tier 2 Capital instruments

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

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.

On 19 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 Company.

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1.11 Regulatory framework

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

- Pillar 1 defines the minimum regulatory capital requirements, based on principles, rules and methods specifying and measuring credit, market and operational risk. These requirements are covered by regulatory own funds, according to the rules and specifications of CRR.
- Pillar 2 addresses the internal processes for assessing overall capital and liquid asset holdings are adequate in relation to risks profile (Internal Capital Adequacy Assessment Process - ICAAP and Internal Liquidity Assessment Process - ILAAP). Moreover, Pillar 2 introduces the Supervisory Review & Evaluation Process (SREP), which assesses the risks banks face and checks that banks are equipped to manage those risks properly.
- Pillar 3 intends to enhance market discipline by developing a set of quantitative and qualitative disclosure requirements, which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes and hence the capital adequacy and the internal liquidity adequacy of credit institutions.

According to the CRD IV provisions:

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

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

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

- Minimum CET1 capital ratio 7%;
- Minimum Tier 1 ratio: 8.5%;
- Minimum Total capital adequacy ratio 10.5%.

Additional capital buffers that CRD IV introduces are the following:

- a) Countercyclical buffer (CCyB). The purpose of this buffer is to counteract the effects of the economic cycle on banks' lending activity, thus making the supply of credit less volatile and possibly even reduce the probability of credit bubbles or crunches. Credit institutions are required under the CRD IV to build up an additional buffer of 0% - 2.5% of CET1 during periods of excess credit growth, according to national circumstances. According to relevant BoG Executive Committee Act No 202/1/11.03.2022, which lays down the procedure for applying the CCyB rate in Greece and the relevant calibration methodology, BoG assesses, on a quarterly basis, the intensity of cyclical systemic risk and the appropriateness of the CCyB rate, taking into account the standardised credit-to-GDP gap, the buffer guide and, in particular, additional indicators for monitoring the build-up of cyclical systemic risk. On 19 December 2023, BoG announced that would keep the countercyclical capital buffer rate for Greece unchanged at "zero percent" (0%) in the first quarter of 2024, with effect from 1 January 2024.
- b) Global systemic institution buffer (G-SIIs). CRD IV includes a mandatory systemic risk buffer of CET1 for banks that are identified by the relevant authority as globally systemically important, which is not applicable to Greek banks.
- c) Other systemically important institutions buffer (O-SIIs). On 12 June 2023, European Banking Authority (EBA) published the updated list of O-SIIs in the EU, which, together with G-SIIs, are identified as systemically important by the relevant authorities according to harmonised criteria laid down in the EBA Guidelines (the size, importance, complexity and interconnectedness). This list is based on year-end-2022 data and also reflects the capital buffers that the relevant authorities have set for the O-SIIs. The list of O-SIIs is disclosed on an annual basis, along with any CET1 capital buffer requirements which may need to be set or reset Higher capital requirements will become applicable in

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case relevant authorities decide to set institution specific buffer requirements following the O-SII identification. For each O-SIII, the list includes the overall score in terms of basis points resulting from the EBA scoring methodology. The EBA methodology has been applied to compute the scores for all the institutions operating in Greece using consolidated data. Based on the above scoring system, all Greek O-SIIs are classified in bucket 4, which corresponds to a capital buffer up to 1%. According to BoG Executive Committee No 212/21.09.2022, the O-SII buffer for Greek institutions is set at 1% 2023.

On 22 December 2022, ECB published the November 2022 Governing Council statement on macroprudential policies regarding the revised floor methodology for assessing capital buffers for O-SIIs. The revised floor methodology increases the number of buckets to which O-SIIs are allocated from four to six and raises the floor level for the highest bucket to 1.50% while keeping the floor of the lowest bucket unchanged at 0.25%. The aforementioned methodology will strengthen the capacity of systemically important banks to absorb losses. Moreover, it will further reduce the risk of heterogeneity in O-SII buffers and lead to a more consistent treatment of these institutions across the countries participating in European banking supervision. The ECB will use the revised floor methodology to assess O-SII buffers proposed by national authorities as of 1 January 2024.

From 1 January 2024, the O-SII buffer for the Bank remains at 1%, in accordance with the Executive Committee Act 221/1/17.10.2023 of BoG.

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

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

1.11.1 Regulatory Developments

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

On 14 February 2023, EBA published the final draft RTS setting out the conditions for the assessment of the homogeneity of the underlying exposures in a pool of a Simple Transparent and Standardised (STS) on-balance-sheet securitisation. In general, the proposed amendments consider the specificities of on-balance-sheet securitisations and aim at enabling both the originators and the investors to assess the underlying risks of the pool of the underlying exposures on the basis of common methodologies and parameters in line with the overarching objective of the homogeneity requirement. The final draft RTS will be submitted to the Commission for endorsement. Following the submission, RTS will be subject to scrutiny by the European Parliament and the Council before being published in the Official Journal of the European Union.

On 18 April 2023, the European Commission submitted a package of legislative proposals to amend the Bank Crisis Management and Deposit Insurance (CMDI) framework. These proposals aim to further harmonize the EU crisis management framework and reduce the use of taxpayer funding. More specifically, the proposals make it easier to place small and mid-sized banks into resolution, addressing some deficiencies of the existing framework that allowed failures

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of small/medium-sized banks to be dealt with under national regimes, often involving the use of public money (bailouts) instead of the industry-funded safety nets, such as the national Deposit Guarantee Schemes (DGSs) or the Single Resolution Fund (SRF). The legislative proposals are being discussed at the European Parliament and the Council. On 3 August 2023, EBA launched a public consultation on draft RTS to identify extraordinary circumstances under which competent authorities may soften or waive certain requirements for the calculation of own funds requirements for market risk on the basis of internal models. More specifically, these RTS set out that only a situation of cross-border financial market stress, or a regime shift, can qualify as a situation of extraordinary circumstances, and only subject to the additional condition that this stress or regime shift impacts the validity of the results of the back-testing or the profit and loss attribution test (PLAT). The consultation runs until 3 November 2023.

On 14 December 2023, the SRB launched a public consultation on the review of its MREL Policy, covering, among others, the calibration of the Market Confidence Charge (component of the MREL target) and the process for monitoring the eligibility of MREL instruments. The consultation closed on 13 February 2024, while the SRB is expected to publish an updated MREL Policy within Q2 2024.

On 20 December 2023, the EBA published its final draft ITS on amendments to disclosure and reporting of the minimum requirement for MREL and TLAC. These amendments reflect the new requirement to deduct investments in eligible liabilities instruments of entities belonging to the same resolution group, the so called ‘daisy chain’ framework, and other changes to the prudential framework. The amendments will apply for the reference date as of end-June 2024.

On 11 December 2023, the Council and European Parliament reached an agreement on the European Commission’s proposals for the amendment of Regulation (EU) No 575/2013 (CRR) and Directive 2013/36/EU (CRDIV). These legislative acts (collectively known as ‘Banking Package’), implement, among others, the final elements of the Basel III framework of 2017 in the EU. The revised CRR (CRR3) will start applying from January 2025, with a transitional period envisaged for certain rules set out therein (e.g. output floor). Member States shall transpose the revised CRDIV (CRD6) in their national laws within 18 months from its entry into force.

On 14 December 2023, EBA published two draft ITS amending Pillar 3 disclosures and supervisory reporting requirements. These consultation papers are a first step in the implementation of the Banking Package (CRR3 and CRD6). In particular, these draft ITS seek to implement the changes related to the output floor, credit risk, including immovable property (IP) losses, capital valuation adjustment (CVA), market risk and leverage ratio. The amendments related to operational risk are not covered by these consultation papers but will be consulted on together with some policy products at the beginning of 2024.

In line with the Roadmap, the EBA will follow a two-step sequential approach to amend both the Pillar 3 disclosures and supervisory reporting ITS, prioritizing, in step 1, those changes necessary to implement and monitor Basel III requirements in the EU. Later in 2024, as part of step 2, the EBA will develop those reporting and disclosure requirements that are not directly linked to Basel III implementation, together with those requirements with an extended implementation timeline.

The consultations run until 14 March 2024. Following the consultation period, the two draft ITS will be finalised and they are expected to be submitted to the European Commission by June 2024.

On 4 March 2024, EBA published a draft RTS under CRR3 regarding the classification’s criteria of off-balance sheet items under the standardised approach of credit risk. The exposure values of off-balance exposure depend on the application of certain percentages, which in turn depend on a bucket classification. The CRR3 is set to introduce amendments to update the calibration of applicable percentages, which results in the introduction of an adjusted weighting scheme and an additional bucket, increasing the number of risk buckets from 4 to 5, and the conversion factor possibilities to 10%, 20%, 40%, 50% or 100%. Furthermore, it specifies the factors that may constrain the institutions’ ability to cancel the unconditionally cancellable commitments. These RTS are part of step 1 of the EBA roadmap on the implementation of the EU banking package. The consultation runs until 4 June 2024.

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1.12 Supervisory Review and Evaluation Process (SREP)

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

Among others, the ECB conducts annually a Supervisory Review and Evaluation Process (SREP) assessment, in order to assess banks' risk profiles and determine quantitative and qualitative requirements for banks.

The key purpose of SREP is to ensure that banks have adequate arrangements, strategies, processes and mechanisms, as well as capital and liquidity to ensure a sound management and coverage of their risks, to which they are or might be exposed, including those revealed by stress testing and risks the institution may pose to the financial system. The methodology followed provides for a holistic and forward-looking assessment of the viability of the supervised institution. The common SREP framework is built around:

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

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

- The minimum required CET1 ratio and the minimum required Total capital adequacy ratio (Total SREP Capital Requirement or TSCR) that the bank must meet at all times; and
- The Overall Capital Requirement (OCR), which includes, in addition to the TSCR, the Combined Buffer Requirement (CBR), and which in case of breach, leads to the trigger of the Maximum Distributable Amount (MDA) restrictions.

The Pillar 2 Requirement (P2R) is a bank specific capital requirement included in the TSCR, which typically covers risks which are underestimated or not covered by the minimum capital requirements (Pillar 1). Considering that the P2R applies to Eurobank Holdings (at consolidated level), this is not applicable to Eurobank S.A.

Based on the SREP decision for the year 2023, the ECB notified that the Bank shall meet, on an individual basis, a total SREP capital requirement (TSCR) of 8%, which is equal to the minimum capital requirements set out in Art. 92 CRR.

1.13 Recovery and Resolution of Credit Institutions

The recovery and resolution framework in the EU is based on the Directive 2014/59 EU "*establishing a framework for the recovery and resolution of credit institutions and investment firms*" (the Bank Recovery and Resolution Directive (BRRD)), which entered into force in 2014. The BRRD, as in force, which was transposed into Greek law by virtue of Law 4335/2015, as in force, relies on a network of national authorities and resolution funds to resolve banks. Pursuant to Law 4335/2015, with respect to Greek banks, the BoG has been designated as the national resolution authority and the Resolution Branch of the Hellenic Deposit and Investment Guarantee Fund (HDIGF) as the national resolution fund.

Considering that banking resolution needs to be exercised uniformly in the Banking Union, the Single Resolution Mechanism (SRM) and a Single Resolution Fund (SRF) were established based on the Regulation No 806/2014 (the "SRM Regulation").

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

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

Under the BRRD and SRM Regulation, European banks are required to meet the Minimum Requirement for own funds and Eligible Liabilities (MREL). The SRB has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes. Based on the latest official SRB's decision, the fully calibrated MREL (final target) to be met by Eurobank S.A. on a consolidated basis until the end of 2025 is set at 27.82% of its total Risk Weighted Exposures Amounts (RWEAs), including a fully loaded CBR of 4.25%. The final MREL target is updated by the SRB on an annual basis. The 2024 interim non-binding MREL target, applicable from January 2024, stands at 23.23% of RWEAs, including a CBR of 4.18%.

