Hellenic Bank Group

Member of Eurobank Group

Annual Financial Report of the Hellenic Bank Group

For the year ended 31 December 2024

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Annual Financial Report
For the year ended 31 December 2024
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HELLENIC BANK PUBLIC COMPANY LIMITED
MANAGEMENT REPORT

INCORPORATION, ACTIVITIES AND BRANCH NETWORK

Hellenic Bank Public Company Limited (the "Bank") was incorporated in Cyprus and is a public company in accordance with the provisions of the Companies Law (Cap. 113), the Cyprus Stock Exchange Laws and Regulations and the Income Tax Laws. The Bank's registered office is located at 200, Corner of Limassol and Athalassa Avenues, 2025 Strovolos, P.O. Box 24747, 1394 Nicosia. The Bank is the holding company of Hellenic Bank Group (the "Group").

The principal activity of the Group continues to be the provision of a wide range of banking and financial services, which include financial, investment and insurance services, custodian and factoring services and management and disposal of properties, predominantly acquired in debt satisfaction.

The Bank provides banking and financial services through its branch network and digital channels. As at 31 December 2024 the Bank's branch network included 52 branches and 158 ATMs in Cyprus.

GROUP'S STRUCTURE

The financial statements for the year ended 31 December 2024 (the "Financial Statements") comprise the financial statements of Hellenic Bank Public Company Limited and its subsidiary companies, which together are referred to as the Group. All group companies and details of the Bank's acquisitions and disposals of subsidiaries made during the year 2024 are presented in Note 25 of the Financial Statements.

ALTERNATIVE PERFORMANCE INDICATORS ('API')

Throughout this Management Report (the "Report"), references are made to non-IFRS measures, namely Alternative Performance Indicators ('APIs'). Management believes that, in addition to IFRS related measures, these indicators provide relevant information to the users in assessing the financial performance and position of the Group on a consistent basis. Where APIs and the reported results calculated and presented in the Financial Statements are provided on a different basis, a reconciliation of the figures is provided in 'Reconciliations' section of the Annual Financial Report. During 2024 as a result of the Bank's acquisition by Eurobank S.A., certain APIs have been amended compared to 2023 in order to be aligned with the Eurobank group's equivalent APIs. Refer to the "Glossary and Definitions of the performance measures" for the revised definitions of such APIs.

FINANCIAL RESULTS[1]

The Group's profit for FY2024 amounted to €382,6 million (Bank: profit €379,4 million), (31 December 2023: Group €365,4 million, Bank €365,7 million).

Profit attributable to the shareholders of the parent company FY2024 amounted to €382,6 million compared to €365,4 million for FY2023, whereas Return on Tangible Equity (ROTE) amounted to 23,2% in FY2024 compared to 28,7% in FY2023.

1. The Group's Annual Financial Report and the Group's Financial Results presentation for the year ended 31 December 2024 are available on the Group's website www.hellenicbank.com (Investor Relations). The Annual Financial Report is also available at the Bank's registered office.

Income Statement Analysis

Net interest income

The Group's net interest income for FY2024 was €598,9 million (Bank's €598,6 million), up by 12% (Bank: up by 12%) compared to €536,3 million (Bank: €536,1 million) for FY2023. The increase YoY was mainly driven by higher interest income from the loan portfolio, primarily due to the increase of the Bank's lending base rate during the first three quarters of 2024, and higher interest income on debt securities due to higher interest rates, partially offset by higher interest expense on customer deposits mostly due to higher deposit rates. The decrease in both interest expense on funding by Central Banks and interest income on balances with Central Banks, was mainly due to the TLTRO repayment in June 2024.

The interest expense on loan capital for the Group and the Bank totaling to €40,8 million in FY2024 is higher by 4% (FY2023: €39,2 million) due to higher interest expense during FY2024 on Tier 2 Subordinated Notes which were issued in March 2023, as well as interest expense on the Senior Preferred notes compared to FY2024.

The Group's and the Bank's net interest margin (NIM) for FY2024 amounted to 3,31% and recorded an increase of 56 bps compared to 2,75% for FY2023, positively impacted by the increase in NII, as explained above, as well as the decrease in the average interest-bearing assets. The decrease in the average interest-bearing assets during FY2024 was mainly driven by the decrease in the cash and balances with Central Banks, which was in turn primarily due to the TLTRO repayment in June 2024 as well as the decrease in the level of average customer deposits during FY2024 compared to FY2023.

Adjusting for the TLTRO borrowing, by removing the TLTRO equivalent amount from the average interest-bearing assets, NIM for FY2024 and FY2023 increases to 3,50% and 3,12% respectively.

Non-interest income

The Group's total non-interest income for FY2024 amounted to €129,4 million (comprising net fee and commission income of €69,9 million, net gains on disposal and revaluation of foreign currencies and financial instruments of €26,3 million, net income from insurance operations of €17,3 million and other income of €16,0 million), up by 1% compared to €128,0 million for FY2023. The increase was mainly driven by higher net gains on disposal and revaluation of foreign currencies and financial instruments, partially offset by the decrease in other income and net fee and commission income.

The Bank's total non-interest income for FY2024 amounted to €120,8 million (comprising net fee and commission income of €75,1 million, net gains on disposal and revaluation of foreign currencies and financial instruments of €22,8 million, and other income of €23,0 million), down by 2% compared to €123,7 million for FY2023. The decrease was mainly due to the decrease in net fee and commission income.

Net gains on disposal and revaluation of foreign currencies and financial instruments

The Group's net gains on disposal and revaluation of foreign currencies and financial instruments amounted to €26,3 million for FY2024 (comprising net gains on foreign currencies of €6,0 million and net gains on disposal and revaluation of financial instruments of €20,3 million), higher by 79% compared to net gains of €14,6 million for FY2023 (comprising net gains on foreign currencies of €7,3 million and net gains on disposal and revaluation of financial instruments of €7,3 million).

The net increase of €13,0 million in net gains on disposal and revaluation of financial instruments for FY2024 was primarily driven by the net increase of €11,4 million in net gains on revaluation of financial instruments, mainly from other financial instruments arising from the revaluation of interest rate swap contracts that the Bank executed during the 3rd quarter of 2024. Additionally, net gains on revaluation of equity instruments primarily from the Bank's equity securities portfolio.

The Bank's net gains on disposal and revaluation of foreign currencies and financial instruments amounted to €22,8 million for FY2024 (comprising net gains on foreign currencies of €6,0 million and net gains on disposal and revaluation of financial instruments of €16,8 million), higher by 114% compared to net gains of €10,6 million for FY2023 (comprising net gains on foreign currencies of €7,3 million and net gains on disposal and revaluation of financial instruments of €3,3 million).

Net fee and commission income
Net fee and commission income for FY2024 was €69,9 million (Bank: €75,1 million) and recorded a decrease of 4% (Bank: decrease by 4%), compared to €72,8 million (Bank: €78,0 million) in FY2023. The decrease was mainly due to lower banking fees and commissions, mostly driven by lower loans and credit facilities income.

Net income from insurance operations
Net income from insurance operations amounted to €17,3 million for FY2024 compared to €14,3 million in FY2023, increasing by 21% mainly due to increase in the net insurance service result, driven primarily from higher net premiums from the Group's non-Life insurance business. This was partially offset by the increase in the net insurance finance expenses due to deviations in the term structure of interest rates between the two valuation periods, mainly from the Group's Life insurance business.

Other income
Other income for FY2024 amounted to €16,0 million (Bank: €23,0 million) decreased by 39% (Bank: decrease 35%) compared to €26,2 million in FY2023 (Bank: €35,1 million) mainly due to the favorable outcome of a disputed amount of c.€3,0 million from KEDIPES as well as an amount of c.€8,5 million relating to the recovery of VAT on common expenses relating to prior years, following the recent approval obtained by the Tax Department on the method used by the Bank, both included in sundry income for FY2023.

Total net income of the Group for FY2024 amounted to €728,3 million (Bank: €719,4 million), increasing by 10% compared to €664,3 million (Bank: €659,8 million, increase by 9%) for FY2023, driven mainly by the increase in net interest income.

Expenses
The Group's total expenses for FY2024 amounted to €291,2 million (Bank: €287,2 million) up by 12% compared to €259,1 million (Bank: €257,7 million) (Bank up by 11%) for FY2023, mainly driven by higher administrative and other expenses and staff costs.

Staff costs
The Group's staff costs for FY2024 amounted to €134,2 million, up by 12% compared to €119,3 million for FY2023 and accounted for 46% of the Group's total expenses (FY2023:46%).

The Bank's staff costs for FY2024 amounted to €132,9 million and compared to €118,2 million for FY2023, recorded an increase of 12% and accounted for 46% of the Bank's total expenses (FY2023:46%).

The main drivers for the increase in Staff costs were salary increments, higher COLA and higher employer's contributions, as well as costs emanating from the renewal of the Collective Agreement signed in November 2024.

The analysis of staff costs is disclosed in Note 12 of the Financial Statements.

Administrative and other expenses
The Group's total administrative and other expenses for FY2024 amounted to €136,7 million, increased by 16% compared to €117,4 million for FY2023.

The Bank's total administrative and other expenses for FY2024 amounted to €134,1 million, increased by 14% compared to €117,3 million for FY2023.

The increase was mainly driven by the higher Repairs and maintenance costs and Consultancy and other professional services fees, resulting from the Bank's continuous efforts to deliver its strategic plan as well as a one-off expense relating to a VAT provision charge on long disputable VAT Law provisions (included in Other administrative expenses). Additionally, the servicer's administration fees were higher as the management and success fees of APS Cyprus for the first three-months of 2023 were eliminated on consolidation, when the APS Cyprus was treated as a subsidiary. These increases were partially offset by the lower contribution to the Deposit Guarantee Fund (DGF) of €5,5 million for FY2024 (FY2023: €8,0 million) and the release of provision for pending litigations of €1,5 million during 3Q2024, following the positive outcome of certain cases.

The Bank was subject to the contribution to Deposit Guarantee Fund (DGF) on a semi-annual basis from 2020 and until 3 July 2024. Contributions were paid at least until the target level laid down in Regulation 16(1) of the Deposit Guarantee and Resolution of Credit and Other Institutions Scheme (DGS) Regulations of 2016 to (No. 2) of 2020 is reached. Contributions were calculated and collected from credit institutions participating in the DGS twice a year from 2020 to 2023 and once for the year 2024, in order to reach the target level on time by 3 July 2024 (i.e. a total of nine six-month periods from 2020 to 2024, recognised in Income Statement in 1Q and 3Q in each FY). On April 2024, the Management Committee (MC) of the Deposit Guarantee and Resolution of Credit and other Institutions Scheme (DGS) informed the Bank that with the last contributions for the first half of 2024, the target level of 0.8% of covered deposits of all authorised Credit Institutions in line with the relevant legislation and EU Directive was reached. The MC of the DGS can decide to collect additional ex-ante contributions to achieve a higher return.

Analysis of administrative and other expenses and total fees relating to the Group's statutory auditors is disclosed in Note 13 of the Financial Statements.

The Group's cost to income ratio for FY2024 was 40,0% compared to 39,0% for FY2023. The Bank's cost to income ratio for FY2024 was 40,0% in comparison to 39,0% for FY2023.

The YoY increase was driven by higher total expenses (12%), despite the increase in total net income (10%)

The Group's cost to income ratio, adjusted for the Special Levy, DGS contribution and Transformation costs decreases to 35,4% for FY2024 and 33,3% for FY2023 and the Bank's 35,2% for FY2024 and 33,3% for FY2023.

Impairment losses on financial instruments and non financial assets

Impairment losses on financial instruments
The Group's reversal of impairment losses on financial instruments amounted to €13,8 million for FY2024 (Bank: €13,8 million) compared to a charge €7,2 million for FY2023 (Bank: €7,2 million).

The release for impairment losses on loans and advances to customers and financial guarantees and loan commitments of €5,7 million for FY2024 was mainly due to releases from the update of IFRS 9 PD model to reflect the latest macroeconomic projections and the EURIBOR/Bank's base rate projections, as well as resolutions executed above book value. This release was partially offset by charges due to the update of LGD models and other related LGD parameters and ECL booked on new lending.

As at 31 December 2024, the probability weights for each macroeconomic scenario (Baseline, Optimistic and Pessimistic scenario) used for IFRS 9 purposes were 50%-25%-25% for each scenario respectively and remained unchanged from 31 December 2023.

Additionally, the release for impairment losses on other financial assets of €8,1 million incurred during FY2024, related mainly to changes in the estimated cash flows from the APS indemnification asset. The APS scheme covers a perimeter of both performing and non-performing exposures and offers a 90% protection (at the inception) on impairments losses basis. As such the drivers and the logic of the APS scheme is aligned with the impairment methodology and assumptions, however it moves by nature in the opposite direction.

The cost of risk for FY2024 and FY2023 amounted to 0,13% and 0,14% respectively. Adjusting for the cash flows re-estimation of the APS indemnification asset, the adjusted cost of risk for FY2024 and FY2023 amounted to 0,01% and 0,24% respectively.

Impairment losses on non-financial assets
The Group's Impairment losses on non-financial assets for FY2024 amounted to €7,8 million (Bank: €8,2 million) and decreased by 15% compared to €9,2 million for FY2023 (Bank: €9,5 million decrease by 14%). The decrease is mainly due to the impairment losses of property, plant and equipment (PPE) of €1,1 million included in impairment losses on non-financial assets for FY2023, following the revaluation of land and buildings during FY2023 carried out by qualified valuers by applying valuation methodologies recommended by the internationally accepted valuation standards.

Further analysis is disclosed in Note 14 of the Financial Statements.

Taxation
The Group's taxation for FY2024 amounted to a tax charge of €61,5 million (FY2023: €47,4 million), which includes current tax charge of €54,7 million (FY2023: €47,5 million), €6,4 million Pillar Two income top-up tax provision (FY2023: Nil) and deferred tax charge of €0,0 million (FY2023: €0,3 million deferred tax credit).

The Banks's taxation for FY2024 amounted to a tax charge of €59,4 million (FY2023: €46,1 million), which includes current tax charge of €53,1 million (FY2023: €44,9 million), €5,9 million Pillar 2 income tax provision (FY2023: Nil) and deferred tax charge of €0,0 million (FY2023: €1,0 million deferred tax credit).

On 12 December 2024 the Cyprus House of Representatives voted for transposition into Law of the Council Directive (EU) 2022/2523 on ensuring a minimum global level of Taxation (minimum tax rate of 15%) for multinational enterprise groups and large-scale domestic groups in the Union. The Law has been published in the Cyprus Government Gazette on 18 December 2024 with effect as from 1 December 2024. According to the Income Tax Law 118(I)/2002 as amended, the Bank's taxable profit and that of its subsidiaries in Cyprus, is subject to income tax at the rate of 12,5%. Following the acquisition of 56% of the Share Capital of the Bank by Eurobank A.E., the Bank and its subsidiaries are subject to the Pillar Two provisions for the period, in 2024, during which the results of the Bank and its subsidiaries are consolidated with the results of Eurobank A.E. The jurisdictional top up tax is calculated on the difference of the effective tax rate, of the group entities in Cyprus, and the minimum global tax rate of 15%.

Statement of Financial Position Analysis

As at 31 December 2024, the Group's total assets amounted to €18,4 billion (Bank: €18,2 billion) and decreasing by 8% compared to €20,1 billion as at 31 December 2023 (Bank: €20,0 billion). The decrease was mainly driven by the reduction in balances with Central banks, partially offset by the increase in investments in debt securities.

Funding

Deposits
The Group's and the Bank's customer deposits amounted to €15,7 billion as at 31 December 2024 (31 December 2023: €15,3 billion) and increased by 2% since 31 December 2023. They comprised €14,7 billion deposits in Euro (31 December 2023: €14,3 billion) and €1,0 billion deposits in foreign currencies (31 December 2023: €1,0 billion), mostly in US Dollars. The Group and the Bank have a primarily retail customer deposit base and c.67% of the total customer deposits are protected under the deposit guarantee scheme as at 31 December 2024.

The Bank's deposits market share was 28,1% as at 31 December 2024 and 29,4% as at 31 December 2023. Deposits' market share as at 31 December 2024 consists of 35,2% Households deposits (31 December 2023: 37,3%) and 19,1% Non-financial corporations deposits (31 December 2023: 19,8%).

The net loans to deposits ratio of the Group and the Bank was 36,6% as at 31 December 2024, compared to 39,4% at 31 December 2023. Pro forma for the HFS portfolio, the net loans to deposits ratio as at 31 December 2023 was reduced to 39,3%.

Funding by Central banks
As at 31 December 2024, the Group and the Bank had no outstanding funding by Central banks (31 December 2023: €2,4 billion).

In June 2021, the Bank participated in the 8th series of the TLTROs III by borrowing an amount of €2,3 billion. The borrowing was for duration of 3 years with maturity date 26 June 2024 and the Bank had the option to repay (partially or fully) on a quarterly basis starting from June 2022 onwards. On 26 June 2024, the Group's and the Bank's funding under the TLTRO program matured, leading to a full repayment of the amount of €2,4 billion.

Loan capital
Loan capital, including accrued interest, amounted to €310 million as at 31 December 2024, compared to €442 million as at 31 December 2023. The decrease in loan capital relates mainly to the redemption of Convertible Capital Securities 1 (CCS1) and Convertible Capital Securities 2 (CCS2) on 31 December 2024, totaling €130 million, following regulatory permission obtained.

In July 2024, the €100 million Senior Preferred notes issued in July 2022, with a fixed coupon of 9%, maturing on 15 July 2025, were called at par. In September 2024, the Bank issued €100 million Senior Preferred notes, with a 4% coupon and maturity of 2 years with 1 year non-callable.

Additional information on Loan capital is disclosed in Note 38 of the Financial Statements.

Liquidity
The CRD/CRR sets forth the guidelines for calculating liquidity measures such as the Liquidity Coverage Requirement Ratio (LCR) and the Net Stable Funding Ratio (NSFR). As at 31 December 2024, the Group was in compliance with all regulatory liquidity requirements.

The Group's LCR stood at 519% as at 31 December 2024, compared to 542% as at 31 December 2023, which is considerably higher than the minimum regulatory limit of 100%. The liquidity surplus in LCR as at 31 December 2024 amounted to €7,7 billion, compared to €7,4 billion as at 31 December 2023.

The Group's NSFR stood at 225% as at 31 December 2024 compared to 217% as at 31 December 2023. This is considerably higher than the minimum regulatory requirement of 100%. The NSFR liquidity surplus for 31 December 2024 amounted to €8,6 billion compared to €8,1 billion as at 31 December 2023.

Additional information on liquidity requirements will be disclosed in the Pillar III disclosures for the year ended 31 December 2024, which will be available on the Bank's website: Pillar III Disclosures (hellenicbank.com) (Investor Relations).

Loans
The Group's and the Bank's gross loans amounted to €5.850 million as at 31 December 2024, compared to €6.166 million as at 31 December 2023 (31 December 2023: €6.162 million, excluding HFS portfolio), and decreased by 5%, as repayments offset new lending.

As at 31 December 2024, the Group's and the Bank's net loans and advances to customers amounted to €5.738 million compared to net loans and advances to customers of €6.024 million as at 31 December 2023, decreasing by 5%.

Additionally, as at 31 December 2023, the Group's and the Bank's net loans and advances to customers which were classified as held for sale in accordance with IFRS 5, were €3 million relating to a portfolio of secured NPL exposures which was sold in May 2024.

The Bank's loan market share as at 31 December 2024 was 23,9% (31 December 2023: 25,8%) and consists 31,8% Household loans (31 December 2023: 32,9%) and 19,1% Non-financial corporations loans (31 December 2023: 21,8%).

Total new lending during FY2024 amounted to €1.075 million, of which €230 million relates to total green new lending representing 21% of the total new lending of the Bank, recording a YoY decrease of 11% compared to new lending of €1.204 million for FY2023. New lending in FY2024 comprised €389 million of retail loans (of which €277 million were housing loans), €229 million of corporate loans, €138 million of commercial loans and €319 million of shipping and international credit loans. The Bank continued providing lending to creditworthy businesses and households while at the same time focusing on managing early arrears and avoiding new NPLs.

The Bank's new lending market share as at 31 December 2024 was 20,3% (31 December 2023: 28,7%).

Loan Portfolio Quality

As part of its ongoing NPE deleveraging efforts, the Bank in May 2024 completed the sale of a non-performing portfolio with gross carrying amount of €4 million, which has been classified as a disposal group held for sale in 2023. References to pro forma figures and APIs disclosed throughout this report as at 31 December 2023 refer to the NPE portfolio classified as a disposal group held for sale, which was excluded. Where figures are provided on a pro forma basis, this is stated and referred to as "Pro forma for held for sale" or "Pro forma for HFS". Where figures and APIs disclosed are provided on a different basis, this is stated.

Non-performing exposures reduction
The Group's non-performing exposures (NPEs) as defined by the European Banking Authority (EBA) amounted to €382 million as at 31 December 2024, compared to €464 million as at 31 December 2023, decreasing by 18% (excluding NPEs covered by the APS agreement, NPEs amounted to €0,1 billion as at 31 December 2024 and €0,2 billion as at 31 December 2023).

The reduction of NPEs during FY2024 was mainly driven by organic deleveraging as well as non-contractual write- offs executed during FY2024 of c.€25 million, partially offset by new defaults and accrued interest.

Pro forma for HFS portfolio, NPEs were reduced further to €460 million as at 31 December 2023, (NPEs excluding NPEs covered by the APS agreement amounted to €0,2 billion as at 31 December 2023).

Terminated loans included in NPEs amounted to €201 million as at 31 December 2024 (31 December 2023: €281 million) and gross loans with forbearance measures amounted to €275 million as at 31 December 2024 (31 December 2023: €404 million).

Pro forma for HFS portfolio, terminated loans included in NPEs amounted to €276 million as at 31 December 2023 and gross loans with forbearance measures amounted to €400 million as at 31 December 2023.

The stock of property, which is mostly from customers' debt settlement, amounted to €76,2 million as at 31 December 2024, compared to €100,4 million as at 31 December 2023. The movement in the balance of stock of property from customers' debt settlement during FY2024 included mainly additions of €3,4 million and disposals of €19,7 million.

The Group's and the Bank's NPE ratio as at 31 December 2024 was 6,5% (31 December 2023: 7,5%). The ratio excluding the NPEs covered by the APS agreement as at 31 December 2024 was 2,4% (31 December 2023: 2,6%). Pro forma for HFS portfolio, the NPE ratio was 7,5% as at 31 December 2023, while the NPE ratio excluding the NPEs covered by the APS agreement was 2,5% as at 31 December 2023.

The net NPEs to total assets ratio as at 31 December 2024 stood at 1,4% (31 December 2023: 1,5%), while the ratio excluding the NPEs covered by the APS agreement as at 31 December 2024 stood at 0,5% (December 2023: 0,4%). Pro forma for HFS portfolio, as at 31 December 2023, these ratios remained the same.

Total accumulated impairment losses
The Group's and the Bank's total accumulated impairment losses amounted to €125 million as at 31 December 2024 (31 December 2023: €154 million) and represented 2,1% of the total gross loans (31 December 2023: 2,5%). Total accumulated impairment losses over gross loans excluding the loans covered by the APS agreement was 1,7% as at 31 December 2024 (31 December 2023: 2,1%). Pro forma for HFS portfolio, as at 31 December 2023, the ratio of total accumulated impairment losses over gross loans remained the same, while excluding the loans covered by the APS agreement the ratio was 2,0%.

The Group's and the Bank's NPEs coverage ratio, stood at 43% as at 31 December 2024 (December 2023: 42%), while excluding the NPEs covered by the APS agreement, the ratio is adjusted to 63% as at 31 December 2024 (31 December 2023: 71%). Pro forma for HFS portfolio, as at 31 December 2023, the NPEs coverage ratio remained the same, while excluding the NPEs covered by the APS agreement the ratio is adjusted to 73%.

Taking into account tangible collaterals the NPEs overall coverage stood at 131% as at 31 December 2024 (31 December 2023: 128%), while excluding the NPEs covered by the APS agreement and the corresponding tangible collateral and gross total accumulated impairment losses of the NPEs covered by the APS agreement, the ratio is adjusted to 149% as at 31 December 2024 (31 December 2023: 154%). Pro forma for HFS portfolio, as at 31 December 2023, the NPEs overall coverage remained the same, while excluding the NPEs covered by the APS agreement the ratio is adjusted to 155%.

Investment assets
The Group's investment assets comprise cash and balances with Central Banks, placements with other banks, reverse repurchase agreements, investments in debt securities and investments in equity securities and collective investment units. The Bank's investment assets comprise cash and balances with Central Banks, placements with other banks, reverse repurchase agreements, investments in debt securities and investments in equity securities. The Group's carrying value of investment assets amounted to €12.208 million as at 31 December 2024 (31 December 2023: €13.622 million), decreasing by 10% compared to 31 December 2023 and represented 66% of the Group's total assets (31 December 2023: 68%). The Banks carrying value of investment assets amounted to €12.090 million as at 31 December 2024 (31 December 2023: €13.517 million), decreasing by 11% compared to 31 December 2023 and represented 66% of the Bank's total assets (31 December 2023: 68%). The decrease is mainly due to the decrease in balances with Central Banks, partially offset by the increase in investments in debt securities and reverse repurchase agreements.

The Group's and the Bank's cash and balances with Central Banks and placements with other banks as at 31 December 2024 amounted to €6.086 million and €6.082 million respectively (31 December 2023: Group: €8.505 million, Bank: €8.497 million). Most foreign currency placements were with P-1 rated banks. Cash and balances with Central Banks and placements with other banks decreased by 28% for both the Group and the Bank, compared to 31 December 2023. The decrease YoY in balances with Central banks was primarily due to the TLTRO repayment in June 2024, the inception of a reverse repurchase agreement and the funds utilised to increase the investments in debt securities, partially offset by the increase in placements with other banks and the level of customer deposits.

