Company Registration Number: 635417

ASTARTI DESIGNATED ACTIVITY COMPANY
DIRECTORS' REPORT AND FINANCIAL STATEMENTS

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2021

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FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2021

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ASTARTI DESIGNATED ACTIVITY COMPANY

DIRECTORS' AND OTHER INFORMATION

Company number	635417
Directors	Ken Casey Eileen Starrs
Registered Office	Fourth Floor 3 George's Dock IFSC Dublin 1 Ireland
Company Secretary and Corporate Service Provider	Wilmington Trust SP Services (Dublin) Limited Fourth Floor 3 George's Dock IFSC Dublin 1 Ireland
Independent Auditor	KPMG Chartered Accountants Statutory Audit Firm 1 Harbourmaster Place International Financial Services Centre Dublin 1 Ireland
Solicitor	Arthur Cox 10 Earlsfort Terrace Dublin 2 D02 T380 Ireland
Arranger	Eurobank Ergasias S.A. 8 Othonos Street 10557 Athens Greece
Bank account	Citibank, n.a, London Branch 13th floor Citigroup Centre Canada Square Canary Wharf London E14 5LB Eurobank S.A. 88 Othonos Street 10557 Athens Greece

The directors present their audited financial statements of Astarti Designated Activity Company (the "Company" or the "Issuer") for the year ended 31 December 2021. In accordance with IFRSs as adopted by EU, and particularly IFRS 10 - Consolidated financial statements, the Company is considered to be controlled by Eurobank Ergasias S.A. (the "Transferor" or the "Originator" or the "Servicer"), a bank incorporated in Greece. The Company was incorporated in Ireland on 8 October 2018.

BUSINESS REVIEW AND PRINCIPAL ACTIVITIES

The principal activity of the Company is a receivable finance facility structure that holds the legal title to certain Consumer and Small Business term (the "portfolio") loans arising under the Greek Law and made to borrowers which qualify as Wholesale loans originated by Eurobank Ergasias S.A. The Company has financed the purchase of the Portfolio via senior notes (Class A Notes) issued to Class A Noteholders and subordinated notes (Class B Notes) issued to Class B Noteholders. Eurobank Ergasias S.A. as Subordinated Loan Provider granted to the Company a Subordinated Loan and the proceeds of the Subordinated Loan are used to fund the Cash Reserve established and maintained on the Cash Reserve Account.

On 10 December 2018 the Company issued €591,000,000 class A (senior class) notes under the note facility agreement bearing an interest rate of 3 months EURIBOR plus 210 basis points which are due 31 December 2050.

On 10 December 2018 the Company issued €219,000,000 class B (subordinated class) notes to Eurobank which are due 31 December 2050. As per Class B Note Issuance Agreement the subscription price of the Class B Notes were paid by the Class B Noteholder to the Issuer by way of set-off against the Purchase Price of the portfolio payable by the Issuer, such that both liabilities were extinguished in full with no physical payments between the Class B Noteholder and the Issuer, both being Eurobank.

On 10 December 2018 the Company entered into a Subordinated Loan Agreement with Eurobank Ergasias S.A. as Subordinated Loan Provider in the amount of €6,510,000. The proceeds of the Subordinated Loan are used to fund the Cash Reserve established and maintained on the Cash Reserve Account of €5,910,000 and the Expense Reserve established and maintained on the Expense Account of €600,000.

On the 15 March 2021, the Company entered into the 2021 Master Amendment and Restatement deed and on the 28th May 2021 the Company approved further amendments to the Master deed.

The board approved that all rights and obligations for the existing cash manager and account bank, Citibank, N.A, London Branch, under the transaction documents were transferred to Eurobank S.A, the new Cash manager and account bank. The paying agency agreement with Citibank, N.A, London was terminated and Eurobank S.A. was appointed the new paying agent under the new paying agency agreement.

The Issuer created and issued additional Class A Notes so that the Principal Amount Outstanding of the Class A Notes as at 22 March 2021 was increased to €250,000,000. On closing date, 22 March 2021, the Issuer repaid the Class B Notes in the amount of €120,700,000 so that the Principal Amount Outstanding of the Class B Notes are €98,300,000. €910,000 was also repaid on the subordinated loan so that the Principal Amount Outstanding on the subordinated loan in the Cash Reserve Account was €5,000,000. Interest on Class A Notes was payable on a quarterly basis at the three-month EURIBOR plus 210 basis points. As at 22 March 2021, the Interest on Class A Notes is now payable on a monthly basis at the one-month EURIBOR plus 180 basis points.

The Board of Directors have made an assessment of the Company covering at least 12 months from the date of approval of these financial statements and up to the Final Maturity Date, having taken into consideration the factors relating to (a) the Company's financial position, (b) the Originator's financial position, (c) the performance of the underlying Receivables, and are satisfied that the financial statements of the Company can be prepared on a going concern basis.

BUSINESS REVIEW AND PRINCIPAL ACTIVITIES (CONTINUED)

There are two charges registered by the Company. They are as follows: Deed of Charge and Greek Securitisation Law Pledge.

The sale of the Receivables to the Company is considered to fail the derecognition criteria of IFRS 9 financial instruments and therefore they are retained on the statement of financial position of the Originator as Eurobank Ergasias S.A retained the risks and rewards of the portfolio by purchasing 100% of the Class B Notes. The Company records in its statement of financial position a receivable from the Originator (the "Deemed Loan to the Originator"), rather than the portfolio it has legally purchased.

The Company retains €250 per quarter as profit before tax based on the contractual documents.

The Company's only sources of funds for the payment of principal and interest due on the Notes are the principal and interest collections which the Company will be entitled to receive from the portfolio. As per the priority of payments outlined in the securitisation agreements, the order of payment of principal and interest due on the Notes and subordinated loan are as follows: payment towards class A noteholders of all interest due on the class A notes, payment of the interest due on the Subordinated Loan on the interest payment date, payment of the principal amount outstanding of the Class A Notes until the principal amount has been reduced to zero, payment of the principal amount of the Class B Notes until the principal amount outstanding has been reduced to EUR 1, payment of the principal amount due in respect of the subordinated loan and finally, payment to the Class B noteholder of any remaining amounts as variable return in respect of the Class B Notes.

Credit enhancement is provided to the Class A Notes mainly through accrued interest on the Class B Notes, Class B Notes and a reserve fund account funded through a subordinated loan from the Originator. Credit Enhancements have been set up in order to absorb any credit losses arising from the securitized loans.

The Originator is contractually obliged to repurchase any loans prior to making any amendments to them other than certain Permitted Contract Amendments as described in the contractual documents. In addition, the Originator has a continuing policy to repurchase any loans arising under a Defaulted Loan (no contractual obligation), i.e. a Loan that is in arrears by 90 or more consecutive calendar days or the relevant Borrower has been declared insolvent or bankrupt or is subject to insolvency proceedings; or which is written off or deemed uncollectable in accordance with the Collection and Servicing Procedures, further strengthening the Company's financial position. The Originator and the Issuer may agree in some cases that the consideration to be received by the Issuer for the aforementioned repurchases may be partly in cash and partly through the assignment to the Issuer of other loans. In such case, the aggregate balance of the newly assigned loans together with any cash consideration shall be equal to the total consideration which would have been payable to the Issuer in case the consideration was fully in cash.

RESULTS AND DIVIDENDS

The results for the year and the Company's financial position at the end of the year are shown in the attached financial statements. The profit for the year was €750 (2020: €750). At the year end, the Company had net assets of €2,251 (2020: €1,501). The directors have not recommended a dividend for the financial year.

AUDIT COMMITTEE

As at the date of these financial statements, the Company is operating within the turnover threshold limits as set out under Section 167(1) of the Act and as such the Company does not meet the requirements to establish an audit committee for the current financial year ended 31 December 2021.

DIRECTORS' COMPLIANCE STATEMENT

At this present time the Company is operating within one of the two threshold limits as set out under Section 225(7) of the Companies Act 2014 which enables the Company to avail of an exemption to the compliance statement obligations. The Company meets one of the threshold limits as its turnover for the year does not exceed the limit of €25,000,000 however it does not satisfy the second threshold limit as the Company's balance

BUSINESS REVIEW AND PRINCIPAL ACTIVITIES (CONTINUED)

DIRECTORS' COMPLIANCE STATEMENT (CONTINUED)

sheet exceeds €12,500,000. Accordingly, the Directors are not required to include a compliance statement in their statutory directors' report for the current financial year ending 31 December 2021.