During 2023, in the context of the implementation of its medium-term strategy to meet its MREL requirements, the Bank proceeded with the issuance of two (2) MREL-eligible senior preferred bonds with a nominal value of € 500 million each. As a result, on 31 December 2023, the Bank's MREL ratio at Eurobank S.A. consolidated level stood at 24.91% (including profits for the year ended 31 December 2023), which is significantly above the 2024 non-binding MREL target of 23.23%, including a CBR of 4.18%. In terms of Leverage Ratio Exposure, the Bank's MREL ratio as of December 2023 stood at 12.75%, which is significantly above the relevant MREL target of 5.91%.

In January 2024, the Bank successfully completed an issue of €300 million of Tier 2 instrument. The proceeds from the issue will support Eurobank Group's strategy to ensure ongoing compliance with its MREL requirement and further enhance its strong capital position.

1.14 Implementation of Capital Adequacy framework

1.14.1 Credit risk

On 1st of March 2023, the Group received approval from ECB to revert from the Internal Ratings Based (IRB) approach to the Standardized (STD) approach for all credit risk exposures. The Group'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 IRB models are calibrated is of limited representativeness taking into account the recent economic developments. The Bank continues utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring.

1.14.2 Market risk

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

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

For the measurement of market risk exposure and the calculation of capital requirements for the Bank's subsidiaries in Greece and in international operations, the STD approach is applied.

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The Bank also applies additional metrics for the measurement and monitoring of its market risk, both for its Greek and international subsidiaries' operations, including stress testing and sensitivity analysis, historical simulation and other market risk metrics (e.g., expected shortfall).

1.14.3 Operational risk

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

1.15 2023 EU-wide stress Test

In January 2023, EBA launched the 2023 EU-wide stress test exercise which is designed to provide valuable input for assessing the resilience of the European banking sector in the current uncertain and changing macroeconomic environment. This exercise is coordinated by the EBA in cooperation with the ECB and national supervisory authorities and is conducted according to the EBA's methodology. Eurobank Holdings Group is participating in the EBA-led stress test.

Further information about the 2023 EU-wide stress test is included in the consolidated Pillar III of Eurobank Holdings for the year ended 31 December 2023.

1.16 Fit-for-55 Climate Risk Scenario Analysis

Eurobank participated in the One-off Fit-for-55 Climate Risk Scenario Analysis exercise, launched by the EBA in collaboration with the ECB and the ESRB in 2023.

The regulatory exercise aimed to assess the financial sector's resilience in alignment with the Fit-for-55 package, providing valuable insights into the financial system's capability to support the transition to a low-carbon economy, particularly under stress conditions.

Further information is included in the consolidated Pillar III of Eurobank Holdings for the year ended 31 December 2023.

1.17 Scope of Pillar 3

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

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

Pillar 3 disclosures consist of both qualitative and quantitative information. They have been prepared according to the specific CRR Articles 437, 438, 440, 442, 450, 451, 451a and 453 of Part Eight of the Regulation (EU) No 575/2013, as in force. Consequently, it is subject to the limited disclosure requirement on an annual basis.

In December 2016, EBA published EBA/GL/2016/11 guidelines on revised Pillar 3 disclosures requirements to improve the consistency and comparability of institutions' regulatory disclosures. These guidelines harmonised the frequency of disclosures and updated the list of requirements to be considered for more frequent disclosures.

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

In December 2018, EBA published EBA/GL/2018/10 guidelines, which include enhanced disclosure formats for credit institutions for disclosures related to non-performing exposures, forborne exposures and foreclosed assets. Some templates are applicable to significant credit institutions that have a gross NPL ratio of 5% or above. Although the Group's NPE ratio stands at 3.5% for the year ended 31 December 2023, it continues to report the aforementioned information following article 4 of Regulation 680/2014. Based on this article, the Group may stop reporting information subject to

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thresholds from the next reporting reference date where it has fallen below the relevant thresholds on three consecutive reporting reference dates.

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

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

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

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

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

On 1 March 2023, the Bank reverted to STD approach for credit risk exposures, following ECB approval. As the relevant disclosures are published for first time in their entirety under the STD approach, the data of the previous periods are not reported as the templates are not comparable.

1.18 Location, timing and frequency of disclosures

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

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

Moreover, the Bank has issued an internal approved by the Board of Directors "Pillar 3 Disclosures Policy" in order to ensure consistent and continuous compliance with the Pillar 3 disclosures requirements. In addition, the Bank puts in place and maintains internal processes, systems and controls to verify that the disclosures are appropriate and in compliance with the aforementioned regulatory framework.

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

Quantitative information, which is included in the Bank's Financial Statements, is also provided at the above location. In this way, the Bank secures easy access of the market participants to continuous and complete information without cross-reference to other locations or media of communication.

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Regarding the timing of disclosures, CRR clarifies that disclosures shall be published on the same date as the date on which the institution publishes its financial reports or as soon as possible thereafter. The Bank's Pillar 3 disclosures will be published the latest either within one month from the publication of the financial statements or within the deadline of relevant financial statements publication, as defined in Law 3556/2007.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee and was approved by the Board of Directors on 25 April 2024 prior to their publication on the Bank's website.

1.19 Compliance with Basel III Pillar 3 disclosures

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

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

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

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

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1.20 Regulatory Balance Sheet

There is no difference between regulatory and accounting Balance Sheet.

The table below presents the Bank's regulatory and accounting Balance Sheet as at 31 December 2023 and 31 December 2022.

Table 1: Regulatory and accounting Balance Sheet

Ref.	31 December 2023	31 December 2022
	€ million	€ million
Assets		
Cash and Balances with central banks	6,362	9,712
Due from credit institutions	2,547	2,177
Securities held for trading	227	69
Derivative financial instruments	891	1,215
Loans and advances to customers	30,609	30,619
Investment securities	11,715	10,487
Shares in subsidiaries	2,188	2,514
Investments in associates and joint ventures	213	39
Property, plant and equipment	541	527
Investment property	1,033	936
Intangible assets	203	189
Deferred tax asset	3,986	4,154
of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	<i>a</i> -	-
of which deferred tax credit	3,213	3,402
of which deferred tax assets arising from temporary differences	773	752
Other assets	1,601	1,805
Assets of disposal group classified as held for sale	205	81
Total assets	62,321	64,524
Liabilities		
Due to central banks	3,771	7,927
Due to credit institutions	4,482	4,058
Derivative financial instruments	1,457	1,696
Due to customers	40,740	40,256
Debt securities in issue	4,951	3,665
Other liabilities	865	1,339
Total liabilities	56,266	58,941
Equity		
Ordinary share capital	<i>b</i> 3,941	3,941
Share premium	<i>c</i> -	-
Reserves and retained earnings	2,114	1,642
of which cash flow hedge reserves	<i>d</i> (14)	(12)
Total equity	<i>e</i> 6,055	5,583
Total equity and liabilities	62,321	64,524

Capital Management

2. Capital Management

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

2.1 Regulatory capital – definition

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

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

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

Addition of:

- 50% of IFRS 9 'quick fix' impact of 2023 increases in stage 1 and stage 2 provisions (refer to par. 2.2 and 2.5);

Deduction of:

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

Tier 1 capital comprises CET1 capital plus AT1 capital including preferred securities subject to phase out. In case deductions of Tier 1 capital exceed positive amounts of Tier 1 capital, then the difference is deducted from CET1 capital.

Tier 2 capital comprises long term subordinated liabilities that meet certain regulatory specified criteria. In case deductions of Tier 2 capital exceed positive amounts of Tier 2 capital, then the difference is deducted from Tier 1 capital.

2.2 Transition rules

According to the CRR 'quick fix' relief package, the IFRS 9 transitional arrangements have been extended by two years and a new calculation has been introduced where 100% relief is applied in 2020 and 2021 for increases in stage 1 and stage 2 provisions from 1 January 2020. Accordingly, the relief applied for 2022 is 75%, for 2023 50% and for 2024 25% respectively. The full impact is expected as of 1 January 2025.

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

Capital Management

2.3 Key Metrics

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

Table 2: EU KM1 - Key Metrics template

	a	b
	31 December 2023 ⁽¹⁾	31 December 2022
	€ million	€ million
Available own funds (amounts)		
1 Common Equity Tier 1 (CET1) capital	5,583	5,467
2 Tier 1 capital	5,583	5,467
3 Total capital	6,658	6,834
Risk-weighted exposure amounts		
4 Total risk exposure amount	34,669	36,108
Capital ratios (as a percentage of risk-weighted exposure amount)		
5 Common Equity Tier 1 ratio (%)	16.1%	15.1%
6 Tier 1 ratio (%)	16.1%	15.1%
7 Total capital ratio (%)	19.2%	18.9%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)		
EU 7a Additional own funds requirements to address risks other than the risk of excessive leverage (%)	0.00%	0.00%
EU 7b of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%
EU 7c of which: to be made up of Tier 1 capital (percentage points)	0.00%	0.00%
EU 7d Total SREP own funds requirements (%)	8.00%	8.00%
Combined buffer requirement (as a percentage of risk-weighted exposure amount)		
8 Capital conservation buffer (%)	2.50%	2.50%
EU 8a Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%
9 Institution specific countercyclical capital buffer (%)	0.21%	0.03%
EU 9a Systemic risk buffer (%)	0.00%	0.00%
10 Global Systemically Important Institution buffer (%)	0.00%	0.00%
EU 10a Other Systemically Important Institution buffer	1.00%	0.75%
11 Combined buffer requirement (%)	3.71%	3.28%
EU 11a Overall capital requirements (%)	11.71%	11.28%
12 CET1 available after meeting the total SREP own funds requirements (%)	10.10%	9.14%
Leverage ratio		
13 Leverage ratio total exposure measure	66,879	67,279
14 Leverage ratio	8.4%	8.1%
Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)		
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%
EU 14c Total SREP leverage ratio requirements (%)	3.00%	3.00%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)		
EU 14d Leverage ratio buffer requirement (%)	0.00%	0.00%
EU 14e Overall leverage ratio requirements (%)	3.00%	3.00%
Liquidity Coverage Ratio		
15 Total high-quality liquid assets (HQLA) (Weighted value - average)	13,180	10,822
EU 16a Cash outflows - Total weighted value	7,545	6,920
EU 16b Cash inflows - Total weighted value	371	487
16 Total net cash outflows (adjusted value)	7,174	6,434
Liquidity coverage ratio (%) (adjusted value) ⁽²⁾	183.8%	168.1%
17 Liquidity coverage ratio (%)	191.1%	180.5%
Net Stable Funding Ratio		
18 Total available stable funding	44,974	45,291
19 Total required stable funding	39,671	39,524
20 NSFR ratio (%)	113.4%	114.6%

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023.

⁽²⁾ Average figures based on previous monthly data points.

⁽³⁾ The Pro forma CET1 and Total Capital Adequacy ratios as at 31 December 2023 with the completion of Projects "Solar" and "Leon" as well as the issuance of Subordinated Tier II debt instruments in January 2024 would be 16.2% and 20.2% respectively.

Capital Management

2.4 Regulatory capital

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

In addition, in Appendix 1, a transitional own fund disclosure template can be found, which presents the components of regulatory capital on transitional and end-point basis as at 31 December 2023 and at 31 December 2022. The disclosure has been prepared using the format set out in Annex VI of the "Commission Implementing Regulation (EU) No 1423/2013 of 20 December 2013 laying down implementing technical standards with regard to disclosure of own funds requirements for institutions according to Regulation (EU) No 575/2013 of European Parliament and of the Council."

The table below presents the composition of the Bank's regulatory capital as at 31 December 2023 and at 31 December 2022 which is calculated according to CRD IV as amended.

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

	c	a & b	
		31 December 2023 ⁽¹⁾	31 December 2022
	Ref.	€ million	€ million
Total equity	e	6,055	5,583
Regulatory adjustments			
Part of interim or year-end profit not eligible		-	-
Cash flow hedge reserves	d	14	12
Adjustments due to IFRS 9 transitional arrangements		-	214
Temporary treatment of unrealised losses measured at FVTOCI in accordance with Article 468 of the CRR		-	55
Intangible assets		(142)	(110)
of which Goodwill		-	-
IRB shortfall of credit risk adjustments to expected losses		-	(78)
Deferred tax assets that rely on future profitability (unused tax losses)	a	-	-
Deferred tax assets arising from temporary differences (amount above 10% threshold)		(169)	(144)
Prudent Valuation Adjustments		(7)	(7)
Other regulatory adjustments		(168)	(57)
Amount exceeding the 17.65% threshold		-	-
Common Equity Tier I capital		5,583	5,467
Regulatory adjustments		-	-
Total Tier I capital		5,583	5,467
Tier II capital - subordinated debt		1,075	1,250
IRB Excess of impairment allowances over expected losses eligible		-	117
Total Regulatory Capital		6,658	6,834
Risk Weighted Assets		34,669	36,108
Ratios			
Common Equity Tier I		16.1%	15.1%
Tier I		16.1%	15.1%
Total Capital Adequacy Ratio		19.2%	18.9%

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023.