The Group's and the Bank's reverse repurchase agreements amounted to €300 million as at 31 December 2024 (31 December 2023: €Nil) and relate to a reverse repo transaction with Eurobank S.A. on an arm's length basis.

The Group's investments in debt securities amounted to €5.676 million (Bank: €5.663 million) as at 31 December 2024 (31 December 2023: Group: €4.985 million, Bank: €4.984 million), up by 14% and represented 31% of total assets (31 December 2023: 25%). The net increase was mainly due to acquisitions of debt securities partially offset by maturities and disposals during FY2024. The Group's investments in debt securities comprised mainly high-grade investments in financial institutions covered bonds and Senior Preferred bonds, sovereign bonds including CGB (Cyprus Government Bonds), CLOs (Collateralised Loan Obligations), supranational bonds, High Yield Corporate bonds through discretionary Asset Manager mandates and RMBS (Residential Mortgage-Backed Security).

As at 31 December 2024 the Group's and the Bank's, investments in financial institutions and securitisations represent 48% and 15% of the Group's investments in debt securities respectively (31 December 2023: 47% and 20% respectively).

The CGBs held by the Group and the Bank as at 31 December 2024 amounted to €771 million and increased by 35% compared to €570 million as at 31 December 2023 mainly due to acquisitions. Out of the total CGB held by the Group and the Bank as at 31 December 2024, €149 million will mature within 1 year, €126 million will mature within 1 and 5 years and the remaining €496 million will mature within 5 and 10 years.

SHARE CAPITAL

At 31 December 2024, 412.805.230 fully paid ordinary shares were in issue, with a nominal value of €0,50 each (31 December 2023: 412.805.230 fully paid shares with a nominal value €0,50 each).

Details on share capital of the Bank are disclosed in Note 39 of the Financial Statements.

There are no restrictions on the transfer of the Bank's ordinary shares, other than the provisions of the Business of Credit Institutions Law of Republic of Cyprus which require the approval of the Central Bank of Cyprus (CBC) prior to acquiring shares of the Bank above certain thresholds and the requirements of the EU Market Abuse Regulation.

The Bank's issued ordinary shares do not carry special control rights.

CAPITAL MANAGEMENT

The objective of the Bank's capital and leverage policy is to retain sufficient capital and leverage levels and ratios by complying with the legal and regulatory framework requirements as well as any internal capital buffers set while safeguarding the best interests of shareholders and supporting the Group's business strategy.

Throughout this Report, the capital ratios, leverage ratio and MREL ratio as at 31 December 2024, include interim reviewed profits for the six-month period ended 30 June 2024 as well as unaudited profits for the second half of 2024, for which the Bank has obtained permission from Supervisory Authorities, in accordance with the ECB Decision (EU) 2015/656 on the conditions under which credit institutions are permitted to include interim or year-end profits in CET1 capital in accordance with Article 26(2) of the CRR. These ratios have been calculated in accordance with the legal framework in relation to the CRR capital requirements.

As at 31 December 2024, the Group's regulatory Total Capital ratio amounted to 32,20% (Bank: 32,10%), the Tier 1 ratio amounted to 28,72% (Bank: 28,62%) and the Common Equity Tier 1 ratio (CET 1) amounted to 28,72% (Bank: 28,62%).

The Group's risk weighted assets as at 31 December 2024 amounted to €6.009 million (Bank: €6.019 million).

The Group's capital ratios remain above the minimum SREP requirements.

The agreement with CNP Assurances on CNP Cyprus Insurance Holdings Limited is expected to have a capital impact of c.-2,5 p.p, therefore the Group's pro forma Total Capital ratio as at 31 December 2024 is expected at c.29,7%, upon completion.

The Group's regulatory Leverage ratio as at 31 December 2024 amounted to 9,43% which continues to be above the minimum leverage ratio requirement.

The agreement with CNP Assurances for the acquisition of CNP Cyprus Insurance Holdings Limited is expected to have an impact of c.-0,3 p.p, therefore the Group's Leverage pro forma ratio as at 31 December 2024 is expected at c.9,1%, upon completion of the acquisition.

Additional information on the capital management of the Group is disclosed in Note 46 of the Financial Statements and in the unaudited "Additional risk and capital information for the year ended 31 December 2024" section 2 "Capital management".

ADOPTION OF NEW INTERNATIONAL FINANCIAL REPORTING STANDARDS

Details on the Group's accounting policies and financial results are disclosed in Note 3 of the Financial Statements.

DIVIDENDS

Any recommendation for dividend is subject to regulatory approval. The Bank is currently not proceeding with the declaration of dividend for year 2024 due to regulatory restriction.

STRATEGIC TARGETS AND OUTLOOK

The Bank's vision is to be customers' primary bank in Cyprus because of the customer experience that it offers and to be recognised as the safest, most reliable partner, always supporting customer's aspirations.

In delivering its strategy, the Bank is committed to remain a strong bank that meets the expectations of its shareholders, employees, clients and the society.

The economic environment in 2024 has improved considerably but remains challenging due to heightened geopolitical risks and strained global trade relations. While Cyprus is experiencing economic growth, medium to long-term risks persist as global trade tensions and geopolitical uncertainties weigh on the outlook. Although the Bank has successfully maintained the credit quality of its portfolio, the recent escalation of geopolitical risks - particularly following the Middle East crisis that began in October 2023 could negatively impact lending in certain sectors. These challenges may adversely affect the repayment capacity of specific borrowers, potentially increasing expected credit losses. To address these risks, the Bank is actively monitoring the impacted segments of its loan portfolio. It has implemented an effective and comprehensive arrears management framework, utilizing early warning indicators and behavioral scoring models to mitigate potential new defaults. With a significant portion of the loan portfolio already assessed through lifetime provisioning, performing loans partially covered by the Asset Protection Scheme, and the recent sale of non-performing exposures, the Bank is well-positioned to normalize its cost of risk in the coming periods. Despite these challenges, the Bank remains committed to supporting the real economy and strengthening its market position. By adopting proactive risk management strategies and continuing its focus on sustainable growth, the Bank aims to ensure resilience and stability in an increasingly uncertain global environment.

The Bank's Strategic Plan comprises five pillars: Growth, ESG, Asset Quality, Cost Optimisation and Capital & Funding Optimisation. The Bank intends to continue to carry out its role in supporting the economy, while safeguarding its shareholders' value through prudent policies and in line with the Bank's target risk profile. During 2024, the Bank granted €1,1 billion of new lending to viable households and businesses.

In order to execute its strategy, the Bank is implementing a transformation plan with focus on driving retail sales, enhancing digital footprint and achieving efficiencies. The Bank's transformation strategy embraces next generation technology, power of data, streamlining processes and unlocking human potential through culture change and meritocracy, with emphasis on improving the customer service.

In terms of asset quality, the Bank aims to effectively tackle its NPEs in an accelerated way and with higher recoveries.

The Bank has sufficient liquidity, allowing the exploitation of opportunities in various sectors of the domestic market, with a long-term strategy to selectively expand into other jurisdictions. The Bank aims to continue its pivotal role in the support of the real economy, financing creditworthy Cypriot businesses and households with a comprehensive range of quality banking services and within its risk appetite. The focus of new loans will continue to be to companies that increase the competitiveness and productivity of the country, such as in the sectors of retail trade, manufacturing, health, education, energy and renewables, transportation and storage, information and communication and hospitality. At the same time, loans to individuals are geared toward mortgages.

The Bank monitors closely the developments in the Cypriot, European and Global economic environment and assesses the evolving situation, whilst continuing the implementation of its strategy. The operating environment remains challenging; however, the Bank aims to remain vigilant of developments and to turn these challenges into opportunities.

Following the acquisition by Eurobank and merger with Eurobank Cyprus, the Bank will strengthen further by becoming one of the largest financial institutions in Cyprus. The Bank continues the implementation of its strategy until completion of the legal merger and operational integration of systems, policies and processes across both entities. Ensuring a seamless transition to a unified entity under a single strategic vision, the strategic plan is expected to be re-assessed considering the combined entity.

ECONOMIC ENVIRONMENT

The current economic environment is significantly shaped by external geopolitical shocks. The ongoing Russia-Ukraine conflict, which began in February 2022, and the Middle East crisis that emerged in October 2023—now nearing resolution following an agreement between Israel and the Palestinian authorities in Gaza—have had far-reaching effects on both the global and local economies. Despite these external pressures, the Cypriot economy continues to demonstrate resilience in the face of geopolitical and financial uncertainties. One of the most notable impacts has been the surge in inflation and rising interest rates, prompting significant shifts in monetary policy since the onset of geopolitical tensions in February 2022 and their subsequent economic effects. However, a normalization process has been underway since June 2024, with the European Central Bank (ECB) gradually reducing reference rates four times, bringing them down from 4,0% in June to 3,0% by the end of the year. This policy adjustment has been facilitated by the moderation of inflation to levels near 2%, aligning with the ECB's target, with further rate cuts expected in 2025 to ease financial conditions. Meanwhile, global risks are escalating, particularly as trade protectionism gains traction as a strategic economic policy, especially in the United States, posing a threat to international trade and economic stability. Additionally, potential shifts in U.S. energy policy under the new administration could influence energy prices, the adoption of renewable energy, and geopolitical stability, all of which may have indirect consequences for the Cypriot economy.

During the first three quarters of 2024, the economy recorded a growth rate of 3,7%, compared to 2,6% during the same period in 2023. This positive GDP performance was primarily driven by key sectors, including Hotels and Restaurants, Construction, Information and Communication, Wholesale and Retail Trade (including the Repair of Motor Vehicles), and Arts, Entertainment, and Recreation. These industries played a crucial role in sustaining economic expansion, reflecting strong domestic demand, increased tourism activity, and continued investment in infrastructure and digital transformation.

The Bank expects GDP growth to remain positive over the 2025-2027 period, despite short-term risks stemming from ongoing geopolitical conflicts, escalating trade tensions, and their potential impact on both the local and global economy. In the medium term, real economic activity is projected to be supported by funds from the EU’s Resilience and Recovery Facility (RRF), under which Cyprus is set to receive €1,2 billion between 2021 and 2026. These funds are aimed at facilitating the transition to a green economy and advancing the digital transformation of the Cypriot economy. In line with its commitment to Environmental, Social, and Governance (ESG) principles, the Bank has begun integrating these principles into its operations, aligning its efforts with the initiatives developed under the European Facility for Recovery and Resilience.

During 2024, unemployment declined to 4,9%, reflecting a significant improvement compared to 2023, when it stood at 5,8%. Seasonally adjusted registered unemployment data, which highlight underlying trends, show that the average number of registered unemployed in 2024 fell to 10.903, marking a 14% decrease from 12.683 in 2023. Simultaneously, the job vacancy rate remained above normal levels, reaching 3,2% in the first three quarters of 2024, compared to 2,9% during the same period in 2023, signaling sustained labor demand. Looking ahead, the Bank forecasts that unemployment will continue to decline between 2025 and 2027, driven by strong economic growth and a persistently high number of job vacancies.

In 2024, inflation declined to 2,2% , a significant improvement from 3,9% in 2023. This sharp reduction was primarily driven by the gradual de-escalation of energy prices, which eased cost pressures across various sectors. However, services and food inflation remained relatively high, preventing a more pronounced decline in overall price levels. Looking ahead, the Bank projects that inflation will continue its downward trajectory, falling below 2,0% between 2025 and 2027, supported by stable energy prices, and monetary policy adjustments. However, shifting global trade dynamics, including rising protectionism and disruptions in supply chains, could pose risks to this downward trend, potentially exerting renewed inflationary pressures in the medium term.

In the banking sector, total non-performing exposures (NPEs) declined significantly, reaching €1,6 billion or 6,5% of gross loans by the end of September 2024, compared to 17,7% at the end of 2020. The coverage ratio also improved substantially, rising to 55,7% in September 2024, up from 46,2% at the end of 2020, reflecting strengthened risk management and enhanced provisions for credit losses.

The fiscal position in 2024 remains strong, with the budget continuing to register a surplus. Preliminary data for January–November 2024 indicate a fiscal surplus of €1,42 billion (4,2% of GDP), nearly doubling the €709,9 million surplus (2,3% of GDP) recorded during the same period in 2023. This improvement reflects robust revenue performance, prudent fiscal management, and sustained economic growth. Meanwhile, the debt-to-GDP ratio has followed a steady downward trajectory, declining from 99,3% in 2021 to 85,6% by the end of 2022. The ratio is projected to continue its decline, reaching 54,6% by the end of 2027, assuming that debt servicing costs remain favorable. This trend underscores the government's commitment to fiscal consolidation and long-term debt sustainability.

The sovereign risk ratings of the Cyprus Government have improved significantly in recent years, reflecting enhanced economic resilience and consistent fiscal outperformance. During the fourth quarter of 2024, Cyprus received further credit rating upgrades, reinforcing the country's strong fiscal discipline and economic recovery momentum. In December 2024, S&P and Fitch Ratings upgraded Cyprus to 'A-' (from BBB+), citing better-than-expected fiscal performance, a continued decline in public debt, and the sustained above-Euro Area average economic growth. Similarly, in November 2024, Moody's upgraded Cyprus to A3 (from Baa2), recognising the country's improved economic outlook and strong macroeconomic fundamentals. As a result of these upgrades, the Republic of Cyprus is now rated at A- by S&P, A- by Fitch, and A3 by Moody's, firmly establishing the country within the investment-grade category.

The overall economic environment remains highly influenced by high interest rates and the monetary policy stance of the European Central Bank (ECB). In the first half of 2024, ECB interest rates reached a plateau, prompting the central bank to initiate a monetary easing cycle with a 25bps rate cut in June. This was followed by three additional 25bps cuts by December, bringing the ECB rate down to 3,0%. As inflation continues to decline and uncertainty surrounding Eurozone economic conditions eases, the ECB has maintained its accommodative stance, implementing another 25bps rate cut in January 2025. Further reductions are anticipated by the end of 2025, supporting financial conditions and economic growth across the Eurozone.

Geopolitical Instabilities and their effect to Cyprus Economy
For the Bank's Contingency Risk Management regarding the geopolitical instabilities refer to Note 47.1 in the Financial Statements.

RISK MANAGEMENT

The Group is exposed to a variety of risks, the most important of which are described and analysed in Note 47 of the Financial Statements for the year ended 31 December 2024, in the unaudited "Additional Risk and Capital management information for the year ended 31 December 2024" section of the Annual Financial Report. During the year ended 31 December 2024, the Group's exposure to the different risks, as well as its risk profile, has not significantly changed compared to 31 December 2023.

The management and monitoring of risks is centralised under a uniform management, which covers the entire range of the Group's operations.

AGREEMENTS WITH MEMBERS OF THE BOARD OF DIRECTORS OR THE STAFF OF THE BANK

Details on agreements with members of the Board of Directors are described in the 2024 Remuneration Policy Report.

CORPORATE GOVERNANCE STATEMENT

The Corporate Governance Code (the “Code”) published by the Cyprus Stock Exchange (sixth edition – April 2024) has been fully adopted by the Bank’s Board of Directors.

The Board of Directors recognises the importance of implementing sound Corporate Governance based on the Code in combination with the mandate and practices followed by the various Committees of the Board of Directors in order to achieve the target of maximising the shareholders’ investment.

The Corporate Governance Code is publicly available on the Cyprus Stock Exchange (CSE) website www.cse.com.cy.

Information on Members of the Board of Directors retiring and being eligible for re-election, as well as on the composition and operation of the Bank’s Board of Directors and its committees are set out in section B of the Report on Corporate Governance.

Any amendments to the Articles of Association of the Bank are only valid if approved by a Special Resolution at a General Meeting of the Shareholders.

Any restrictions in relation to the shares of the Bank are set out in Note 39 of the Financial Statements.

The Board of Directors may issue share capital if there is sufficient authorised capital which has not been issued and as long as the new shares to be issued are offered first to the existing shareholders, pro-rata to their percentage holding in the Bank’s share capital. In the event that a share capital increase requires an increase in the authorised share capital or if the new shares will not be offered to existing shareholders, the prior approval of the shareholders at a General Meeting must be obtained. The Board of Directors may also propose to a General Meeting of the Shareholders a share buyback scheme.

GOING CONCERN

The Management of the Bank, after performing an assessment on the Group’s ability to continue as a going concern, concluded that there are no material uncertainties which could cast significant doubt over the Bank’s ability to continue as a going concern for at least the next 12 months from the date of approval of the Financial Statements for the year ended 31 December 2024.

Details on the going concern assessment are set out in Note 2 of the Financial Statements.

SHAREHOLDERS HOLDING MORE THAN 5% OF THE SHARE CAPITAL

According to the Cyprus Securities and Stock Exchange Regulations and pursuant to the requirements of the Directive DI190/2007/04 para. 4 of the Cyprus Securities and Exchange Commission, the following shareholders owned five (5%) percent or more of the nominal value of the Bank’s issued share capital as at 31 December 2024:

Eurobank S.A.	55,96%
Demetra Holdings PLC[1]	21,33%

On 7 November 2024 Eurobank S.A. (“Eurobank”) announced that it has entered into share purchase agreements with the Cyprus Union of Bank Employees (ETYK), the Cyprus Bank Employees Welfare Fund, the Cyprus Bank Employees Health Fund and the Financial Sector Provident Fund to acquire 12,848% (53.037.786 shares) in the Bank for a consideration of c.€243 million, corresponding to €4,58 per share.

On 25 November 2024 Eurobank announced that it has entered into share purchase agreements with Demetra Holdings Plc (“Demetra”) and Logicom Services Limited (“Logicom”) to acquire 24,66% (101.794.409 shares) in the Bank for a consideration of c.€493 million, corresponding to €4,843 per share. Specifically, Eurobank will acquire 88.064.705 shares (21,33%) from Demetra for a consideration of c.€426 million, and 13.729.704 shares (3,33%) from Logicom for a consideration of c.€66 million.

As per Eurobank's announcements, the transactions were subject to regulatory approvals and the approval of the General Meeting of the shareholders of Demetra (for the share purchase agreements with Demetra and Logicom) and has been completed after their fulfilment on 8 February 2025, which is six months after the completion of Eurobank's last mandatory tender offer.

Eurobank as at 31 December 2024 held 55,962% in the Bank and has increased its holding to 93,47% following the completion of the above transactions.

Pursuant to Articles 13 and 6(2) of the Takeover Bids Law of 2007 to 2022 of the Republic of Cyprus, L.41(I)/2007 (the "Law"), Eurobank ("Offeror") announced the submission of a Mandatory Takeover Bid to the shareholders of the Bank for the acquisition of up to 100% of the issued share capital of the Bank ("Takeover Bid"). The consideration offered for the acquisition of the shares of the Bank is €4,843/share, paid in cash to all the shareholders who will accept the Takeover Bid.

Given also that the Offeror already holds more than 90% of the issued share capital and voting rights of the Bank, it intends, upon completion of the Takeover Bid, to exercise the Squeeze-out right, based on which, in accordance with the provisions of Article 36 of the Law, it is entitled to require the transfer of all remaining shares of the Bank at an equal price and in the same form as the consideration offered in the Takeover Bid.

On 5 March 2025 the Cyprus Securities and Exchange Commission approved the Takeover Bid Document and authorised its publication. The acceptance period for the remaining shareholders of the Bank will commenced on 11 March 2025 and end on 9 April 2025.

On 31 December 2024 shareholders holding more than 5% of the share capital, had in their possession directly or indirectly through their subsidiary entities Senior preferred notes and Tier 2 Capital Subordinated Notes amounting to €56,0 million and €32,8 million respectively.

Pursuant to the requirements of the Directive DI190/2007/04 of the Cyprus Securities and Exchange Commission, the Bank is required to disclose the shareholders who held at least five (5%) percent of the nominal value of the issued share capital, five (5) days prior to the date of approval of the Financial Statements by the Board.

Eurobank S.A.	93,47%

Note 1: It is noted that as at 31 December 2024 Logicom Services Ltd, which had a direct holding of 3,33% in the Bank, also had a 29,62% holding in Demetra Holdings Plc whose holding in the Bank is specified in the above table.

For further information refer to the Announcements made by the Bank, which is available on the Bank's official website: Announcements (hellenicbank.com) (Investor Relations).

ENVIROMENTAL, SOCIAL AND GOVERNANCE (ESG)

As the world is moving towards a more sustainable future, the banking sector plays a pivotal role during this transition. Shareholders, regulators, governments and other key stakeholders recognize the urgency to act and exert pressure on financial institutions to mobilize. From strategy setting to regulatory compliance and disclosures, ESG priorities are stipulated in response to the stakeholders and market expectations.

In that context, the Bank established a dedicated ESG department and assigned ESG related roles and responsibilities across all three lines of defense. The ESG department is responsible for the Bank's strategic direction on ESG matters, as well as the development and implementation of the Bank's sustainability and ESG goals as part of its business model. With this set up and in the context of its evolution and transformation, the Bank invests further in sustainable development and is consistently designing its actions to improve its environmental and social impact, while ensuring robust corporate governance.

Extensive information as to the Group's environmental, social, and corporate governance (ESG) related actions is to be found in the Group's Sustainability Statement for the year 2024 on pages 288 to 440.

EMPLOYEE MATTERS

After years of intensive deliberations and negotiation for the renewal of the Collective Agreement (CA) with ETYK, a key milestone was finally achieved following the submission of a Mediation Proposal by the Ministry of Labour and Social Insurance.

The renewed CA will aid the Bank in achieving uniformity, through the harmonization of employment terms and benefits across staff as well as to facilitate the new culture that the transformation roadmap requires.

The renewal of the CA from 2023 onwards, will be held under the auspices of the Employers' Association of Cyprus Banks (EACB) which will be covering all the Banks members of the EACB.

An important pillar of the Transformation Plan (transformation roadmap) is the evolution of the Bank's culture by enhancing and creating a motivating and inspiring work environment for all staff members.

Specifically, with regards to our people development, during 2024, emphasis was given to the enhancement of knowledge and skills in a wide range of subjects and particularly on risk & compliance, insurance, negotiations and selling skills, training programs on change mindset, for newly appointed employees in managerial/supervisory roles for developing the required skillset, as well as programs related to Digital & Technology, and other specialized programs, including Environmental, Social, and Governance courses. New workshops under 'HB Skills Development Lab' were introduced in areas including Resilience and Wellbeing, Mental Health and Leadership Skills for experienced Managers, aiming to increase self-awareness levels, emotional intelligence and interpersonal skills. A 'Train the Trainer' workshop was also launched, specifically addressed to the Bank's internal instructors, aiming to strengthen their knowledge in matters of designing and delivering training programs more effectively, ensuring at the same time consistency in the facilitation approach of internal instructors. Additionally, workshops on "Advanced Negotiations", "Advanced Selling Skills", "Corporate Restructuring", "Enhancing Efficiency through Process", "Enhancing Individual and Team performance", 'Integrated Real Estate and Development", were implemented, targeted to staff members who are highly involved in the initiatives of the Transformation Plan of the Bank.

In 2024, 10 'HB EmPOWERment Talks' were implemented, where speakers from various industries and background shared their knowledge and experience with staff members, focusing on self-growth and wellbeing, and aiming in inspiring staff members in their personal development path. 9 virtual presentations of 1 hour each and 1 hybrid event of 2.5 hours, were conducted.

E-learning continued to be utilized for the provision of courses in regulatory and compliance areas, including in the areas of "Financial Crime and Sanctions", "Operational Risk Awareness", "Information Security & Fraud and Physical Security", "Risk Management Fundamentals", "Code of Business Conduct and Ethics & Anti-Bribery and Corruption", "Data Governance Framework", as well as in "Protection of Personal Data" subjects; specifically, 7 e-learning programs were conducted in 2024.

Training programs were conducted both: (i) in the form of webinars, due to the significant efficiencies gained from the said training method, and (ii) physical presence, where deemed more beneficial, to ensure the maximum return on investment.

In 2024, Hellenic Bank Volunteer team implemented its action plan through various initiatives, including among others (i) the blood donation program and (ii) the “All kids with school supplies” campaign, which for the first time all staff members were invited to get involved by donating their time and related supplies. In 2024, the new 'Volunteer Ambassadors' initiative was launched, where staff representatives across all levels and districts, had the opportunity to exchange ideas and further enhance the volunteering initiatives. In addition to the above, the #HBVolunteersChallenge campaign, which is organized on an annual basis by the Bank's HR Unit, within the framework of the Pancyprian Volunteering Week, was implemented, as now is embedded in the Bank's culture and its success rests on all staff members and their generous contribution and involvement, as well as their participation to the new events - Bingo Charity Nights. Also, the staff members participated in various sports events that have a charitable nature, such as Corporate 5km Runs, Beach Volley Tournament, as well as the Pancyprian Shooting (Sporting) Championship.

Furthermore, the annual Performance Appraisal process was implemented through the Performance Appraisal System, which focuses on professional development with a forward-looking approach, giving emphasis on the Bank’s predefined professional behaviors / competencies and the strategic priorities. Within 2024, training sessions for the Performance Appraisal System were conducted for all new appraisers. The annual Performance Appraisal process for the 2024 Performance Appraisal cycle has been initiated in January 2025.

The Bank also aims to further simplify, automate, and introduce agile HR processes and various HR procedures have been enhanced to the benefit of the employees.

In an aim to improve operational efficiency and collaboration between various departments, internal reorganisations were carried out within the Divisions. The most important organizational changes were implemented in the Banking Division, the Technology & Operations Division, and the Group's Insurance Companies.

The acquisition of Hellenic Bank by the Eurobank Group brought significant organisational changes to the Bank's top organisational structure.

Another main component in achieving the Bank’s strategic goals is the successful implementation of the annual resource plan through the identification and selection of the most suitable candidates for the positions, especially in specific divisions/departments/units such as Technology & Digital, Finance, Arrears, Company Secretariat, Strategy & Transformation and Control Functions.

Moreover, to make the onboarding experience as smooth as possible as well as to ensure employee retention, growth and development, HR in 2024 has also launched both group and one-to-one meetings with new joiners.