DIRECTORS

The directors who served the Company during the year are as stated on page 1:

- Ken Casey – (Irish)
- Eileen Starrs – (Irish)

SECRETARY

Wilmington Trust SP Services (Dublin) Limited served as Company Secretary for the year ended 31 December 2021 and remains as the current Company Secretary.

DIRECTORS, SECRETARY AND THEIR INTERESTS

The Directors and Secretary who served during the financial year are set out on page 1 of these financial statements. The directors and secretary do not have any direct or beneficial interest in the shares, share options, deferred shares and debentures of the Company during the financial year. The directors of the Company, Ken Casey and Eileen Starrs, are employees of Wilmington Trust SP Services (Dublin) Limited ("Wilmington Trust"), being the entity that acts as secretary and administrator of the Company.

During the year the Company purchased services to the value of €26,211 (2020: €36,868) from Wilmington Trust. These services were provided under normal commercial terms.

GOING CONCERN

The Board of Directors have made an assessment of the Company covering at least 12 months from the date of approval of these financial statements and up to the Final Maturity Date, having taken into consideration the factors relating to (a) the Company's financial position, (b) the Originator's financial position, (c) the performance of the underlying Receivables, and are satisfied that the financial statements of the Company can be prepared on a going concern basis. Please refer to note 1 of these financial statements for further information.

ACCOUNTING RECORDS

The Directors believe that they have complied with the requirements of Section 281 to 285 of the Companies Act 2014 with regard to keeping adequate accounting records by contracting service providers with appropriate expertise to provide adequate resources to the financial function. The accounting records of the Company are maintained at the registered office: Fourth Floor, 3 George's Dock, IFSC, Dublin 1, Ireland.

PRINCIPAL RISKS AND UNCERTAINTIES

MACROECONOMIC ENVIRONMENT AND PARENT COMPANY POSITION

Eurobank Ergasias S.A. (the "Parent Company" or "Group") has faced significant challenges over recent years and it still has a large non-performing loan portfolio. In addition, it is systemically linked to the Greek economy, which itself has had very significant and well publicised difficulties, including high unemployment and slow growth. Whilst the position of both the Parent Company and the Greek economy have improved, there remain challenges ahead as set out below, which are a potential uncertainty for the Parent Company.

The following risks and challenges were identified in the latest available financial statements of the Parent Company for the year ended 31 December 2021 of the Parent Company:

a) 2021 was a year of strong recovery, as the Greek economy reclaimed most of its pandemic inflicted losses. The significant progress of vaccination programs allowed the gradual relaxation of containment measures and the reopening of the economy that led to the strengthening of consumption and the recovery of the tourism sector providing substantial boost to real GDP growth. Based on Hellenic Statistical Authority's (ELSTAT) provisional data, Greek real GDP increased by 8.3% in 2021 (9% decrease in 2020), the seasonally adjusted unemployment rate dropped to 12.8% in December 2021 (December 2020: 16.3%), while the inflation, as measured by the 12-month average Harmonized Index of Consumer Prices (HICP), closed at 0.6% in 2021, compared to -1.3% in 2020. According to ELSTAT, the HICP increased by 6.3% in February 2022 compared to -1.9% in February 2021 mainly reflecting the current rise in energy and fuel costs. The European Commission (EC), in its winter economic forecasts (February 2022), estimates the real GDP growth rate in Greece at 4.9% and 3.5% in 2022 and 2023 respectively. On the fiscal front, according to 2022 State Budget, the general government's primary balance in European System of Accounts (ESA2010) terms in 2021 and 2022 is expected to register deficits of 7.0% and 1.4% of GDP respectively as a result of the implementation of public support measures amounted to € 16.9 billion in 2021, and € 3.3 billion in 2022 aiming to address the economic and social effects of the Covid-19 pandemic. The gross public debt is estimated at 197.1% and 189.6% of GDP in 2021 and 2022 respectively (2020: primary deficit at 7.1% and public debt at 206.3%). These forecasts take into account the public support measures aiming to alleviate the impact of increased energy and fuel costs in 2021 (€0.9 billion), but not the additional and more encompassing measures announced in 2022 (an additional €2.8 billion as of 17 March 2022). However, since a large part of these measures will be covered by funds earmarked especially for this purpose as well as additional government proceeds, their fiscal impact will be significantly smaller than the above amount. The deviation from the Enhanced Surveillance (ES) primary surplus target of 3.5% of GDP in 2021 and 2022 is not considered a violation of Greece's commitments under the ES framework, as in March 2020 EC activated the general escape clause, allowing for non-permanent deviations from the agreed fiscal paths of the member-states due to the extraordinary health and economic distress caused by the pandemic. According to the 2 June 2021 EC press release, the clause shall remain in force in 2022, and is expected to be deactivated in 2023. These forecasts may change as a result of the actual size of the public sector's support measures, the impact of inflationary pressure on economic growth, and the repercussions of the energy price hikes on public finances.

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

PRINCIPAL RISKS AND UNCERTAINTIES (CONTINUED)

MACROECONOMIC ENVIRONMENT AND PARENT COMPANY POSITION (CONTINUED)

b) would cease net bond purchases under PEPP at the end of March 2022, as scheduled. Reinvestment of principal from maturing securities will, however, continue at least until the end of 2024, allowing explicitly for the purchase of Greek Government Bonds (GGBs) over and above rollovers of redemptions.

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

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

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

f) As at 31 December 2021, following the completion of the project "Mexico" (sale of 95% mezzanine and junior "Mexico" securitization notes) and the subsequent derecognition of the underlying securitized loan portfolio of € 3.1 billion (consisting primarily of NPE), the Group decreased significantly its NPE stock by € 2.9 billion to € 2.8 billion (31 December 2020: € 5.7 billion), driving the NPE ratio at 6.8% (31 December 2020: 14%), while the NPE coverage ratio stood at 69.2% (31 December 2020: 61.8%). The Group's Total Capital Adequacy (total CAD) and Common Equity Tier 1 (CET1) ratios stood at 16.1% (31 December 2020: 16.3%) and 13.7% (31 December 2020: 13.9%) respectively as at 31

PRINCIPAL RISKS AND UNCERTAINTIES (CONTINUED)

MACROECONOMIC ENVIRONMENT AND PARENT COMPANY POSITION (CONTINUED)

f) December 2021. In addition, the Group completed successfully the 2021 SSM stress test (ST), which was coordinated and conducted by the ECB.

g) In the context of the 2021 ILAAP (Internal Liquidity Adequacy Assessment Process), the liquidity stress tests results indicate that the Bank has adequate liquidity buffer to cover the potential outflows that could occur in all scenarios both in the short term (1 month horizon) and in the medium term (1 year horizon).

One of the main quantitative tools that Eurobank utilizes in order to confirm the soundness of its liquidity adequacy is its liquidity stress testing framework. These are based on business plans for the Group. Eurobank runs the liquidity stress tests on a monthly basis and their results are reviewed by Group ALCO. Eurobank uses the below five short-term stress test scenarios:

- An idiosyncratic scenario (Eurobank specific); refers to internal or external events that affect the Eurobank's reputation
- A mild Greek market scenario; refers to any event related to the Greek economy that would result to mild negative effects at the Eurobank's operations
- Severe Greek market scenario; refers to any event related to the Greek economy that would severely affect Eurobank
- Global market scenario; refers to any severe event related to the global economy that would affect key market parameters
- Adverse (worst case) scenario; it is a combination of the Severe Greek market and Global market scenario

POLITICAL DONATIONS
The Company made no political donations during the year ended 31 December 2021 (2020: €Nil).

RELEVANT AUDIT INFORMATION
The Directors believe they have taken all steps necessary to make themselves aware of any relevant audit information and have established that the Company's statutory auditors are aware of that information. In so far as they are aware, there is no relevant audit information of which the Company's statutory auditors are unaware.