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

⁽³⁾ CET1 ratio was increased mainly due to the organic profitability for the year ended 31 December 2023, Wave IV securitization, and the decrease of the RWEAs due to the reversion from IRB to STD 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 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.

⁽⁴⁾ The Pro forma CET1 and Total Capital Adequacy ratios as at 31 December 2023 with the completion of Projects "Solar" and "Leon" as well as the issuance of Subordinated Tier II debt instruments in January 2024 would be 16.2% and 20.2% respectively.

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

As at 31 December 2023, pursuant to the Law 4172/2013, as in force, the Bank's eligible Deferred Tax Assets (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 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 unamortised part of the DTC eligible crystallized tax losses arising from write-offs and disposals of loan, 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.

For further details, please refer to Financial Statements, Note 14.

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

2.5 IFRS 9 and temporary measures capital impact

According to Regulation (EU) 2017/2395 of the European Parliament and the Council, the five year transition period for the recognition of the impact of IFRS 9 adoption on the regulatory capital ended on 1 January 2023. As a result, the full impact is recognised in the regulatory capital.

According to the CRR 'quick fix' relief package, the IFRS 9 transitional arrangements have been extended by two years and a new calculation has been introduced where 100% relief is applied in 2020 and 2021 for increases in stage 1 and stage 2 provisions from 1 January 2020. Accordingly, the relief which is applicable for 2023 and for 2024 is 50% and 25% respectively. The full impact is expected as of 1 January 2025.

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

Capital Management

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

	a	b
	31 December 2023 ⁽¹⁾	31 December 2022
	€ million	€ million
Available capital		
1 CET1 capital	5,583	5,467
2 CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5,583	5,310
CET1 capital as if the temporary treatment of unrealised gains and losses		
2a measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied		5,389
Fully Loaded CET1 capital	5,564	5,188
3 Tier 1 capital	5,583	5,467
4 Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5,583	5,310
Tier 1 capital as if the temporary treatment of unrealised gains and losses		
4a measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied		5,389
Fully Loaded Tier 1 capital	5,564	5,188
5 Total capital	6,658	6,834
6 Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,658	6,677
Total capital as if the temporary treatment of unrealised gains and losses		
6a measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied		6,756
Fully Loaded Total capital	6,640	6,555
Risk weighted assets		
7 Total risk-weighted assets	34,669	36,108
8 Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	34,669	36,061
Fully Loaded Total risk-weighted assets	34,669	36,061
Capital ratios		
9 CET1 (as a percentage of risk exposure amount)	16.1%	15.1%
10 CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.1%	14.7%
CET1 (as a percentage of risk exposure amount) as if the temporary treatment of		
10a unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied		14.9%
Fully Loaded CET1 (as a percentage of risk exposure amount)	16.0%	14.4%
11 Tier 1 (as a percentage of risk exposure amount)	16.1%	15.1%
12 Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.1%	14.7%
Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of		
12a unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied		14.9%
Fully Loaded Tier 1 (as a percentage of risk exposure amount)	16.0%	14.4%
13 Total capital (as a percentage of risk exposure amount)	19.2%	18.9%
14 Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.2%	18.5%
Total capital (as a percentage of risk exposure amount) as if the temporary		
14a treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied		18.7%
Fully Loaded Total capital (as a percentage of risk exposure amount)	19.2%	18.2%
Leverage ratio		
15 Leverage ratio total exposure measure	66,879	67,279
16 Leverage ratio	8.4%	8.1%
17 Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	8.4%	7.9%
Leverage ratio as if the temporary treatment of unrealised gains and losses		
17a measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied		8.0%
Fully Loaded Leverage ratio	8.3%	7.7%

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023.

⁽²⁾ The Pro forma CET1 and Total Capital Adequacy ratios as at 31 December 2023 with the completion of Projects "Solar" and "Leon" as well as the issuance of Subordinated Tier II debt instruments in January 2024 would be 16.2% and 20.2% respectively.

Capital Management

2.6 Countercyclical buffer

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

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

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

	31 December 2023																									
	a		b		c		d		e		f		g		h		i		j		k		l		m	
	General credit exposures		Relevant credit exposures – Market risk				Securitisation exposures		Total exposure value		Own funds requirements				Risk-weighted exposure amounts		Own funds requirements weights		Counter-cyclical capital buffer rate							
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book	Total exposure value	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total																
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)				
010 Breakdown by country:																										
Greece	28,433	-	-	-	5	28,438	1,504	-	-	1,504	18,800	78%	0.00%													
Romania	131	-	-	-	-	131	7	-	-	7	88	0%	1.00%													
Bulgaria	805	-	-	-	-	805	64	-	-	64	800	3%	2.00%													
United Kingdom	195	-	-	-	76	271	16	-	1	17	213	1%	2.00%													
Cyprus	774	-	-	-	42	816	83	-	4	87	1,088	5%	0.50%													
Luxemburg	213	-	-	-	285	498	21	-	6	27	338	1%	0.50%													
Serbia	12	-	-	-	-	12	1	-	-	1	13	0%	0.00%													
Other Countries ⁽²⁾	984	-	-	-	9,133	10,117	70	-	146	216	2,700	11%	0.82%													
020 Total	31,547	-	-	-	9,541	41,088	1,766	-	157	1,923	24,040	100%	0.21%													

⁽¹⁾ The table above exclude exposures on Central governments or Central banks, Regional governments or local authorities, Public sector entities, Multilateral development banks, International organisations and Institutions asset classes.

⁽²⁾ The Countercyclical capital rate in Other Countries includes the increase of Ireland buffer from 0.50% to 1%.

The table below presents an overview of Bank's specific countercyclical capital risk exposure and buffer requirements.

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

	a	a
	31 December 2023	31 December 2022
1 Total risk exposure amount (€ million)	34,669	36,073
2 Institution specific countercyclical capital buffer rate	0.21%	0.03%
3 Institution specific countercyclical capital buffer requirement (€ million)	73	11

⁽¹⁾ The specific countercyclical capital buffer rate increases mainly due to Ireland buffer from 0.50% to 1%.

Capital Management

2.7 Supervisory Review and Evaluation Process (SREP) capital requirements

Following the 2022 SREP decision communicated by the ECB in 4Q2023, the Bank was required to meet on an individual basis a CET1 ratio of at least 8.21% and a Total Capital Adequacy Ratio of at least 11.71% (Overall Capital Requirements (OCR) including Capital Conservation Buffer (CCB) and the applicable Countercyclical Capital Buffer of 0.21% for the fourth quarter of 2023 stemming from the exposures in Bulgaria, Cyprus and Luxembourg).

The table below presents the capital requirements of the Bank for 31 December 2023.

Table 7: Pillar 2 Requirements

	31 December 2023	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement		
Pillar 2 Requirement (P2R)	4.50%	8.00%
Total SREP Capital Requirement (TSCR)	4.50%	8.00%
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCB)	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)	8.21%	11.71%
AT1 and Tier 2 capital shortfall	1.50%	0.00%
Overall Capital Requirement (OCR), including shortfall	9.71%	11.71%

The above CET1 capital requirement of 9.71% takes into account that the Bank had no AT1 capital, while the Tier 2 capital stood at 3.10% as at 31 December 2023, compared to the portion of 1.5% for AT1 and 2% for Tier 2 capital allowed by the legislation to cover part of Total SREP Capital Requirement (TSCR). Assuming that the Bank had fully utilized the AT1 and Tier 2 capital capacity as at 31 December 2023, the CET1 requirement would stand at 8.21%.

As at 31 December 2023, Eurobank's transitional CET1 ratio and Total Capital ratio, including 12M 2023 profit € 794 million, were 16.1% and 19.2% respectively, which exceeded the 2023 minimum requirements of 8.21% and 11.71%.

From 1 January 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, following a change in the methodology applied for the determination of the O-SII buffer rate. 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.

Capital Management

2.8 Capital requirements under Pillar 1

The table below presents the Bank's risk weighted exposure amounts (RWEAs) and capital requirements as at 31 December 2023 and 31 December 2022. The minimum capital requirements under Pillar 1 are calculated as 8% of RWEAs.

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

	a	b	c
	Risk weighted exposure amounts (RWEAs)		Total own funds requirements
	31 December 2023 ⁽¹⁾	31 December 2022	31 December 2023
	€ million	€ million	€ million
1 Credit risk (excluding CCR)	27,011	29,506	2,161
2 Of which the standardised approach	27,011	10,105	2,161
3 Of which the foundation IRB (FIRB) approach	-	6,670	-
4 Of which: slotting approach	-	3,404	-
EU 4a Of which: equities under the simple riskweighted approach	-	5,171	-
5 Of which the advanced IRB (AIRB) approach	-	4,156	-
6 Counterparty credit risk - CCR	622	425	50
7 Of which the standardised approach	242	167	19
8 Of which internal model method (IMM)	-	-	-
EU 8a Of which exposures to a CCP	12	16	1
EU 8b Of which credit valuation adjustment - CVA	184	137	15
9 Of which other CCR	184	105	15
15 Settlement risk	-	-	-
16 Securitisation exposures in the non trading book (after the cap)	1,968	1,696	157
17 Of which SEC-IRBA approach	-	360	-
18 Of which SEC-ERBA (including IAA)	245	259	20
19 Of which SEC-SA approach	1,723	1,077	138
EU 19a Of which 1250%/ deduction	-	-	-
20 Position, foreign exchange and commodities risks (Market risk)	500	584	40
21 Of which the standardised approach	-	-	-
22 Of which IMA	500	584	40
EU 22a Large exposures	-	-	-
23 Operational risk	2,603	2,243	208
EU 23a Of which basic indicator approach	-	-	-
EU 23b Of which standardised approach	2,603	2,243	208
EU 23c Of which advanced measurement approach	-	-	-
24 Amounts below the thresholds for deduction (subject to 250% risk weight)	1,965	1,654	157
29 Total ⁽²⁾	34,669	36,108	2,774

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023.

⁽²⁾ The decrease of the RWEAs compared to 31 December 2022 is mainly due to Wave IV securitization and to the reversion from the IRB to the STD, which was partly offset by the new production of loans, loan commitments and Letters of Guarantee, as well the increase of Operational Risk.

Capital Management

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

Table 9: INS1 – Non deducted participation in insurance undertakings

	a	b	a	b
	31 December 2023		31 December 2022	
	Exposure value	Risk-weighted exposure amount	Exposure value	Risk-weighted exposure amount
	€ million	€ million	€ million	€ million
Own fund instruments held in insurance or re- insurance undertakings or insurance holding company not deducted from own funds	23	58	23	58

2.9 Internal Capital Adequacy Assessment Process (ICAAP)

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

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

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

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

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

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

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

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

Capital Management

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

The results of the stress tests are utilised during the capital planning process to ensure that the contingency plans in place are adequate if stressed conditions materialize and to produce a set of plausible action plans to mitigate the impact of the assumed stress scenario.

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

2.10 Internal Liquidity Adequacy Assessment Process (ILAAP)

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

The Group's ILAAP covers the following areas:

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

Credit Risk

3. Credit Risk

3.1 Definition of credit risk

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

- a) Country risk is the risk of losses arising from economic difficulties or political unrest in a country, including the risk of losses following nationalization, expropriation and debt restructuring.
- 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, including from credit enhancement provided, such as financial guarantees and letters of credit. The Bank is also exposed to credit risk arising from other activities such as investments in debt securities, trading activities, capital markets and settlement activities. Taking into account that credit risk is the principal risk the Bank is exposed to, it is very closely managed and is monitored by centralised dedicated risk units, reporting to the GCRO.