The Bank aims to promote DE&I and, to ensure equal opportunities in the workplace. In this respect, specific targets relating to DE&I have been included in the ESG strategy, and necessary actions are currently taken to this direction, including the implementation of the Key Function Holders’ Diversity Policy, which was introduced in 2022 to ensure that Diversity, Equity, and Inclusion (DE&I) is taken into consideration in recruiting, selection and succession planning of the Key Function Holders’ positions.

The Bank through its practices, policies and procedures respects human rights, supports inclusion and creates conditions in the workplace, that encourage and value diversity.

MINIMUM REQUIREMENT FOR OWN FUNDS AND ELIGIBLE LIABILITIES (MREL)

The Bank, within the framework of the Bank Recovery and Resolution Directive (BRRD), is subject to the minimum requirement for own funds and eligible liabilities (MREL), that entered into effect on 1 January 2016. On 27 June 2019, Directive 2019/879/EU (BRRD II) came into effect, and it was then transposed into National Law. The BRRD provides authorities with a credible set of tools to intervene sufficiently early and quickly in an unsound or failing institution ensuring the continuity of the institution's critical financial and economic functions, while minimizing the impact of a failure on the economy and financial system. MREL refers to the funding structure banks are required to maintain, that includes a certain proportion of liabilities that can be written-off or converted into new equity in the event of a bank failure (that is: "bailed in"). Such liabilities, in combination with equity, are known as MREL.

In January 2024, the Bank received notification from the Single Resolution Board (SRB) of its decision for the binding MREL requirement for the Group. Accordingly, the MREL target was set at 25,17% of total risk exposure amount (TREA), plus combined buffer requirement (CBR) while the MREL target of leverage ratio exposure (LRE) was set at 5,91%, both to be met by 31 December 2025. No MREL subordination requirement has been communicated to the Bank.

Furthermore, the Bank must continue to meet MREL requirements equal to 16,57% of TREA and 5,91% of LRE that were set as intermediate targets in the previous resolution planning cycle for 1 January 2022. The own funds used by the Bank to meet the combined buffer requirements (CBR) will not be eligible to meet its MREL requirements expressed in terms of risk weighted assets.

Taking into consideration the applicable CBR requirements as at 31 December 2024, the intermediate binding target for MREL requirements resulted to 21,3% and the final target to 29,9% of TREA to be met by 31 December 2025. These are expected to increase further following the increase of the O-SII buffer rate to 1,50% effective from 1 January 2025 taking the MREL requirements for the final target to 30,17%.

As at 31 December 2024, the Group's MREL ratio was 34,3% of TREA and 11,3% of LRE The redemption of €130 million AT1 capital (CCS1 and CCS2 instruments) on 31 December 2024, had a negative capital impact of 216 bps on MREL TREA ratio.

The agreement with CNP Assurances on CNP Cyprus Insurance Holdings Limited which as at the date of this report, is not yet completed due to pending regulatory approvals, is expected to have an impact of c.-2,6 p.p, therefore the Group's pro forma MREL ratio as at 31 December 2024 is expected at c.31,7% of TREA, upon completion.

The Bank has established a Euro Medium Term Note (EMTN) program of €1,5 billion to issue MREL. In July 2022 the Bank issued €100 million Senior Preferred Notes (the "SP Notes"), with a fixed coupon of 9%, maturing on 15 July 2025 and with call-at-par date of 15 July 2024 (3NC2). On 15 July 2024, the SP Notes were called at par. In March 2023 the Bank issued a €200 million Tier 2 Subordinated Notes (the "T2 Notes"), with a fixed coupon of 10,25%, maturing on 14 June 2033 and callable at par during a 3-month period commencing on 14 March 2028 (10,25NC5,25). In September 2024, the Bank issued €100 million Senior Preferred notes (the "SP2024 Notes"), with a 4% coupon and maturity of 2 years with 1 year non-callable (2NC1).

Following draft communication from the SRB, it is expected that from 30 June 2025, the Single Point of Entry will remain as the preferred resolution strategy for the Eurobank Group after the Bank's consolidation and therefore the Bank will be covering its MREL requirements by obtaining funding from the Eurobank Group. The Bank's final MREL TREA target is expected to be decreased to 24,69% plus CBR applicable as at 30 June 2025 where its MREL LRE target is expected to remain the same.

Further details on MREL are set out in the unaudited "Additional Risk and Capital management information for the year ended 31 December 2024" section of the Annual Financial Report.

COMPLIANCE WITH THE REQUIREMENTS OF EUROPEAN SECURITIES MARKET AUTHORITY (ESMA)

The Bank complied with the ESMA requirement for the preparation of its Financial Statements in the format of European Electronic Format (ESEF). Financial Statements in the ESEF format are available on the Bank's website www.hellenicbank.com (Investor Relations).

PREPARATION OF PERIODIC REPORTS

The Group has in place an adequate and effective system of internal control, the adequacy and effectiveness of which are assessed (on a risk basis), at least annually by the Board of Directors and on a more regular basis by the Board's Audit and Risk Management Committees, in respect of financial and operational systems as well as compliance systems and systems for the management of risks that threaten the attainment of the Group's objectives.

To meet this requirement, procedures have been designed for safeguarding the Group's assets, for maintaining proper accounting records and for ensuring the accuracy, completeness and validity of the information provided to the Group's stakeholders. These procedures can only provide reasonable but not absolute assurance against material misstatement, errors, losses, fraud or breaches of laws and regulations.

The Group's internal control and risk management systems incorporate effective procedures aiming at the identification and prevention of errors, omissions or fraud that could result in material misstatements during the preparation of the Financial Statements and of the relevant disclosures which are included in the periodic reporting provided by the Group based on Part II of the Transparency Requirements Law (Securities admitted to trading on a Regulated Market) Law of 2007 as amended.

SYSTEM OF INTERNAL CONTROL

The Board of Directors has ensured the existence on a continuous basis of an adequate and effective System of Internal Control in 2024. The adequacy and effectiveness of the System of Internal Control are assessed by the Board at least annually. The risk-based assessment covers all systems of internal control, including financial and operational systems, as well as compliance systems and systems for the management of risks that threaten the attainment of the Group's objectives.

In order to maintain an adequate and effective System of Internal Control, relevant procedures have been designed for safeguarding the Group's assets, for maintaining proper accounting records and for ensuring the accuracy, completeness and validity of the information provided to the Group's stakeholders. These procedures can only provide reasonable but not absolute assurance against material misstatement, errors, losses, fraud or breaches of laws and regulations.

The Audit Committee meets before the announcement of the quarterly financial results, to monitor the integrity, accuracy and reliability of the Group's quarterly and annual financial reporting process and Financial Statements as well as any formal announcements relating to the Group's financial performance and other disclosures, to assess the adequacy of the provisions on financial and non-financial assets and on material litigation against the Bank in line with accounting policies and standards and to monitor the establishment of accounting policies and practices, paying particular attention to (i) changes to critical accounting policies and practices, (ii) decisions requiring a significant element of judgement and (iii) unusual transactions and how these are disclosed. It then proceeds with the relevant suggestions to the Board of Directors through a memo.

EVENTS AFTER THE REPORTING PERIOD

Details of the events after the reporting period are disclosed in Note 49 of the Financial Statements.

BOARD OF DIRECTORS

The Members of the Board of Directors as at 31 December 2024 were the following:

Petros Christodoulou	Non-Executive Chairman
Robert Anastassis Kyprianou	Non-Executive Vice-Chairman
Oliver Bernard Ellingham	Non-Executive Member of the Board
Stephen John Albutt	Non-Executive Member of the Board
Miranda Xafa	Non-Executive Member of the Board
Maria Charalambous	Non-Executive Member of the Board
Sofronis Clerides	Non-Executive Member of the Board
Charalambos Constantinou	Non-Executive Member of the Board
Kenneth Howard Prince-Wright	Non-Executive Member of the Board
Michalis Louis	Executive Member of the Board
Antonis Rouvas	Executive Member of the Board

During 2024 and until the date of this Report the changes in the Board of Directors of the Bank were as follows:

After receiving notice from Mr Oliver Gatzke, Executive Member of the Board / Chief Executive Officer of the Bank, that he had decided to terminate his employment contract with the Bank with effect from 22 July 2024, the expiry date of the contract, in accordance with the provisions of Mr Gatzke's employment contract, the Bank decided to place him on Garden Leave with full pay, effective as from 1 August 2023, until further notice. Mr Gatzke's employment contract expired on 22 July 2024. On 1 August 2023, Mr Antonis Rouvas was appointed Interim Chief Executive Officer of the Bank, until 18 September 2024, when Mr Michalis Louis was appointed Chief Executive Officer of the Group.

Mr Petros Christodoulou was appointed as Independent Non-Executive Member and Chairman of the Board of Directors of the Bank on 8 January 2024.

The following Non-Executive Members of the Board of Directors resigned in 2024: Messrs. Kristofer Richard Kraus (20 June 2024), Christos Themistocleous (5 August 2024), Marios Maratheftis (8 August 2024), Andreas Persianis (18 September 2024), Marco Comastri (18 September 2024), Christodoulos Hadjistavris (18 September 2024) and John Gregory Iossifidis (18 September 2024). Also, on 18 September 2024, Mr Demetrios Efstathiou's term of office on the Board of Directors expired.

At the Annual General Meeting (AGM) of the Shareholders held on 18 September 2024, the following Independent Non-Executive Members were elected to the Board of Directors of the Bank: Mr Robert Anastassis Kyprianou, Mr Oliver Bernard Ellingham, Ms Maria Charalambous, Mr Sofronis Clerides, Mr Charalambos Constantinou and Mr Kenneth Howard Prince-Wright. At the AGM, Mr Michalis Louis was also elected as Executive Member of the Board of Directors. Subsequently, the Board of Directors appointed Mr Robert Anastassis Kyprianou as Vice-Chairman of the Board, Mr Oliver Bernard Ellingham as Senior Independent Director and Mr Michalis Louis as Chief Executive Officer.

The Bank's Articles of Association provide that at each AGM, provided they have completed three years in office from the date of their last election to the Board, one-third of the Board Members for the time being, or, if their number is not three or a multiple of three, then the number nearest to one-third, and any person appointed by the Board in accordance with the Articles of Association, shall retire from office and shall, if willing to act, be eligible for re-election.

The Board Members to retire at each AGM shall be those who have been longest in office since the date of their last election, but as between persons who were last elected on the same day those to retire shall be those Board Members longest in office since the date of their first appointment to the Board (and as between persons whose first appointment to the Board was on the same day those to retire shall (unless they otherwise agree among themselves) be determined by lot).

The Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus additionally provides that, in the event of a change in the ownership structure of the Bank, the provision for the completion of three years in office from the date of the Board Member's last election to the Board does not apply in determining the Non-Executive Directors to retire at each AGM. A change in the ownership structure means the acquisition of a qualifying holding (at least 10%) in the share capital of the Bank and any further increase of such qualifying holding so that the holding percentage in the share capital of the Bank reaches or exceeds 20%, 30% or 50% of its share capital, based on the provisions of section 17(1) of the Business of Credit Institutions Law of 1997 (Law 66(I)/1997), as amended.

In accordance with the provisions of the Bank's Articles of Association, the following Directors will retire and are eligible (provided they offer themselves) for re- election at the next Annual General Meeting of the Shareholders:
(a) Antonis Rouvas
(b) Miranda Xafa

Reference to Directors' emoluments, fees and compensation is provided in Note 43 of the Financial Statements and in the Remuneration Policy Report for the year 2024, of the Annual Financial report.

DIRECTORS' INTEREST IN THE SHARE CAPITAL OF THE COMPANY

According to the Cyprus Securities and Stock Exchange Regulations and in accordance with the requirements of the Directive DI190/2007/04 para. 4 of the Cyprus Securities and Exchange Commission, the Bank is required to disclose the percentage shareholdings in the Bank's share capital owned by Members of the Board of Directors, their spouses, or/and relatives by blood up to first degree and companies in which they control directly and indirectly at least 20% of the voting rights at 31 December 2024 and the respective percentages as at 13 March 2025.

	31 December 2024			13 March 2025		
	Direct participation	Indirect participation	Total	Direct participation	Indirect participation	Total
Petros Christodoulou	-	-	-	-	-	-
Robert Anastassis Kyprianou	-	-	-	-	-	-
Oliver Bernard Ellingham	-	-	-	-	-	-
Stephen John Albutt	-	-	-	-	-	-
Miranda Xafa	-	-	-	-	-	-
Maria Charalambous	-	-	-	-	-	-
Sofronis Clerides	-	-	-	-	-	-
Charalambos Constantinou	-	-	-	-	-	-
Kenneth Howard Prince-Wright	-	-	-	-	-	-
Michalis Louis	-	0,00011%	0,00011%	-	0,00011%	0,00011%
Antonis Rouvas	-	0,00001%	0,00001%	-	0,00001%	0,00001%

The Members of the Board of Directors as at 31 December 2024 held €200 thousand in the Bank's issued loan capital. As at 13 March 2025 the Members of the Board of Directors did not hold any stake in the Bank's issued loan capital.

OTHER MATTERS

Agreement with CNP Assurances on CNP Cyprus Insurance Holdings

On 24 April 2024, the Bank entered into exclusive negotiations and a put option with CNP Assurances for the acquisition of its subsidiary CNP Cyprus Insurance Holdings Limited (the “Transaction”), which operates in Cyprus and Greece and consists of amongst others: CNP Cyprialife Ltd, CNP Asfalistiki Ltd, CNP Zois SA and CNP Cyprus Properties Ltd. Under the put option, CNP Assurances had the option to sell and the Bank was irrevocably committed to acquire CNP Cyprus Insurance Holdings if such option was exercised.

On 9 July 2024, following the completion of the consultation of CNP Assurances with its European Works Council, the Bank and CNP Assurances signed the relevant Sales and Purchase Agreement. The total consideration is expected to be €182 million.

On 28 November 2024, the Bank announced that the Commission for the Protection of Competition, in its meeting held on 27 November 2024, approved the concentration arising from the Transaction. The Transaction is not yet completed as it is also subject to other regulatory approvals and is expected to be completed by the second quarter of 2025.

CNP Cyprus Insurance Holdings Limited is a leading insurance operator in Cyprus. It offers life and general insurance products and services through the largest network of independent agents in the country. During 2023, it had c.330 employees and generated €236 million of gross premiums.

The Transaction is expected to be a significant milestone for growing and further strengthening the Bank’s insurance operations, enriching the products and choices offered to an enlarged customer base. Upon the completion of the Transaction, the Bank is expected to have a leading position in the insurance market in Cyprus, with market shares of c.30% and c.22% in life and general insurance, respectively.

Taking into account the Bank’s strong capital position with a total capital ratio of 32,2% as at 31 December 2024, the pro-forma total capital ratio is expected at c.29,7%, upon completion, well above the minimum regulatory requirements. Furthermore, the Transaction is expected to strengthen the Bank’s position in the insurance market and to create revenue synergy opportunities, thereby increasing the insurance income and enhancing the quality of the Bank’s profitability.

In terms of the potential profit contribution towards the Group going forward, we note that CNP Cyprus entities had a cumulative profit of c.€21 million for the financial year ended 31 December 2023, while the profitability of the CNP Cyprus entities for the financial year ended 31 December 2024 is expected to remain strong.

Targeted support measures

In December 2024, the Bank announced a number of targeted support measures to help and protect the community, households and vulnerable groups. These measures include among other free cash withdrawals from ATMs at any bank in Cyprus and Europe, free over-the-counter cash withdrawals and deposits at the Bank’s branches, as well as a free checkbook for all pensioners and free money transfers within Cyprus and Europe (SEPA transfers) for amounts up to €3.000 and same-day execution, also free, via Online Banking and the Bank’s Mobile App.

INDEPENDENT AUDITORS

The Board of Directors of the Bank and of each of its subsidiaries have approved the appointment of KPMG Ltd as the External Auditors of the Bank and its subsidiaries for the audit of the Financial Year 2025. This decision was approved by the Regulatory Authorities.

A resolution authorising the Board of Directors to appoint and fix their remuneration will be proposed at the next AGM.

On behalf of the Board of Directors,

Petros Christodoulou
Chairman of the Board of Directors

Nicosia, 20 March 2025

STATEMENT BY THE CHIEF EXECUTIVE OFFICER MR. MICHALIS LOUIS

Commenting on the Hellenic Bank Group's financial results for the year ended 31 December 2024, Mr. Michalis Louis, the Chief Executive Officer, stated:

2024 was a landmark year for Hellenic Bank in terms of financial performance and ownership structure.

The Bank achieved strong financial performance in 2024 with a net profit of €383 million (up 10% Y-o-Y adj. for discontinued operations) and a return on tangible equity of 23%. The balance sheet remains solid, with a total capital ratio of 32% and a liquidity coverage ratio of 519%, while the NPE ratio has reduced to 2,4%. New lending during 2024 of €1,1 billion demonstrated our commitment towards supporting the domestic economy and serving our clients.

The Eurobank Group currently owns 93,5% of the Bank's share capital and is expected to increase its ownership to 100%, following a mandatory tender offer and a squeeze out process during the first half of 2025. Then, and subject to regulatory approvals we will proceed with the merger of Hellenic Bank with Eurobank Cyprus creating one of the largest financial institutions in Cyprus. The business models of the two banks are complementary and will serve in further enhancing our customer products and our customer service.

Further, we expect to complete the acquisition of CNP Cyprus Insurance Holdings during the second quarter of 2025. This is an important milestone for the Bank as we establish ourselves as one of the leading financial services institutions in Cyprus focusing on our customers, our people and the society we operate.

Being part of the Eurobank Group, one of the leading banking groups in Greece and the region with assets exceeding c.€100 billion, we aim to grow our business and to become the best bank in Cyprus through enhancing customer relationships and offering excellent customer service. We will strive to continue supporting the Cypriot society contributing to economic growth, ensuring the sustainability of the banking system and the welfare of our customers.

I would like to thank my colleagues for the great year. We are excited to drive the Bank forward as a member of the Eurobank Group for the benefit of all our stakeholders.

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Independent Auditor's Report

To the Members of Hellenic Bank Public Company Limited

Report on the Audit of the Consolidated and Separate Financial Statements

Opinion

We have audited the consolidated and separate financial statements of Hellenic Bank Public Company Limited (the "Bank"), and its subsidiaries (together with the Bank, the "Group"), which are presented in pages 32 to 206 and comprise the consolidated statement of financial position of the Group and the statement of financial position of the Bank as at 31 December 2024, and the consolidated income statement, consolidated statements of comprehensive income, changes in equity and cash flows of the Group and income statement, statements of comprehensive income, changes in equity and cash flows of the Bank for the year then ended, and notes to the consolidated and separate financial statements, including material accounting policy information about the Group and the Bank.

In our opinion, the accompanying consolidated and separate financial statements give a true and fair view of the consolidated and separate financial position of the Group and the Bank as at 31 December 2024, and of its consolidated and separate financial performance and its consolidated and separate cash flows for the year then ended in accordance with IFRS Accounting Standards as adopted by the European Union and the requirements of the Cyprus Companies Law, Cap. 113.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs). Our responsibilities under those standards are further described in the Auditor's Responsibilities for the Audit of the Consolidated and Separate Financial Statements section of our report. We remained independent of the Group and the Bank throughout the period of our appointment in accordance with the International Ethics Standards Board for Accountants' International Code of Ethics for Professional Accountants (including International Independence Standards) (IESBA Code) together with the ethical requirements that are relevant to our audit of the consolidated and separate financial statements in Cyprus, and we have fulfilled our other ethical responsibilities in accordance with these requirements and the IESBA Code. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key audit matters incorporating the most significant risks of material misstatements, including assessed risk of material misstatements due to fraud

Key audit matters are those matters that, in our professional judgment, were of most significance in our audit of the consolidated financial statements of the current period. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters. For each matter below, our description of how our audit addressed the matter is provided in that context.

We have fulfilled the responsibilities described in the Auditor's responsibilities for the audit of the consolidated and separate financial statements section of our report, including in relation to these matters. Accordingly, our audit included the performance of procedures designed to respond to our assessment of the risks of material misstatement of the consolidated and separate financial statements. The results of our audit procedures, including the procedures performed to address the matters below, provide the basis for our audit opinion on the accompanying consolidated and separate financial statements.

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Key Audit Matter	How our audit addressed the Key Audit Matter

Expected credit losses on loans and advances to customers
 	
As at 31 December 2024, gross loans and advances to customers amounted to €5.849.792 thousand and the related expected credit losses (ECL) amounted to €111.681 thousand.
 	
Refer to Note 22 of the consolidated and separate financial statements for the relevant disclosures.
 	
The relevant accounting policy is presented in Note 3.12.5 of the consolidated and separate financial statements.
 	
Management exercises significant judgement, using subjective assumptions when determining the amount of the ECL for loans and advances to customers.
 	
Management exercises significant level of judgment and estimates for the below areas:
 	
• The allocation of loans and advances to customers to Stages 1, 2 or 3 using criteria in accordance with IFRS 9;
• The inputs, assumptions and probability weightings assigned to multiple economic scenarios; and
• The identification of loans and advances to customers which are individually assessed and the measurement of their ECL;
 	
Refer to Note 4.1 to the consolidated and separate financial statements for the significant judgments and estimates used in the calculation of ECL.
	We have performed, among others, the following audit procedures:
	
	• Updated our understanding and performed walkthroughs of the processes relevant to the calculation of ECL to identify key systems, applications and controls within the processes.
	• Tested the operating effectiveness of controls across the processes relevant to the calculation of ECL.
	• Inspected the key technical papers such as the ECL policy and involved our financial risk specialists to read the methodology of the Bank used for the calculation of impairment and assess whether it is in accordance with IFRS 9.
	• With the assistance of our financial risk specialists, we performed the following:
	  o Assessed whether the coding of the Bank's ECL tool, in relation to the Probability of Default (PDs), is in line with the Bank's methodology; and
	  o Tested the Loss Given Default (LGD) calculation by independently reconstructing the model used in accordance with the Bank's methodology.
	• With the assistance of our internal economists, we assessed the main macroeconomic parameters used in the Bank's ECL calculation.
	• Selected a sample of collateral valuations and engaged property valuation specialists to assess whether the value recognized by the Bank is reasonable.
	• Analysed and evaluated the criteria used to allocate loans and advances to customers to Stage 1, 2 or 3 in accordance with IFRS 9. Specifically, we have selected a sample of loans and advances to customers in Stage 1, 2 or 3 to verify that they were allocated to the appropriate stage.

We consider this to be a key audit matter due to the fact that a significant level of judgment is exercised by management in estimating the expected credit losses on loans and advances to customers. Furthermore, we consider this to be a key audit matter, as loans and advances to customers are a significant part of the Company's and Group's total assets (31% of Total Assets of the Group and the Bank).	• Assessed whether the main assumptions used for the calculation of ECL, such as the probability weightings assigned to multiple economic scenarios, are reasonable. • Selected a sample of loans and advances to customers, which were collectively assessed, and tested that the inputs used in the ECL calculation, such as liquidation haircuts and liquidation date, are in accordance with the Bank's policy. • Performed analytical procedures on the ECL recognised, including ratio analysis on staging, to assess the reasonableness of the ECL recognised by the Bank. • Read the minutes of the Board Risk Management Committee meetings, where the inputs, assumptions and ECL adequacy were discussed and approved. • Tested a sample of the individually assessed loan files performed by the Bank and assessed the measurement of the provisions, including the main assumptions and inputs used, such as collateral value, liquidation date and estimated cash flows. • Selected a sample of loans and advances to customers and assessed whether they have been correctly allocated to either the collectively assessed loans or the individually assessed loans. • Assessed the adequacy of disclosures against the relevant accounting standards.

Reporting on Other Information

The Board of Directors is responsible for the other information. The other information comprises the information included in the Annual Financial Report but does not include the consolidated financial statements and our auditor's report thereon.

Our opinion on the consolidated and separate financial statements does not cover the other information and we do not express any form of assurance conclusion thereon.

In connection with our audit of the consolidated and separate financial statements, our responsibility is to read the other information identified above and, in doing so, consider whether the other information is materially inconsistent with the consolidated and separate financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

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Responsibilities of the Board of Directors and Those Charged with Governance for the Consolidated and Separate Financial Statements

The Board of Directors is responsible for the preparation of consolidated and separate financial statements that give a true and fair view in accordance with IFRS Accounting Standards as adopted by the European Union and the requirements of the Cyprus Companies Law, Cap. 113, and for such internal control as the Board of Directors determines is necessary to enable the preparation of consolidated and separate financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated and separate financial statements, the Board of Directors is responsible for assessing the Group'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 the Board of Directors either intends to liquidate the Bank or to cease operations, or has no realistic alternative but to do so.

Those charged with governance are responsible for overseeing the Group's financial reporting process.

Auditor's Responsibilities for the Audit of the Consolidated and Separate Financial Statements

Our objectives are to obtain reasonable assurance about whether the consolidated and separate 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 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 consolidated and separate financial statements.

As part of an audit in accordance with ISAs, we exercise professional judgment and maintain professional scepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the consolidated and separate financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Bank's and the Group's internal control.
- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by the Board of Directors.
- Conclude on the appropriateness of the Board of Directors' use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Bank's and the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated and separate financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Bank and the Group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the consolidated and separate financial statements, including the disclosures, and whether the consolidated and separate financial statements represent the underlying transactions and events in a manner that achieves a true and fair view.
- Plan and perform the group audit to obtain sufficient appropriate audit evidence regarding the financial information of the entities or business units within the Group as a basis for forming an opinion on the consolidated financial statements. We are responsible for the direction, supervision and review of the audit work performed for the purposes of the group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, actions taken to eliminate threats or safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the consolidated and separate financial statements of the current period and are therefore the key audit matters.

Report on Other Legal and Regulatory Requirements

Requirements of Article 10(2) of the EU Regulation 537/2014

1. Appointment of the Auditor and Period of Engagement

We were first appointed as auditors of the Bank and the Group on 21 June 2021 by the Annual General Meeting of the shareholders. Our appointment has been renewed annually by shareholder resolution representing a total period of uninterrupted engagement appointment of four (4) years.