FUTURE DEVELOPMENTS
No changes are expected to the company's operations in the future as the company's operations are governed by the transaction documents. The future performance of the Company depends on the performance of the loan portfolio.

KEY PERFORMANCE INDICATORS
The key financial performance indicators of the business are considered to be the credit quality of the underlying loans as detailed in note 7, the Company's cash position and the credit enhancements in place, namely the Class B notes, subordinated loan and the cash reserve account. For information on financial risk management, please refer to note 14 of these financial statements.

SUBSEQUENT EVENTS
Details of significant events affecting the Company which have taken place since the end of the reporting year are disclosed in note 16.

PRINCIPAL RISKS AND UNCERTAINTIES (CONTINUED)

INDEPENDENT AUDITOR

KPMG, Chartered Accountants and Statutory Audit Firm were appointed as auditors by the directors under the provisions of Section 393(1) and they have expressed their willingness to continue in office in accordance with the provisions of Section 383(2) of the Companies Act 2014.

This report was approved by the board of directors on 17 November 2022 and signed on behalf of the board by:

Ken Casey	Eileen Starrs
Director	Director

ASTARTI DESIGNATED ACTIVITY COMPANY

STATEMENT OF DIRECTORS' RESPONSIBILITIES IN RESPECT OF THE DIRECTORS' REPORT AND THE FINANCIAL STATEMENTS

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2021

The directors are responsible for preparing the directors' report and the financial statements in accordance with applicable law and regulations.

Company law requires the directors to prepare financial statements for each financial year. Under that law they have elected to prepare the financial statements in accordance with International Financial Reporting Standards (IFRS) as adopted by the European Union and applicable law.

Under company law the directors must not approve the financial statements unless they are satisfied that they give a true and fair view of the assets, liabilities and financial position of the Company and of its profit or loss for that year. In preparing the financial statements, the directors are required to:

• select suitable accounting policies and then apply them consistently;

• make judgements and estimates that are reasonable and prudent;

• state whether applicable Accounting Standards have been followed, subject to any material departures disclosed and explained in the financial statements;

• assess the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and

• use the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

The directors are responsible for keeping adequate accounting records which disclose with reasonable accuracy at any time the assets, liabilities, financial position and profit or loss of the Company and enable them to ensure that its financial statements comply with the Companies Act 2014. They are responsible for such internal controls as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error, and have general responsibility for taking such steps as are reasonably open to them to safeguard the assets of the Company and to prevent and detect fraud and other irregularities. The directors are also responsible for preparing a directors' report that complies with the requirements of the Companies Act 2014.

On behalf of the board

Ken Casey	Eileen Starrs
Director	Director

Date: 17 November 2022

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ASTARTI DESIGNATED ACTIVITY COMPANY

Report on the audit of the financial statements

Report on the audit of the financial statements

Opinion

We have audited the financial statements of Astarti Designated Activity Company ('the Company') for the year ended 31 December 2021 set out on pages 13 to 31, which comprise the Statement of Comprehensive Income, Statement of Financial Position, Statement of Changes in Equity, Statement of Cashflows and related notes, including the summary of significant accounting policies set out in note 1. The financial reporting framework that has been applied in their preparation is Irish Law and International Financial Reporting Standards (IFRS) as adopted by the European Union.

In our opinion:

- the financial statements give a true and fair view of the assets, liabilities and financial position of the Company as at 31 December 2021 and of its profit for the year then ended;
- the financial statements have been properly prepared in accordance with IFRS as adopted by the European Union; and
- the financial statements have been properly prepared in accordance with the requirements of the Companies Act 2014.

Basis for opinion

We conducted our audit in accordance with International Standards on Auditing (Ireland) (ISAs (Ireland)) and applicable law. Our responsibilities under those standards are further described in the Auditor's responsibilities for the audit of the financial statements section of our report. We are independent of the Company in accordance with ethical requirements that are relevant to our audit of financial statements in Ireland, including the Ethical Standard issued by the Irish Auditing and Accounting Supervisory Authority (IAASA), and we have fulfilled our other ethical responsibilities in accordance with these requirements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Conclusions relating to going concern

In auditing the financial statements, we have concluded that the directors' use of the going concern basis of accounting in the preparation of the financial statements is appropriate.

Based on the work we have performed, we have not identified any material uncertainties relating to events or conditions that, individually or collectively, may cast significant doubt on the Company's ability to continue as a going concern for a period of at least twelve months from the date when the financial statements are authorised for issue.

Our responsibilities and the responsibilities of the directors with respect to going concern are described in the relevant sections of this report.

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ASTARTI DESIGNATED ACTIVITY COMPANY (CONTINUED)

Other information

The directors are responsible for the other information presented in the Annual Report together with the financial statements. The other information comprises the information included in the directors' report. The financial statements and our auditor's report thereon do not comprise part of the other information. Our opinion on the financial statements does not cover the other information and, accordingly, we do not express an audit opinion or, except as explicitly stated below, any form of assurance conclusion thereon.

Our responsibility is to read the other information and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on that work we have not identified material misstatements in the other information.

Based solely on our work on the other information undertaken during the course of the audit, we report that:

- We have not identified material misstatements in the directors' report;
- In our opinion, the information given in the directors' report is consistent with the financial statements;
- In our opinion, the directors' report has been prepared in accordance with the Companies Act 2014.

Opinions on other matters prescribed by the Companies Act 2014

We have obtained all the information and explanations which we consider necessary for the purposes of our audit.

In our opinion the accounting records of the Company were sufficient to permit the financial statements to be readily and properly audited and the financial statements are in agreement with the accounting records.

Matters on which we are required to report by exception

The Companies Act 2014 requires us to report to you if, in our opinion, the disclosures of directors' remuneration and transactions required by Sections 305 to 312 of the Act are not made. We have nothing to report in this regard.

Respective responsibilities and restrictions on use

Responsibilities of directors for the financial statements

As explained more fully in the directors' responsibilities statement set out on page 9, the directors are responsible for: the preparation of the financial statements including being satisfied that they give a true and fair view; such internal control as they determine is necessary to enable the preparation of financial statements that are free from material misstatement, whether due to fraud or error; assessing the Company's ability to continue as a going concern, disclosing, as applicable, matters related to going concern; and using the going concern basis of accounting unless they either intend to liquidate the Company or to cease operations, or have no realistic alternative but to do so.

INDEPENDENT AUDITOR'S REPORT TO THE MEMBERS OF ASTARTI DESIGNATED ACTIVITY COMPANY (CONTINUED)

Auditor's responsibilities for the audit of the financial statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs (Ireland) will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these financial statements.

A fuller description of our responsibilities is provided on IAASA's website at http://www.iaasa.ie/Publications/Auditing-standards/International-Standards-on-Auditing-for-use-in-Ire/Description-of-the-auditor-s-responsibilities-for.

The purpose of our audit work and to whom we owe our responsibilities

Our report is made solely to the Company's members, as a body, in accordance with Section 391 of the Companies Act 2014. Our audit work has been undertaken so that we might state to the Company's members those matters we are required to state to them in an auditor's report and for no other purpose. To the fullest extent permitted by law, we do not accept or assume responsibility to anyone other than the Company and the Company's members, as a body, for our audit work, for this report, or for the opinions we have formed.

Date

Cristian Reyes
for and on behalf of
KPMG
Chartered Accountants, Statutory Audit Firm
1 Harbourmaster Place,
IFSC,
Dublin 1,
Ireland

ASTARTI DESIGNATED ACTIVITY COMPANY

STATEMENT OF COMPREHENSIVE INCOME

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2021

	Note	Financial year 31 December 2021 €	Financial year 31 December 2020 €
Interest income	3	**3,341,980**	**5,022,093**
Interest expense	4	**(3,109,858)**	**(4,473,137)**
		232,122	**548,956**
Administrative expenses	5	**(231,122)**	**(547,956)**
Profit before tax		**1,000**	**1,000**
Income tax charge	6	**(250)**	**(250)**
Profit after tax		**750**	**750**
Other comprehensive income		**-**	**-**
Total comprehensive income for the year		**750**	**750**

The result for the year was derived from continuing operations.

The notes on pages 17 to 31 form part of these financial statements.