3.2 Credit exposures

3.2.1 Maturity analysis

The table below presents a breakdown of net exposures by residual maturity and exposure classes as at 31 December 2023 and at 31 December 2022.

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

	a	b	c	d	e	f
	31 December 2023					
	Net exposure value					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
	€ million	€ million	€ million	€ million	€ million	€ million
1 Loans and advances ^{(1) & (2)}	-	10,767	6,777	21,567	3,840	42,951
2 Debt securities ⁽³⁾	-	338	3,838	7,587	-	11,763
3 Total	-	11,105	10,615	29,154	3,840	54,714

	a	b	c	d	e	f
	31 December 2022					
	Net exposure value					
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
	€ million	€ million	€ million	€ million	€ million	€ million
1 Loans and advances	-	9,121	7,914	21,070	3,671	41,776
2 Debt securities	-	265	3,781	6,242	-	10,288
3 Total	-	9,386	11,695	27,312	3,671	52,064

⁽¹⁾ The table above includes off balance sheet items.

⁽²⁾ Increase in Loans and advances is mainly due to the new production of loans, loan commitments and letters of guarantee.

⁽³⁾ The increase in debt securities is mainly due to increased position in Sovereign and Financial bonds.

Credit Risk

3.3 Credit quality of financial assets

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

a. Definitions

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

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

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

Regulatory definitions

From 1 January 2021 onwards, the Bank applies the new definition of default (DoD) for regulatory purposes, as is set in the Article 178 of Regulation (EU) No. 575/2013, the Commission Delegated Regulation (EU) 2018/171 and EBA Guidelines (EBA/GL/2016/07).

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

b. Impairment indicators

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

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

- The borrower faces a significant difficulty in meeting his financial obligations;
- There has been a breach of contract, such as a default or unpaid amounts, above specified materiality thresholds, for 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 credit rating of the issuer/counterparty corresponds to a rating equivalent to "C" (Moody's rating scale) or the external rating of the issuer/counterparty at the reporting date is equivalent to "C" (Moody's rating scale) and the internal rating is not available.

Further information is provided in the Financial Statements note 2.

Credit Risk

c. Impairment assessment

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

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

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

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

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

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

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

d. Impairment measurement

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

Credit Risk

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

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

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

ECL key inputs

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

The table below presents an overview of the quality of forborne exposures as at 31 December 2023 and at 31 December 2022.

Table 11: EU CQ1 - Credit quality of forborne exposures

	a	b	c	d	e	f	g	h
	31 December 2023							
	Gross carrying amount/nominal amount with forbearance measures			Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures		
	Non-performing forborne					Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures		
	Performing forborne	Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures			
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits	-	-	-	-	-	-	-	-
010 Loans and advances	624	513	509	513	(43)	(202)	806	301
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	-	12	12	12	-	(6)	6	6
060 Non-financial corporations	314	332	330	332	(22)	(110)	475	216
070 Households	310	169	167	169	(21)	(86)	325	79
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	624	513	509	513	(43)	(202)	806	301

Credit Risk

	a	b	c	d	e	f	g	h
31 December 2022								
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Non-performing forborne				On performing forborne exposures	On non-performing forborne exposures	Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures	
Performing forborne		Of which defaulted	Of which impaired	€ million			€ million	€ million
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
005 deposits								
010 Loans and advances	931	753	750	753	(75)	(266)	1,194	466
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	-	13	13	13	-	(8)	6	6
060 Non-financial corporations	368	521	521	521	(37)	(164)	625	344
070 Households	563	219	216	219	(38)	(94)	563	116
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	931	753	750	753	(75)	(266)	1,194	466

⁽¹⁾ The decrease in forborne exposures is mainly due to retail portfolio.

The table below presents an overview of credit quality of non-performing exposures as at 31 December 2023 and at 31 December 2022.

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

	a	b	c	d	e	f	g	h	i	j	k	l
31 December 2023												
	Gross carrying amount/nominal amount											
	Performing exposures			Non-performing exposures								
	Not past due or Past due <= 30 days	Past due >30 days <= 90 days	Past due >90 days	Unlikely to pay that are not past-due or past-due <=90 days	Past due > 90 days <=180 days	Past due > 180 days <=1 year	Past due > 1 year <=2 year	Past due > 2 year <=5 year	Past due > 5 year <= 7 year	Past due > 7 years	Of which defaulted	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits ⁽¹⁾	5,973	5,973	-	-	-	-	-	-	-	-	-	-
010 Loans and advances ⁽²⁾	32,894	32,819	75	1,240	575	93	155	90	269	13	45	1,237
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	18	18	-	-	-	-	-	-	-	-	-	-
040 Credit institutions	2,310	2,310	-	-	-	-	-	-	-	-	-	-
050 Other financial corporations ⁽³⁾	6,622	6,622	-	21	3	-	-	-	17	-	-	21
060 Non-financial corporations	14,882	14,862	20	779	390	49	68	32	200	8	30	779
070 of which SMEs	4,222	4,202	20	603	248	23	68	31	193	9	30	603
080 Households	9,062	9,007	55	440	182	44	87	58	52	5	15	437
090 Debt Securities ⁽⁴⁾	11,528	11,528	-	32	32	-	-	-	-	-	-	32
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	7,806	7,806	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	1,117	1,117	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	1,254	1,254	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	1,351	1,351	-	32	32	-	-	-	-	-	-	32
150 Off-balance sheet exposures ⁽⁵⁾	10,045			60								60
160 Central banks	-			-								-
170 General governments	242			19								19
180 Credit institutions	146			-								-
190 Other financial corporations	862			1								1
200 Non-financial corporations	6,966			39								39
210 Households	1,829			1								1
220 Total	60,440	50,320	75	1,332	607	93	155	90	269	13	45	1,329

Credit Risk

	a	b	c	d	e	f	g	h	i	j	k	l
	31 December 2022											
	Gross carrying amount/nominal amount											
	Performing exposures			Non-performing exposures								
	Not past due or Past due <= 30 days	Past due >30 days <= 90 days	Past due >90 days	Unlikely to pay that are not past-due or past-due <=90 days	Past due > 90 days <=180 days	Past due > 180 days <=1 year	Past due > 1 year <=2 year	Past due > 2 year <=5 year	Past due > 5 year <= 7 year	Past due > 7 years	Of which defaulted	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits	9,372	9,372	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	32,419	32,259	160	1,862	632	100	199	225	466	32	208	1,858
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	25	25	-	-	-	-	-	-	-	-	-	-
040 Credit institutions	2,054	2,054	-	-	-	-	-	-	-	-	-	-
050 Other financial corporations	6,273	6,273	-	42	-	-	-	-	34	-	8	42
060 Non-financial corporations	14,777	14,720	57	1,185	429	50	88	91	374	14	139	1,184
070 of which SMEs	4,714	4,657	57	995	327	40	88	91	298	14	138	995
080 Households	9,290	9,187	103	635	203	50	111	134	58	18	61	632
090 Debt Securities	10,216	10,216	-	33	33	-	-	-	-	-	-	33
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	6,874	6,874	-	-	-	-	-	-	-	-	-	-
120 Credit institutions	868	868	-	-	-	-	-	-	-	-	-	-
130 Other financial corporations	1,282	1,282	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	1,192	1,192	-	33	33	-	-	-	-	-	-	33
150 Off-balance sheet exposures	9,021			259								259
160 Central banks	-			-								-
170 General governments	242			19								19
180 Credit institutions	73			-								-
190 Other financial corporations	777			9								9
200 Non-financial corporations	6,094			230								230
210 Households	1,835			1								1
220 Total	61,028	51,847	160	2,154	665	100	199	225	466	32	208	2,150

⁽¹⁾ The decrease of the exposure in central banks is mainly due to the repayment of TLTRO funding.

⁽²⁾ The decrease in non-performing exposures is mainly due to project "Leon" and write offs.

⁽³⁾ The increase in performing exposures of Other Financial corporations is mainly due new corporate loans and nostro accounts.

⁽⁴⁾ The increase in debt securities is mainly due to increased position in Sovereign and Financial bonds.

⁽⁵⁾ The increase in Off-balance sheet exposures is mainly due to new production of loan commitments and Letters of Guarantee in corporate loans.

The tables below present an overview of the credit quality of non-performing exposures and related impairments, provisions and valuation adjustments by portfolio and exposure class, by geography and by industry as at 31 December 2023 and at 31 December 2022.

Credit Risk

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

	31 December 2023														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures ⁽⁴⁾			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		€ million		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
005 Cash balances at central banks and other demand deposits ⁽¹⁾	5,973	5,973	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	32,894	28,933	3,936	1,240	-	1,237	(404)	(123)	(280)	(590)	-	(590)	(723)	19,552	607
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	18	18	-	-	-	-	-	-	-	-	-	-	-	1	-
040 Credit institutions	2,310	2,310	-	-	-	-	(2)	(2)	-	-	-	-	-	-	-
050 Other financial corporations ⁽²⁾	6,622	6,610	2	21	-	21	(7)	(7)	-	(10)	-	(10)	(27)	4,832	12
060 Non-financial corporations	14,882	13,666	1,200	780	-	776	(173)	(66)	(106)	(339)	-	(339)	(293)	7,862	404
070 Of which: SMEs	4,222	3,305	917	603	-	603	(113)	(34)	(79)	(269)	-	(269)	(251)	2,822	323
080 Households	9,062	6,329	2,734	439	-	440	(222)	(48)	(174)	(241)	-	(241)	(403)	6,857	191
090 Debt Securities ⁽³⁾	11,528	11,445	57	32	-	32	(16)	(13)	(2)	(7)	-	(7)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	7,806	7,805	-	-	-	-	(5)	(6)	-	-	-	-	-	-	-
120 Credit institutions	1,117	1,092	-	-	-	-	(4)	(4)	-	-	-	-	-	-	-
130 Other financial corporations	1,254	1,247	7	-	-	-	(1)	-	(1)	-	-	-	-	-	-
140 Non-financial corporations	1,351	1,301	50	32	-	32	(6)	(3)	(1)	(7)	-	(7)	-	-	-
150 Off-balance sheet exposures ⁽⁵⁾	10,045	9,593	211	60	-	60	(50)	(17)	(1)	(36)	-	(36)	-	972	16
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	242	1	-	19	-	19	(31)	-	-	(18)	-	(19)	-	-	-
180 Credit institutions	146	146	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	862	862	-	1	-	1	-	-	-	-	-	-	-	20	1
200 Non-financial corporations	6,966	6,843	122	39	-	39	(8)	(7)	-	(18)	-	(17)	-	924	15
210 Households	1,829	1,741	89	1	-	1	(11)	(10)	(1)	-	-	-	-	28	-
220 Total	60,440	55,944	4,204	1,332	-	1,329	(470)	(153)	(283)	(633)	-	(633)	(723)	20,524	623

	31 December 2022														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		of which: stage 1	of which: stage 2		of which: stage 2	of which: stage 3		€ million		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
005 Cash balances at central banks and other demand deposits	9,372	9,372	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	32,419	27,946	4,457	1,862	-	1,853	(419)	(109)	(310)	(903)	-	(903)	(415)	20,033	898
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	25	25	-	-	-	-	-	-	-	-	-	-	-	-	-
040 Credit institutions	2,054	2,054	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
050 Other financial corporations	6,273	6,263	-	43	-	34	(1)	(1)	-	(21)	-	(21)	(3)	4,979	22
060 Non-financial corporations	14,777	13,251	1,520	1,184	-	1,184	(193)	(66)	(127)	(567)	-	(567)	(202)	8,026	588
070 Of which: SMEs	4,714	3,675	1,039	995	-	995	(139)	(35)	(104)	(459)	-	(459)	(193)	3,249	518
080 Households	9,290	6,353	2,937	635	-	635	(224)	(41)	(183)	(315)	-	(315)	(210)	7,028	288
090 Debt Securities	10,216	10,135	81	33	-	33	(20)	(16)	(4)	(10)	-	(10)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	6,874	6,825	50	-	-	-	(8)	(7)	(2)	-	-	-	-	-	-
120 Credit institutions	868	864	4	-	-	-	(4)	(4)	-	-	-	-	-	-	-
130 Other financial corporations	1,282	1,281	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
140 Non-financial corporations	1,192	1,165	27	33	-	33	(7)	(4)	(2)	(10)	-	(10)	-	-	-
150 Off-balance sheet exposures	9,021	8,589	191	259	-	259	(52)	(16)	(2)	(203)	-	(203)	-	790	11
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	242	-	-	19	-	19	(33)	-	-	(19)	-	(19)	-	-	-
180 Credit institutions	73	73	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	777	777	-	9	-	9	-	-	-	(9)	-	(9)	-	145	-
200 Non-financial corporations	6,094	5,986	107	230	-	230	(10)	(8)	(1)	(175)	-	(175)	-	613	11
210 Households	1,835	1,753	84	1	-	1	(9)	(8)	(1)	-	-	-	-	32	-
220 Total	61,028	56,042	4,729	2,154	-	2,145	(491)	(141)	(316)	(1,116)	-	(1,116)	(415)	20,823	909

⁽¹⁾ The decrease of the exposure in central banks is mainly due to the repayment of TLTRO funding.