2. Consistency of the Additional Report to the Audit Committee

We confirm that our audit opinion on the consolidated and separate financial statements expressed in this report is consistent with the additional report to the Audit Committee of the Company, which we issued on 10 March 2025 in accordance with Article 11 of the EU Regulation 537/2014.

3. Provision of Non-audit Services

We declare that no prohibited non-audit services referred to in Article 5 of the EU Regulation 537/2014 and Section 72 of the Auditors Law of 2017 were provided. In addition, there are no non-audit services which were provided by us to the Bank and the Group and which have not been disclosed in the consolidated and separate financial statements or the Management Report.

Other Legal Requirements

Pursuant to the additional requirements of the Auditors Law of 2017, we report the following:

- In our opinion, based on the work undertaken in the course of our audit, the Management Report has been prepared in accordance with the requirements of the Cyprus Companies Law,

Cap. 113, and the information given is consistent with the consolidated and separate financial statements.
- In light of the knowledge and understanding of the Bank and the Group and its environment obtained in the course of the audit, we are required to report if we have identified material misstatements in the Management Report. We have nothing to report in this respect.
- In our opinion, based on the work undertaken in the course of our audit, the information included in the corporate governance statement in accordance with the requirements of subparagraphs (iv) and (v) of paragraph 2(a) of Article 151 of the Cyprus Companies Law, Cap. 113, has been prepared in accordance with the requirements of the Cyprus Companies Law, Cap, 113, and is consistent with the consolidated and separate financial statements.
- In our opinion, based on the work undertaken in the course of our audit, the corporate governance statement includes all information referred to in subparagraphs (i), (ii), (iii), (vi) and (vii) of paragraph 2(a) of Article 151 of the Cyprus Companies Law, Cap. 113.
- In light of the knowledge and understanding of the Bank and the Group and its environment obtained in the course of the audit, we are required to report if we have identified material misstatements in the corporate governance statement in relation to the information disclosed for items (iv) and (v) of subparagraph 2(a) of Article 151 of the Cyprus Companies Law, Cap. 113. We have nothing to report in this respect.

Other Matter

This report, including the opinion, has been prepared for and only for the Bank's members as a body in accordance with Article 10(1) of the EU Regulation 537/2014 and Section 69 of the Auditors Law of 2017 and for no other purpose. We do not, in giving this opinion, accept or assume responsibility for any other purpose or to any other person to whose knowledge this report may come to.

The engagement partner on the audit resulting in this independent auditor's report is Savvas Pentaris.

Savvas Pentaris

Certified Public Accountant and Registered Auditor

for and on behalf of

Ernst & Young Cyprus Limited

Certified Public Accountants and Registered Auditors

20 March 2025

Nicosia

HELLENIC BANK

Financial Statements

Member of Eurobank Group

For the year ended 31 December 2024

HELLENIC BANK GROUP
CONSOLIDATED INCOME STATEMENT
FOR THE YEAR ENDED 31 DECEMBER 2024

	Note	2024 €'000	2023 €'000
Turnover	3.5	**870.076**	817.591
Continuing Operations			
Interest income calculated using the effective interest method	5	**717.293**	660.005
Other interest income	5	**12.279**	20.282
Interest expense calculated using the effective interest method	6	**(120.384)**	(131.261)
Other interest expense	6	**(10.278)**	(12.738)
Net interest income		**598.910**	536.288
Fee and commission income	7	**80.942**	82.114
Fee and commission expense	8	**(11.074)**	(9.272)
Net fee and commission income		**69.868**	72.842
Net gains on disposal and revaluation of foreign currencies and financial instruments	9	**26.266**	14.646
Net income from insurance operations	10	**17.281**	14.334
Other income	11	**16.015**	26.210
Total net income		**728.340**	664.320
Staff costs	12	**(134.156)**	(119.312)
Depreciation and amortisation	26, 28	**(20.363)**	(22.326)
Administrative and other expenses	13	**(136.707)**	(117.450)
Total expenses		**(291.226)**	(259.088)
		437.114	405.232
Net gains on derecognition of financial assets measured at amortised cost		**986**	4.830
Reversal of impairment losses/(impairment losses) on financial instruments	14	**13.792**	(7.235)
Impairment losses on non financial assets	14	**(7.845)**	(9.203)
Profit before taxation		**444.047**	393.624
Taxation	15	**(61.462)**	(47.362)
Profit for the year from continuing operations		**382.585**	346.262
Discontinued Operations			
Profit for the year from discontinued operations	16	**-**	19.179
Profit for the year		**382.585**	365.441
Profit/(loss) attributable to:			
Shareholders of the parent company from continuing operations		**382.587**	346.263
Shareholders of the parent company from discontinued operations		**-**	19.179
Non-controlling interests		**(2)**	(1)
Profit for the year		**382.585**	365.441
Earnings per share (€cent)			
Basic earnings per share (€cent)	17	**92,68**	88,53
Diluted earnings per share (€cent)	17	**92,68**	87,10
Earnings per share (€cent) for continuing operations			
Basic earnings per share (€cent) from continuing operations	17	**92,68**	83,88
Diluted earnings per share (€cent) from continuing operations	17	**92,68**	82,67

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK GROUP
CONSOLIDATED STATEMENT OF COMPREHENSIVE INCOME
FOR THE YEAR ENDED 31 DECEMBER 2024

	Note	**2024 €'000**	2023 €'000
Profit for the year		**382.585**	365.441
Other comprehensive income			
Items that will not be reclassified in the income statement			
Surplus on revaluation of land and buildings	41	**-**	9.843
Deferred taxation on property revaluation	41	**(158)**	(1.095)
(Loss)/gain on disposal of equity securities at fair value through other comprehensive income		**(10)**	102
Net revaluation gain of investments in equity securities and collective investment units at fair value through other comprehensive income	41	**720**	2.674
		552	11.524
Items that are or may be reclassified subsequently in the income statement			
Net revaluation loss of investments in debt securities measured at fair value through other comprehensive income	41	**(337)**	(120)
Transfer to the income statement on disposal of investments in debt securities at fair value through other comprehensive income	41	**-**	412
		(337)	292
Total other comprehensive income		**215**	11.816
Total comprehensive income for the year		**382.800**	377.257
Total comprehensive income for the year attributable to:			
Shareholders of the parent company		**382.802**	377.258
Non-controlling interests		**(2)**	(1)
		382.800	377.257

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK GROUP
CONSOLIDATED STATEMENT OF FINANCIAL POSITION
AT 31 DECEMBER 2024

	Note	**2024 €'000**	2023 €'000
Assets			
Cash and balances with Central Banks	18, 20	**5.730.544**	8.222.845
Placements with other banks	19, 20	**355.416**	281.868
Reverse repurchase agreements	21	**300.274**	-
Loans and advances to customers	22	**5.738.111**	6.024.121
Debt securities	23	**5.675.674**	4.985.044
Equity securities and collective investment units	24	**145.676**	132.458
Property, plant and equipment	26	**173.108**	170.056
Stock of property	27	**76.229**	100.351
Intangible assets	28	**51.157**	45.483
Tax receivable		**4.249**	4.648
Assets and disposal group held for sale	29	**-**	3.296
Other assets	30	**78.791**	68.240
Reinsurance contract assets	31	**28.489**	23.515
Total assets		**18.357.718**	20.061.925
Liabilities			
Deposits by banks	32	**191.504**	96.799
Funding by Central Banks	33	**-**	2.355.508
Customer deposits and other customer accounts	34	**15.658.085**	15.314.788
Tax payable		**19.500**	13.896
Deferred tax liability	35	**11.504**	11.329
Other liabilities	36	**172.933**	233.908
Insurance contract liabilities	31	**106.314**	87.529
Loan capital	38	**309.659**	441.815
Total liabilities		**16.469.499**	18.555.572
Equity			
Share capital	39	**206.403**	206.403
Reserves	39, 40, 41	**1.681.806**	1.299.938
Equity attributable to shareholders of the parent company		**1.888.209**	1.506.341
Non-controlling interests		**10**	12
Total equity		**1.888.219**	1.506.353
Total liabilities and equity		**18.357.718**	20.061.925

The Consolidated Financial Statements have been approved by the Board of Directors on 20 March 2025.

Petros Christodoulou	Michalis Louis	Oliver Bernard Ellingham	Antonis K. Rouvas
Chairman of the Board of Director	Chief Executive Officer	Chairman of the Audit Committee of the Board	Chief Financial Officer

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK GROUP
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2024

	Attributable to shareholders of the parent company							
	Share capital (Note 39) €'000	Reduction of share capital reserve (Note 39) €'000	Share premium reserve (Note 39) €'000	Retained earnings (Note 40) €'000	Revaluation reserves (Note 41) €'000	Total attributable to shareholders of the parent company €'000	Non-controlling interests (Note 25) €'000	Total equity €'000
Balance 1 January 2024	206.403	260.269	553.414	423.223	63.032	**1.506.341**	12	**1.506.353**
Total comprehensive income for the year net of taxation								
Profit/(loss) for the year	-	-	-	382.587	-	**382.587**	(2)	**382.585**
Other comprehensive income for the year	-	-	-	-	225	**225**	-	**225**
Transfer on disposal of equity at fair value through other comprehensive income	-	-	-	292	(302)	**(10)**	-	**(10)**
Transfer on disposal of property	-	-	-	82	(82)	**-**	-	**-**
Transfer of excess depreciation on revaluation surplus	-	-	-	595	(595)	**-**	-	**-**
	-	-	-	383.556	(754)	**382.802**	(2)	**382.800**
Transactions with shareholders								
Contributions and distributions								
Defence on deemed dividend distribution	-	-	-	(934)	-	**(934)**	-	**(934)**
	-	-	-	(934)	-	**(934)**	-	**(934)**
Balance 31 December 2024	206.403	260.269	553.414	805.845	62.278	**1.888.209**	10	**1.888.219**

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK GROUP
CONSOLIDATED STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2024

	Attributable to shareholders of the parent company							
	Share capital (Note 39) €'000	Reduction of share capital reserve (Note 39) €'000	Share premium reserve (Note 39) €'000	Retained earnings (Note 40) €'000	Revaluation reserves (Note 41) €'000	Total attributable to shareholders of the parent company €'000	Non-controlling interests (Note 25) €'000	Total equity €'000
Balance 1 January 2023	206.403	260.269	553.414	57.480	52.148	**1.129.714**	13	**1.129.727**
Total comprehensive income for the year net of taxation								
Profit/(loss) for the year	-	-	-	365.442	-	**365.442**	(1)	**365.441**
Other comprehensive income for the year	-	-	-	-	11.816	**11.816**	-	**11.816**
Transfer of excess depreciation on revaluation surplus	-	-	-	520	(520)	**-**	-	**-**
Transfer on disposal of property	-	-	-	412	(412)	**-**	-	**-**
	-	-	-	366.374	10.884	**377.258**	(1)	**377.257**
Transactions with shareholders								
Contributions and distributions								
Defence on deemed dividend distribution	-	-	-	(631)	-	**(631)**	-	**(631)**
	-	-	-	(631)	-	**(631)**	-	**(631)**
Balance 31 December 2023	206.403	260.269	553.414	423.223	63.032	**1.506.341**	12	**1.506.353**

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK GROUP
CONSOLIDATED STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED 31 DECEMBER 2024

	Note	2024 €'000	2023 €'000
Cash flows from operating activities			
Profit for the year from continuing operations		**382.585**	346.262
Profit for the year from discontinued operations		**-**	19.179
Profit for the year		**382.585**	365.441
Adjustments to reconcile profit for the period to net cash flows:			
Net gains on derecognition of financial assets measured at amortised cost		**(986)**	(4.830)
(Reversal of impairment)/impairment losses on financial instruments	14	**(13.792)**	7.235
Impairment losses on non financial assets	14	**7.845**	9.203
Depreciation of property, plant and equipment and amortisation of intangible assets	26, 28	**21.333**	23.257
Net losses/(gains) on disposal and write offs of property, plant and equipment and intangible assets		**272**	(442)
Net gains on disposal and revaluation of investments in debt securities, equity securities and collective investment units	9	**(10.082)**	(7.538)
(Loss)/gain on derecognition of lease liability		**(11)**	(56)
(Release)/provision for pending litigations or complaints and/or claims	13	**(1.471)**	187
Interest income from other financial assets	5	**(399)**	(412)
Net losses/(gains) from revaluation of investment properties		**460**	(931)
Interest expense/(income) from indemnification assets	5, 6	**23**	(43)
Net gain from the disposal of stock of property	11	**(6.350)**	(4.980)
Interest expense on lease liability	6	**513**	465
Interest income from debt securities	5	**(153.069)**	(108.271)
Dividend income	11	**(3.321)**	(3.045)
Interest income from reverse repurchase agreements	5	**(274)**	-
Interest expense on loan capital	6	**40.849**	39.177
Interest expense on funding by Central Banks	6	**44.941**	77.131
Gain on derecognition of disposal group classified as held for sale		**-**	(20.729)
Taxation	15	**61.462**	47.493
		370.528	418.312
Working capital changes			
Decrease in loans and advances to customers		**289.478**	12.058
Increase in loans and advances to customers held for sale		**(505)**	(266)
Increase in other assets and disposal group assets		**(9.299)**	(5.055)
Increase/(decrease) in customer deposits and other customer accounts		**343.297**	(617.662)
Decrease in other liabilities		**(40.015)**	(7.585)
(Increase)/decrease in placements with other banks		**(18.114)**	1.633
Decrease/(increase) in obligatory reserves with Central Banks		**2.553**	(5.422)
Increase/(decrease) in deposits by banks		**94.705**	(11.228)
Net proceeds on disposal of loans and advances		**4.152**	873
Proceeds on derecognition of disposal group held for sale		**-**	27.502
Net proceeds received from the completion of Project Starlight		**-**	118.381
Net proceeds from the disposal of stock of property		**26.053**	29.348
(Increase)/decrease reinsurance contract assets	31	**(7.234)**	173
Increase in insurance contract liabilities	31	**21.045**	15.561
Net cash from/(used in) operating activities before taxation		**1.076.644**	(23.377)
Tax paid		**(72.421)**	(21.961)
Net cash from/(used in) operating activities		**1.004.223**	(45.338)
Cash flows from investing activities			
Dividend received		**3.321**	3.045
Interest received from debt securities		**111.825**	88.509
Additions of investments in debt securities		**(1.863.893)**	(1.583.608)
Additions of investments in equity securities and collective investment units		**(30.778)**	(21.832)
Proceeds on disposal/maturity/redemption of investments in debt securities		**1.225.841**	1.151.219
Proceeds on disposal of investments in equity securities and collective investment units		**29.364**	7.153
Additions of property, plant and equipment	26	**(9.250)**	(4.223)
Additions of intangible assets	28	**(16.276)**	(13.534)
Purchase of reverse repurchase agreements	21	**(300.000)**	-
Proceeds on disposal of property, plant and equipment		**434**	91
Net cash used in investing activities		**(849.412)**	(373.180)
Cash flows from financing activities			
Net proceeds from the issue of loan capital		**99.094**	197.448
Payments of lease liability	36	**(2.144)**	(2.304)
Repayment of loan capital		**(229.666)**	-
Repayment of funding from central banks	33	**(2.400.450)**	-
Payment on defence on deemed dividend distribution		**(612)**	(5.216)
Interest paid on loan capital	6	**(42.433)**	(27.157)
Net cash (used in)/from financing activities		**(2.576.211)**	162.771
Net decrease in cash and cash equivalents		**(2.421.400)**	(255.747)
Effect of exchange rate fluctuations on cash and cash equivalents		**(21.912)**	13.251
Cash and cash equivalents at the beginning of the year	20	**8.294.447**	8.536.943
Cash and cash equivalents at the end of the year	20	**5.851.135**	8.294.447

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK PUBLIC COMPANY LIMITED
INCOME STATEMENT
FOR THE YEAR ENDED 31 DECEMBER 2024

	Note	**2024 €'000**	2023 €'000
Turnover	3.5	**861.139**	813.034
Continuing Operations			
Interest income calculated using the effective interest method	5	**716.983**	659.818
Other interest income	5	**12.279**	20.282
Interest expense calculated using the effective interest method	6	**(120.382)**	(131.254)
Other interest expense	6	**(10.278)**	(12.738)
Net interest income		**598.602**	536.108
Fee and commission income	7	**86.156**	87.243
Fee and commission expense	8	**(11.074)**	(9.260)
Net fee and commission income		**75.082**	77.983
Net gains on disposal and revaluation of foreign currencies and financial instruments	9	**22.770**	10.631
Other income	11	**22.951**	35.060
Total net income		**719.405**	659.782
Staff costs	12	**(132.858)**	(118.190)
Depreciation and amortisation	26, 28	**(20.247)**	(22.233)
Administrative and other expenses	13	**(134.131)**	(117.299)
Total expenses		**(287.236)**	(257.722)
		432.169	402.060
Net gains on derecognition of financial assets measured at amortised cost		**986**	4.830
Reversal of impairment losses/(impairment losses) on financial instruments	14	**13.797**	(7.235)
Impairment losses on non financial assets	14	**(8.160)**	(9.463)
Profit before taxation		**438.792**	390.192
Taxation	15	**(59.382)**	(46.128)
Profit for the year from continuing operations		**379.410**	344.064
Discontinued Operations			
Profit for the year from discontinued operations	16	**-**	21.614
Profit for the year		**379.410**	365.678
Earnings per share (€cent)			
Basic earnings per share (€cent)	17	**91,91**	88,58
Diluted earnings per share (€cent)	17	**91,91**	87,16

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK PUBLIC COMPANY LIMITED
STATEMENT OF COMPREHENSIVE INCOME
FOR THE YEAR ENDED 31 DECEMBER 2024

	Note	**2024** **€'000**	2023 €'000
Profit for the year		**379.410**	365.678
Other comprehensive income			
Items that will not be reclassified in the income statement			
Surplus on revaluation of land and buildings	41	**-**	8.441
Deferred taxation on property revaluation	41	**(158)**	(1.009)
(Loss)/gain on disposal of equity securities at fair value through other comprehensive income		**(10)**	102
Net revaluation gain of investments in equity securities and collective investment units at fair value through other comprehensive income	41	**720**	2.674
		552	10.208
Items that are or may be reclassified subsequently in the income statement			
Net revaluation loss of investments in debt securities at fair value through other comprehensive income	41	**(337)**	(120)
		(337)	(120)
Total other comprehensive income for the year net of taxation		**215**	10.088
Total comprehensive income for the year		**379.625**	375.766

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK PUBLIC COMPANY LIMITED
STATEMENT OF FINANCIAL POSITION
AT 31 DECEMBER 2024

	Note	2024 €'000	2023 €'000
Assets			
Cash and balances with Central Banks	18,20	**5.730.544**	8.222.845
Placements with other banks	19,20	**351.209**	273.898
Reverse repurchase agreements	21	**300.274**	-
Loans and advances to customers	22	**5.738.111**	6.024.121
Debt securities	23	**5.662.807**	4.984.161
Equity securities	24	**44.701**	36.316
Investments in subsidiary companies	25	**83.333**	89.811
Property, plant and equipment	26	**165.142**	161.750
Stock of property	27	**36.091**	57.671
Intangible assets	28	**35.188**	29.017
Tax receivable		**4.460**	4.859
Assets and disposal group held for sale	29	**-**	3.296
Other assets	30	**80.651**	69.229
Total assets		**18.232.511**	19.956.974
Liabilities			
Deposits by banks	32	**191.504**	96.799
Funding by Central Banks	33	**-**	2.355.508
Customer deposits and other customer accounts	34	**15.658.085**	15.314.788
Amounts due to subsidiary companies	25	**13.768**	12.186
Tax payable		**18.791**	13.261
Deferred tax liability	35	**10.976**	10.836
Other liabilities	36	**171.427**	232.171
Loan capital	38	**309.659**	441.815
Total liabilities		**16.374.210**	18.477.364
Equity			
Share capital	39	**206.403**	206.403
Reserves	39, 40, 41	**1.651.898**	1.273.207
Total equity		**1.858.301**	1.479.610
Total liabilities and equity		**18.232.511**	19.956.974

The Financial Statements have been approved by the Board of Directors on 20 March 2025.

Petros Christodoulou	Michalis Louis	Oliver Bernard Ellingham	Antonis K. Rouvas
Chairman of the Board of Director	Chief Executive Officer	Chairman of the Audit Committee of the Board	Chief Financial Officer

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK PUBLIC COMPANY LIMITED
STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2024

	Share capital (Note 39) €'000	Reduction of share capital reserve (Note 39) €'000	Share premium reserve (Note 39) €'000	Retained earnings (Note 40) €'000	Revaluation reserves (Note 41) €'000	Total equity €'000
Balance 1 January 2024	206.403	260.269	553.281	400.232	59.425	**1.479.610**
Total comprehensive income for the year net of taxation						
Profit for the year	-	-	-	379.410	-	**379.410**
Other comprehensive income for the year	-	-	-	-	225	**225**
Transfer on disposal of equity securities at fair value through other comprehensive income	-	-	-	292	(302)	**(10)**
Transfer on disposal of property	-	-	-	82	(82)	**-**
Transfer of excess depreciation on revaluation surplus	-	-	-	595	(595)	**-**
	-	-	-	380.379	(754)	**379.625**
Transactions with shareholders						
Contributions and distributions						
Defence on deemed dividend distribution	-	-	-	(934)	-	**(934)**
	-	-	-	(934)	-	**(934)**
Balance 31 December 2024	206.403	260.269	553.281	779.677	58.671	**1.858.301**

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK PUBLIC COMPANY LIMITED
STATEMENT OF CHANGES IN EQUITY
FOR THE YEAR ENDED 31 DECEMBER 2024

	Share capital (Note 39) €'000	Reduction of share capital reserve (Note 39) €'000	Share premium reserve (Note 39) €'000	Retained earnings (Note 40) €'000	Revaluation reserves (Note 41) €'000	Total equity €'000
Balance 1 January 2023	206.403	260.269	553.281	34.253	50.269	**1.104.475**
Total comprehensive income for the year net of taxation						
Profit for the year	-	-	-	365.678	-	**365.678**
Other comprehensive income for the year	-	-	-	-	10.088	**10.088**
Transfer on disposal of property	-	-	-	412	(412)	**-**
Transfer of excess depreciation on revaluation surplus	-	-	-	520	(520)	**-**
	-	-	-	366.610	9.156	**375.766**
Transactions with shareholders						
Contributions and distributions						
Defence on deemed dividend distribution	-	-	-	(631)	-	**(631)**
	-	-	-	(631)	-	**(631)**
Balance 31 December 2023	206.403	260.269	553.281	400.232	59.425	**1.479.610**

The notes on pages 44 to 206 form an integral part of the Financial Statements.

HELLENIC BANK PUBLIC COMPANY LIMITED
STATEMENT OF CASH FLOWS
FOR THE YEAR ENDED 31 DECEMBER 2024

	Note	2024 €'000	2023 €'000
Cash flows from operating activities			
Profit for the year from continuing operations		**379.410**	344.064
Profit for the year from discontinued operations		**-**	21.614
Profit for the year		**379.410**	365.678
Adjustments to reconcile profit for the period to net cash flows:			
Net gains on derecognition of financial assets measured at amortised cost		**(986)**	(4.830)
Impairment losses on financial instruments	14	**(13.797)**	7.235
Impairment losses on non financial assets	14	**8.160**	9.463
Depreciation of property, plant and equipment and amortisation of intangible assets	26, 28	**20.247**	22.233
Net losses/(gains) on disposal and write-offs of property, plant and equipment and intangible assets		**216**	(415)
Net gains on disposal and revaluation of investments in debt and equity securities	9	**(6.592)**	(3.502)
Interest expense on lease liability	6	**511**	463
Net expense/(income) from revaluation of investment properties	11	**557**	(688)
Interest income from indemnification assets	6, 5	**23**	(43)
Gain on derecognition of lease liability		**(11)**	(56)
(Release)/provision for pending litigations or complaints and/or claims	13	**(1.471)**	187
Interest income from other financial assets	5	**(399)**	(412)
Interest income from reverse repurchase agreements	5	**(274)**	-
Interest expense on funding by Central Banks	6	**44.941**	77.131
Interest income from debt securities	5	**(152.874)**	(108.220)
Dividend income	11	**(10.414)**	(13.072)
Net gain from the disposal of stock of property	11	**(6.350)**	(3.454)
Interest expense on loan capital	6	**40.849**	39.177
Gain on derecognition of disposal group classified as held for sale		**-**	(21.614)
Gain from the disposal of subsidiary companies	11	**(224)**	(628)
Taxation	15	**59.383**	46.128
		360.905	410.761
Working capital changes			
Decrease in loans and advances to customers		**289.478**	12.058
Increase in loans and advances to customers (classified as assets held for sale)		**(505)**	(266)
Increase in other assets		**(10.268)**	(4.460)
Increase/(decrease) in customer deposits and other customer accounts		**343.297**	(613.459)
Decrease in other liabilities		**(39.763)**	(8.339)
(Increase)/decrease in placements with other banks		**(18.113)**	1.632
Decrease/(increase) in obligatory reserves with Central Banks		**2.553**	(5.310)
Increase/(decrease) in deposits by banks		**94.705**	(11.228)
Decrease/(increase) in amounts due from subsidiary companies		**1.582**	(2.109)
Net proceeds on disposal of Project Starlight		**-**	145.883
Net proceeds from the disposal of loans and advances		**4.152**	873
Net proceeds from the disposal of stock of property		**26.053**	18.219
Net cash from/(used in) operating activities before taxation		**1.054.076**	(55.745)
Tax paid		**(70.502)**	(19.320)
Net cash from/(used in) operating activities		**983.574**	(75.065)
Cash flows from investing activities			
Net increase in investment in subsidiary companies	25	**(505)**	(224)
Net proceeds on disposal of investment in subsidiary companies		**4.351**	6.835
Dividend received		**10.414**	17.572
Interest received from debt securities		**111.764**	88.493
Additions of investments in debt securities		**(1.834.095)**	(1.567.923)
Proceeds on disposal/maturity/redemption of investments in debt securities		**1.207.667**	1.129.932
Proceeds on disposal of investments in equity securities		**155**	134
Additions of property, plant and equipment	26	**(9.229)**	(4.116)
Additions of intangible assets	28	**(15.992)**	(13.032)
Purchase of reverse repurchase agreements	21	**(300.000)**	-
Proceeds on disposal of property, plant and equipment		**434**	91
Net cash used in investing activities		**(825.036)**	(342.238)
Cash flows from financing activities			
Payments of lease liability	36	**(2.115)**	(2.276)
Repayment of funding from central banks	33	**(2.400.450)**	-
Net proceeds from the issue of loan capital		**99.094**	197.447
Repayment of loan capital		**(229.666)**	-
Payment on defence on deemed dividend distribution		**(612)**	(5.216)
Interest paid on loan capital	6	**(42.433)**	(27.157)
Net cash (used in)/from financing activities		**(2.576.182)**	162.798
Net decrease in cash and cash equivalents		**(2.417.644)**	(254.505)
Foreign exchange difference		**(21.912)**	13.251
Cash and cash equivalents at the beginning of the year		**8.286.476**	8.527.730
Cash and cash equivalents at the end of the year	20	**5.846.920**	8.286.476

The notes on pages 44 to 206 form an integral part of the Financial Statements.