ASTARTI DESIGNATED ACTIVITY COMPANY

STATEMENT OF FINANCIAL POSITION

AS AT 31 DECEMBER 2021

	Note	2021 €	2020 €
Assets			
Deemed Loan to the Originator	7	**230,589,718**	**121,445,943**
Other receivables	8	**1,602,885**	**2,287,689**
Cash and cash equivalents	9	**18,692,528**	**22,996,883**
Total assets		**250,885,131**	**146,730,515**
Equity			
Share capital	10	**1**	**1**
Retained earnings		**2,250**	**1,500**
Total equity		**2,251**	**1,501**
Liabilities			
Loan notes issued	11	**249,760,009**	**145,592,684**
Other liabilities	12	**1,122,871**	**1,136,330**
Total liabilities		**250,882,880**	**146,729,014**
Total equity and liabilities		**250,885,131**	**146,730,515**

Approved by the board and authorised for issue on 17 November 2022.

Ken Casey
Director

Eileen Starrs
Director

The notes on pages 17 to 31 form part of these financial statements.

ASTARTI DESIGNATED ACTIVITY COMPANY

STATEMENT OF CHANGES IN EQUITY

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2021

	Share Capital €	Retained Earnings €	Total Equity €
Balance as at 1 January 2020	1	750	751
Share issue	-	-	-
Profit for the year and total comprehensive income	-	750	750
Balance as at 31 December 2020	**1**	**1,500**	**1,501**

	Share Capital €	Retained Earnings €	Total Equity €
Balance as at 1 January 2021	1	1,500	1,501
Share issue	-	-	-
Profit for the year and total comprehensive income	-	750	750
Balance as at 31 December 2021	**1**	**2,250**	**2,251**

ASTARTI DESIGNATED ACTIVITY COMPANY

STATEMENT OF CASH FLOWS

FOR THE FINANCIAL YEAR ENDED 31 DECEMBER 2021

	Notes	Financial year 31 December 2021 €	Financial year 31 December 2020 €
Cash flows from operating activities			
Profit after tax		**750**	**750**
Adjustments for:			
Interest income	**3**	**(3,341,980)**	**(5,022,093)**
Interest expense	**4**	**3,109,858**	**4,473,137**
Other receivables		**348,133**	**600,736**
Other liabilities		**(31,712)**	**3,937**
Amounts receivable from Bank of Greece under Law 128/75		**(163,455)**	**(126,051)**
Issuance costs	**11**	**(393,693)**	**-**
Net cash used in operating activities		**(472,099)**	**(69,584)**
Cash flows from investing activities			
Interest received - net		**(52,764,142)**	**31,748,320**
Proceeds from loan portfolio disposals (repurchases)		**40,039,881**	**-**
Additions	**7**	**(75,026,243)**	**25,113,318**
Proceeds from loan portfolio repayments (collections)	**7**	**104,057,906**	**129,783,419**
Net cash generated from/(used) in investing activities		**16,307,402**	**186,645,057**
Cash flows from financing activities			
Issue of Class A loan notes	**11**	**158,718,449**	**-**
Repayment of Subordinated loan	**7**	**(910,000)**	**-**
Interest paid	**4**	**(2,936,974)**	**(4,335,951)**
Class A loan note repayment	**11**	**(54,311,133)**	**(183,318,007)**
Class B loan note repayment	**10**	**(120,700,000)**	**-**
Net cash used in from financing activities		**(20,139,658)**	**(187,653,958)**
Net decrease in cash and cash equivalents		**(4,304,355)**	**(1,078,485)**
Cash and cash equivalents at start of year		**22,996,883**	**24,075,367**
Cash and cash equivalents at end of year	**9**	**18,692,528**	**22,996,883**

All withdrawals from the Company's bank accounts are in accordance with the detailed priority of payments set out in the securitisation agreements.

The notes on pages 17 to 31 form part of these financial statements.

1. PRINCIPAL ACCOUNTING POLICIES

General information
Astarti DAC is domiciled in Ireland with registered number 635417 and its registered office is as outlined on page 1 of this document. The principal activity of the Company is a receivable finance facility structure that holds the legal title to certain Consumer and Small Business term (the "portfolio") loans arising under the Greek Law and made to borrowers which qualify as Wholesale loans originated by Eurobank Ergasias. The Company has financed the purchase of the Portfolio via senior notes (Class A Notes) issued to Class A Noteholders and subordinated notes (Class B Notes) issued to Class B Noteholders which are held by Eurobank. Eurobank Ergasias S.A. as Subordinated Loan Provider granted to the Company a Subordinated Loan and the proceeds of the Subordinated Loan are used to fund the Cash Reserve established and maintained on the Cash Reserve Account.

Basis of preparation
The principal accounting policies applied in the preparation of these financial statements are set out below. The financial statements have been prepared on a going concern basis, as the Board of the Directors considered as appropriate. Please also refer to the Going Concern section below. These financial statements have been prepared in accordance with International Financial Reporting Standards as adopted by the European Union (IFRSs), and as applied in accordance with the Companies Act 2014. The financial statements have been prepared under the historical cost convention.

The preparation of financial statements in conformity with IFRS requires the use of certain critical accounting estimates. It also requires management to exercise its judgement in the process of applying the Company's accounting policies. The areas involving a higher degree of judgement or complexity, or areas where assumptions and estimates are significant to the financial statements are disclosed in note 2. The Company mainly transacts in Euros ("€"), therefore, the Euro is its functional and presentational currency. Balances within the financial statements are disclosed to the nearest whole number.

Going Concern

Regarding the outlook for the next 12 months, the following poses significant challenges to a number of activities and initiatives critical for the medium-term economic prospects of the region, indicatively:

(i) Russian invasion in Ukraine,
(ii) Prolongation of the ongoing inflationary pressure,
(iii) Increase in the interest rates worldwide,
(iv) Current and potentially new fiscal measures,
(v) Withdrawal of the temporary support measures on growth, employment and the continual service of household and corporate debt,
(vi) The attraction of new investments in the country,
(vii) The emergence of new Covid-19 variants.

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

1. PRINCIPAL ACCOUNTING POLICIES (CONTINUED)

Going concern (continued)
Considering the above, the Board of Directors have made an assessment of the Company covering at least 12 months from the date of approval of these financial statements and up to the Final Maturity Date, having taken into consideration the factors relating to (a) the Company's financial position, (b) the Originator's financial position, (c) the performance of the underlying Receivables, and are satisfied that the financial statements of the Company can be prepared on a going concern basis consideration the Macroeconomic environment, Parent Company position as described in the Directors Report and the following:

The Company's structure
The Directors of the Company have concluded that the Originator has retained substantially all the risks and rewards of the securitised Portfolio and, as a consequence, the Company does not recognise the portfolio on its Statement of Financial Position, but rather a Deemed Loan to the Originator. The subordinated loan (cash reserve account) provided by the Originator to the Company and Class B Notes and the accrued interest on them, act in combination as credit enhancements to the Company's structure.

The Directors have confirmed that the Originator, is contractually obliged to repurchase any loans prior to making any amendments to them other than certain Permitted Contract Amendments as described in the contractual documents. In addition, the Originator has a continuing policy to repurchase any Receivables arising under a Defaulted Loan (no contractual obligation), i.e. a Loan that is in arrears by 90 or more consecutive calendar days or the relevant Borrower has been declared insolvent or bankrupt or is subject to insolvency proceedings; or which is written off or deemed uncollectable in accordance with the Collection and Servicing Procedures, further strengthening the Company's financial position.

Amendments to standards and new interpretations adopted by the Company

Effective for annual periods beginning as of 1 January 2021

The directors have set out the following new standards, amendments and interpretations issued, that became effective as of 1 January 2021

Standards/interpretation	EU Effective date
Interest Rate Benchmark Reform Phrase 2 (Amendments to IFRS 9, IAS 39 and IFRS 7, IFRS 4 and IFRS 16)	1 January 2021

The adoption of the new standards, interpretations and amendments have had no material impact on the financial statements of the Company in the year of the initial application.

A number of standards and amendments to standards are effective for annual periods beginning after 1 January 2022 and earlier application is permitted. The Company has not early adopted them in preparing these financial statements, however, it is expected that they will have minimal effect on the financial statements.