⁽²⁾ The increase in performing exposures of Other Financial corporations is mainly due to new corporate loans and nostro accounts.

⁽³⁾ The increase in debt securities is mainly due to increased position in Sovereign and Financial bonds.

⁽⁴⁾ The decrease in non-performing exposures is mainly due to project "Leon" and write offs.

⁽⁵⁾ The increase in Off-balance sheet exposures is mainly due to new production of loan commitments and Letters of Guarantee in corporate loans.

Credit Risk

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

	a	b	c	d	e	f	g			
	31 December 2023									
	Gross carrying/nominal amount				of which: subject to impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures			
	of which: non-performing		of which defaulted	€ million				Accumulated impairment	€ million	€ million
	€ million	€ million	€ million							
010 On balance sheet exposures	45,694	1,272	1,269	45,654	(1,017)		-			
020 Greece ⁽¹⁾	31,940	1,230	1,230	31,940	(978)		-			
030 Romania	164	7	4	164	(15)		-			
040 Bulgaria ⁽²⁾	737	0	0	737	-		-			
050 United Kingdom ⁽³⁾	516	0	0	516	-		-			
060 Cyprus	545	6	6	519	(5)		-			
070 Other countries	11,792	29	29	11,778	(19)		-			
080 Off balance sheet exposures ⁽⁴⁾	10,105	60	60			(85)				
090 Greece	8,606	49	49			(75)				
100 Romania	34	-	-			-				
110 Bulgaria	8	-	-			-				
120 United Kingdom	46	-	-			-				
130 Cyprus	211	10	9			(9)				
140 Other countries	1,200	1	2			(1)				
150 Total	55,799	1,332	1,328	45,654	(1,017)	(85)	-			

	a	b	c	d	e	f	g			
	31 December 2022									
	Gross carrying/nominal amount				of which: subject to impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures			
	of which: non-performing		of which defaulted	€ million				Accumulated impairment	€ million	€ million
	€ million	€ million	€ million							
010 On balance sheet exposures	44,529	1,894	1,891	44,513	(1,352)		-			
020 Greece	31,346	1,823	1,823	31,345	(1,282)		-			
030 Romania	196	9	6	196	(18)		-			
040 Bulgaria	307	-	-	307	-		-			
050 United Kingdom	381	-	-	381	(2)		-			
060 Cyprus	533	11	11	533	(11)		-			
070 Other countries	11,766	51	51	11,751	(39)		-			
080 Off balance sheet exposures	9,280	259	259			(255)				
090 Greece	7,916	51	51			(81)				
100 Romania	45	-	-			-				
110 Bulgaria	197	190	190			(155)				
120 United Kingdom	48	-	-			-				
130 Cyprus	265	18	18			(19)				
140 Other countries	809	-	-			-				
150 Total	53,809	2,153	2,150	44,513	(1,352)	(255)	-			

⁽¹⁾ The increase in Greece gross amount is due to new corporate loans. The decrease in Greece non-performing and defaulted exposures is mainly due to project “Leon” and write offs.

⁽²⁾ The increase in Bulgaria is mainly due to exposures from Credit Institutions.

⁽³⁾ The increase in United Kingdom is mainly due to exposures from Other financial corporations.

⁽⁴⁾ The increase in Off-balance sheet exposures is mainly due to new production of loan commitments and Letters of Guarantee in corporate loans.

Credit Risk

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

	a	b	c	d	e	f
	31 December 2023					
	Gross carrying/nominal amount				Accumulated impairment € million	Accumulated negative changes in fair value due to credit risk on non-performing exposures € million
	of which: non-performing		of which defaulted € million	of which loans and advances subject to impairment € million		
	€ million	€ million				
010 Agriculture, forestry and fishing	266	99	99	266	(46)	-
020 Mining and quarrying	26	2	2	26	(1)	-
030 Manufacturing ⁽¹⁾	2,412	114	114	2,412	(82)	-
040 Electricity, gas, steam and air conditioning supply ⁽²⁾	2,070	4	4	2,070	(8)	-
050 Water supply	16	-	-	16	-	-
060 Construction	556	65	65	556	(42)	-
070 Wholesale and retail trade ⁽³⁾	2,838	250	250	2,838	(159)	-
080 Transport and storage	3,577	20	20	3,572	(22)	-
090 Accommodation and food service activities	1,544	100	100	1,544	(42)	-
100 Information and communication	152	5	5	152	(12)	-
110 Financial and insurance activities	8	1	1	8	(1)	-
120 Real estate activities	837	38	38	837	(27)	-
130 Professional, scientific and technical activities	384	38	38	384	(38)	-
140 Administrative and support service activities	163	7	7	163	(4)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	22	6	6	22	(3)	-
170 Human health services and social work activities	202	7	7	202	(7)	-
180 Arts, entertainment and recreation	449	7	7	449	(5)	-
190 Other services	139	17	17	139	(14)	-
200 Total	15,662	780	780	15,657	(513)	-

	a	b	c	d	e	f
	31 December 2022					
	Gross carrying/nominal amount				Accumulated impairment € million	Accumulated negative changes in fair value due to credit risk on non-performing exposures € million
	of which: non-performing		of which defaulted € million	of which loans and advances subject to impairment € million		
	€ million	€ million				
010 Agriculture, forestry and fishing	271	21	21	271	(15)	-
020 Mining and quarrying	37	3	3	37	(2)	-
030 Manufacturing	2,676	153	153	2,676	(111)	-
040 Electricity, gas, steam and air conditioning supply	1,428	2	2	1,428	(3)	-
050 Water supply	15	1	1	15	(1)	-
060 Construction	646	83	83	646	(54)	-
070 Wholesale and retail trade	3,096	353	353	3,096	(237)	-
080 Transport and storage	3,412	86	86	3,409	(86)	-
090 Accommodation and food service activities	1,668	220	220	1,668	(75)	-
100 Information and communication	160	9	9	160	(15)	-
110 Financial and insurance activities	9	2	2	9	(1)	-
120 Real estate activities	854	98	98	854	(44)	-
130 Professional, scientific and technical activities	464	89	89	464	(65)	-
140 Administrative and support service activities	204	11	11	204	(8)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	27	6	6	27	(4)	-
170 Human health services and social work activities	347	9	9	347	(8)	-
180 Arts, entertainment and recreation	466	8	8	466	(5)	-
190 Other services	180	30	30	180	(26)	-
200 Total	15,961	1,184	1,184	15,958	(760)	-

⁽¹⁾ Decrease in sector "Manufacturing" mainly due to corporate loans.

⁽²⁾ Increase in sector "Electricity, gas, steam and air conditioning supply" is mainly due to new corporate loans.

⁽³⁾ Decrease in "Wholesale and retail trade" due to corporate and Small Business Loans.

Credit Risk

The table below presents an overview of the credit quality of loans and advances to non-financial corporations as at 31 December 2023 and 31 December 2022.

Table 16: EU CQ2 - Quality of forbearance

	a	a
	31 December 2023	31 December 2022
	Gross carrying amount of forborne exposures € million	Gross carrying amount of forborne exposures € million
010 Loans and advances that have been forborne more than twice Non-performing forborne loans and advances that failed to meet	304	521
020 the non-performing exit criteria	367	401

The table below presents an analysis of collateral valuation and other information on loans and advances as at 31 December 2023 and 31 December 2022.

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

	a	b	c	d	e	f	g	h	i	j	k	l					
	31 December 2023																
	Loans and advances																
	Performing			Non Performing ⁽¹⁾													
				Unlikely to pay that are not past due or past due <=90 days		Past due > 90 days											
	of which past due > 30 days <= 90 days					of which Past due > 90 days <= 180 days		of which Past due > 180 days <= 1 year		of which Past due > 1 year <= 2 years		of which Past due > 2 years <= 5 years		of which Past due > 5 years <= 7 years		of which Past due > 7 years	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Gross carrying amount	34,135	32,894	75	1,241	576	665	93	155	90	269	13	45					
020 Of which: secured	24,824	23,765	52	1,060	481	578	75	129	80	247	12	35					
030 Of which: secured with immovable property	11,934	11,062	45	872	395	477	45	114	77	198	11	32					
040 of which: instruments with LTV higher than 60% and lower or equal to 80%	3,746	3,580		166	101	65											
050 of which: instruments with LTV higher than 80% and lower or equal to 100%	2,022	1,863		159	66	94											
060 of which: instruments with LTV higher than 100%	2,655	2,272		383	140	243											
070 Accumulated impairment for secured assets	(673)	(246)	(4)	(427)	(148)	(279)	(26)	(56)	(36)	(127)	(7)	(27)					
080 Collateral																	
090 of which value capped at the value of exposure	15,902	15,346	43	556	299	257	31	65	43	107	4	7					
100 of which immovable property	10,693	10,165	39	529	284	245	29	64	42	100	4	6					
110 Of which value above the cap	14,018	13,048	37	970	520	450											
120 of which immovable property	8,824	8,132	36	691	297	394											
130 Financial guarantees received	4,257	4,206	2	50	22	28	7	7	1	11	-	1					
140 Accumulated partial write-off	(723)	(3)	-	(720)	(392)	(328)	(1)	(6)	(24)	(180)	(13)	(104)					

Credit Risk

	a	b	c	d	e	f	g	h	i	j	k	l
31 December 2022												
Loans and advances												
	Performing			Non Performing								
			of which past due > 30 days <= 90 days	Unlikely to pay that are not past due <=90 days	Past due > 90 days							
	€ million	€ million	€ million	€ million	€ million	€ million	of which Past due > 90 days <= 180 days	of which Past due > 180 days <= 1 year	of which Past due > 1 year <= 2 years	of which Past due > 2 years <= 5 years	of which Past due > 5 years <= 7 years	of which Past due > 7 years
010 Gross carrying amount	34,280	32,419	160	1,861	632	1,229	100	199	225	466	32	208
020 Of which: secured	25,279	23,842	119	1,437	520	917	75	153	178	325	23	163
030 Of which: secured with immovable property	12,576	11,321	109	1,255	454	801	72	148	172	258	20	131
040 of which: instruments with LTV higher than 60% and lower or equal to 80%	3,179	2,948		231	59	172						
050 of which: instruments with LTV higher than 80% and lower or equal to 100%	2,443	2,205		238	98	140						
060 of which: instruments with LTV higher than 100%	3,128	2,554		574	212	362						
070 Accumulated impairment for secured assets	(785)	(259)	(9)	(526)	(137)	(389)	(14)	(36)	(48)	(171)	(10)	(110)
080 Collateral												
090 of which value capped at the value of exposure	16,024	15,184	100	841	357	484	60	114	128	139	9	35
100 of which immovable property	11,193	10,395	96	798	332	466	59	113	126	126	9	34
110 Of which value above the cap	14,670	13,494	91	1,176	458	718						
120 of which immovable property	9,350	8,427	87	923	285	638						
130 Financial guarantees received	4,907	4,849	5	57	17	41	2	2	2	15	4	17
140 Accumulated partial write-off	(415)	(3)	(1)	(413)	(71)	(342)	(2)	(7)	(16)	(196)	(4)	(117)

⁽¹⁾ The decrease in non-performing exposures is mainly due to project "Leon" and write offs.