1. INCORPORATION AND PRINCIPAL ACTIVITY

Hellenic Bank Public Company Limited (the "Bank") was incorporated and is domiciled in Cyprus and is a public company in accordance with the provisions of the Cyprus Companies Law (Cap. 113), the Cyprus Stock Exchange Laws and Regulations and the Income Tax Laws. The Bank's registered office is located at 200, Corner of Limassol and Athalassa Avenues, 2025 Strovolos, P.O. Box 24747, 1394 Nicosia. The Bank is the holding company of Hellenic Bank Group (the "Group").

As from 30 July 2024, the Group is a member of the Eurobank Group with a percentage of 55,5%.

The principal activity of the Group continued to be the provision of a wide range of banking and financial services, which include financial, investment and insurance services, custodian and factoring services and management and disposal of properties, predominantly acquired in debt satisfaction.

The financial statements for the year ended 31 December 2024 (the "Financial Statements"; "Consolidated Financial Statements") comprise the financial statements of Hellenic Bank Public Company Limited and its subsidiary companies, which together are referred to as the Group.

The Financial Statements have been prepared in both the English and the Greek language. In case of a difference or inconsistency between the two, the English version prevails.

2. GOING CONCERN

Management applied the going concern principle for the preparation of the Consolidated Financial Statements as at for the year ended 31 December 2024. For assessing the appropriateness of the application of this principle, Management considered the 2025 Budget and 2026-2027 Business Plan approved by the Board on 30 January 2025 which presented the Bank's profitability key drivers and challenges, financial projections and key transformation plan deliverables. Management also considered a wide range of information relating to current and future economic and monetary policy developments based on which adverse scenarios were formulated, and the impact on net interest income, profitability, cash flows, capital and liquidity requirements was assessed. The main macroeconomic developments that could cause uncertainties regarding the application of this principle include the ongoing Russia-Ukraine conflict that started in February 2022 and the Middle East crisis that emerged in October 2023. Management closely monitors the developments and the impact they may have on the Group's operations and financial performance. Based on the above and taking into account:

- the strong financial performance in 2024 with a net profit of €383 million;
- the capital and liquidity position of the Bank;
- the signing of the Sales and Purchase Agreement with CNP Assurances to acquire its subsidiary CNP Cyprus Insurance Holdings Limited;

The Group concluded that there are no material uncertainties which could cast significant doubt over the Group's ability to continue as a going concern for at least the next 12 months from the date of approval of the Consolidated Financial Statements for the year ended 31 December 2024. It should be noted that as at the reporting date, the Bank is part of the Eurobank Group, one of the leading banking groups in Greece and the region and in 2025, subject to regulatory approvals, the legal merger of Hellenic Bank with Eurobank Cyprus will be completed creating one of the largest banks in Cyprus.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES

The accounting policies set out below have been applied consistently to all periods presented in the Consolidated Financial Statements and the Bank's separate Financial Statements (throughout the document collectively referred to as "Financial Statements") and have been applied consistently by all companies of the Group.

3.1. Basis of preparation

The Consolidated Financial Statements are presented in Euro (€), which is the functional and presentation currency of the Bank and its subsidiaries. All figures have been rounded to the nearest thousand, except where otherwise indicated.

Basis of consolidation
The Consolidated Financial Statements comprise the financial statements of the Bank and its subsidiaries as at 31 December 2024. The financial information of the subsidiaries is prepared as of the same reporting date as that of the Bank. When necessary, adjustments are made to the financial information of subsidiaries to bring their accounting policies in line with the Bank's accounting policies.

(a) Going concern principle
The Financial Statements have been prepared on a going concern basis.

(b) Statement of compliance
The Financial Statements have been prepared in accordance with IFRS Accounting Standards as adopted by the European Union (EU) and the requirements of the Cyprus Companies Law, Cap.113.

(c) Basis of measurement
The Financial Statements have been prepared on the historical cost basis, except from derivative financial instruments, financial assets at fair value through profit and loss (FVPL), investments at fair value through other comprehensive income (FVOCI), properties held for own use and investment properties which are measured at fair value, stock of property which is measured at the lower of cost and net realisable value and insurance and reinsurance contract assets and liabilities which are measured based on their fulfilment cash flows and the, Contractual Service Margin, if any.

3.2. Adoption of new and revised International Financial Reporting Standards (IFRSs) and interpretations

As from 1 January 2024, the Group adopted all the changes to International Financial Reporting Standards (IFRSs) as adopted by the EU which become effective on that date and which are relevant to its operations.

IAS 1 Presentation of Financial Statements: Classification of Liabilities as Current or Non-current (Amendments)

The objective of the amendments is to clarify the principles in IAS 1 for the classification of liabilities as either current or non-current. The amendments clarify the meaning of a right to defer settlement, the requirement for this right to exist at the end of the reporting period, that management intent does not affect current or non-current classification, that options by the counterparty that could result in settlement by the transfer of the entity's own equity instruments do not affect current or non-current classification. Also, the amendments specify that only covenants with which an entity must comply on or before the reporting date will affect a liability's classification. Additional disclosures are also required for non-current liabilities arising from loan arrangements that are subject to covenants to be complied with within twelve months after the reporting period. These amendments do not have any effect on the Financial Statements.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

IFRS 16 Leases: Lease Liability in a Sale and Leaseback (Amendments)

The amendments are intended to improve the requirements that a seller-lessee uses in measuring the lease liability arising in a sale and leaseback transaction in IFRS 16, while it does not change the accounting for leases unrelated to sale and leaseback transactions. In particular, the seller-lessee determines 'lease payments' or 'revised lease payments' in such a way that the seller-lessee would not recognise any amount of the gain or loss that relates to the right of use it retains. Applying these requirements does not prevent the seller-lessee from recognising, in profit and loss, any gain or loss relating to the partial or full termination of a lease. A seller-lessee applies the amendment retrospectively in accordance with IAS 8 to sale and leaseback transactions entered into after the date of initial application, being the beginning of the annual reporting period in which an entity first applied IFRS 16. The adoption of these amendments does not have any impact on the Financial Statements.

IAS 7 Statement of Cash Flows and IFRS 7 Financial Instruments Disclosure - Supplier Finance Arrangements (Amendments)

The amendments supplement requirements already in IFRS and require an entity to disclose the terms and conditions of supplier finance arrangements. Additionally, entities are required to disclose at the beginning and end of reporting period the carrying amounts of supplier finance arrangement financial liabilities and the line items in which those liabilities are presented as well as the carrying amounts of financial liabilities and line items, for which the finance providers have already settled the corresponding trade payables. Entities should also disclose the type and effect of non-cash changes in the carrying amounts of supplier finance arrangement financial liabilities, which prevent the carrying amounts of the financial liabilities from being comparable. Furthermore, the amendments require an entity to disclose as at the beginning and end of the reporting period the range of payment due dates for financial liabilities owed to the finance providers and for comparable trade payables that are not part of those arrangements. These amendments do not have any effect on the Financial Statements.

3.2.1. Standards, Amendments and Interpretation issued but not yet effective

The following Standards, Amendments to Standards and Interpretations have been issued by International Accounting Standards Board ("IASB") but are not yet effective for annual periods beginning on 1 January 2024. Those which may be relevant to the Group are set out below. The Group does not plan to adopt these Standards, Amendments and Interpretations early.

IAS 21 The Effects of Changes in Foreign Exchange Rates: Lack of Exchangeability (Amendments)

The amendments are effective for annual reporting periods beginning on or after 1 January 2025, with earlier application permitted. The amendments specify how an entity should assess whether a currency is exchangeable and how it should determine a spot exchange rate when exchangeability is lacking. A currency is considered to be exchangeable into another currency when an entity is able to obtain the other currency within a time frame that allows for a normal administrative delay and through a market or exchange mechanism in which an exchange transaction would create enforceable rights and obligations. If a currency is not exchangeable into another currency, an entity is required to estimate the spot exchange rate at the measurement date. An entity's objective in estimating the spot exchange rate is to reflect the rate at which an orderly exchange transaction would take place at the measurement date between market participants under prevailing economic conditions. The amendments note that an entity can use an observable exchange rate without adjustment or another estimation technique. The amendments have not yet been endorsed by the EU. The Group does not expect that these amendments will have an impact on its financial statements.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Annual Improvements to IFRS Accounting Standards - Volume 11

On 18 July 2024, the International standards Board (the IASB) published nine narrow scope amendments as part of its periodic maintenance of IFRS accounting standards. The amendments include clarifications, simplifications, corrections or changes to improve consistency in IFRS1 First-time Adoption of International Reporting Standards, IFRS7 Financial Instruments: Disclosures and its accompanying Guidance on implementing IFRS 7; IFRS 9 Financial Instruments; IFRS 10 Consolidated Statements; and IAS 7 Statement of Cash Flows. These Annual Improvementshave not yet been endorsed by the EU. The amendments are effective for annual reporting periods beginning on or after 1 January 2026. The Group is currently evaluating the expected impact of adopting these amendments on its financial statements.

Amendments to IFRS 9 and IFRS 7 - Amendments to the Classification and Measurement of Financial Instruments

The amendments clarify that a financial liability is derecognised on the ‘settlement date’ and introduce an accounting policy choice to derecognise financial liabilities settled using an electronic payment system before the settlement date, if certain conditions are met. In addition the amendments clarify how to assess the contractual cash flow characteristics of financial assets with Environmental, Social and Governance (ESG)-linked and other similar contingent features. Finally, the amendments clarify the treatment of non-recourse loans and contractually linked instruments. Additional disclosures are introduced for financial instruments with contingent features and equity instruments classified at fair value through Other Comprehensive Income. The amendments become effective for reporting periods beginning on or after 1 January 2026. Early adoption is permitted, with an option to early adopt the amendments for contingent features only. The amendments have not been endorsed by the EU. The Group is currently evaluating the expected impact of adopting these amendments on its financial statements.

IFRS 18: Presentation and Disclosures in Financial Statements

IFRS 18 introduces new requirements on presentation within the statement of profit and loss. It requires an entity to classify all income and expenses within its statement of profit and loss into one of the five categories: operating; investing; financing; income taxes; and discontinued operations. These categories are complemented by the requirements to present subtotals and totals for ‘operating profit and loss’, ‘profit and loss before financing and income taxes’ and ‘profit and loss’. It also requires disclosure of management-defined performance measures and includes new requirements for aggregation and disaggregation of financial information based on the identified ‘roles’ of the primary financial statements and the notes. In addition, there are consequential amendments to other accounting standards. IFRS 18 is effective for reporting periods beginning on or after 1 January 2027, with earlier application permitted. Retrospective application is required in both annual and interim financial statements. The standard has not been endorsed by the EU. The Group is currently evaluating the expected impact of adopting this standard on its financial statements.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

IFRS 9 Financial Instruments and IFRS 7 Financial Instruments: Disclosures - Contracts Referencing Nature-dependent Electricity (Amendments)

The amendments are effective for annual reporting periods beginning on or after January 1, 2026, with earlier application permitted. The amendments include clarifying the application of the 'own-use' requirements, permitting hedge accounting if contracts in scope of the amendments are used as hedging instruments, and introduce new disclosure requirements to enable investors to understand the impact of these contracts on a company's financial performance and cash flows. The clarifications regarding the 'own-use' requirements must be applied retrospectively, but the guidance permitting hedge accounting have to be applied prospectively to new hedging relationships designated on or after the date of initial application. The amendments have not yet been endorsed by the EU. The Group is currently evaluating the expected impact of adopting these amendments on its financial statements.

3.3. Foreign currency

(a) Foreign currency transactions
Transactions in foreign currencies are translated into the respective functional currencies of Group entities at exchange rates at the dates of the transactions. Monetary assets and liabilities denominated in foreign currencies at the reporting date are translated into the functional currency at the exchange rate at that date. Non-monetary assets and liabilities denominated in foreign currencies that are measured at fair value are translated into the functional currency at the exchange rate at the date when the fair value was determined. Foreign currency differences arising on retranslation are recognised in the income statement, except for differences arising on the translation of a financial liability designated as the hedging instrument in a hedge of the net investment in a foreign operation or in a qualifying cash flows hedge, which are recognised directly in equity.

(b) Foreign operations
The assets and liabilities of foreign operations, including goodwill and fair value adjustments arising on acquisition, are translated into the Group’s presentation currency (Euro) at exchange rates at the statement of financial position date. The income and expenses of foreign operations are translated into Euro using the average exchange rates for the year. Exchange differences arising on translation of foreign operations are recognised directly in the translation reserve within equity. When a foreign operation is disposed of, the cumulative amount of the exchange differences recognised in equity and relating to that foreign operation is reclassified to the income statement when the gain or loss on disposal is recognised.

The Group also hedges the foreign currency risk that derives from the translation to Euro of the net position of its foreign subsidiaries by maintaining an open foreign exchange position. All exchange differences resulting from the translation of the open foreign exchange position are recognised in the translation reserve. There was no movement in the translation reserve since the termination of the foreign operations.

3.4. Segment reporting
Operating segments are reported in a manner consistent with the internal reporting provided to the chief operating decision-maker, which is the Management Board of the Bank under the leadership of the Chief Executive Officer. The chief operating decision-maker is the person or group that is responsible for allocating resources to and assessing the performance of the operating segments of the Group. The Group's operations are mainly concentrated in Cyprus.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

For management purposes, the Group is organised into two operating segments in Cyprus based on the provision of services, as follows:

- Banking and financial services segment - principally providing banking and financial services, including financing and investment services, custodian and factoring services as well as management and disposal of properties. Banking and financial services segment also includes the share of results of associate company;
- Insurance services segment - principally providing life and general insurance services.

Management monitors the operating results of the Group’s operating segments separately for the purpose of making decisions about resource allocation and performance assessment. Segment performance is evaluated based on profit and loss before taxation which is measured in the same manner as in the Financial Statements.

Transfer prices between segments are on an arm's length basis in a manner similar to transactions with third parties. Balances and transactions between segments are eliminated on consolidation. Segmental information is presented in Note 45.

3.5. Turnover
Turnover comprises interest income, fee and commission income, net gains or losses on disposal and revaluation of foreign currencies and financial instruments and other income. Group turnover also includes net insurance income.

3.6. Interest income and expense
Net interest income comprises interest income and interest expense calculated using the effective interest method (EIR) and other methods. The EIR is the rate that exactly discounts the estimated future cash payments or receipts through the expected life of the financial asset or liability to the net carrying amount of the financial asset or liability.

Interest income on financial assets at amortised cost and on financial assets at fair value through other comprehensive income (FVOCI) is calculated by applying the EIR on the gross carrying amount of the asset, unless the asset is credit impaired. For financial assets that are credit-impaired, interest income is calculated by applying EIR to the amortised cost (i.e. gross carrying amount less credit loss allowance). For purchased or originated credit impaired (POCI) financial assets, interest income is recognised by applying a credit adjusted EIR (CAEIR) (based on an initial expectation of further credit losses) on the amortised cost of the financial asset.

Interest expense on financial liabilities held at amortised cost is calculated using the effective interest method (EIR) which allocates interest over the expected life of the financial liabilities.

Interest income from financial assets at amortised cost and financial assets at FVOCI is presented within “Interest income calculated using the effective interest method” in the income statement, which also includes negative interest on certain financial liabilities at amortised cost. Interest expense on financial liabilities held at amortised cost is presented within “Interest expense calculated using the effective interest method” which also includes negative interest on certain financial assets held at amortised cost. Interest income and expense on derivative financial instruments are included in “Other interest income” and “Other interest expense” respectively in the income statement.

Further details on interest income and interest expense are disclosed in Note 5 and Note 6 respectively.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

3.7. Fee and commission income and expense

The Group earns fee and commission income from a diverse range of services it provides to its clients performed either at a point in time or over a certain period of time.

The Group applies a five-step revenue recognition model to recognise commissions and fee income, under which the performance obligations as well as the timing of their satisfaction are identified and income is recognised when control of goods and services is transferred, i.e. the contractual performance obligation to the client has been satisfied. The amount of income is measured on the basis of the contractually agreed transaction price and is allocated to the performance obligations defined in the contract.

Fee and commission expense is recognised in the income statement on an accruals basis, as the related services are performed.

Further details on fee and commission income and expense are disclosed in Note 7 and Note 8 respectively.

3.8. Leases

The Group leases land and building for its branches. At inception of a contract, the Group assesses whether a contract is, or contains, a lease. That is, if the contract conveys the right to control the use of an identified asset for a period of time in exchange for consideration.

Group as lessee

At commencement or on modification of a contract that contains a lease component, the Group allocates consideration in the contract to each lease component on the basis of its relative stand-alone price. However, for leases of branches and office premises the Group elected not to separate non-lease components and accounts for the lease and non-lease components as a single lease component.

The Group recognises a right-of-use asset and a lease liability at the lease commencement date. The right-of-use asset is initially measured at cost, which comprises the initial amount of the lease liability adjusted for any lease payments made at or before the commencement date, plus any initial direct costs incurred and an estimate of costs to dismantle and remove any improvements made to the branches or office premises.

The right-of-use asset is subsequently depreciated using the straight line method from the commencement date to the end of the lease term and recorded to the income statement within "Depreciation and amortisation". In addition, right-of-use asset is periodically reduced by impairment losses, if any, and adjusted for certain remeasurements of the lease liability. The Group presents right-of-use assets in Note 26 "Property, plant and equipment" in the statement of financial position.

The lease liability is initially measured at the present value of the lease payments that are not paid at the commencement date, discounted using the interest rate implicit in the lease or, if that rate cannot be readily determined, the Group’s incremental borrowing rate. Generally, the Group uses its incremental borrowing rate as the discount rate. The incremental borrowing rate reflects what the Group would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right of use asset in a similar economic environment.

The lease liability is measured at amortised cost using the effective interest method with interest charged to the income statement within "Interest expense". It is remeasured when there is a change in future lease payments arising from the change in an index or rate, if there is a change in the Group’s estimate of the amount expected to be payable under a residual value guarantee, if the Group changes its assessment of whether it will exercise a purchase, extension or termination option or if there is a revised in-substance fixed lease payment.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

When the lease liability is remeasured in this way, a corresponding adjustment is made to the carrying amount of the right-of-use asset and any remaining difference is recorded in the income statement within "Other income". The Group presents lease liabilities in "Other liabilities" in the statement of financial position.

For leases that at commencement date have a lease term of 12 months or less and leases for which the underlying asset is of low value, the Group applies either the short-term exemption or the low value asset exemption and such assets are not presented on the Group's balance sheet. Instead, payments are recognised on a straight line basis over the lease term in Note 13 "Administrative and other expenses". Such exemptions were applied for lease contracts of vehicles and equipment.

In addition, where practicable/feasible, the Group seeks to include extension options in new leases to provide operational flexibility. The extension options are exercisable by the Group companies and not the lessor. As a result, the Group applied judgement to determine whether it is reasonably certain that an extension option or termination option will be exercised which in effect impacts the determination of the lease term and hence, the determination of the discount rate and the amounts that the lease liability and right-of-use assets are recognised.

Group as lessor
When the Group acts as a lessor, it determines at lease inception whether the lease is a finance lease or an operating lease. To classify each lease, the Group makes an overall assessment of whether the lease transfers substantially all of the risks and rewards incidental to ownership of the underlying asset. If this is the case, then the lease is a finance lease, if not, then it is an operating lease. As part of this assessment, the Group considers certain indicators such as whether the lease is for the major part of the economic life of the asset.

The Group applies the derecognition and impairment requirements in IFRS 9 to the net investment in the lease. The Group further regularly reviews estimated unguaranteed residual values used in calculating the gross investment in the lease.

3.8.1. Determination of the lease term
The Group determines the lease term as the non-cancellable term of the lease. Where practicable/feasible, the Group seeks to include extension options in new leases to provide operational flexibility. As the extension options are exercisable by the Group companies, the Group applies judgement to determine whether it is reasonably certain that an extension option or termination option will be exercised which in effect impacts the determination of the lease term and the amounts that the lease liability and right of use assets are recognised.

3.8.2. Estimating the incremental borrowing rate
In determining the carrying amount of the right of use asset and lease liabilities, the Group is required to estimate the incremental borrowing rate since the interest rate implicit in the lease is not readily determined. The incremental borrowing rate therefore reflects what the Group would have to pay to borrow over a similar term, and with a similar security, the funds necessary to obtain an asset of a similar value to the right of use asset in a similar economic environment.

3.9. Employee retirement benefits
The Group participates in different defined contribution retirement plans.

The terms of employment of the majority of Group employees are in accordance with the provisions of the Collective Agreement (CA) between the Cyprus Bankers Employers' Association and the Cyprus Union of Bank Employees and/or between Hellenic Bank and the Cyprus Union of Bank Employees. Under these terms of employment, a defined contribution Provident Fund scheme for employees was set up.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

The rules and regulations of the Provident Fund (the "Fund") scheme is governed by the Cyprus legislation. The employer's contribution to the Provident Fund for the majority of Hellenic Bank employees is set at 9%. Different terms also apply for a small number of employees who have not chosen to become members of the said Fund.

The Bank also offers to employees whose employment contracts are not in accordance with the terms of employment of the CA, the option to become members of multi-employer defined contribution Provident Fund schemes of their choice to which the employer's contribution is set at 9%.

Group obligations towards the employees' retirement benefits are limited to payment of the contributions to each Provident Fund. Employer's contributions due for payment are recognised as staff costs (refer to Note 12).

Prepaid contributions are recognised as an asset to the extent that cash will be refunded or future payments will be reduced.

3.10. Income tax

Income tax comprises current tax and deferred tax. It is recognised in the income statement unless it relates to items recognised directly in equity or in the statement of comprehensive income.

The Group has determined that the global minimum top-up tax, which it is required to pay under Pillar Two legislation, is an income tax in the scope of IAS 12. The Group has applied a temporary mandatory relief from deferred tax accounting for the impacts of the top-up tax and accounts for it as a current tax when it is incurred.

Current tax

Current tax represents the amount of current income tax payable on the taxable profit of a tax period, using tax rates prevailing as at the date of the statement of financial position as well as any adjustments to tax payable in respect of previous years' results. The amount of tax payable or receivable is the best estimate of the tax amount expected to be paid or received. It is measured using tax rates enacted at the reporting date. Management periodically evaluates positions taken in the tax returns with respect to situations in which applicable tax regulations are subject to interpretation and adjusts the tax position accordingly. Additional disclosures are provided in Note 15.

Deferred tax

Deferred tax is recognised for deductible temporary differences and unused tax losses carried forward only to the extent that it is probable that future taxable profits will be available against which the deductible temporary differences and the unused tax losses can be utilised. Temporary differences arise from differences between the carrying amounts of assets and liabilities in the statement of financial position and their tax base. The carrying amount of deferred tax asset is reviewed at each reporting date and reduced to the extent that it is no longer probable that/it is uncertain whether there will be sufficient taxable profit will be available to allow all or part of the deferred tax asset to be utilised. Unrecognised deferred tax assets are reassessed at each reporting date and are recognised to the extent that it becomes probable that future taxable profit will allow the deferred tax asset to be recovered.

Deferred tax is calculated at tax rates expected to be applicable in the period during which the asset will be utilised or the liability will be settled taking into consideration the tax rates and legislation enacted or substantially enacted at the reporting date. Detailed disclosures on the deferred tax asset and deferred tax liability are provided in Note 35.

Current and deferred tax assets and liabilities are offset if they relate to taxes imposed by the same tax authority provided it allows such settlements, and provided the intention of the Group is to either settle the net amount or realise the asset and settle the obligation simultaneously.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

3.11. Special Levy
According to the "Special Levy on Credit Institutions Law of 2011 to 2017", special levy is imposed on credit institutions on a quarterly basis, at the rate of 0,0375% on qualifying deposits held by each credit institution on 31 December of the previous year for the quarter ending on 31 March, on 31 March of the same year for the quarter ending on 30 June, on 30 June of the same year for the quarter ending on 30 September and on 30 September of the same year for the quarter ending on 31 December. Based on an amendment to the Law effective as from 6 October 2017, an amount corresponding to the annual contribution of each credit institution to the Resolution Fund or to the Single Resolution Fund as the case may be, is deducted from the balance of special levy payable, up to the maximum amount of special levy for the same year.

Special levy is recognised in the income statement in "Administrative and other expenses".

3.12. Financial instruments

3.12.1. Recognition and initial measurement
The Group initially recognises loans and advances to customers, customers deposits and loan capital issued on the date at which they are originated. All other financial assets and liabilities are initially recognised on the trade date at which the Group becomes party to the contractual provisions of the instrument.

A financial asset or a financial liability is initially measured at fair value plus, for an item measured at FVTPL, transaction costs that are directly attributable to its acquisition or issue. The fair value of a financial instrument at initial recognition is generally its transaction price. Financial instruments without significant financing component are initially measured at the transaction price.