Standards/interpretation	EU Effective date
Amendments to IFRS 3 - The Conceptual Framework	1 January 2022*
IAS 41 Agriculture - Taxation in fair value measurements	1 January 2022*
Amendments to IAS 12 - Deferred Tax related to Assets and Liabilities arising from a Single Transaction	1 January 2023*
Amendments to IAS 8 – Definition of Accounting Estimates	1 January 2023*
Amendment to IAS 1 - Classification of Liabilities as Current or Non-current	1 January 2023*

1. PRINCIPAL ACCOUNTING POLICIES (CONTINUED)

New standards and interpretations applicable to future reporting periods
Where new requirements are endorsed, the EU effective date is disclosed. For un-endorsed standards and interpretations, the IASB's effective date is noted. Where any of the upcoming requirements are applicable to the Company, it will apply them from their EU effective date. The Directors have considered all the upcoming IASB standards and do not consider any of them to be of material relevance to the financial statements of the Company.

Classification and measurement of financial assets and financial liabilities
The financial assets and financial liabilities of the Company comprise the Deemed Loan to the Originator, other assets, cash, Loan notes issued and other liabilities. These are measured at amortised cost. IFRS 9 contains three principal classification categories for financial assets: measured at amortised cost, fair value through other comprehensive income ("FVOCI") and fair value through profit and loss ("FVTPL"). The classification of financial assets under IFRS 9 is generally based on the business model in which a financial asset is managed and its contractual cash flow characteristics.

Financial assets
Financial assets are measured on initial recognition at fair value. Under IFRS 9, the classification and subsequent measurement of financial assets is principally determined by the entity's business model and their contractual cash flow characteristics (whether the cash flows represent 'solely payments of principal and interest').

The Company has assessed its business models in order to determine the appropriate IFRS 9 classification for its financial assets. Financial assets are held to collect contractual cash flows and therefore meet the criteria to be classified at amortised cost. In order to be accounted for at amortised cost, it is necessary for individual instruments to have contractual cash flows that are solely payments of principal and interest. These financial assets meet this criteria and are therefore subsequently measured at amortised cost.

Financial assets and liabilities measured at amortised cost are accounted for under the effective interest rate ('EIR') method. This method of calculating the amortised cost of a financial asset or liability involves allocating interest income or expense over the relevant period. The EIR rate is the rate that exactly discounts estimated future cash flows through the expected life of the financial asset or liability or, where appropriate, a shorter period, to the gross carrying amount on initial recognition. The financial assets are recorded at trade date.

Deemed Loan to the Originator
Under IFRS 9 Financial instruments, if a transferor retains substantially all the risks and rewards associated with the transferred assets, the transaction is accounted for as a financing transaction, notwithstanding that it is a sale transaction from a legal perspective. The directors of the Company have concluded that the Originator has retained substantially all the risks and rewards of the securitised Portfolio as the Originator repurchases loans as per the mechanisms described above and furthermore, has provided appropriate credit mechanisms (subordinated loan related to cash reserve account, has purchased the Class B Notes) issued by the Company. As a consequence, the Company does not recognise the portfolio on its Statement of Financial Position, but rather a Deemed Loan to the Originator.

The Deemed Loan to the Originator initially represented the consideration paid by the Company in respect of the acquisition of an interest in the securitised Portfolio and is subsequently adjusted due to any new assignments and due to repayments made by the Originator to the Company. The Deemed Loan is carried at amortised cost using the effective interest method.

The subordinated loan (cash reserve account) provided by the Originator to the Company is a form of credit enhancement for the Notes. It is netted off against the Deemed Loan to the Originator since they have the same counterparty.

In addition to the subordinated loan, Class B Notes including any accrued interest on them, are netted off against the Deemed loan to the Originator as they are also held by Eurobank. They were entered into at the same time and in contemplation of one another. In the Statement of Comprehensive Income, the accrued interest on the Class B Notes is netted off against interest income in line with the netting treatment adopted on the asset side. The Company regularly reviews the underlying collateral in relation to the Deemed Loan to the Originator to assess for impairment. The methodology applied is further discussed below.

1. PRINCIPAL ACCOUNTING POLICIES (CONTINUED)

Impairment losses on Deemed Loan to the Originator
The Company's Deemed Loan to the Originator as defined above, was subject to IFRS 9's expected credit loss model. This impairment model applies to financial assets measured at amortised cost and debt investments at FVOCI, but not to investments in equity instruments. ECLs are a probability-weighted estimate of credit losses. Credit losses are measured as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the entity in accordance with the contract and the cash flows that the Company expects to receive).

The Company recognises expected credit loss impairment on the Deemed Loan to the Originator when it is estimated that it will not be in a position to receive all payments due. The amount of the expected credit losses ("ECL") allowance for impairment at amortised cost is the difference between all contractual cash flows that are due in accordance with the contract and all the cash flows that the entity expects to receive discounted at the original effective interest rate of the deemed loan.

At each reporting date, an impairment loss equal to 12-month expected credit losses (allocated to stage 1) is recognised for all financial assets for which there is no significant increase in credit risk since initial recognition. For financial assets for which there is a significant increase in credit risk since their initial recognition (allocated to stage 2), and that are credit impaired (allocated to stage 3) an impairment loss equal to lifetime expected credit losses will be recognised.

The underlying portfolio is considered impaired when it is probable that the Company will be unable to collect all amounts due according to the relevant contractual terms.

An assessment of whether credit risk has increased significantly since the initial recognition of the underlying portfolio is performed at each reporting period by considering primarily the change in the risk of default occurring over the remaining life of the underlying portfolio. The Company assessed whether a significant increase in credit risk ("SICR") has occurred since the initial recognition based on qualitative and quantitative, reasonable and supportable forward-looking information that includes a degree of management judgment.

The directors of the Company will review the availability of credit enhancement and assess whether the deemed loan is in default (90 days in arrears) and will also take into consideration any qualitative factors that the Originator is unlikely to pay.

The ECL calculation on the underlying portfolio takes into account the repurchases of loans by the Originator, the subordinated loan (cash reserve account), Class B Notes and accrued interest on the Class B Notes. The impairment of the underlying portfolio is also considered. The Originator's key assumptions for the recoverability of the underlying portfolio relate to the estimates of the probability of any account going into default, cash flows from borrowers' accounts, their timing and expected proceeds from the sale of repossessed collateral. These Originator's key assumptions are based on observed data from historical patterns and are updated regularly as new data becomes available. The ECL of the underlying loan portfolio has been calculated by the Originator, under the requirements of IFRS 9, at €10.2m (2020: €8.8m) as at 31 December 2021 and is lower than the respective level of available credit enhancements. The accuracy of impairment calculations would be affected by the probability of default, significant increase in credit risk, loss given default and the macroeconomic factors. The macroeconomic factors that are incorporated into the risk parameter models are used to calculate the ECL of the underlying portfolio of receivables which is assessed against the credit enhancements. As a result of these available credit enhancements, the macroeconomic conditions do not currently have any material effect on the Deemed Loan to the Originator.

Loan notes issued
Loan notes issued were initially recognised at the fair value of the issue proceeds net of transaction costs incurred and are subsequently stated at amortised cost using the effective interest method. In the event that impairment losses exceed the credit enhancement provided by the Originator, some loss may be borne by the Noteholders.

1. PRINCIPAL ACCOUNTING POLICIES (CONTINUED)

Derecognition
A financial asset (or, where applicable, a part of a financial asset or a part of a group of similar financial assets) is derecognised where the rights to receive cash flows from the asset have expired, or the Company has transferred its rights to receive cash flows from the asset, or has assumed an obligation to pay the received cash flows in full without material delay to a third party under a pass-through arrangement and the Company has:

- Transferred substantially all of the risks and rewards of the asset; or
- Neither transferred nor retained substantially all the risks and rewards of the asset but has transferred control of the asset.

When the Company has transferred its right to receive cash flows from an asset (or has entered into a pass-through arrangement) and has neither transferred nor retained substantially all of the risks and rewards of the asset nor transferred control of the asset, the asset is recognised to the extent of the Company's continuing involvement in the asset. In that case, the Company also recognises an associated liability. The transferred asset and the associated liability are measured on a basis that reflects the rights and obligations that the Company has retained. The Company derecognises a financial liability when the obligation under the liability is discharged, cancelled or expired. Similarly, a financial liability is derecognized when the obligation under the liability is discharged, cancelled or expires.