The tables below present an overview of the movements (inflows and outflows) of non-performing loans and advances as at 31 December 2023.

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

	a
	31 December 2023
	Gross carrying amount € million
010 Initial stock of non-performing loans and advances	1,861
020 Inflows to non-performing portfolios	1,042
030 Outflows from non-performing portfolios	(1,662)
040 Outflows due to write-offs	(322)
050 Outflow due to other situations ⁽¹⁾	(1,340)
060 Final stock of non-performing loans and advances	1,241

⁽¹⁾ It represents mainly the outflow: (i) to performing portfolio (mainly retail) (ii) due to loan repayment, partial or total (iii) of loans that have been sold or reclassified as held for sale during the year.

Credit Risk

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

	31 December 2023	
	a Gross carrying amount € million	b Related net accumulated recoveries € million
010 Initial stock of non-performing loans and advances	1,861	
020 Inflows to non-performing portfolios	1,042	
030 Outflows from non-performing portfolios	(1,662)	
040 Outflow to performing portfolio	(395)	
050 Outflow due to loan repayment, partial or total	(221)	
060 Outflow due to collateral liquidations	(89)	-
070 Outflow due to taking possession of collateral	(11)	-
080 Outflow due to sale of instruments	(190)	-
090 Outflow due to risk transfers	-	-
100 Outflows due to write-off	(322)	
110 Outflow due to other situations	(37)	
120 Outflow due to reclassification as held for sale	(397)	
130 Final stock of non-performing loans and advances	1,241	

The table below presents an overview of foreclosed assets obtained from non-performing exposures as at 31 December 2023 and 31 December 2022.

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

	31 December 2023		31 December 2022	
	a Value at initial recognition € million	b Accumulated negative changes € million	a Value at initial recognition € million	b Accumulated negative changes € million
010 Property Plant and Equipment (PP&E)	-	-	-	-
020 Other than PP&E	582	(92)	637	(86)
030 Residential immovable property	235	(41)	251	(41)
040 Commercial Immovable property	331	(52)	372	(45)
050 Movable property (auto, shipping, etc.)	2	-	2	-
060 Equity and debt instruments	13	-	12	-
070 Other collateral	-	-	-	-
080 Total	582	(92)	637	(86)

Credit Risk

The table below presents an overview of collateral obtained by taking possession by type, by time since date of foreclosure as at 31 December 2023 and 31 December 2022.

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

	a	b	c	d	e	f	g	h	i	j	k	l	
31 December 2023													
Debt balance reduction	Total collateral obtained by taking possession												
			Foreclosed <= 2 years		Foreclosed >= 2 years <= 5 years		Foreclosed > 5 years		Of which: Non-current assets held-for-sale				
Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Collateral obtained by taking possession classified as PP&E	-	-	-	-	-	-	-	-	-	-	-	-	-
020 Collateral obtained by taking possession other than classified as PP&E	-	-	582	(92)	27	(15)	153	(8)	402	(70)	-	-	-
030 Residential immovable property	-	-	235	(41)	10	(4)	55	(2)	171	(35)	-	-	-
040 Commercial Immovable property	-	-	331	(52)	16	(11)	92	(6)	224	(35)	-	-	-
050 Movable property (auto, shipping, etc.)	-	-	2	-	2	-	-	-	-	-	-	-	-
060 Equity and debt instruments	-	-	13	-	-	-	7	-	7	-	-	-	-
070 Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-
080 Total	-	-	582	(92)	27	(15)	153	(8)	402	(70)	-	-	-

	a	b	c	d	e	f	g	h	i	j	k	l	
31 December 2022													
Debt balance reduction	Total collateral obtained by taking possession												
			Foreclosed <= 2 years		Foreclosed >= 2 years <= 5 years		Foreclosed > 5 years		Of which: Non-current assets held-for-sale				
Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Collateral obtained by taking possession classified as PP&E	-	-	-	-	-	-	-	-	-	-	-	-	-
020 Collateral obtained by taking possession other than classified as PP&E	-	-	637	(86)	42	(13)	318	(18)	278	(55)	-	-	-
030 Residential immovable property	-	-	251	(41)	14	(4)	115	(6)	122	(31)	-	-	-
040 Commercial Immovable property	-	-	372	(45)	26	(9)	196	(12)	150	(25)	-	-	-
050 Movable property (auto, shipping, etc.)	-	-	2	-	2	-	-	-	-	-	-	-	-
060 Equity and debt instruments	-	-	12	-	-	-	7	-	6	-	-	-	-
070 Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-
080 Total	-	-	637	(86)	42	(13)	318	(18)	278	(55)	-	-	-

Credit Risk

3.4 Standardised approach

On 1 March 2023, the Group received approval from ECB to revert to the Standardized approach (STD) for all credit risk exposures. The Group'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 continues utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring. To that end, the Group has applied since Q1 2023 CoRep reporting the requirements of EU Regulation 575/2013 ('CRR') under Title II, Chapter 2 ('Standardised approach') and its subsequent amendments and has aligned respectively the Pillar III disclosures.

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

The table below presents Standardised exposures as at 31 December 2023.

Table 22: EU CR4 – Standardised approach – Credit risk exposure and CRM effects

Exposure classes	a	b	c	d	e	f
	31 December 2023					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWAs density	
	On-balance-sheet exposures € million	Off-balance-sheet exposures € million	On-balance-sheet exposures € million	Off-balance-sheet amount € million	RWAs € million	RWAs density %
1 Central governments or central banks	17,476	-	20,781	-	4,838	23%
2 Regional government or local authorities	18	1	17	-	4	24%
3 Public sector entities	438	-	816	-	286	35%
4 Multilateral development banks	-	-	610	-	-	0%
5 International organisations	-	-	-	-	-	0%
6 Institutions	4,677	210	4,694	167	1,933	40%
7 Corporates	9,928	6,597	9,487	2,568	9,962	83%
8 Retail	3,907	2,638	3,230	76	2,315	70%
9 Secured by mortgages on immovable property	7,893	184	7,893	132	2,943	37%
10 Exposures in default	824	25	749	19	813	106%
11 Exposures associated with particularly high risk	137	156	134	136	406	150%
12 Covered bonds	9	-	9	-	1	11%
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
14 Collective investment undertakings	28	-	28	-	28	100%
15 Equity	2,545	-	2,545	-	2,846	112%
16 Other items	3,243	-	3,243	-	2,601	80%
17 Total	51,123	9,811	54,236	3,098	28,976	51%

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

⁽²⁾ The table above does not include securitisations.

Credit Risk

3.5 Credit risk mitigation

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

3.5.1 Types of collateral commonly accepted by the Bank

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

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

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

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

3.5.2 Valuation principles of collateral

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

All valuations (including revaluations) should be performed by independent qualified appraisers (individuals or legal entities or employees of legal entities), who possess the necessary qualifications, ability and experience to execute a valuation. In all cases, the Bank must be the ordering party. Otherwise, the Bank needs to obtain a “duty of care” statement or a reliance letter from the valuator signed off from the Legal Unit (applicable mainly in specialized lending).

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

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

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

After two sequential individual valuations (as those are defined below) of the same immovable property, the appraiser should rotate (either to a different independent valuator or to a different independent appraisal provider). The same applies after three sequential individual valuations for vessels & / yachts.

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

Credit Risk

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

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

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

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

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

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

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

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

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

Individual Valuations

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

Valuation with Physical Inspection

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

If during the inspection it is identified that the property has undergone changes (alterations) regarding its surface, the property has to be appraised after the submission of required / mandatory documents.

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

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

Credit Risk

Desktop Valuation

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

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

Index for Residential Real Estate

Eurobank is using the Residential Property Index of the Bank of Greece to revalue residential real estate properties over the loan's lifetime. The index has been created by the Real Estate Market Analysis Section of BoG using detailed information collected from all Credit Institutions and Real Estate Investment Companies (REIC) operating in Greece. It is considered as a tool used to monitor probable changes in the values of residential real estate properties but also for analyzing current market's trend. This index is updated on an annual basis.

Index for Commercial Real Estate

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

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

The following table summarizes the revaluation policy for the Retail lending portfolios (Individual Banking and Small SB).

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

Special types of immovable assets (hotels, shopping centers (malls), refineries, quarries, marinas, clinics/hospitals/diagnostic centers, schools) should be revaluated through Desktop annually and every two years with Physical Inspection.

Credit Risk

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

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

(1) Special types: Hotels, Shopping centers (malls), refineries, quarries, marinas, clinics/hospitals/diagnostic centers, schools

Other collaterals

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

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

3.5.3 Guarantees and credit derivatives

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

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

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

Credit Risk

3.5.4 Analysis of collaterals

The table below presents the volume of unsecured and secured exposures including all collateral, financial guarantees and credit derivatives used as credit risk mitigants and are eligible under the respective regulatory approach as at 31 December 2023 and at 31 December 2022.

Table 23: EU CR3 – CRM techniques – Overview: Disclosure of the use of credit risk mitigation techniques

	a	b	c	d	e
	31 December 2023				
	Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	€ million	€ million	€ million	€ million	€ million
1 Loans and advances ⁽¹⁾	18,955	20,159	15,902	4,257	-
2 Debt securities ⁽²⁾	11,559	-	-	-	-
3 Total	30,514	20,159	15,902	4,257	-
4 Of which non-performing exposures	666	607	557	50	-
EU-5 Of which defaulted	663	606			

	a	b	c	d	e
	31 December 2022				
	Unsecured carrying amount	Secured carrying amount			
			Of which secured by collateral	Of which secured by financial guarantees	Of which secured by credit derivatives
	€ million	€ million	€ million	€ million	€ million
1 Loans and advances	21,400	20,931	16,024	4,907	-
2 Debt securities	10,249	-	-	-	-
3 Total	31,649	20,931	16,024	4,907	-
4 Of which non-performing exposures	997	898	841	57	-
EU-5 Of which defaulted	997	898			

⁽¹⁾ The decrease in Loans and advances is mainly due to decreased exposures in Central Banks.

⁽²⁾ The increase in debt securities is mainly due to increased position in Sovereign and Financial bonds.

⁽³⁾ The value of collaterals and the amount of financial guarantees shown above are the allocated values after regulatory haircuts.

⁽⁴⁾ For real estate properties the lower between the market value and the pledged amount is considered.

Market Risk

4. Market Risk

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

The below two tables summarize the components of the capital requirement, under the IMA approach applied by the Bank as at 31 December 2023 and 31 December 2022. The delta observed in 2023 RWEAs is mainly attributed to the reduced regulatory multiplier to 3.25 (4.25 as at December 2022), due to the decreased number of exceptions (1 vs 17 in December 2022), along with the elimination of RSD FX position from the Bank's Trading Book, due to the sale of "Eurobank Direktna a.d." in early Q4 2023.

Table 24: EU MR2-B – RWEAs flow of market risk exposures under IMA

	a	b	c	d	e	f	g
	31 December 2023						
	Comprehensive risk					Total own funds	
	VaR	SVaR	IRC	measure	Other	Total RWEAs	requirements
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 RWEAs at 1 January 2023 ¹	159	383	42	-	-	584	47
1a Regulatory adjustment ²	(128)	(303)	-	-	-	(431)	(34)
1b RWEAs at the previous quarter-end (end of the day) ³	32	79	42	-	-	153	12
2 Movement in risk levels	(49)	(181)	146	-	-	(84)	(7)
3 Model updates/changes	-	-	-	-	-	-	-
4 Methodology and policy	-	-	-	-	-	-	-
5 Acquisitions and disposals	-	-	-	-	-	-	-
6 Foreign exchange movements	-	-	-	-	-	-	-
7 Other	-	-	-	-	-	-	-
8a RWEAs at the end of the reporting period (end of the day) ³	19	48	89	-	-	156	12
8b Regulatory adjustment ²	91	154	99	-	-	344	28
8 RWEAs at 31 December 2023¹	110	202	188	-	-	500	40

⁽¹⁾ RWEAs at previous and current reporting period.

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

⁽³⁾ RWEAs that would be estimated on the basis of the previous or current quarter end figure (instead of the max of it and the 60-day average).