3.12.2. Classification and Measurement of financial assets and liabilities
The classification of financial assets is determined on the basis of the Bank's business model within which the financial assets are managed and the contractual cash flow characteristics (whether the cash flows represent 'solely payments of principal and interest' (SPPI)).

Financial assets that are held within a business model whose objective is to hold assets to collect contractual cash flows (the "hold to collect" business model) and their contractual terms meet the SPPI criterion will be classified at amortised cost. Those debt instruments held within a business model whose objective is achieved by both collecting contractual cash flows and selling the asset (the 'hold to collect and sell' business model) and their contractual terms meet the SPPI criterion will be classified at FVOCI. Financial assets with contractual terms that do not meet the SPPI criterion are classified as FVTPL.

Financial assets that are held for trading and those that are managed and whose performance is evaluated on a fair value basis will be measured at FVTPL because they are neither held to collect contractual cash flows nor held both to collect contractual cash flows and to sell financial assets.

Business Model Assessment
The Group assessed the business model criteria at a portfolio level because this best reflects the way in which the business is managed, and information is provided to management. Information that is considered in determining the applicable business model includes:

- the stated policies and objectives for the portfolio and the operation of those policies in practice,
- how the performance of the business model and the financial assets held within that business model are evaluated and reported to the Bank's management,

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

- the risks that affect the performance of the business model and, in particular the way in which those risks are managed,

- the frequency, volume and timing of sales in prior periods, the reason for such sales and expectations about future sales activity, which should be considered as part of an overall assessment of how the Bank's stated objective for managing the financial assets is achieved and how cash flows are generated.

Assessment whether contractual cash flows are solely payments of principal and interest
The contractual cash flow characteristics of financial assets are assessed, at product level, with reference to whether the cash flows represent SPPI. "Principal" is defined as the fair value of the financial asset on initial recognition. "Interest" is defined as consideration for the time value of money, for the credit risk associated with the principal amount outstanding during a particular period of time and for other basic lending risks and costs, as well as a profit margin.

In assessing whether the contractual cash flows are SPPI, the Group considers the contractual terms that could change the contractual cash flows so that it would not meet the condition for SPPI, including: (i) contingent and leverage features, (ii) non-recourse arrangements and (iii) features that could modify the time value of money.

Measurement categories of financial assets and liabilities

Financial Assets at amortised cost
Financial assets are classified and subsequently measured at amortised cost, unless designated under the fair value option, if the financial asset is held in a "Hold to Collect" business model and the contractual cash flows are SPPI.

At initial recognition, the financial asset is measured at fair value including any directly attributable transaction costs and are subsequently measured at amortised cost using the effective interest method. Amortised cost is calculated by taking into account any discount or premium on acquisition and fees that are an integral part of the effective interest rate. The amortised cost is also reduced with any expected credit loss. In the income statement, the amortisation is included in "Interest income calculated using the effective interest method", the foreign exchange gains and losses are included in "Net gains on disposal and revaluation of foreign currencies and financial instruments" and impairment losses are included in "Impairment losses on financial instruments". Any gain or loss on derecognition is recognised in the income statement in "Net gains on derecognition of financial assets measured at amortised cost".

The classification relates to cash and balances with Central Bank, placements with other banks, reversed repurchased agreements, loans and advances to customers that pass the SPPI test, debt securities held under the "Hold to collect" business model and indemnification assets.

Financial Assets at Fair Value through Profit and Loss (FVTPL)
A financial asset that has been originated, acquired or incurred principally for the purpose of trading or that is not managed within a "hold to collect" or a "hold to collect and sell" business model is measured at FVTPL.

Additionally, instruments for which the contractual cash flows do not meet the SPPI assessment must be measured at FVTPL even if they are managed within a business model whose objective is "hold to collect" or "hold to collect and sell".

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

At initial recognition, the Bank may also choose to irrevocably designate a financial asset as measured at fair value through profit and loss if doing so eliminates or significantly reduces a measurement or recognition inconsistency that would otherwise arise from measuring assets or liabilities or recognising the gains and losses on them on different bases. All financial assets at FVTPL were mandatorily classified as such.

Upon subsequent measurement of FVTPL a gain or loss on financial asset is recognised in the income statement in "Net gains on disposal and revaluation of foreign currencies and financial instruments".

Included in this classification are equity securities and derivatives held for trading.

Debt Instruments at Fair Value through Other Comprehensive Income (FVOCI)
Debt Instruments are classified and measured at fair value through other comprehensive income (FVOCI), unless designated under the fair value option, if the financial asset is held in a "Hold to Collect and Sell" business model and the contractual cash flows are SPPI.

Upon subsequent measurement of FVOCI a gain or loss on debt instruments is recognised in other comprehensive income, except for interest revenue, foreign exchange gains and losses and impairment gains or losses, which are recognised in the income statement in "Interest income calculated using the effective interest method", "Net gains on disposal and revaluation of foreign currencies and financial instruments" and "Impairment losses on financial instruments" respectively. When the debt instrument is derecognised the cumulative gain or loss previously recognised in other comprehensive income is reclassified from equity to the income statement in "Net gains on disposal and revaluation of foreign currencies and financial instruments".

Included in this classification are debt securities held under the "Hold to collect and sell" business model.

Equity instruments at Fair Value through Other Comprehensive Income (FVOCI)
An equity instrument is any instrument that meets the definition of equity when it meets the definition of Equity under IAS 32 Financial Instruments: Presentation. Equity instruments are measured at FVTPL, unless they are not held for trading purposes. For such instruments the Group has made an irrevocable election on initial recognition to measure them at FVOCI. The measurement of such instruments is determined on an instruments-by instrument basis. For equity securities at FVOCI, other net gains and losses are recognised in OCI and are never reclassified to the income statement. No impairment loss is recognised in the income statement.

Financial Liabilities
Financial liabilities include deposits by banks, funding by Central Banks, customer deposits and other customer accounts and are classified as measured at amortised cost.

Financial liabilities are subsequently measured at amortised cost using the effective interest method. Interest expense is recognised in the income statement in “Interest Expense calculated using the effective interest method”. Any gain or loss on derecognition is also recognised in the income statement in “Net gains on disposal and revaluation of foreign currencies and financial instruments”.

For financial liabilities designated at FVTPL, gains or losses attributable to changes in own credit risk may be presented in other comprehensive income. All financial liabilities are classified at amortised cost.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Loan capital
On issuance of bonds an assessment is made to determine whether the instruments issued should be classified as financial liabilities or as compound financial instruments that contain both liability and equity elements, as these are accounted for separately, as financial liabilities and equity respectively. In addition, an assessment is made whether the instrument is a hybrid instrument containing a derivative and a financial liability host contract.

Bonds issued that represent contracts that will or may be settled in the entity's own equity instruments and they are non-derivative contracts that consist of an obligation for the entity to deliver a variable number of its own equity instruments are classified as financial liabilities. Furthermore, a single obligation to deliver a variable number of an entity's own equity instruments is a non-derivative obligation that meets the definition of a financial liability and cannot be subdivided into components for the purpose of evaluating whether the instrument contains a component that meets the definition of equity.

Bonds issued that are classified as financial liabilities under loan capital are initially measured at the fair value of the consideration received minus transaction costs that are directly attributable to the issue of the loan capital. Subsequently these are measured at amortised cost using the effective interest method, in order to amortise the difference between the cost and the redemption value, over the period to the earliest date that the Bank has the right to redeem the loan capital.

Based on this assessment, the loan capital issued contains an embedded derivative, represented by the mandatory conversion feature. This assessment does not apply for Notes issued under the EMTN program.

Derivatives
Derivatives are recognised initially and are subsequently measured at fair value. Derivatives are classified as assets when their fair value is positive or as liabilities when their fair value is negative. Derivatives embedded in contracts where the host is a financial asset in the scope of IFRS 9 are not separated. Instead, the hybrid financial instrument is assessed for classification in its entirety.

3.12.3. Reclassification of financial assets and liabilities
Financial assets subsequent to their initial recognition are not reclassified to other measurement category (as mentioned above), unless the Group changes its business model for managing financial assets, in which case all affected financial assets are reclassified on the first day of the first reporting period following the change in the business model. A change in the business model is made only in exceptional circumstances.

3.12.4. Derecognition of financial assets and financial liabilities
Derecognition of financial assets
The Group derecognises a financial asset when the contractual rights to the cash flows from the financial asset expire, or it transfers the rights to receive the contractual cash flows in a transaction in which substantially all of the risks and rewards of ownership of the financial asset are transferred or in which the Group neither transfers nor retains substantially all of the risks and rewards of ownership and it does not retain control of the financial asset.

The Group enters into transactions whereby it transfers assets recognised in its statement of financial position, but retains either all or substantially all of the risks and rewards of the transferred assets. In these cases, the transferred assets are not derecognised.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Derecognition of financial liabilities
The Group derecognises a financial liability when its contractual obligations are discharged or cancelled, or expire. The Group also derecognises a financial liability when its terms are modified and the cash flows of the modified liability are substantially different, in which case a new financial liability based on the modified terms is recognised at fair value.

On derecognition of a financial liability, the difference between the carrying amount extinguished and the consideration paid (including any non-cash assets transferred or liabilities assumed) is recognised in profit and loss.

Derecognition and contract modification
The Bank sometimes modifies the terms of loans provided to customers due to commercial renegotiations, or for distressed loans, with a view to maximising recovery. Such restructuring activities include extended payment term arrangements, change in interest rates, payment holidays, payment forgiveness or exchange of debt instruments.

A forborne exposure may be derecognised and the renegotiated loan recognised as a new loan at fair value when the new terms are substantially different to the original terms. The renegotiation date is consequently considered to be the date of initial recognition for impairment calculation purposes, including for the purpose of determining whether a significant increase in credit risk has occurred. However, the Group also assesses whether the "new" financial asset recognised is deemed to be credit impaired at initial recognition, especially in circumstances where the renegotiation was driven by the debtor being unable to make the originally agreed payments. Differences between the carrying amount of the original terms and the fair value at initial recognition of the "new" loan are recognised as a gain or loss in "Net gains on derecognition of financial assets measured at amortised cost" in the income statement.

If the terms are not substantially different, the renegotiation or modification does not result in derecognition, and the Group recalculates the gross carrying amount based on the revised cash flows of the financial asset and recognises a modification gain or loss in the income statement in line "Impairment losses on financial instruments". The new gross carrying amount is recalculated by discounting the modified cash flows at the original effective interest rate (or credit adjusted effective interest rate for purchased or originated credit impaired financial assets) and is compared to the gross carrying amount of the original loan.

Offsetting
Financial assets and financial liabilities are offset and the net amount presented in the statement of financial position when, and only when, the Group currently has a legally enforceable right to set off the amounts and it intends either to settle them on a net basis or to realise the asset and settle the liability simultaneously.

3.12.5. Impairment of financial assets
The "Expected Credit Loss (ECL)" approach applies to all financial assets that are measured at amortised cost or FVOCI, and to off balance sheet lending commitments such as loan commitments and financial guarantees. Under the ECL model provisions are recognised upon initial recognition of the financial asset reflecting the expectation of potential credit losses at the time of initial recognition. The Group recognises a loss allowance for such losses at each reporting date in “Impairment losses on financial instruments” in the income statement.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Measurement of ECL
The measurement of ECL reflects an unbiased and probability weighted amount that is determined by evaluating a range of possible outcomes and considering reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions. The Group calculates ECL as the product of probability of default (PD), exposure at default (EAD) and loss given default (LGD). Refer to the sections below for details on each of these components.

ECL for exposures in Stage 1 are calculated by multiplying the 12-month PD by LGD and EAD. Lifetime ECL is calculated by multiplying the lifetime PD by LGD and EAD.

A loss allowance is recognised either at an amount equal to 12-month ECL or lifetime ECL. At initial recognition, an impairment allowance is required for expected credit losses (ECL) resulting from default events that are possible within the next 12 months (12-month ECL). In the event of a significant increase in credit risk, an allowance is required for ECL resulting from all possible default events over the expected life of the financial instrument (lifetime ECL). Facilities/customers are classified in three stages, according to the increases in credit risk level, considering certain criteria:

- Stage 1: Financial Instruments are classified as stage 1 when the credit risk has not increased significantly since initial recognition. The Group recognises a credit loss allowance at an amount equal to 12 month expected credit losses.

- Stage 2: Financial Instruments are classified as stage 2 when the credit risk has increased significantly since initial recognition but not to the point that the asset is credit impaired. The Group recognises a credit loss allowance at an amount equal to lifetime expected credit losses.

- Stage 3: Financial Instruments are classified as stage 3 when the credit quality of a financial asset deteriorates to the point that the asset is credit impaired. The Bank aligned Stage 3 classification with the NPE classification consistent with the definition used for internal credit risk management purposes. The Group recognises a credit loss allowance at an amount equal to lifetime expected credit losses.

Financial assets that are credit impaired upon initial recognition are categorised within Stage 3 with a carrying value already reflecting the lifetime expected credit losses. The accounting treatment for these purchased or originated credit impaired (POCI) assets is discussed further below.

For facilities/customers that meet the criteria to be individually assessed for provisions the Bank reviews and validates the Stage classification using a combination of backward looking, current and forward-looking indicators.

Loans and advances acquired as part of a business combination are initially recognised at fair value. The fair values on initial recognition form the gross amount of the loans irrespective of the principal amount of these loans and what constituted the gross carrying amount of these loans in the accounting records of the Seller. In cases where the acquired loans were credit impaired, the Bank includes the initial expected credit losses in the estimated cash flows when calculating the credit adjusted effective interest rate. Accordingly, the effective interest rate of a POCI would be the discount rate that equates the present value of the expected cash flows with the purchase price of the loan.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Probability of default (PD)
PD represents the likelihood of a borrower defaulting on their financial obligation in a specified time period, assuming it has not closed or defaulted since the reporting date. Projection of PDs is based on macroeconomic scenarios and are differentiated based on segment (e.g. Retail, SME and Corporate), and status (e.g. dpd, restructured). For the externally rated exposures (e.g. Treasury and International lending), the historical default rates published by Moody's per rating are utilized. For the non-externally rated facilities, i.e. local loan book, the PD is estimated based on the Bank's historical default rates.

Exposure at default (EAD)
EAD represents the amount expected to be owed if a default event was to occur. The EAD is determined by calculating the expected cash flows which vary depending on the product type. By analyzing the behavior of the product types, the behavioral maturity of these products is estimated. The utilization of the off-balance sheet amount of revolving facilities is also considered in determining the Credit Conversion Factor (CCF).

Loss given default (LGD)
LGD represents an estimate of the loss arising on default. It is calculated as the expected loss at default divided by EAD. LGD is based on factors that impact the likelihood and value of any subsequent loss, in which case it takes into account property prices, liquidation haircuts due to forced sale or market conditions, liquidation periods and other factors.

Definition of default
IFRS 9 does not define default but requires the definition to be consistent with the definition of default used for internal credit risk management purposes. The Group considers a financial instrument defaulted, and hence stage 3 for ECL calculations, when the borrower is unlikely to pay its credit obligations to the Group in full, and the borrower is more than 90 days past due on any material credit obligation to the Group. The Bank aligned Stage 3 classification with the European Banking Authority's (EBA) criteria for NPE classification.

Purchased or Originated Credit Impaired Financial assets (POCI)
Financial assets are considered purchased or originated credit impaired (POCI) if upon initial recognition they are purchased or originated at a deep discount which indicates evidence of impairment. Since the asset is originated credit impaired, the Bank only recognises the cumulative changes in lifetime ECL since initial recognition as a loss allowance in profit and loss until the POCI is derecognised.

Significant increase in credit risk
An assessment of whether credit risk has increased significantly since initial recognition is performed at each reporting date by considering the increase in the risk of default occurring over the remaining life of the financial instrument. When determining whether the risk of default on a financial instrument has increased significantly since initial recognition, the Bank considers reasonable and supportable information that is relevant and available without undue cost or effort, including both quantitative and qualitative information and analysis based on the historical experience of each exposure, expert credit assessment and forward looking information. The assessment of significant increase in credit risk is key in determining when to move from measuring an allowance based on 12-month ECLs to one that is based on lifetime ECLs.

The criteria for determining whether the exposure has experienced significant deterioration in credit risk since origination are in line with Stage 2 criteria and are as follows:

- Days in Arrears: Exposures with more than 30 days in arrears,

- Forbearance flag: A performing account with an active forbearance flag in line with the European Banking Authority (EBA) definition,

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

- Accounts managed by recovery units (for early arrears before default),

- A pooling effect is applied at a customer level which classifies as Stage 2 accounts not meeting the above criteria but fall under the same customer whose other accounts exhibit credit triggers such as those above,

- Behavioural Scoring: Retail and SME exposures with low behavioural score resulting from models developed by the Bank for predicting defaults/delinquencies.

- PD comparisons: Exposures originated post IFRS 9 implementation in 2018 who have experienced a 200% relative increase in the current lifetime PD relative to the origination PD.

Interest income recognition
Interest income is calculated on the gross carrying amount of the financial assets in Stages 1 and 2 by applying the effective interest rate (EIR). For financial assets at Stage 3, interest income is calculated by applying EIR to the credit adjusted amortised cost (i.e. gross carrying amount less credit loss allowance). For POCI financial assets, interest income is recognised by applying a credit adjusted EIR (CAEIR) (based on an initial expectation of further credit losses) on the amortised cost of the financial asset.

Write-offs
The Group reduces, either partially or in full, the carrying amount of a financial asset when there is no reasonable expectation of recovery. Write-offs are recognised in "Impairment losses on financial instruments" in the income statement.

3.13. Impairment of non financial assets
The carrying amounts of the Group's non financial assets are assessed at each reporting date to determine whether there is any indication of impairment. If any such indication exists, then the asset's recoverable amount is estimated.

An impairment loss is recognised if the carrying amount of an asset or its cash generating unit exceeds its estimated recoverable amount. Impairment losses are recognised in the income statement.

The recoverable amount of an asset or cash-generating unit is the greater of its value in use and its fair value less costs to sell. In assessing value in use, the estimated future cash flows are discounted to their present value using a pre-tax discount rate that reflects current market assessments of the time value of money and the risks specific to the asset.

The loss from impairment of goodwill is non-reversible. The loss from impairment of other non financial assets is reversible only to the extent that the carrying value does not exceed net carrying value that the non financial asset would have if the impairment loss was not recognised.

3.14. Financial guarantees and loan commitments
Financial guarantees contracts issued by the Bank are contracts that require the Bank to make specified payments to reimburse the holder for a loss that it incurs because a specified debtor fails to make payment when it is due in accordance with the terms of a debt instrument. Such financial guarantees are given to banks, financial institutions and others on behalf of customers to secure loans, overdrafts and other banking facilities. From the issuer's perspective, financial guarantee contracts fall in the scope of IFRS 9.

Loan commitments represent unused portions of authorisations to extend credit under pre-specified terms and conditions in the form of loans, guarantees or letters of credit.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Subsequent to initial recognition, issued financial guarantee contracts and commitments to provide loans at below-market rate are measured at the higher of the amount of the loss allowance determined in accordance with IFRS 9 and the amount initially recognised less the cumulative amount of income recognised in accordance with IFRS 15 (where applicable). Other loan commitments are subsequently measured at the amount of the loss determined in accordance with IFRS 9.

Liabilities arising from financial guarantees and loan commitments are included within provisions/other liabilities.

3.15. Cash and cash equivalents

Cash and cash equivalents for the purpose of the statement of cash flows include cash and available for use balances with Central Banks, placements with other banks, funding by Central Banks and repurchase agreements, with original maturities of less than three months.

3.16. Repurchase and reverse repurchase agreements

Securities sold subject to repurchase agreements (repos) continue to be recorded in the Bank's Statement of Financial Position as the Bank retains substantially all risks and rewards of ownership, while the liability to the counterparty is included in amounts due to other banks or due to customers, as appropriate, and measured at amortized cost. Securities purchased under agreements to resell (reverse repos) are recorded separately on the face of the Statement of Financial Position and are measured at amortised cost. Any interest arising from the above mentioned transactions is recognized as interest income or expense in the Bank's Income Statement and is accrued over the period of the repo or reverse repo agreements using the effective interest method.

3.17. Indemnification Asset

An indemnification asset arises when the seller in a business combination is contractually obliged to indemnify the acquirer for the outcome of a contingency or uncertainty related to all or part of a specific asset or liability. In other words, the seller guarantees that the acquirer's losses will not exceed a specified amount.

The indemnification asset is recognised as an asset of the Group (as the acquirer in a business combination) at the same time and on the same basis as the indemnified item. Thus, an indemnification asset is recognised by the Group at the acquisition date if and only if it relates to an indemnified asset or liability that is recognised at the acquisition date.

The indemnification asset is initially recognised at fair value. Subsequent to initial recognition, the indemnification asset is measured at amortised cost using the effective interest method. It is also subject to impairment requirements (refer to Note 3.12). The Group derecognises the indemnification asset only when it collects the asset, sells it or otherwise loses the right to it.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

The Bank has recognised the following indemnification assets:

a) Indemnification asset – Asset Protection Scheme (APS)

The terms of the agreement relating to the acquisition of part of ex CCB's assets and liabilities, include an asset protection scheme (APS) provided by ex CCB, which has been recognised as an indemnification asset. Ex CCB's obligations under the APS are guaranteed by the Republic of Cyprus ("RoC") pursuant to a guarantee agreement entered into prior to the completion of the acquisition between the Bank and the RoC. The APS is a single contract providing credit protection to the Bank in respect of parts of the acquired loan portfolio ("covered assets") against future losses. There is no change in the recognition and measurement of the covered assets as a result of the APS, which are measured at amortised cost subsequent to the acquisition. Impairment on covered assets is assessed and recognised in accordance with the Group's accounting policy for financial assets recognised at amortised cost. There is no change in how gains and losses on the covered assets are recognised in the income statement or in other comprehensive income.

b) Indemnification asset – certain off-balance items acquired

Under the BTA, the Bank identified and recognised an indemnification asset in relation to the certain off balance sheet exposures acquired. Specifically, pursuant to the BTA, ex CCB shall on demand indemnify the Bank against all losses in respect of certain off balance sheet exposures.

Indemnification assets are presented in Other assets in Note 30.

3.18. Property, plant and equipment

Owner-occupied property is property held by the Group for use in the supply of services or for administrative purposes. The classification of property is assessed on a regular basis to account for any major changes in use. Owner occupied land and buildings are initially recognised at cost and are subsequently measured at fair value less accumulated depreciation and impairment losses. Fair value is determined from market-based valuations undertaken by professionally qualified valuers periodically between three to five years. Plant and equipment are measured at cost less accumulated depreciation and accumulated impairment losses.

Cost includes all expenditure that is directly attributable to the acquisition of the asset.

Depreciation for property, plant and equipment is recognised in the income statement on a straight line basis over the estimated useful lives of the assets. Land is not depreciated.

The depreciation rates used are as follows:

Buildings	2%
Leasehold improvements	20%
Plant and equipment	10% to 25%

Depreciation methods, useful lives and residual values are reassessed at each reporting date.

Gains and losses on disposal of property, plant and equipment, that are determined as the difference between the net disposal proceeds and the carrying amount of the asset, are included in the income statement when the item is derecognised.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

When the use of a property changes, the property is remeasured to fair value and reclassified accordingly. Any gain arising on this remeasurement is recognised in profit and loss to the extent that it reverses a previous impairment loss on the specific property, with any remaining gain recognised in the Statement of Comprehensive Income and presented in the revaluation reserve. Any loss is recognised in the income statement.

3.19. Property revaluation reserve

Any surplus arising on the revaluation of land and buildings is credited to the property revaluation reserve that is included in equity. If, after a revaluation, the depreciation charge is increased, then an amount equal to the increase (net of deferred taxation), is transferred annually from the property revaluation reserve to retained earnings. Upon disposal of revalued property, any relevant accumulated revaluation surplus which remains in the property revaluation reserve is also transferred to retained earnings.

3.20. Investment properties

Investment properties, comprise properties which are not occupied by the Bank and are held for rental yields and/or capital appreciation.

Investment properties are initially measured at cost, including transaction costs, and subsequently at fair value with any change therein recognised in "Net gains from revaluation of investment properties" in the income statement. Fair value is determined from market based valuations undertaken by professionally qualified valuers annually. Any gain or loss on disposal of investment properties (calculated as the difference between the net proceeds from disposal and the carrying amount of the item) is recognised in profit and loss. When investment properties that were previously classified as property, plant and equipment are sold, any related amount included in the revaluation reserve is transferred to retained earnings. Transfers to or from the investment properties are made only when there is a change in use.

3.21. Stock of property

Assets are classified as stock of property held for sale if their carrying amount will be recovered principally through a sale transaction rather than through own use. This category mainly includes properties acquired in satisfaction of debt.

The Group, in its normal course of business, repossesses properties through debt to asset swaps and/or through the foreclosure process. These properties are held either directly or by entities set up and controlled by the Bank (Special Purpose Vehicle(s) SPV) for liquidation optimisation purposes. The SPVs are mainly a single property owner. The initial measurement of the acquired property is based on the carrying amount of the debt settled.

Stock of property is initially measured at cost and subsequently is measured at the lower of cost and net realisable value (NRV). Any write down to NRV is recognised as an impairment charge in the period in which the write down occurs. Any reversal is recognised in the income statement in the period in which the reversal occurs.

Gain or loss from disposal of stock of property, is the difference between the net consideration amount and the carrying value of the asset and is recognised in "Net gains from disposal of stock of properties" in the income statement when the asset is disposed.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

3.22. Assets held for sale and discontinued operations

The Group classifies non-current assets and disposal groups as held for sale if their carrying amount will be recovered principally through a sale transaction rather than through continuing use. The condition is regarded as met only when the sale is highly probable and the non-current asset or disposal group is available for immediate sale in its present condition. Actions required to complete the sale should indicate that it is unlikely that significant changes to the sale will be made or that the decision to sell will be withdrawn. Management must be committed to the sale, which should be expected to qualify for recognition as a completed sale within one year from the date of classification.