Cash and cash equivalents
Cash and cash equivalents comprise deposits with banks and highly liquid financial assets with maturities of three months or less from the date of acquisition that are subject to an insignificant risk of changes in their fair value and are used by the Company in the management of short-term commitments, other than cash collateral provided in respect of derivatives and securities borrowing transactions. Cash and cash equivalents are measured at amortised cost.

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

Interest income and interest expense
Interest income and expense for all interest-bearing financial instruments are recognised on accruals basis within 'interest income' and 'interest expense' in the statement of comprehensive income using the effective interest rate method.

Foreign currencies
Monetary assets and liabilities in foreign currencies are translated into Euros at the rates of exchange ruling at the reporting date. Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation at period-end exchange rates of monetary assets and liabilities denominated in foreign currencies are recognised in the statement of comprehensive income.

Effective interest rates
The effective interest rate method calculates the amortised cost of a financial asset or financial liability (or a group of financial assets or liabilities) and allocates the interest income or interest expense over the expected life of the asset or liability. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the net carrying amount of the financial asset or financial liability. Calculation of the effective interest rate takes into account early redemption fees and transaction costs. All contractual terms of a financial instrument are considered when estimating future cash flows. In order to determine the effective interest rate applicable to loans an estimate must be made of the expected life of the loans and hence the cash flows relating to them. These estimates are based on historical data from historical patterns and are updated regularly.

1. PRINCIPAL ACCOUNTING POLICIES (CONTINUED)

Taxation
Income tax expense comprises current and deferred tax. Income tax expense is recognised in the Statement of Comprehensive Income except to the extent that it relates to items recognised directly in equity, in which case it is recognised in equity. Current tax comprises the expected tax payable on the taxable income for the period, using the tax rates applicable to the Company's activities enacted or substantively enacted at the reporting date, and any adjustments to tax payable in respect of previous years.

Deferred taxation is accounted for, without discounting, in respect of all temporary differences between the treatment of certain items for taxation and accounting purposes which have arisen but not reversed by the balance sheet date except as otherwise required by IAS 12 'Income Tax'. Provision is made at the tax rates which are expected to apply in the periods in which the temporary differences reverse.

A deferred tax asset is recognised only to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is probable that future taxable profits will be available against which the asset can be utilised. Deferred tax assets are reviewed at each reporting date and are reduced to the extent that it is no longer probable that related tax benefit will be realised.

2. CRITICAL ACCOUNTING ESTIMATES AND JUDGEMENTS

In the application of the Company's accounting policies, which are described in note 1, the directors are required to make judgements (other than those involving estimations) that have a significant impact on the amounts recognised and to make estimates and assumptions about the carrying amounts of assets and liabilities that are not readily apparent from other sources. The estimates and associated assumptions are based on historical experience and other factors that are considered to be relevant. Actual results may differ from these estimates.

The most important area where the directors use judgement in applying its accounting policies is in relation to ECL. The ECL on the underlying loan portfolio is calculated to be €10.2m (2020: €8.8m) as at 31 December 2021 however given the credit enhancement provided in the deemed loan this amount is well below the total credit enhancement and is considered immaterial to the financial statements and hence the directors have assessed the ECL to be zero. This conclusion has been reached as:
1) Originator repurchases underlying portfolio as per the mechanisms described above as a result the Company has not incurred a loss since inception.
2) Credit enhancement provided through a Subordinated loan of €5m (cash reserve account €5.9m: 2020) funded through a loan from the Originator and Class B Notes being purchased by the Originator and the accrued interest on them; and
3) Class B Notes which are also considered to be a credit enhancement as described above amounted to €98.3m (2020: €219m) and the accrued interest owed on them is €8.3m (2020: €64.7m).

Therefore, total credit enhancement (ignoring future excess spread) is €111.6m (2020: €289.6m).

The directors of the Company have concluded that the Originator has retained substantially all the risks and rewards of the securitised Portfolio as the Originator repurchases loans as per the mechanisms described above and furthermore, has provided appropriate credit mechanisms (subordinated loan related to cash reserve account, has purchased the Class B Notes) issued by the Company. As a consequence, the Company does not recognise the portfolio on its Statement of Financial Position, but rather a Deemed Loan to the Originator.

For the Deemed Loan to the Originator, the estimates and underlying assumptions are reviewed on an on-going basis. Revisions to accounting estimates are recognised in the period in which the estimate is revised if the revision affects only that period or in the period of the revision and future periods if the revision affects both current and future periods.

3. INTEREST INCOME

Interest income represents the net interest income on the Deemed Loan to the Originator.

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Interest on gross Deemed loan to the Originator	22,619,111	30,979,376
Interest on subordinate loan (cash reserve account)	(10,823)	(19,199)
Accrued interest on Class B Notes	(19,266,308)	(25,938,084)
	3,341,980	5,022,093

4. INTEREST EXPENSE

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Interest on Class A Notes	2,955,227	4,257,074
Amortisation of issuance costs	153,702	214,114
Interest on subordinated loan (expense reserve account)	929	1,949
	3,109,858	4,473,137

5. ADMINISTRATIVE EXPENSES

Profit before tax is stated after charging:	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Auditor's remuneration – audit of the statutory financial statements of the Company	45,988	42,329
Tax fees	6,027	2,956
Accountancy fees	26,211	36,868
Servicing fees	38,000	20,000
Other expenses	114,896	445,803
	231,122	547,956

Auditor's remuneration (VAT excluded) in respect of the financial year	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Statutory audit	36,750	35,000
Other assurance services	-	-
Tax advisory services	-	-
Other non-audit services	-	-
	36,750	35,000

Apart from the directors, the Company has no employees and, other than the fees paid to Wilmington Trust SP Services (Dublin) Limited as set out in note 13, the directors received no remuneration during the year. The terms of the corporate services agreement provide for a single fee for the provision of corporate services (including making available of individuals to act as directors of the Company). As a result, the allocation of fees between the different services provided is a subjective and approximate calculation. The Company has allocated an amount of €1,000 (2020: €1,000) per director of the total administration fees paid to Wilmington Trust for the provision of the services of director. The individuals acting as directors do not (and will not), in their personal capacity or any other capacity, receive any fee for acting or having acted as directors of the Company. Tax and other compliance services were not provided by the Company's appointed auditors during the year.

6. INCOME TAX CHARGE

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Current tax:		
Irish corporation tax	**250**	**250**
Profit on ordinary activities before tax	**1,000**	**1,000**
Profit before tax multiplied by the standard rate of tax at 12.5%	**125**	**125**
Effect of: Higher rate tax applicable under S110 TCA, 1997	**125**	**125**
Income tax charge for the year	**250**	**250**

The Company is a qualifying Company within the meaning of Section 110 of the TCA, 1997. As such, the profits are chargeable to income tax under Case III of Schedule D at a rate of 25% but are computed in accordance with the provisions applicable to Case I of Schedule D of the TCA 1997. There was no deferred tax during the financial year.

7. DEEMED LOAN TO THE ORIGINATOR

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Gross Deemed Loan to the Originator	**342,174,736**	**411,246,280**
Class B Notes	**(98,300,000)**	**(219,000,000)**
Subordinate Loan (cash reserve account)	**(5,000,000)**	**(5,910,000)**
Amounts receivable from Bank of Greece under Law 128/75	**-**	**(163,455)**
Accrued interest on Class B Notes	**(8,285,018)**	**(64,726,882)**
Net Deemed Loan to the Originator	**230,589,718**	**121,445,943**

Interest on Class B Notes is determined in line with the waterfall structure defined in the Trust Deed.

The Deemed Loan to the Originator is classified as a stage 1 asset given that the credit risk has not increased significantly from initial recognition. Under the IFRS 9 context, the Company assessed the impairment allowance for the Deemed Loan to the Originator in accordance with the IFRS 9 expected loss model. Based on the above assessment the Company determined that no impairment loss should be recognised to the Deemed Loan to the Originator. Specifically, the increase of any impairment loss on the underlying portfolio, under IFRS 9 requirements, is absorbed against the existing credit enhancements available within the structure (the Subordinated Loan, Class B Notes and accrued interest on the Class B Notes).