Counterparty Risk

5. Counterparty Risk

5.1 Definition

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

5.2 Mitigation of counterparty risk

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

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

5.3 RWEA flow statements of CCR exposures under IMM

Table 25: EU CCR7 – RWEA flow statements of CCR exposures under the IMM is not included as the Bank does not use an internal model for the calculation of the RWEAs of CCR exposures.

Leverage Ratio

6. Leverage Ratio

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

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

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

The level of the leverage ratio with reference date 31.12.2023 on individual basis, including profits, was at 8.4% (31 December 2022: 8.1%), according to the transitional definition of Tier 1 capital, significantly over the 3% minimum threshold applied by the competent authorities.

In the tables below, the detailed disclosures on the Bank's leverage ratio are presented with reference date 31 December 2023 and 31 December 2022.

Table 26: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

	a	a
	31 December 2023 ⁽¹⁾	31 December 2022
	€ million	€ million
1 Total assets as per published financial statements	62,321	64,524
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-	-
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4 (Adjustment for temporary exemption of exposures to central bank (if applicable))	-	-
5 (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-
7 Adjustment for eligible cash pooling transactions	-	-
8 Adjustments for derivative financial instruments	(246)	(369)
9 Adjustment for securities financing transactions (SFTs)	1,763	409
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	3,773	3,256
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12 Other adjustments	(732)	(541)
13 Total exposure measure	66,879	67,279

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023 .

Leverage Ratio

Table 27: EU LR2 - LRCom: Leverage ratio common disclosure

	a	a
	31 December 2023 ⁽¹⁾	31 December 2022
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
On - balance sheet exposures (excluding derivatives and SFT's)		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	61,324	63,318
2 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(361)	(236)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(373)	(316)
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	60,590	62,765
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	135	274
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	510	572
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-
EU-9b Exposure determined under Original Exposure Method	-	-
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13 Total derivatives exposures	645	846
Securities financing transaction exposures		
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1,317	116
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	(1)	-
16 Counterparty credit risk exposure for SFT assets	554	295
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-
17 Agent transaction exposures	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-
18 Total securities financing transaction exposures	1,870	411
Other off-balance sheet exposures		
19 Off-balance sheet exposures of gross notional amount	9,866	8,755
20 (Adjustments for conversion to credit equivalent amounts)	(6,093)	(5,499)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22 Off-balance sheet exposures	3,773	3,256
Excluded exposures		
EU-22k (Total exempted exposures)	-	-
Capital and total exposure measure	-	-
23 Tier 1 capital	5,583	5,467
24 Total exposure measure	66,879	67,279
Leverage ratio		
25 Leverage ratio	8.4%	8.1%
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	8.4%	8.1%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	8.4%	8.1%
26 Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%
EU-26b of which: to be made up of CET1 capital	0.00%	0.00%
27 Leverage ratio buffer requirement (%)	0.00%	0.00%
EU-27a Overall leverage ratio requirement (%)	3.00%	3.00%
Choice on transitional arrangements and relevant exposures		
EU-27b Choice on transitional arrangements for the definition of capital measure	Transitional	Transitional

Leverage Ratio

	a	a
	31 December 2023 ⁽¹⁾	31 December 2022
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
Disclosure of mean values		
28		
Mean value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	1,334	104
29		
Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	645	116
Total exposure measures (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	67,568	67,267
Total exposure measures (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	67,568	67,267
Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	8.3%	8.1%
Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	8.3%	8.1%

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023 .

⁽²⁾ Total off-balance sheet items exposures presented in accordance with Article 111 (1) of Regulation (EU) No 575/2013 (standardised approach).

⁽³⁾ The increase in the leverage ratio compared to 31 December 2022 is mainly due to the decrease in the on balance sheet exposures, along with the increase in Tier 1 capital.

Table 28: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

	a	a
	31 December 2023 ⁽¹⁾	31 December 2022
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	60,963	63,082
EU-2 Trading book exposures	227	69
EU-3 Banking book exposures, of which:	60,736	63,013
EU-4 Covered bonds	9	55
EU-5 Exposures treated as sovereigns	22,394	25,583
EU-6 Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-	-
EU-7 Institutions	4,358	3,694
EU-8 Secured by mortgages of immovable properties	7,893	7,989
EU-9 Retail exposures	3,398	2,917
EU-10 Corporates	9,868	10,742
EU-11 Exposures in default	754	768
EU-12 Other exposures (eg equity, securitisations, and other non-credit obligation assets)	12,062	11,265

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023 .

Liquidity Risk

7. 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 and maturity of secured or unsecured funding (interbank repos and money market takings), loan draw-downs and forfeiture of guarantees. Furthermore, margin calls on secured funding transactions (with ECB and the market) and on risk mitigation contracts (CSAs, GMRAs) and on centrally cleared transactions (CCPs) result in liquidity exposure. The Bank maintains cash resources to meet all of these needs. The BRC sets liquidity limits to ensure that sufficient funds are available to meet such contingencies.

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

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

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

7.1 Liquidity Risk Management Framework

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

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

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

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

7.2 Liquidity Buffer

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

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

Liquidity Risk

The Bank in 2023 decreased the long-term funding from the ECB through TLTRO III operations (ECB funding decreased from € 8.02 billion as of December 2022 to € 3.67 billion as of December 2023, which consists entirely of TLTRO funding). On the other hand, inflows mainly from deposits (+ € 0.4 billion in 2023), along with the successful issuance of two senior preferred notes (€0.5 billion each) that served both funding / liquidity and MREL compliance purposes, significantly contributed to the formation of High-Quality Liquid Assets (HQLAs) buffer and to the further increase of the Liquidity Coverage Ratio (LCR).

7.3 Liquidity Coverage Ratio (LCR) calculations

LCR as of 31 December 2023 is equal to 191.1% (December 2022 180.5%). The corresponding HQLAs as of 31 December 2023 as defined by the regulation for the calculation of LCR are € 13,892 million.

The next table presents the key components of Bank’s LCR, as per the respective guidelines on LCR disclosure (EBA/GL/2017/01). According to the guideline, 12 monthly data points are used in the calculations below, thus in this table the average of 2023 is presented.

The increase of LCR ratio compared to 31 December 2022 is mainly due to inflows from deposits (+ € 0.4 billion in 2023), along with the successful issuance of two senior preferred notes (€0.5 billion each) in this year that significantly contributed to the formation of HQLAs buffer and to the further increase of the Liquidity Coverage Ratio (LCR).

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

Table 29: LIQ1 – Liquidity Coverage ratio

EU 1a	Quarter ending on	a		b		e		f	
		Total unweighted value (average)				Total weighted value (average)			
		31 December 2023	31 December 2022	31 December 2023	31 December 2022	31 December 2023	31 December 2022	31 December 2023	31 December 2022
EU 1b	Number of data points used in the calculation of averages	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
		12	12	12	12				
HIGH-QUALITY LIQUID ASSETS									
	1 Total high-quality liquid assets (HQLA)					13,180		10,822	
CASH-OUTFLOWS									
	2 Retail deposits and deposits from small business customers, of which:	25,752	24,663	1,723	1,440				
	3 Stable deposits	17,564	20,533	878	1,027				
	4 Less stable deposits	8,188	4,130	845	413				
	5 Unsecured wholesale funding	9,358	8,441	4,386	3,825				
	6 Operational deposits (all counterparties) and deposits in networks of cooperative banks	-	-	-	-				
	7 Non-operational deposits (all counterparties)	9,358	8,441	4,386	3,825				
	8 Unsecured debt	-	-	-	-				
	9 Secured wholesale funding			185	524				
	10 Additional requirements	3,856	1,939	1,075	976				
	11 Outflows related to derivative exposures and other collateral requirements	769	872	769	872				
	12 Outflows related to loss of funding on debt products	-	-	-	-				
	13 Credit and liquidity facilities	3,088	1,067	306	104				
	14 Other contractual funding obligations	-	-	-	-				
	15 Other contingent funding obligations	2,745	2,411	176	156				
	16 TOTAL CASH OUTFLOWS			7,545	6,920				
CASH-INFLOWS									
	17 Secured lending (eg reverse repos)	162	224	13	20				
	18 Inflows from fully performing exposures	170	200	129	158				
	19 Other cash inflows	1,149	1,373	230	-				
	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19a				-	-				
EU-19b	(Excess inflows from a related specialised credit institution)			-	-				
	20 TOTAL CASH INFLOWS	1,481	1,797	371	487				
EU-20a	Fully exempt inflows	-	-	-	-				
EU-20b	Inflows Subject to 90% Cap	-	-	-	-				
EU-20c	Inflows Subject to 75% Cap	1,481	1,797	371	487				
						TOTAL ADJUSTED VALUE			
EU-21	LIQUIDITY BUFFER			13,180	10,822				
22	TOTAL NET CASH OUTFLOWS			7,174	6,434				
23	LIQUIDITY COVERAGE RATIO (%)			183.8%	168.1%				

Liquidity Risk

		a	b	c	d	e
		30 September 2023				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
		€ million	€ million	€ million	€ million	€ million
Available stable funding (ASF) Items						
1	Capital items and instruments	6,136	-	-	1,260	7,396
2	Own funds	6,136	-	-	1,260	7,396
3	Other capital instruments		-	-	-	-
4	Retail deposits		25,746	2,529	540	26,958
5	Stable deposits		18,802	614	7	18,452
6	Less stable deposits		6,944	1,915	533	8,506
7	Wholesale funding:		15,104	319	3,569	8,622
8	Operational deposits		-	-	-	-
9	Other wholesale funding		15,104	319	3,569	8,622
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	758	806	102	2,977	3,028
12	NSFR derivative liabilities	758				
13	All other liabilities and capital instruments not included in the above categories		806	102	2,977	3,028
14	Total available stable funding (ASF)					46,003
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					208
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		112	82	3,825	3,416
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		3,500	1,334	25,494	24,573
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,371	85	1,407	1,587
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		2,063	1,205	17,464	19,987
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		60	32	3,130	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		5	12	3,494	2,999
25	Interdependent assets		-	-	-	-
26	Other assets:		1,486	-	10,490	10,549
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	276	234
29	NSFR derivative assets		-			
30	NSFR derivative liabilities before deduction of variation margin posted		994			50
31	All other assets not included in the above categories		493	-	10,215	10,265
32	Off-balance sheet items		5,668	-	-	283
33	Total RSF					39,029
NSFR						
		30 September 2023				
34	Net Stable Funding Ratio (%)					117.9%

Liquidity Risk

	a	b	c	d	e	
	30 June 2023					
	Unweighted value by residual maturity				Weighted value	
	No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr		
	€ million	€ million	€ million	€ million	€ million	
Available stable funding (ASF) Items						
1	Capital items and instruments	5,998	-	-	1,246	7,244
2	Own funds	5,998	-	-	1,246	7,244
3	Other capital instruments		-	-	-	-
4	Retail deposits		24,435	3,191	636	26,469
5	Stable deposits		18,753	626	12	18,422
6	Less stable deposits		5,682	2,565	624	8,046
7	Wholesale funding:		16,619	1,233	3,348	8,593
8	Operational deposits		-	-	-	-
9	Other wholesale funding		16,619	1,233	3,348	8,593
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	670	893	-	3,005	3,005
12	NSFR derivative liabilities	670				
13	All other liabilities and capital instruments not included in the above categories		893	-	3,005	3,005
14	Total available stable funding (ASF)					45,311
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					202
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		111	83	3,938	3,512
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		2,660	1,963	25,102	23,825
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		626	794	1,437	1,897
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		1,970	1,128	17,209	19,014
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		59	32	3,059	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		5	10	3,397	2,914
25	Interdependent assets		-	-	-	-
26	Other assets:		1,462	-	11,734	11,779
27	Physical traded commodities					
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	376	320
29	NSFR derivative assets		-			-
30	NSFR derivative liabilities before deduction of variation margin posted		957			48
31	All other assets not included in the above categories		505	-	11,357	11,411
32	Off-balance sheet items		5,537	-	-	277
33	Total RSF					39,596
NSFR						
34	Net Stable Funding Ratio (%)					114.4%