Non-current assets and disposal groups classified as held for sale are measured at the lower of their carrying amount and fair value less cost to sell, except for those assets and liabilities that are not in the scope of the measurement requirements of IFRS 5 ‘Non-current assets held for sale and discontinued operations’ such as deferred taxes, financial instruments, investment properties measured at fair value, insurance contracts and assets and liabilities arising from employee benefits. Those assets and liabilities should continue to be measured in accordance with the Group’s relevant accounting policies for the specific assets and liabilities despite their classification as held for sale.

Impairment losses on initial classification and gains or losses from subsequent measurement are recognised in the income statement. A gain is only recognised to the extent that it is not in excess of the cumulative impairment loss that has been recognised. An asset classified as held for sale, or included within a disposal group that is classified as held for sale, is not depreciated or amortised once classified as held for sale. Assets and liabilities classified as held for sale are presented separately on the face of the balance sheet.

A disposal group qualifies as discontinued operation if an entity or a component of an entity has been disposed of or is classified as held for sale and:

a) Represents a separate major line of business or geographical area of operations;

b) Is part of a single coordinated plan to dispose of a separate major line of business or geographical area of operations; or

c) Is a subsidiary acquired exclusively with a view to resale.

Discontinued operations are excluded from the results of continuing operations and are presented as a single amount as profit and loss after tax from discontinued operations in the income statement. Intercompany transactions between continuing and discontinued operations are eliminated in the consolidated income statement in accordance with IFRS 10. Upon classification of a Group entity as a discontinued operation, the Group represents prior periods in the income statement.

3.23. Intangible assets

Goodwill

Goodwill represents the excess of the cost of the acquisition over the Group’s interest in the net fair value of the identifiable assets, liabilities and contingent liabilities of the acquired entities at the date of acquisition. When the excess is negative (negative goodwill) is recognised immediately in the income statement.

Subsequent to initial recognition, goodwill is measured at cost less accumulated impairment losses. The carrying amount of goodwill is assessed for impairment at least on an annual basis.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Computer software
Computer software is measured at cost less accumulated amortisation and accumulated impairment losses. Amortisation is recognised in the income statement on a straight-line basis over the estimated useful life of the software estimated at five years.

Other Intangible Assets
In accordance with IFRS 3, an acquirer shall recognise, separately from goodwill, the identifiable intangible assets acquired in a business combination at their acquisition date fair values. An intangible asset is recognised only if it is probable that the expected future economic benefits attributable to the asset will flow to the Bank and its cost can be measured reliably. Subsequently, amortisation is charged to profit and loss over the assets' estimated economic lives using methods that best reflect the pattern of economic benefits and is included in depreciation and amortisation.

Core deposits
As part of the acquisition of part of ex-CCB's banking operations in 2018, the Bank on-boarded some short-term deposits (e.g. current accounts) with credit balances over medium-to-long periods that carry lower interest rates compared to other medium-to-long term accounts. In such cases, an intangible asset was recognised since the Bank benefits from such lower interest expense, compared to the interest expense that would accrue to the bank should the borrowers have deposited the core amount in a term deposit.

Customer relationships (Purchased credit cards and overdrafts)
An additional intangible asset was recognised from the on-boarding of loans with revolving nature such as overdrafts and credit card accounts. Customers on-boarded by the Bank are expected to continue utilise their overdraft and credit card accounts in the future, creating an additional benefit to the Bank.

The estimated useful economic lives of the above mentioned intangible assets are as follows:

Core deposits	10 years
Purchased credit cards and overdrafts	5 years

Derecognition and impairment of Intangible assets
Intangible assets are derecognised from the statement of financial position at the time of disposal or when no economic benefits are expected from it.

Intangible assets are assessed for impairment when events relating to changes to circumstances indicate that the carrying value may not be recoverable. If the carrying amount exceeds the recoverable amount then the intangible assets are written down to their recoverable amount. Impairment charge is recognised in "Impairment losses on non financial assets" in the Income Statement.

3.24. Share capital
The difference between the issue price of share capital and its nominal value is recognised in the share premium reserve.

Expenses incurred from increase of authorised capital and issue of share capital are directly recognised in equity in the same year.

Any differences emerging from a reduction of the nominal value of share capital are transferred from share capital to a reduction of share capital reserve.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

3.25. Provisions for pending litigations or complaints and/or claims or cases subject to arbitration proceedings

Provisions for pending litigations or complaints and/or claims or cases subject to arbitration proceedings are recognised when:
(a) the Group has a present obligation (legal or constructive) as a result of a past event,
(b) an outflow of resources embodying economic benefits to settle the obligation is probable and
(c) a reliable estimate of the amount of the obligation can be made.

The amount recognised as a provision is the best estimate of the expenditure required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the facts and circumstances of any litigation or arbitration proceedings. When a separate liability is measured, the most likely outcome may be considered the best estimate of the liability.

Where an individual provision is material, the fact that a provision has been made is stated and quantified, except to the extent doing so would be seriously prejudicial. Any provision recognised does not constitute an admission of wrongdoing or legal liability.

Where the effect of the time value of money is material, the amount of the provision is the present value of the estimated future expenditures expected to be required to settle the obligation.

Where an outflow of resources embodying economic benefits to settle the obligation is possible, a contingent liability is disclosed, unless the possibility of an outflow of resources embodying economic benefits is remote.

3.26. Provisions to cover credit risk resulting from commitments and guarantees

The Group enters into various contingent liabilities. These include acceptances and endorsements, guarantees, undrawn formal standby facilities, undisbursed loans amounts and other commitments. Although these liabilities are not recognised in the statement of financial position, they expose the Group to credit risk. To cover the credit risk a provision is calculated and recognised in other liabilities in the statement of financial position with a corresponding charge in the income statement under "Impairment losses on financial instruments".

3.27. Insurance contracts

3.27.1. Definition and classification of insurance and reinsurance contracts

Insurance contracts are contracts under which the Group accepts significant insurance risk from a policyholder by agreeing to compensate the policyholder if a specified uncertain future event adversely affects the policyholder. The Group only issues insurance contracts.

In making this assessment, all substantive rights and obligations, including those arising from law or regulation, are considered on a contract-by-contract basis at the contract issue date. The Group uses judgement to assess whether a contract transfers insurance risk (that is, if there is a scenario with commercial substance in which the Group has the possibility of a loss on a present value basis) and whether the accepted insurance risk is significant.

The Group holds reinsurance contracts that transfer significant insurance risk or are deemed to transfer significant insurance risk since they transfer to the reinsurer substantially all the insurance risk relating to the reinsured portions of the underlying insurance contracts.

Insurance contracts are classified as direct participating contracts or contracts without direct participation features.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

The savings (unit-linked) contracts issued by the Group are classified as direct participating contracts. Such contracts allow policyholders to participate in investment returns with the Group, in addition to compensation for losses from insured risk. These contracts are substantially investment service-related contracts where the return on the underlying items is shared with policyholders. Underlying items comprise specified portfolios of investment assets that determine amounts payable to policyholders.

Where the Group’s reinsurance contracts held covered multiple risks, no separation of the insurance components is made as a result of cashflow inter-dependencies between the different reinsured risks.

3.27.2. Aggregation level

For insurance contracts issued, the Group identifies portfolios of contracts. A portfolio comprises contracts subject to similar risks and managed together.

The Group identifies portfolios by aggregating insurance contracts that are subject to similar risks and managed together. The Group determined that all contracts within each product line, as defined for management purposes, have similar risks and, therefore, represent a portfolio of contracts when they are managed together.

Reinsurance contracts held are grouped into portfolios taking into consideration the nature of the risk and the type of reinsurance cover.

Each portfolio is sub-divided into groups of contracts to which the recognition and measurement requirements of IFRS 17 are applied. At initial recognition, the Group segregates contracts based on when they were issued. An annual cohort contains all contracts that were issued within a 12-month period. Each annual cohort is then further disaggregated into three groups of contracts:

- contracts that are onerous on initial recognition;
- contracts that, on initial recognition, have no significant possibility of becoming onerous subsequently; and
- any remaining contracts in the annual cohort.

The composition of groups established at initial recognition is not subsequently reassessed.

3.27.3. Recognition

The Group recognises groups of insurance contracts that it issues from the earliest of the following:

- The beginning of the coverage period of the group of contracts;
- The date when the first payment from a policyholder in the group is due, or when the first payment is received if there is no due date;
- When the Group determines that a group of contracts becomes onerous.

Concerning onerous contracts such contracts expected on initial recognition to be loss-making are grouped together and such groups are measured and presented separately. Once contracts are allocated to a group, they are not re-allocated to another group, unless they are substantively modified.

The Group recognises a group of reinsurance contracts held:

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

- If the reinsurance contracts provide proportionate coverage, at the later of the beginning of the coverage period of the group, or the initial recognition of any underlying contract;

- In all other cases, from the beginning of the coverage period of the first contract in the group.

If the Group entered into the reinsurance contract held at or before the date when an onerous group of underlying contracts is recognised prior to the beginning of the coverage period of the group of reinsurance contracts held, the reinsurance contract held is recognised at the same time as the group of underlying insurance contracts is recognised.

The Group adds new contracts to the group in the reporting period in which they meet the recognition criteria.

3.27.4. Contract Boundaries

Insurance contracts

The Group includes in the measurement of a group of insurance contracts all the future cash flows within the boundary of each contract in the group.

Cash flows are within the boundary of an insurance contract if they arise from substantive rights and obligations that exist during the reporting period in which the Group can compel the policyholder to pay the premiums, or in which the Group has a substantive obligation to provide the policyholder with services.

Cash flows within the boundary of an insurance contract are those that relate directly to the fulfilment of the contract, including cash flows for which the Group has discretion over the amount or timing.

A substantive obligation to provide services ends when:

- The Group has the practical ability to reassess the risks of the particular policyholder and, as a result, can set a price or level of benefits that fully reflects those risks; or

- Both of the following criteria are satisfied:

    - The Group has the practical ability to reassess the risks of the portfolio of insurance contracts that contain the contract and, as a result, can set a price or level of benefits that fully reflects the risk of that portfolio;

    - The pricing of the premiums for coverage up to the date when the risks are reassessed does not take into account the risks that relate to periods after the reassessment date.

Reinsurance contracts

For groups of reinsurance contracts held, cash flows are within the contract boundary if they arise from substantive rights and obligations of the cedant that exist during the reporting period in which the Group is compelled to pay amounts to the reinsurer or has a substantive right to receive insurance contract services from the reinsurer.

The boundary of a reinsurance contract held includes cash flows resulting from the underlying contracts covered by the reinsurance contract. This includes cash flows from insurance contracts that are expected to be issued by the Group in the future if these contracts are expected to be issued within the boundary of the reinsurance contract held.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

The Group's reinsurance contracts providing coverage on a loss occurring basis cover claims incurred during the accident year from underlying insurance contracts. Thus, all cash flows arising from claims incurred and expected to be incurred in the accident year will be included in the measurement of the reinsurance contracts held.

The Group holds proportional reinsurance contracts which have an unlimited duration providing coverage on a risk attaching basis which allow both the reinsurer and the Group to terminate the contract, for new business ceded, by providing a three months' notice.

The Group assessed the contract boundary for its insurance and reinsurance contracts, based on the above requirements.

3.27.5. Insurance acquisition cashflows

Insurance acquisition cash flows arise from the costs of selling, underwriting and starting a group of insurance contracts (issued or expected to be issued) that are directly attributable to the portfolio of insurance contracts to which the group belongs. Such cash flows include cash flows that are not directly attributable to individual contracts or groups of insurance contracts within the portfolio.

Insurance acquisition cash flows that are directly attributable to a group of insurance contracts are allocated to that group and to renewal groups of insurance contracts using a systematic and rational method and considering, in an unbiased way, all reasonable and supportable information that is available without undue cost or effort. A systematic and rational method is also used to allocate insurance acquisition cash flows directly attributable to a portfolio but not to groups of contracts to such groups in the portfolio.

Insurance acquisition cash flows arising before the recognition of the related group of contracts are recognised as an asset. Insurance acquisition cash flows arise when they are paid or when a liability is required to be recognised under a standard other than IFRS 17. Such an asset is recognised for each group of contracts to which the insurance acquisition cash flows are allocated. The asset is derecognised when the insurance acquisition cash flows are included in the measurement of the group of contracts.

At each reporting date, the Group revises the amounts allocated to groups to reflect any changes in assumptions that determine the inputs to the allocation method used.

3.27.6. Measurement of Insurance contracts issued

The liability for remaining coverage ("LRC") represents the Group's obligation to investigate and pay valid claims under existing contracts for insured events that have not yet occurred (i.e. the obligation that relates to the unexpired portion of the coverage period).

The liability for incurred claims ("LIC") includes the Group's liability to pay valid claims for insured events that have already incurred, other incurred insurance expenses arising from past coverage service and includes the liability for claims incurred but not yet reported. It also includes the Group's liability to pay amounts the Group is obliged to pay the policyholder under the contract, including repayment of investment components, when a contract is derecognised. The current estimate of LIC comprises the fulfilment cash flows related to current and past service allocated to the group at the reporting date.

The carrying amount of a group of insurance contracts at each reporting date is the sum of the LRC and the LIC.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

3.27.7. Initial measurement of contracts measured under the GMM or VFA

Under the general measurement model ("GMM") and the variable fee approach ("VFA") the Group measures a group of contracts on initial recognition as the sum of the expected fulfilment cash flows within the contract boundary and the contractual service margin representing the unearned profit in the contracts relating to services that will be provided under the contracts. The Group applies the GMM approach to its life insurance contracts (except its group life contracts and other life contracts with coverage period of one year or less) as well as to reinsurance contracts with coverage period over one year, while the VFA approach is applied to life insurance contracts in the unit-linked portfolio.

Fulfilment Cashflows ("FCF")

FCF comprise unbiased and probability-weighted estimates of future cash flows, an adjustment to reflect the time value of money and the financial risks related to the future cash flows, to the extent that the financial risks are not included in the estimates of the future cash flows, plus a risk adjustment for non-financial risk. The Group's objective in estimating future cash flows is to determine the expected value, or the probability weighted mean, of the full range of possible outcomes, considering all reasonable and supportable information available at the reporting date without undue cost or effort, that reflect the timing and uncertainty of those future cash flows.

The Group estimates future cash flows considering a range of scenarios which have commercial substance and give a good representation of possible outcomes. The cash flows from each scenario are probability-weighted and discounted using current assumptions.

The Group estimates certain FCF at the portfolio level or higher and then allocates such estimates to groups of contracts.

The Group updates its estimates at the end of each reporting period using all newly available, as well as historic evidence and information about trends. The Group determines its current expectations of probabilities of future events occurring at the end of the reporting period. In developing new estimates, the Group considers the most recent experience and earlier experience, as well as other information.

Risk Adjustment ("RA")

The risk adjustment for non-financial risk for a group of insurance contracts, determined separately from the other estimates, is the compensation required for bearing uncertainty about the amount and timing of the cash flows that arises from non-financial risk. The risk adjustment also reflects the degree of diversification benefit the Group includes when determining the compensation it requires for bearing that risk; and both favourable and unfavourable outcomes, in a way that reflects the Group's degree of risk aversion.

The Group uses the value at risk method in estimating the risk adjustment.

Time value of money and Financial risks

The Group adjusts (i.e. discounts) the estimates of future cash flows to reflect the time value of money and the financial risks related to those cash flows, to the extent that the financial risks are not included in the estimates of cash flows.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Contractual Service Margin ("CSM")

The CSM is a component of the overall carrying amount of a group of insurance contracts representing unearned profit the Group will recognise as it provides insurance contract services over the coverage period.

On initial recognition of a group of insurance contracts, if the total of (a) the fulfilment cash flows, (b) any cash flows arising at that date and (c) any amount arising from the derecognition of any assets or liabilities previously recognised for cash flows related to the group (including assets for insurance acquisition cash flows) is a net inflow, the CSM is measured as the equal and opposite amount of the net inflow, which results in no gain no loss, arising on initial recognition.

In the case of net outflow, then the group is onerous. In this case, the net outflow is recognised immediately as a loss in profit or loss. A loss component is created to depict the amount of the net cash outflow, which determines the amounts that are subsequently presented in profit or loss as reversals of losses on onerous contracts and are excluded from insurance revenue.

The Group determines, at initial recognition, the group's coverage units and allocates the group's CSM based on the coverage units provided in the period.

3.27.8. Subsequent measurement of contracts measured under the GMM and VFA

Changes in fulfilment cash flows

At the end of each reporting period, the Group updates the fulfilment cash flows for both LIC and LRC to reflect the current estimates of the amounts, timing and uncertainty of future cash flows, as well as discount rates and other financial variables.

Experience adjustments relating to current or past service are recognized in profit or loss. For incurred claims (including incurred but not reported) and other incurred insurance service expenses, experience adjustments would always relate to current or past service. They are included in profit or loss as part of insurance service expenses.

Experience adjustments relating to future service is included in the LRC by adjusting the CSM.

Adjustments to the CSM - Insurance contracts without direct participation features

For a group of insurance contracts, the carrying amount of the CSM of the group at the end of the reporting period equals the carrying amount at the beginning of the reporting period adjusted, as follows:

- The effect of any new contracts added to the group in the reporting period
- Interest accreted on the carrying amount of the CSM during the reporting period, measured at the discount rates at initial recognition
- The changes in fulfilment cash flows relating to future service, except to the extent that:
    - Such increases in the fulfilment cash flows exceed the carrying amount of the CSM, giving rise to a loss; or
    - Such decreases in the fulfilment cash flows are allocated to the loss component of the liability for remaining coverage

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

- The effect of any currency exchange differences on the CSM
- The amount recognised as insurance revenue because of the transfer of services in the period, determined by the allocation of the CSM remaining at the end of the reporting period (before any allocation) over the current and remaining coverage period.

The CSM at the end of the reporting period represents the profit in the group of insurance contracts that has not yet been recognised in profit or loss, because it relates to future service.

An amount of the CSM is released to profit or loss in each period during which the insurance contract services are provided.

Adjustments to the CSM - Insurance contracts with direct participation features, measured using the variable fee approach ("VFA")

When measuring a group of direct participating contracts, the Group adjusts the fulfilment cash flows for the whole of the changes in the obligation to pay policyholders an amount equal to the fair value of the underlying items. These changes do not relate to future services and are recognised in profit or loss. The Group then adjusts any CSM for changes in the amount of the Group's share of the fair value of the underlying items which relate to future services.

Hence, the carrying amount of the CSM at each reporting date is the carrying amount at the start of the year, adjusted for:

- the CSM of any new contracts that are added to the group in the year;
- the change in the amount of the Group's share of the fair value of the underlying items and changes in fulfilment cash flows that relate to future services, except to the extent that:
    - a decrease in the amount of the Group's share of the fair value of the underlying items, or an increase in the fulfilment cash flows that relate to future services, exceeds the carrying amount of the CSM, giving rise to a loss in profit or loss (included in insurance service expenses) and creating a loss component; or
    - an increase in the amount of the Group's share of the fair value of the underlying items, or a decrease in the fulfilment cash flows that relate to future services, is allocated to the loss component, reversing losses previously recognised in profit or loss (included in insurance service expenses);
- the effect of any currency exchange differences on the CSM; and
- the amount recognised as insurance revenue because of the services provided in the year.

Onerous Contracts

After the loss component is recognised, the Group allocates any subsequent changes in fulfilment cash flows of the LRC on a systematic basis between 'loss component' and 'LRC excluding the loss component'.

The Group determines the systematic allocation of insurance service expenses incurred based on the percentage of loss component to the total outflows included in the LRC, excluding any investment component amount.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Any subsequent decreases relating to future service in fulfilment cash flows allocated to the group arising from changes in estimates of future cash flows and the risk adjustments for non-financial risk are allocated first only to the loss component, until it is exhausted. Once it is exhausted, any further decreases in fulfilment cash flows relating to future service create the group's CSM.

3.27.9. Measurement of contracts under the PAA

The premium allocation approach (PAA) is an optional simplified measurement model in IFRS 17 that is available to insurance contracts that meet the eligibility criteria. On initial recognition the Group applies the PAA:

- When the coverage period of each insurance contract in the group is one year or less.
- For groups of insurance contracts including contracts with a coverage period extending beyond one year the Group reasonably expects that such simplification would produce a measurement of the LRC for the group that would not differ materially from the one that would be produced applying the requirements of the general measurement model.

The Group applies the PAA approach to substantially all its non-life insurance contracts, to group life insurance contracts as well as to individual life contracts and reinsurance contracts with coverage period of one year or less.

At initial recognition, for a group of contracts that is not onerous, the Group measures the carrying amount of the LRC as:

- the premiums, if any, received in cash;
- minus any insurance acquisition cash flows at that date considering that the Group did not elect to recognise such payments as an expense when incurred and
- plus or minus any amount arising from the de-recognition at that date of any asset for insurance acquisition cash flows and any other asset or liability previously recognised for cash flows related to the group of contracts that the Group pays or receives before the group of insurance contracts is recognised.

The carrying amount of the LRC at the end of each subsequent reporting period for a group of contracts that is not onerous, represents the carrying amount at the start of the reporting period:

- Plus premiums received in the period;
- Minus insurance acquisition cash flows paid in the period;
- Plus any amounts relating to the amortisation of the acquisition cash flows recognised as an expense in the reporting period;
- Minus the amount recognised as insurance revenue for the services provided in the period.

The LRC is not discounted to reflect the time value of money and the effect of financial risk since at initial recognition of each group of contracts, the expected time between providing each part of the services and the related premium due date is no more than a year.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

Applying the PAA, the insurance revenue for the period consists of the amount of expected premium receipts including premium experience adjustments allocated to the period. The allocation is done on the basis of the passage of time unless the expected pattern of release from risk differs significantly from the passage of time, in which case it will be recognised on the expected timing of incurred claims and benefits.

Under the PAA, no contracts are assumed as onerous at initial recognition unless facts and circumstances indicate otherwise. Where this is not the case, and if at any time during the coverage period facts and circumstances lead the Group to believe that a group of insurance contracts under PAA has become onerous, the Group would test it for onerousness. If the amount of the fulfilment cash flows exceeds the carrying amount of the LRC, the Group establishes a loss component and increases the LRC for the corresponding amount and recognises the loss in profit or loss.

Under IFRS 17, the LIC for groups of insurance contracts measured under the PAA is estimated based on the general measurement model.

3.27.10. Measurement of reinsurance contracts held

The same accounting policies are applied as for insurance contracts issued to measure a group of reinsurance contracts held, adapted where necessary to reflect features that differ from those of insurance contracts.

3.27.11. Insurance contracts – modification and derecognition

The Group derecognises insurance contracts when:

- The rights and obligations relating to the contract are extinguished (i.e., discharged, cancelled or expired); or
- The contract is modified such that the modification results in:
  - the contract being outside the scope of IFRS 17;
  - a different insurance contract due to separating components from the host contract;
  - a substantially different contract boundary;
  - the contract being included in a different group of contracts.

On derecognition of a contract from within a group of contracts:

- the fulfilment cash flows allocated to the group are adjusted to eliminate those that relate to the rights and obligations derecognised;
- the CSM of the group is adjusted for the change in the fulfilment cash flows, except where such changes are allocated to a loss component; and
- the number of coverage units for the expected remaining services is adjusted to reflect the coverage units derecognised from the group.

When a modification is not treated as a derecognition, the Company recognises amounts paid or received for the modification with the contract as an adjustment to the relevant liability for remaining coverage.

3. SUMMARY OF MATERIAL ACCOUNTING POLICIES (continued)

3.27.12. Insurance finance income and expense

Insurance finance income or expenses comprise the change in the carrying amount of the group of insurance contracts arising from:

- The effect of the time value of money and changes in the time value of money
- The effect of financial risk and changes in financial risk.

For contracts measured under the GMM insurance finance income or expenses reflects interest accreted on the future cash flows and the CSM and the effect of changes in interest rates and other financial assumptions.

For contracts measured under the VFA insurance finance income or expenses comprise changes in the measurement of the groups of contracts caused by changes in the value of underlying items (excluding additions and withdrawals).

For contracts measured under the PAA insurance finance or expenses reflects interest accreted on the future cash flows under the LIC and the effect of changes in interest rates and other financial assumptions.

The Company disaggregates changes in the risk adjustment for non-financial risk between insurance service result and insurance financial income or expenses.

The Company has an accounting policy choice to either present all of the period’s insurance finance income or expenses in profit or loss or to split the amount between profit or loss and other comprehensive income (OCI). The accounting policy choice is applied on a portfolio-by-portfolio basis. The Company does not disaggregate insurance finance income or expenses between the profit or loss and the OCI and instead presents them in their entirety in profit or loss.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES

The preparation of the Financial Statements requires Management to make use of judgements, estimates and assumptions that affect the application of accounting policies and the reported amounts of assets, liabilities, income and expenses. The estimates and underlying assumptions are based on historical experience and various other factors that are believed to be reasonable under the circumstances and the results of which form the basis of making judgments about the carrying amounts of assets and liabilities that are not readily apparent from other sources. Therefore, they involve risks and uncertainties as they relate to events and depend on circumstances that will occur in the future. Actual results may differ from these estimates.

Estimates and underlying assumptions are assessed on an ongoing 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 in future periods if the revision affects both current and future periods.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

The significant estimates and judgments that are deemed significant to the Group's results and financial position are set out below:

4.1. Measurement of expected credit loss (ECL)

The measurement of the expected credit loss for financial assets measured at amortised cost and fair value through other comprehensive income (FVOCI) is an area that requires management's judgement in defining what is considered to be a significant increase in credit risk and in making assumptions and estimates to incorporate relevant information about past events, current conditions and forecasts of economic conditions. The assumptions used are based, to the extent possible, on data and evidence. Whenever sufficient data is not available, the impairment calculation incorporates assumptions based on management judgement.

The Group evaluates individually loans, including loans of economic groups, that are individually significant based on certain thresholds set by the Bank. It collectively assesses loans that are not individually significant and loans which were individually assessed as Stage 1.