Movement on deemed loan to the originator during the year:

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Opening balance	**411,246,280**	**566,143,017**
Additions	**75,026,243**	**-**
Repurchases	**(40,039,881)**	**(25,113,318)**
Other (Collections)	**(104,057,906)**	**(129,783,419)**
Closing balance	**342,174,736**	**411,246,280**

The Directors have reviewed data and information relating to the credit quality of the loan agreements underlying the Deemed loan to the Originator and are satisfied that the level of impairment of the underlying assets does not exceed the amount of the credit enhancements, namely the subordinated loan (cash reserve

7. DEEMED LOAN TO THE ORIGINATOR (continued)

account), accrued interest on the Class B Notes and Class B notes. In addition they have confirmed that the Originator is contractually obliged to repurchase any underlying portfolio prior to making any amendments to them other than certain Permitted Contract Amendments as described in the contractual documents, as well as that the Originator has a continuing policy to repurchase any Receivables arising under a Defaulted Loan (no contractual obligation), i.e. a Loan that is in arrears by 90 or more consecutive calendar days or the relevant Borrower has been declared insolvent or bankrupt or is subject to insolvency proceedings; or which is written off or deemed uncollectable in accordance with the Collection and Servicing Procedures, further strengthening the Company's financial position.

Having considered the above, it has been concluded that the Deemed Loan to the Originator is not considered to be impaired as of 31 December 2021.

Ageing analysis of the underlying Portfolio is disclosed below:

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Past due 1 – 29 days	**321,748,883**	**379,431,342**
Past due 30 – 59 days	**15,435,867**	**24,489,849**
Past due 60 – 89 days	**3,740,782**	**5,325,706**
Past due 90 – 179 days	**1,249,204**	**1,658,327**
Past due 180 – 359 days	**-**	**338,407**
Past due > 360 days	**-**	**2,649**
Total	**342,174,736**	**411,246,280**

The balance included in past due for more than 90 days and amounting to €1,249,204 (2020: €1,999,383) was repurchased by the Originator in January 2022 in the context of buyback mechanism described above.

8. OTHER RECEIVABLES

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Accrued income	**1,588,780**	**1,925,451**
Other receivable from the Originator	**-**	**296,641**
Other receivables from borrowers	**14,105**	**65,597**
	1,602,885	**2,287,689**

The balance included in other receivable from the Originator relates to cash collected from underlying loan repayments not yet transferred to the Company's bank account as at 31 December 2021. The balance included in other receivables from borrowers relates to insurance, legal, and other expenses which will be paid to the Originator once received.

9. CASH AND CASH EQUIVALENTS

All withdrawals from the Company's bank accounts are in accordance with the detailed priority of payments set out in the securitisation agreements.

	Year ended 31 December 2021	Year ended 31 December 2020
	€	€
Cash and bank current accounts	18,692,528	22,996,883
	18,692,528	22,996,883

All cash was held with Citibank in current accounts. As at 22 March 2021, Eurobank S.A. was appointed by the Company as the new cash manager. The cash is now held with Eurobank S.A.

10. SHARE CAPITAL

	Year ended 31 December 2021	Year ended 31 December 2020
Authorised:	€	€
100 ordinary shares of €1 each	100	100
Issued and fully paid:		
1 ordinary share of €1 each	1	1

The Company's capital as at the financial year end is best represented by the ordinary shares outstanding. The Company is not exposed to externally imposed capital requirements and, accordingly, the directors do not actively manage its ordinary share capital. The Company has issued 1 share of the total authorised shares of 100 to Wilmington Trust SP Services (Dublin) Limited. All shares are held under the terms of declarations of trust under which the relevant share trustee holds the issued shares of the Company in trust for a charity.

11. LOAN NOTES ISSUED

	Year ended 31 December 2021	Year ended 31 December 2020
	€	€
Class A Loan notes	250,000,000	145,592,684
Unamortized Issue costs	(239,991)	-
	249,760,009	145,592,684
Movement during the year:		
Balance as at beginning of year	145,592,684	328,910,691
Additions during the year	158,718,449	-
Unamortized Issue costs	(239,991)	-
Repayments during the year	(54,311,133)	(183,318,007)
Balance at end of year	249,760,009	145,592,684

The exposure of the Company's borrowings to interest rate changes and contractual re-pricing dates at the reporting date are as follows:

	Year ended 31 December 2021	Year ended 31 December 2020
	€	€
3 months or less	249,760,009	145,592,684

Interest on Class A Notes was payable on a quarterly basis at the three-month EURIBOR plus 210 basis points. As at 22 March 2021, the Interest on Class A Notes is now payable on a monthly basis at the one-month EURIBOR plus 180 basis points. The notes must be repaid in full by 31 December 2050. The Company has not had any defaults on principal, interest or any other breaches with respect to their liabilities during the year.

12. OTHER LIABILITIES

	Year ended 31 December 2021 €	Year ended 31 December 2020 €
Interest payable	**81,849**	**63,597**
Accruals	**72,314**	**60,000**
Due to Eurobank	**368,458**	**412,483**
Subordinated loan (expense reserve account)	**600,000**	**600,000**
Corporation tax payable	**250**	**250**
	1,122,871	**1,136,330**

The amount due to Eurobank represents payable on account of insurance, legal and other expenses due to be received from borrowers and is a current balance. The balance will be settled once the respective amounts are paid by the borrowers or loan buy back occurs.

13. RELATED PARTY TRANSACTIONS

The Company has identified the following transactions which are required to be disclosed under the terms of IAS 24 "Related Party Disclosures".

The Company has no employees during the financial year and the directors who are also employees of Wilmington Trust received no remuneration during the financial year. The terms of the corporate services agreement provide for a single fee for the provision of corporate services (including making available of individuals to act as directors of the Company). As a result, the allocation of fees between the different services provided is a subjective and approximate calculation. The Company has allocated an amount of €1,000 (2020: €1,000) per director of the total administration fees paid to Wilmington Trust for the provision of the services of directors. The individuals acting as directors do not (and will not), in their personal capacity or any other capacity, receive any fee for acting or having acted as directors of the Company.

The Company has an other receivable balance in the amount of €NIL (2020: €296,641) due from Eurobank Ergasias S.A. that relates to cash collected from underlying loan repayments not yet transferred to the Company's bank account as at 31 December 2021.

The income earned on the underlying portfolio for the year was €22,619,111 (2020: €30,979,376). The deemed to the originator balance for the year end 31 December 2021 is €342,174,736 (2020: 411,246,280)

Eurobank Ergasias S.A. administers the portfolio on behalf of the Company and earned €38,000 (2020: €20,000) during the year. Eurobank Ergasias S.A. are the noteholders of the Class B Notes amounting to €98,300,000 (2020: €219,000,000).

Eurobank Ergasias S.A. earned €19,266,308 (2020: €25,938,084) with respect to the accrued interest on Class B Notes during the year and was owed €8,285,018 (2020: €64,726,882) at the end of the year, which is included within the Deemed Loan to the Originator.

Eurobank Ergasias S.A. earned €10,823 (2020: €19,199) with respect to interest income on the €5,000,000 (2020: 5,910,000) subordinated loan they provided to the Company for the year. Eurobank Ergasias S.A. earned €929 (2020: €1,949) with respect to interest expense on the €600,000 subordinated loan on the expense reserve account for the year.

Amounts of €368,458 (2020: 412,483) due to Eurobank represent payment on account payable on account of insurance, legal and other expenses due to be received from borrowers and is a current balance. The balance will be settled once the respective amounts are paid by the borrowers or loan buy back occurs

14. FINANCIAL RISK MANAGEMENT

The Originator considers the Company to be its subsidiary. The Originator manages the underlying portfolio under the servicer agreement with the Company. In managing the loans, the Originator applies its own formal risk management structure for managing risk, including established risk limits, reporting lines, mandates and other control procedures. This structure is reviewed regularly by the Originator's Assets and Liabilities Committee (ALCO), which is charged with the responsibility for managing and controlling the statement of financial position exposures of the Originator.