Liquidity Risk

		a	b	c	d	e
		31 March 2023				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
<u>Available stable funding (ASF) Items</u>		€ million	€ million	€ million	€ million	€ million
1	Capital items and instruments	5,755	-	-	1,264	7,019
2	Own funds	5,755	-	-	1,264	7,019
3	Other capital instruments		-	-	-	-
4	Retail deposits		24,956	2,109	554	25,878
5	Stable deposits		18,821	484	99	18,438
6	Less stable deposits		6,135	1,625	456	7,440
7	Wholesale funding:		18,160	1,771	3,353	8,862
8	Operational deposits		-	-	-	-
9	Other wholesale funding		18,160	1,771	3,353	8,862
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	722	1,195	4	2,941	2,943
12	NSFR derivative liabilities	722				
13	All other liabilities and capital instruments not included in the above categories		1,195	4	2,941	2,943
14	Total available stable funding (ASF)					44,703

		a	b	c	d	e
		31 March 2023				
		Unweighted value by residual maturity				Weighted value
		No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
<u>Required stable funding (RSF) Items</u>		€ million	€ million	€ million	€ million	€ million
15	Total high-quality liquid assets (HQLA)					226
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		130	116	3,820	3,457
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		2,465	2,106	25,525	24,037
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		563	69	488	579
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		1,844	1,968	18,685	20,534
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
22	Performing residential mortgages, of which:		49	61	2,945	-
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		-	-	-	-
24	Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		9	8	3,407	2,923
25	Interdependent assets		-	-	-	-
26	Other assets:		1,523	-	11,250	11,309
27	Physical traded commodities					-
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	394	335
29	NSFR derivative assets		-			-
30	NSFR derivative liabilities before deduction of variation margin posted		994			50
31	All other assets not included in the above categories		529	-	10,857	10,925
32	Off-balance sheet items		5,537	-	-	277
33	Total RSF					39,306

		31 March 2023				
34	Net Stable Funding Ratio (%)					113.7%

Appendix1: EU CC1 – Composition of regulatory own funds

Appendix 1: EU CC1 - Composition of regulatory own funds

	a		b
	31 December 2023 ⁽¹⁾	31 December 2022	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	Current period	Current period	
	€ million	€ million	
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1	3,941	3,940	<i>b & c</i>
2	1,005	(172)	
3	315	427	
5	-	-	
EU-5a	794	1,388	
6	6,055	5,583	
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7	(7)	(7)	
8	(142)	(110)	
10	-	-	<i>a</i>
11	14	12	<i>d</i>
12	-	(22)	
14	-	-	
15	-	-	
16	-	-	
18	-	-	
19	-	-	
EU-20a	(64)	(34)	
EU-20c	(64)	(34)	
21	(188)	(210)	
22	-	-	
23	-	-	
25	-	-	
EU-25a	-	-	
27	(25)	-	
27a	(60)	255	
28	(472)	(116)	
29	5,583	5,467	
Additional Tier 1 (AT1) capital: instruments			
30	-	-	
33	-	-	
36	-	-	
Additional Tier 1 (AT1) capital: regulatory adjustments			
40	(25)	-	
42	-	-	
43	(25)	-	
44	-	-	
45	5,583	5,467	
Tier 2 (T2) capital: instruments			
46	1,075	1,250	
47	-	-	
50	-	117	
51	1,075	1,367	
Tier 2 (T2) capital: regulatory adjustments			
56b	-	-	
57	-	-	
58	1,075	1,367	
59	6,658	6,834	
60	34,669	36,108	

Appendix1: EU CC1 – Composition of regulatory own funds

	a		b
	31 December 2023 ⁽¹⁾	31 December 2022	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
	Current period	Current period	
	€ million	€ million	
Capital ratios and requirements including buffers			
61	Common Equity Tier 1	16.1%	15.1%
62	Tier 1	16.1%	15.1%
63	Total capital	19.2%	18.9%
64	Institution CET1 overall capital requirements	8.21%	7.78%
65	of which: capital conservation buffer requirement	2.50%	2.50%
66	of which: countercyclical capital buffer requirement	0.21%	0.03%
67	of which: systemic risk buffer requirement	0.00%	0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.00%	0.75%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	10.10%	9.14%
Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	370	277
73	Direct and indirect holdings by the institution of CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% threshold and net of eligible short positions)	201	119
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in 38 (3) are met)	586	542
Applicable caps on the inclusion of provisions in Tier 2			
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	-	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	368	150
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	260
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	117

⁽¹⁾ Including profits € 794 million for year ended 31 December 2023 .

⁽²⁾ For the year ended 31 December 2022 other regulatory adjustments include mainly the IFRS 9 transitional adjustments.

Appendix 2: Capital instruments' main features disclosure

APPENDIX 2: CAPITAL INSTRUMENTS' MAIN FEATURES DISCLOSURE

		a	a	a
		Eurobank S.A.	Eurobank S.A.	Eurobank SA
1	Issuer	Eurobank S.A.	Eurobank S.A.	Eurobank SA
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	213800KGF4EFNUQKAT69	ISIN Code: HO0000000001	ISIN Code: XS2564362643
2a	Public or private placement	Public placement	Private placement	Private placement
3	Governing law(s) of the instrument	Greek	English law, with the exception of Condition 3B (Status-Subordinated Instruments) and Condition 22 (Bank Holders' Agent) which are governed by the laws of the Hellenic Republic and Regulation No.575/2013 (CRR) and Condition 23 (Acknowledgement of Statutory Loss Absorption Powers).	The Instruments and any non-contractual obligations arising out of or in connection with the Instruments shall be governed by, and construed in accordance with, English law, save for Condition 3, Condition 17 and Condition 18, which shall be governed by, and construed in accordance with, the laws of the Hellenic Republic
3a	Contractual recognition of write down and conversion powers of resolution authorities	N/A	Yes	Yes
	Regulatory treatment			
4	Current treatment taking into account, where applicable, transitional CRR rules	Common Equity Tier 1	Tier2	Tier2
5	Post- transitional CRR rules	Common Equity Tier 1	Tier 2	Tier 2
6	Eligible at solo/(sub-) consolidated/solo & (sub-) consolidated	Solo & Consolidated	Solo & Consolidated	Solo & Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares	Tier 2 Subordinated Capital Instrument (Art.63 of the CRR)	Tier 2 Subordinated Capital Instrument (Art.63 of the CRR)
8	Amount recognised in regulatory capital as at 31 December 2022- or eligible liabilities (Currency in million, 31/12/2023)	€ 3.941 million	N/A - The instruments were Issued in March 2020	N/A - The instruments were Issued in December 2022
9	Nominal amount of instrument	€ 1,07 per ordinary share (at date) / € 4.052 million	€ 950 million	€ 300 million
EU-9a	Issue price	-	100%	98.228%
EU-9b	Redemption price	-	Redemption at par (100 per cent of nominal amount) together with interest accrued up to (but excluding) the date of redemption	Redemption at par (100 per cent of nominal amount) together with interest accrued up to (but excluding) the date of redemption
10	Accounting classification	Shareholders Equity	Liability - amortised cost	Liability - amortised cost
11	Original date of issuance	Various	20 March 2020	6 December 2022
12	Perpetual or dated	Perpetual	Dated	Dated
13	Original maturity date	-	17 January 2028	6 December 2032
14	Issuer call subject to prior supervisory approval	N/A	Yes	Yes
15	Optional call date, contingent call dates and redemption amount	N/A	First date of call: 17 January 2023. The instruments have also a Tax and Capital Disqualification Event call (Art.78(4) of CRR).In both cases, the instruments may be redeemed in whole but not in part. Redemption at par together with interest accrued.	6 December 2027. The instruments have also a Tax and Capital Disqualification Event call (Art.78(4) of CRR).In both cases, the instruments may be redeemed in whole but not in part. Redemption at par together with interest accrued, subject to the prior permission of the Relevant Regulator (to the extent then required).
16	Subsequent call dates, if applicable	N/A	Optional subsequent call dates: Any day after 17 January 2023.Tax and Capital Disqualification Event call : at any time	n/a
	Coupon / dividends			
17	Fixed or floating dividend/coupon	N/A	Fixed	Fixed rate of 10.00% payable until (but excluding) the 6th December 2027; reset from (and including) the 6th December 2027 to a fixed rate equal to the 5-year Mid-Swap rate prevailing at the Reset Determination Date plus 7.588 per cent. per annum (no step-up); subject to Benchmark Replacement provisions
18	Coupon rate and any related index	N/A	6.41%	Fixed rate of 10.00% payable until (but excluding) the 6th December 2027; reset from (and including) the 6th December 2027 to a fixed rate equal to the 5-year Mid-Swap rate prevailing at the Reset Determination Date plus 7.588 per cent. per annum (no step-up); subject to Benchmark Replacement provisions
19	Existence of a dividend stopper	N/A	No	No
EU-20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary	Mandatory	Mandatory
EU-20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem	No	No	No
22	Noncumulative or cumulative	Non cumulative	Noncumulative	Cumulative
23	Convertible or non-convertible	Non convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	No	Yes	Yes
31	If write-down, write-down trigger(s)	N/A	Statutory & Condition 23 (Acknowledgement of Statutory Loss Absorption Powers) , Bank of Greece	Statutory & Condition 17 (Acknowledgement of Statutory Loss Absorption Powers) , Bank of Greece
32	If write-down, full or partial	N/A	Fully or partially	Fully or partially
33	If write-down, permanent or temporary	N/A	Permanent	as defined in Statutory & Condition 17
34	If temporary write-down, description of write-up mechanism	N/A	N/A	as defined in Statutory & Condition 17
34a	Type of subordination (only for eligible liabilities)	N/A	Contractual	Contractual
EU-34b	Ranking of the instrument in normal insolvency proceedings	1	3	3
35	Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Additional Tier I	Immediately subordinate to the claims of Senior Creditors (as defined in Condition 3B)	junior to any present and future claims of the Senior Creditors (as defined in Condition 3E)
36	Non-compliant transitioned features	No	No	No
37	If yes, specify non-compliant features	N/A	N/A	N/A
37a	Link to the full term and conditions of the instrument (signposting)	https://www.eurobank.gr/-/media/eurobank/omilos/poioi-eimaste/etairiki-diakubernisi/katatatiko/katatatiko-en.pdf		

Appendix 3: List of Abbreviations

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Abbreviation	Definition
AT1	Additional Tier 1
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
CCB	Capital Conservation Buffer
CCyB	Counter Cyclical Buffer
CCF	Credit Conversion Factor
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CET1	Common equity Tier 1
COREPs	Common Reports
CRD IV	Capital Requirements Directive IV
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Value Adjustment
DoD	Definition of Default
EAD	Exposure At Default
EBA	European Banking Authority
ECAIs	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
F-IRB	Foundation Internal Rating Based Approach
GMRA	Global Master Repurchase Agreement
G-SIIs	Global Systemic Institution Buffer
HAPS	Hellenic Asset Protection Scheme
HDIGF	Hellenic Deposit and Investment Guarantee Fund
HQLA	High Quality Liquid Assets.
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Internal Liquidity Adequacy Assessment Process
IRB	Internal Ratings Based Approach
IRRBB	Interest Rate risk in the Banking Book
IRC	Incremental Risk Charge
ISDA	International Swaps and Derivatives Association
ITS	Implementing Technical Standards
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
MDA	Maximum Distributable Amount
MREL	Minimum Requirement for own funds and Eligible Liabilities
OCR	Overall Capital Requirement
O-SIIs	Other Systemically Important Institution
PD	Probability of Default
P2R	Pillar 2 Requirement
RTS	Regulatory Technical Standards
RWEAs	Risk Weighted Exposure Amounts
SFTs	Securities Financing Transactions
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRF	Single Resolution Fund
SRM	Single Resolution Mechanism
SPE	Single Point of Entry
SSM	Single Supervisory Mechanism
SyRB	Systemic Risk Buffer
TLTRO	Targeted Long Term Refinancing Operations
TSCR	Total SREP Capital Requirement
VAR	Value at Risk

Appendix 4: Guidelines and Regulations mapping on Disclosure Requirements

Appendix 4: Guidelines and Regulations mapping on Disclosures Requirements

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