Interest rate risk
After taking into consideration the administered interest rate nature of the Company's Deemed Loan to the Originator and the current expectations of the market indicating no significant increase of the basis rate in the forthcoming years, the directors do not believe that the Company has any significant interest rate re-pricing exposure. Based on an analysis of the interest rate risk sensitivity for the base rate (i.e. Euribor), the impact on interest expense on Class A Notes by an increase / decrease in Euribor of 10% would have caused an increase / decrease of €217,687 (2020: €315,855) respectively.

Credit risk
Credit risk is the risk of financial loss to the Company if the customer of the financial instrument fails to meet its contractual obligations and arises principally from the Company's cash and cash equivalents, Deemed Loan to Originator and trade and other receivables.

The maximum exposure to credit risk is considered by the directors to be the carrying value of the Deemed Loan to the Originator (see note 7), other receivables and bank deposits. The underlying loan book consists of certain Consumer and Small Business term (the "portfolio") loans selected from the total portfolio of agreements entered into by the Transferor with obligors in Greece and originated by Eurobank Ergasias S.A.

The underlying portfolio loans which are defaulted are repurchased by the Originator and as a result the Company has not incurred any loses The ECL of the underlying loan portfolio, calculated as €10.2m (2020: €8.8m) as at 31 December 2021 by the loan Originator, is lower than the respective level of available credit enhancements of €111.6m (2020: €289.6m) as at 31 December 2021 and therefore the ECL does not have a significant impact on the credit risk of the Company.

The maximum exposure to credit risk at the reporting date is:

	Year ended 31 December 2021	**Year ended 31 December 2020**
	€	**€**
Deemed loan to the Originator	**230,589,718**	**121,445,943**
Other receivables	**1,602,885**	**2,287,689**
Cash and cash equivalents	**18,692,528**	**22,996,883**
	250,885,131	**146,730,515**

In relation to cash and cash equivalents, the Company monitors the rating (Moody's) of the bank account ensuring that the bank continues to be an eligible institution. The short-term credit rating for Citibank at the reporting date is P-1. Management believes that the ECL on cash balances is not material as at 31 December 2021. Given the short-term nature of other receivable balances and its credit quality, management believes that the ECL on these are not material.

Liquidity risk
The Company's policy is to manage liquidity risk through its excess spread, a reserve fund and an over-collateralisation of the portfolio underlying the loan to the Originator. As the length of the Notes is designed to match the length of the portfolio underlying the loan to the Originator, there are deemed to be limited liquidity risks facing the Company.

The following table details the Company's liquidity analysis for its financial liabilities at 31 December 2021 and 31 December 2020. The interest payable on the loan notes and subordinated loans is estimated based on the outstanding principal and interest rates at the period end calculated up to the expected redemption date:

14. FINANCIAL RISK MANAGEMENT (continued)

Liquidity risk (continued)

At 31 December 2021	Carrying Amount €	Gross nominal outflow €	Less than 1 month €	1 to 3 months €	3 to 12 months €	More than 1 year €
Liabilities						
Class A Notes	**250,000,000**	**449,208,965**	**269,270.83**	**490,243**	**3,467,868**	**444,981,583**
Interest payable	**81,849**	**81,849**	**81,849**	**-**	**-**	**-**
Other liabilities	**1,041,022**	**1,041,022**	**1,041,022**	**-**	**-**	**-**
Total liabilities	**251,122,871**	**450,331,836**	**1,392,142**	**490,243**	**3,467,868**	**444,981,583**

At 31 December 2020	Carrying Amount €	Gross nominal outflow €	Less than 1 month €	1 to 3 months €	3 to 12 months €	More than 1 year €
Liabilities						
Class A Notes	**145,592,684**	**214,853,514**	**-**	**543,619**	**1,763,601**	**212,546,294**
Interest payable	**63,597**	**63,597**	**63,597**	**-**	**-**	**-**
Other liabilities	**1,072,733**	**1,072,733**	**1,072,733**	**-**	**-**	**-**
Total liabilities	**146,729,014**	**215,989,844**	**1,136,330**	**543,619**	**1,763,601**	**212,546,294**

Currency risk

All of the Company's assets and liabilities are denominated in Euros ("€"), and therefore currently there is no foreign currency risk.

Financial instruments

The Company's financial instruments comprise of a Deemed Loan to the Originator, cash and cash equivalents, interest-bearing borrowings and various receivables and payables that arise directly from its operations.

It is, and has been throughout the period under review, the Company's policy that no trading in financial instruments is undertaken.

Fair values

The fair values together with the carrying amounts shown in the statement of financial position are as follows:

	Note	Carrying amount 2021 €	Approximate fair value 2021 €
Deemed Loan to the Originator	7	**230,589,718**	**230,589,718**
Other receivables	8	**1,602,885**	**1,602,885**
Cash and cash equivalents	9	**18,692,528**	**18,692,528**
		250,885,131	**250,885,131**

		Carrying amount 2021 €	Approximate fair value 2021 €
Loan notes issued held at amortised cost	11	**249,760,009**	**249,760,009**
Other liabilities	12	**1,123,122**	**1,123,122**
		250,883,130	**250,883,130**

14. FINANCIAL RISK MANAGEMENT (CONTINUED)

Fair values (continued)

	Note	Carrying amount 2020 €	Approximate fair value 2020 €
Deemed Loan to the Originator	7	**121,445,943**	**121,445,943**
Other receivables	8	**2,287,689**	**2,287,689**
Cash and cash equivalents	9	**22,996,883**	**22,996,883**
		146,730,515	**146,730,515**

	Note	Carrying amount 2020 €	Approximate fair value 2020 €
Loan notes issued held at amortised cost	11	**145,592,684**	**145,592,684**
Other liabilities	12	**1,136,580**	**1,136,580**
		146,729,264	**146,729,264**

The quality of the underlying securitized loan portfolio between the initiation of the transaction and the reporting date has remained stable, as indicated by the underlying loans delinquency status, as well as the Originator's IFRS 9 ECL calculations, indicating a price of the Notes very close to the issuance price. Based on the performing collateral and characteristics of these floating rate notes i.e. stable interest rates, the carrying amount is the approximate fair value.

Fair value hierarchy
Categorisation within the hierarchy has been determined on the basis of the lowest level input that is significant to the fair value measurement of the relevant asset or liability as follows:

Level 1 - valued using quoted prices in active markets for identical assets or liabilities.
Level 2 - valued by reference to valuation techniques using observable inputs other than quoted prices included within Level 1.
Level 3 - valued by reference to valuation techniques using inputs that are not based on observable market data.
The valuation techniques used by the Company are explained in the accounting policies note.

The Company has no financial instruments included in its balance sheet that are measured at fair value. The fair value of Deemed Loans and Loans Notes issued are categorised as level 3. All other financial assets and liabilities are defined as being level 2 with the exception of cash and cash equivalents which is defined as being level 1.

15. ULTIMATE PARENT UNDERTAKING AND CONTROLLING PARTY

The shares in the Company are held by Wilmington Trust SP Services (Dublin) Limited under Declarations of Trust for charitable purposes dated 22 June 2018. Eurobank Ergasias S.A. has no direct equity ownership interest in the Company. However, in accordance with IFRS, and particularly IFRS 10, the Originator considers itself to be the controlling party of the Company and the results of the Company are included in the consolidated financial statements of Eurobank Ergasias S.A., which are available online at www.eurobank.gr.

The financial statements of Eurobank Ergasias S.A. are available from its head office: 8 Othonos Street, 105 57, Athens, Greece, and from its website at www.eurobank.gr.

16. SUBSEQUENT EVENTS

The invasion of Ukraine in February 2022 has caused significant volatility in international markets. There is significant uncertainty around the impact of the situation on international economies and, as such, the Company is actively monitoring the extent of the impact to its operations, financial accounting and reporting. The scale of this conflict in Europe is an unprecedented event in modern history and the eventual impact on the global economy and markets will largely depend on the scale and duration of the conflict. The political unrest between Russia and Ukraine does not have any impact on the Company as the Company has no presence in those countries.

There were no other material events after the reporting financial year.

17. APPROVAL OF FINANCIAL STATEMENTS

The financial statements were approved and authorised for issue by the board of directors on 17 November 2022.