Individually assessed loans (Stages 2 and 3)
The amount of impairment loss on the value of loans and advances to customers which are examined on an individual basis, is measured for a) financial assets that are not credit-impaired at the reporting date: as the present value of all cash shortfalls (i.e. the difference between the cash flows due to the Bank in accordance with the contract and the cash flows that the Bank expects to receive); b) financial assets that are credit-impaired at the reporting date: as the difference between the gross carrying amount and the present value of estimated future cash flows. In cases where the interest rate of the loan is variable, the original effective interest rate is measured with reference to the initial margin corresponding to the current base rate of the interest rate and the value of the current base rate at the reporting date. The estimated future cash flows are based on assumptions about a number of factors and therefore the actual losses may be different. To determine the amount of impairment loss on the value of loans and advances to customers, judgment is involved regarding the amount and timing of estimated future cash flows. The estimated future cash flows include any expected cash flows from the borrower's operations, any other sources of funds and the expected proceeds from the liquidation of collateral, where applicable. The timing of these cash flows is estimated on a case by case basis.

Collectively assessed loans (Stages 1 to 3)
For the calculation of impairment loss on a collective basis, loans and advances are grouped based on similar credit risk characteristics and appropriate models are applied that take into account the recent historical loss experience of each group with similar credit risk characteristics adjusted for current conditions using appropriate probabilities of default and loss given default. The grouping requires a number of judgments by management and considers factors such as the customer type, industry, product, days in arrears and restructuring status.

To measure ECL, the Group uses: (a) Exposure at default (EAD), (b) Probability of default (PD), (c) Loss given default (LGD). These calculations include estimates and the use of judgment to supplement, assess and adjust accordingly the historical information and past experience events which determine the parameters and the measurement of ECL as at the reporting date. The main assumptions used to estimate loss given default relate to property collateral such as the time needed for collateral liquidation and the liquidation discount at the point of sale. In addition, management is required to exercise judgment in determining staging criteria for significant increase in credit risk as well as establishing the number and relative weightings of forward-looking scenarios for each type of product/market and the associated ECL.

With respect to model related changes, a decrease of impairments c. €2,8 million was exhibited from the update of IFRS9 risk parameters (PD, LGD, EAD), for the year ended 31 December 2024 to reflect the latest macroeconomic projections and incorporation of latest available data in the model calibration. The update of the models reflects the latest macroeconomic projections as presented in table below.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

Forward looking information
In line with IFRS 9 impairment requirements, forward-looking information, including current conditions and projections of macroeconomic and other factors, are incorporated in a range of unbiased future economic scenarios for ECL purposes. Determination of the forward-looking information, to be used in the ECL estimate, requires judgment and estimates about the future economic outlook. The ECL estimate incorporates the expected impact of all reasonable and supportable forward-looking information, taking into consideration the macroeconomic factors. The Bank incorporated three forward-looking macroeconomic scenarios in its ECL calculations process: a baseline scenario, an optimistic scenario and a pessimistic scenario. Probability weights were attributed to each scenario.

The macroeconomic variables affecting the level of ECL are real GDP growth, inflation rate, the rate of unemployment and forward-looking prices of residential and commercial real estates.

For the estimation of the 2024 impairment losses, the Bank updated its macroeconomic forecasts to reflect latest macroeconomic developments as follow:

- In December 2024, the baseline scenario maintains a stable outlook for economic growth, with GDP projections. The unemployment rate is expected to gradually decline, reflecting sustained job market strength. Inflation forecasts remain largely unchanged but acknowledge ongoing pressures from energy costs. Residential property prices continue to show steady growth, though at a slightly moderated pace compared to earlier expectations, while commercial property prices exhibit minimal fluctuations. Overall, the December 2024 update reinforces a balanced economic trajectory, with moderate growth, stable labor market conditions, and contained inflationary pressures.

- In December 2024 for the optimistic scenario, the Bank’s updated macroeconomic projections reflect slightly lower near-term GDP. Unemployment rates are adjusted to remain relatively low through 2026—consistent with a robust labor market—while inflation projections are marginally higher, partly due to rising energy costs. Residential property price growth is still strong but revised down from the September forecast for 2024, whereas commercial property price growth is more subdued, pointing to a more moderate outlook in that sector. Overall, these December 2024 revisions emphasise ongoing normalisation in economic conditions, with cautious optimism for sustained growth despite mild upward pressures on prices.

- In December 2024, the pessimistic scenario reflects a more challenging economic outlook. GDP growth for 2025 has been revised downward, signaling potential economic contraction before a gradual recovery in the following years. The unemployment rate is now expected to rise more sharply, reflecting weaker labor market conditions. Inflation projections have been revised upwards, driven by concerns over rising energy costs and supply chain disruptions. Residential and commercial property prices are forecasted to decline in 2025, with a slower recovery anticipated thereafter. Overall, the updated pessimistic scenario highlights increased economic uncertainty, with higher inflation, weaker employment prospects, and a subdued property market outlook.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

The tables below show the macroeconomic variables, for each scenario and the respective scenario weights used in estimating the ECL:

31 December 2024

Cyprus Economy - Macroeconomic Parameters

Scenarios		**2024**	**2025**	**2026**	**2027**	**Probability – weight %**
Optimistic	Real GDP (% change)	**3,14**	3,82	4,14	3,41	25%
	Unemployment (%)	**5,71**	5,00	4,50	4,20	
	Inflation (% change)	**2,31**	1,82	2,35	2,05	
	Residential Price Index (% change)	**6,00**	4,25	2,00	2,00	
	Commercial Price Index (% change)	**2,25**	2,50	2,25	2,25	
Baseline	Real GDP (% change)	**3,14**	3,20	3,40	2,70	50%
	Unemployment (%)	**5,71**	5,50	5,20	5,10	
	Inflation (% change)	**2,31**	2,00	1,80	1,70	
	Residential Price Index (% change)	**6,00**	3,00	1,65	1,50	
	Commercial Price Index (% change)	**2,25**	1,70	1,65	1,60	
Pessimistic	Real GDP (% change)	**3,14**	(1,26)	2,01	2,81	25%
	Unemployment (%)	**5,71**	7,20	6,50	6,00	
	Inflation (% change)	**2,31**	4,41	3,07	2,15	
	Residential Price Index (% change)	**6,00**	(0,40)	1,30	0,00	
	Commercial Price Index (% change)	**2,25**	(0,90)	1,15	0,00	

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

31 December 2023

Cyprus Economy - Macroeconomic Parameters

Scenarios		**2023**	**2024**	**2025**	**2026**	**Probability – weight %**
Optimistic	Real GDP (% change)	**4,00**	2,75	3,00	3,50	25%
	Unemployment (%)	**5,50**	4,75	4,50	4,25	
	Inflation (% change)	**2,75**	1,25	1,25	1,15	
	Residential Price Index (% change)	**8,50**	4,25	2,25	2,00	
	Commercial Price Index (% change)	**7,75**	3,25	2,50	2,25	
Baseline	Real GDP (% change)	**2,50**	2,75	3,00	3,25	50%
	Unemployment (%)	**6,00**	5,75	5,50	5,00	
	Inflation (% change)	**4,00**	2,75	2,10	2,05	
	Residential Price Index (% change)	**7,00**	2,50	1,70	1,65	
	Commercial Price Index (% change)	**6,00**	2,25	1,70	1,65	
Pessimistic	Real GDP (% change)	**0,50**	1,25	1,50	1,45	25%
	Unemployment (%)	**8,50**	8,25	7,00	6,75	
	Inflation (% change)	**5,50**	3,75	3,25	3,15	
	Residential Price Index (% change)	**5,00**	1,50	0,75	0,50	
	Commercial Price Index (% change)	**4,00**	1,50	0,75	0,50	

Significant increase in credit risk
Stage classification uses a combination of backward looking, current and forward-looking indicators which includes PD comparison of current lifetime PD vs PD at origination. The threshold utilised for stage 2 classification is a threefold relative increase in the current lifetime PD relative to the origination PD.

Exposure at default (EAD)
EAD represents the expected exposure in the event of default during the life of a financial instrument taking into account the amortisation of the exposure (i.e. anticipated repayments, interest payments, accruals) as well as the behavioural maturity and credit conversion factor.

For performing exposures, the projected EAD is the amortised carrying value plus the credit conversion factor applied on the undrawn amount over the residual maturity of the exposure. The credit conversion factor and behavioural maturity for revolving facilities are derived based on empirical data from 2011 onwards.

With regards to the credit-impaired exposures, the EAD is equal to the exposure at default as at the reporting date.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

Probability of default (PD)
PD represents the likelihood of a borrower defaulting on their financial obligation in a specified time period, assuming it has not closed or defaulted since the reporting date. Projection of PDs is based on macro-economic scenarios and are differentiated based on segment (e.g. Retail, SME and Corporate), and status (e.g. dpd, restructured). For the externally rated exposures (e.g. Treasury and International lending), the historical default rates published by Moody's per rating are utilised. For the non-externally rated facilities, i.e. local loan book, the PD is estimated based on the Bank's historical default rates.

Loss given default (LGD)
LGD represents an estimate of the loss in case of default and expressed as a percentage of the EAD. Two distinct possibilities are taken into consideration for the LGD parameter: 1) the probability to proceed with collateral liquidation and 2) the probability to resolve the exposure via other means (i.e. cure, disposal/sale, settlement etc) with the associated loss assigned to each exposure.

To this end, the LGD model considers parameters such as historical loss and/or recovery rates as well as the collateral value, which is discounted to the present value, determining the amount of the expected shortfall. The average liquidation period of the collateralised non-performing collectively assessed portfolio for the year ended 31 December 2024 was 7,6 years (2023: on average 7,6 years) while for performing loans, the liquidation period assumption was 5 years (2023: on average 5 years).

Liquidation haircuts are also applied to the value of the collateral for the purposes of estimating expected loss. The collateral information, which was incorporated both in collective and individual provisioning involves judgement and takes into account the specificities of the properties by segmenting them into various property types and sub types as well as by classifying them by district and location within each district. Different liquidation discounts are applied depending on the type and location of each collateral with the liquidation discount including cost ranging from 15% to 65%. The resulting weighted average liquidation discount for the collectively assessed portfolio for the year ended 31 December 2024 was 28,2% including costs (2023: 28,3%).

Collateral
On the basis of the Group's policy, the amount of credit facilities granted should be based on the repayment capacity of the relevant counterparties. Furthermore, policies are applied for the hedging and mitigation of credit risk through the holding of collateral. These policies define the types of collaterals held and the methods for estimating their fair value.

The main collaterals held by the Group include mortgage interests over property, pledging of cash, government and bank guarantees, charges over business assets as well as personal and corporate guarantees.

The value of the real estate collateral involves, among others, judgments relating to the allocation of tangible security to each account and its indexation to today (based on latest available property prices if applicable). The value of the real estate collaterals is restricted up to the mortgaged amount or open market value for real estate.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

Property collateral relates to commercial, residential and land real estate collateral. The Bank maintains a Property Valuations Policy, which provides a standardised approach for acceptable property valuations from independent professional valuers, the selection criteria and the processes to evaluate the performance of property valuers. Valuations are carried out by independent qualified valuers by applying valuation methodologies recommended by Royal Institute of Chartered Surveyors and International Valuation Standards Council. In arriving at their estimates of the fair value of properties, the valuers use their market knowledge and professional judgment and do not rely solely on historical transaction comparables, especially for asset classes where there is greater degree of uncertainty than would have existed in a more active market. The Policy outlines the frequency for revaluations, establish the criteria for monitoring collateral values and introduces the use of indexation. The open market value of property is indexed to present, using appropriate property indices (CBC and RICS). Indices are monitored, validated and back tested in order to accurately reflect the current market values of the property collaterals of the Bank.

Collaterals' values are also indexed from the latest valuation date to the reporting date. The Bank is indexing the property collaterals to the reporting period using publicly available indices. With respect to collateral values applicable at the liquidation date, the Bank is applying zero forward indexation to its property price collaterals.

Other considerations
The Bank, as part of its deleveraging strategy examines various options. Accordingly, when measuring the ECL of the NPE portfolio, the scenario of selling the exposure is considered relevant in estimating the credit loss expected to occur. It therefore considers the possibility of recovery under a scenario involving the disposal of the exposure as one of the potential strategies used in the estimation of the ECL for its NPE portfolio. The assessment of the probability of a recovery through a sale depends on the facts and circumstances as of the reference date and involves management judgment.

Accumulated impairment losses of the Group's loans and advances are inherently uncertain due to their sensitivity to economic and credit conditions of the environment in which the Group operates. Conditions are affected by many factors with a high degree of interdependency and there is not one single factor to which these conditions are particularly sensitive. It is possible for the actual conditions in the next financial year to differ significantly from the assumptions made during the current period, so that the carrying amount of loans and advances to be adjusted significantly.

For the purposes of providing an indication of the change in accumulated impairment losses as a result of changes in key loan impairment assumptions, the Bank utilised the collective models on the loan and advances portfolio, to carry out a sensitivity analysis on the collectively assessed portfolio. The simulated impact on the provisions for impairment of loans and advances is presented below:

31 December 2024

Change on key assumptions	**Increase/(decrease) on accumulated impairment losses on the total loan and advances portfolio €' million**
Increase the liquidation period by 1 year	5
Decrease the liquidation period by 1 year	(6)
Increase the liquidation discount (i.e. reduce the recoverable amount from collateral) by 5%	7
Decrease the liquidation discount (i.e. increase the recoverable amount from collateral) by 5%	(7)

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

31 December 2023

Change on key assumptions	**Increase/(decrease) on accumulated impairment losses on the total loan and advances portfolio €' million**
Increase the liquidation period by 1 year	8
Decrease the liquidation period by 1 year	(8)
Increase the liquidation discount (i.e. reduce the recoverable amount from collateral) by 5%	6
Decrease the liquidation discount (i.e. increase the recoverable amount from collateral) by 5%	(6)

4.2. Provisions for pending litigations or complaints and/or claims or cases subject to arbitration proceedings

In order to assess whether a provision must be recognised, the Group examines whether there is a present obligation (legal or constructive) as a result of a past event, for which an outflow of resources embodying economic benefits is probable and a reliable estimate for the amount of the obligation can be made.

The amounts recognised as provisions are the best estimates of the expenditure required to settle the present obligation at the end of the reporting period. When a separate liability is measured, the most likely outcome may be considered the best estimate of the liability. Given the subjectivity and uncertainty of determining the probability and amount of losses, the Group takes into account a number of factors including external legal advice, the stage of the matter and historical evidence from similar incidents. Significant judgment is required to conclude on these estimates.

4.3. Impairment of goodwill

The process of identifying and evaluating impairment of goodwill is inherently uncertain because it requires Management to exercise judgment in making a series of estimates to determine their recoverable amount, the results of which are sensitive to the assumptions used.

To determine the recoverable amount of goodwill Management applies its judgment to determine future cash flows, which appropriately reflect Management's view of future business prospects, and the cost of capital used to discount these future cash flows.

4.4. Fair value of investments

The best evidence of fair value of investments is a quoted price in an actively traded market. If the market for a financial instrument is not active, a valuation technique is used. The majority of valuation techniques employed by the Group use only observable market data and thus the reliability of the fair value measurement is relatively high.

However, certain financial instruments are valued on the basis of valuation techniques that feature one or more significant inputs that are not observable. Valuation techniques that rely on non-observable inputs require a higher level of management judgment to calculate a fair value than those based wholly on observable inputs.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

The Group uses models with unobservable inputs only for the valuation of non-listed investments. In these cases, a higher degree of Group's management judgment and estimation in the determination of fair value is required, for the selection of the appropriate valuation model, determination of expected future cash flows of the instrument being valued, determination of the probability of counterparty default and other. Fair value estimates are adjusted for any other factors, such as liquidity risk or model uncertainties, to the extent that the Group believes that a third party market participant would take them into account in pricing a transaction, considering all available information in time. For unobservable inputs, there is limited available market information which can be used to determine the valuation of an arm's length transaction for the instrument being valued hence are determined based on the best information available.

4.5. Business Model and SPPI assessments
Classification of financial assets is determined based on both the business model used for managing the financial assets and whether the contractual cash flows generated by an asset constitute solely payments of principal and interest (SPPI).

The assessment of the business model requires judgment based on the facts and circumstances at the date of the assessment. The Bank has considered both quantitative and qualitative factors in its assessment such as how the performance of the business model and the financial assets held within that business model are evaluated and reported to the Bank's management as well as the frequency, volume and timing of sales in prior periods.

If a financial asset is held in either a "hold to collect" or a "hold to collect and sell" business model, then an assessment to determine whether the contractual cash flows are SPPI is required. In making this assessment the Group exercises judgment in considering whether the contractual cash flows are consistent with a basic lending arrangement, i.e. interest includes only consideration for the time value of money, credit risk, other basic lending risks and profit margin.

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

4.6. Indemnification Asset
At the end of each reporting period, the Group measures the indemnification asset that was recognised at the acquisition date on the same basis as the indemnified asset, subject to any contractual limitations on its amount and management's assessment of the collectability of the indemnification asset. Estimates and judgments used for the measurement of the Indemnification asset are in line with the judgments and estimates management applies for the measurement of expected credit losses on loans and advances to customers.

4.7. Stock of property
Stock of property is measured at the lower of cost and Net Realisable Value ('NRV'), where cost is based on carrying amount of the debt settled and NRV the estimated selling price less the estimated cost to sell.

NRV is determined through valuation techniques, requiring significant judgment, which take into account all available reference points, such as expert valuation reports, current market conditions, the holding period of the asset, applying an appropriate illiquidity discount, where considered necessary, and any other relevant parameters. Estimated cost to sell is deducted from the estimated selling price and depending on the value of the underlying asset and available market information, the determination of costs to sell may require professional judgment which involves a degree of uncertainty due to the relatively low level of market activity.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

4.8. Fair value of properties held for own use and investment properties

The Group's accounting policy for property held for own use, as well as for investment property requires that it is measured at fair value. In the case of property held for own use, valuations are carried out periodically so that the carrying value is not materially different from the fair value, whereas in the case of investment properties, the fair value is established at each reporting date. Valuations are carried out by qualified valuers by applying valuation methodologies recommended by the internationally accepted valuation standards.

In arriving at their estimates of the fair values of properties, the valuers used their market knowledge and professional judgment. For properties of low marketability or with a limited number of transactions in recent years, valuers did not rely solely on historical transactional comparable information, taking into consideration that there is a greater degree of uncertainty than that which exists in a more active market. Depending on the nature of the underlying asset and available market information, the determination of the fair value of property may require the use of estimates such as future cash flows from assets and discount rates applicable to those assets. All these estimates are based on local market conditions existing at the reporting date.

4.9. Taxation

Income and Indirect Taxes

The Group is subject to income and indirect taxes in the countries in which it operates. Estimates are required in determining the provision for such taxes at the reporting date. The Group recognises income tax and indirect tax liabilities for transactions and assessments whose tax treatment is uncertain. The Group has a number of open income tax returns with the tax authorities. Liabilities relating to these matters are based on management estimates at each reporting date. Where the final tax is different from the amounts initially recognised in the consolidated income statement, such differences will impact the income and indirect tax expense, the tax liabilities and deferred tax assets or liabilities of the period in which the final tax is agreed with the relevant tax authorities.

On loans acquired the Bank opted to recognise current tax liability on their settlement date. The method followed is considered most appropriate, considering the complexity of other methods and also the fact that it captures the actual gain realised from each loan.

Deferred tax assets are recognised to the extent that it is probable that the Group will generate future taxable profits against which the tax losses and the deductible temporary differences can be utilised. The recognition of deferred tax assets is sensitive to judgments made in relation to the probability, sufficiency and timing of future taxable profits as well as the applicability of future tax planning strategies. These judgments rely on historical available information and estimations regarding, among others, macroeconomic conditions, changes in interest rates, real estate prices and demand, the level of the nonperforming exposures and the expected results of operations based on the business model and the currently approved Strategic Plan of the Group. The parameters underlying the judgments made are subject to uncertainty and may result in changes in the measurement of deferred tax asset compared to initial estimates.

4.10. Insurance contracts

The measurement of insurance contract liabilities involves the exercise of judgment, estimates, and assumptions, especially in relation to mortality and morbidity rates, claims, lapse and surrender rates, and costs. Actuarial calculation methods, statistical estimates, blanket estimates, and measurements based on past experience are used.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

Contractual Service Margin (CSM)

The Group exercises judgment to determine the coverage units for its insurance contracts on the basis of the benefits payable on death, including any investment components, and the respective probability each insurance contract.

For reinsurance contract held, the CSM amortisation reflects the level of service received and depends on the number of underlying contracts in-force.

Measurement of future cash flows

The following assumptions were used when estimating future cash flows:

- Mortality and morbidity rates

Mortality and morbidity risks are inherent in most lines of business. The Group performs an investigation, at least on an annual basis, to ensure the validity of the mortality assumptions, and when deemed necessary the assumptions are adjusted accordingly. The assumptions are set based on the internal experience of the Group when there are sufficient volumes of data to support a credible investigation. When internal experience is not sufficient, the assumptions are set with reference to industry experience and commonly used tables.

- Expenses

Assessment of directly attributable cash flows
The Group applies judgment in assessing whether cash flows are directly attributable to a specific portfolio of insurance contracts. Insurance acquisition cash flows are included in the measurement of a group of insurance contracts only if they are directly attributable to either the individual contracts in a group, or to the group itself, or the portfolio of insurance contracts to which the group belongs. The Group also considers as attributable cash flows fixed and variable overheads directly attributable to the fulfilment of insurance contracts.

Expense basis for cashflow projections
The Group performs a detailed expense investigation, at least on an annual basis, to determine the expense assumptions used in the cashflow projections. The expense basis is set in accordance with the budgeted attributable expenses and the projected volumes of business. The Group also determines an assumption for the future expense inflation.

- Lapse and surrender rates

Lapse and surrenders assumptions relate to the rate by which policyholders cancel/surrender their policies. The assumptions are set in line with recent Group experience, by adjusting for expected improvements/deteriorations where necessary. The rates vary by product and duration in force.

Discount rates

Long term life insurance contract liabilities are calculated by discounting expected future cash flows. The Group uses the bottom-up approach in determining the discount rates and hence uses a risk-free rate, plus an illiquidity premium. Risk free rates are determined by reference to the European Insurance and Occupational Pensions Authority (EIOPA) yields and the illiquidity premium is determined using EIOPA’s volatility adjustment.

4. SIGNIFICANT JUDGMENTS AND ESTIMATES (continued)

Risk adjustments for non-financial risk

The risk adjustment for non-financial risk is determined to reflect the compensation that the Group requires for bearing non-financial risk and its degree of risk aversion. The risk adjustment is determined using a confidence level technique and specifically the scalar approach method with its target confidence level set at 80 percent which represents the Group's degree of risk aversion.

5. INTEREST INCOME

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Interest income calculated using the effective interest method				
Financial assets at amortised cost:				
Interest income from cash and balances with Central Banks	**239.933**	268.310	**239.933**	268.310
Interest income from placements with other banks	**14.454**	14.344	**14.339**	14.208
Interest income from reverse repurchase agreements	**274**	-	**274**	-
Interest income from loans and advances to customers	**309.164**	268.627	**309.164**	268.627
Interest income from debt securities	**151.323**	105.846	**151.189**	105.795
Interest income from indemnification assets	**-**	43	**-**	43
Interest income from other financial assets	**399**	412	**399**	412
Financial assets at fair value:				
Interest income from debt securities at fair value through other comprehensive income	**1.746**	2.423	**1.685**	2.423
	717.293	660.005	**716.983**	659.818
Other interest income				
Interest income from other financial instruments	**12.279**	20.282	**12.279**	20.282
	729.572	680.287	**729.262**	680.100

Interest income from loans and advances to customers includes interest on the net carrying amount of impaired loans and advances amounting to €25,8 million (31 December 2023: €25,5 million).

Other interest income relates mainly to interest on derivatives which are measured at fair value through profit and loss (FVTPL), specifically interest rate swaps and foreign currency swaps.

6. INTEREST EXPENSE

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Interest expense calculated using the effective interest method				
Interest expense on deposits by other banks	**300**	279	**300**	274
Interest expense on funding by Central Banks	**44.941**	77.131	**44.941**	77.131
Interest expense on customer deposits and other customer accounts	**33.758**	14.209	**33.758**	14.209
Interest expense on loan capital	**40.849**	39.177	**40.849**	39.177
Interest expense on indemnification assets	**23**	-	**23**	-
Interest expense on lease liability	**513**	465	**511**	463
	120.384	131.261	**120.382**	131.254
Other interest expense				
Interest expense on other financial instruments	**10.278**	12.738	**10.278**	12.738
	130.662	143.999	**130.660**	143.992

Other interest expense relates mainly to interest on derivatives which are measured at fair value through profit and loss (FVTPL), specifically interest rate swaps and foreign currency forwards.

7. FEE AND COMMISSION INCOME

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Banking fees and commissions	**80.587**	81.823	**85.768**	86.921
Custodian services and asset management fees	**355**	291	**388**	322
	80.942	82.114	**86.156**	87.243

Banking fees and commissions of the Group include credit related fees and commissions amounting to € 29.788 thousand (31 December 2023: €28.854 thousand) and other banking commissions amounting to €46.315 thousand (31 December 2023: €49.081 thousand).

8. FEE AND COMMISSION EXPENSE

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Banking fees and commissions	**10.074**	8.492	**10.074**	8.492
Commissions for insurance operations	**-**	12	**-**	-
Other fees and commissions	**1.000**	768	**1.000**	768
	11.074	9.272	**11.074**	9.260

Banking fees and commissions include credit related fees and commissions amounting to €9.041 thousand (31 December 2023: €7.527 thousand) and other banking commissions amounting to €1.033 thousand (31 December 2023: €965 thousand).

9. NET GAINS ON DISPOSAL AND REVALUATION OF FOREIGN CURRENCIES AND FINANCIAL INSTRUMENTS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Net gains on foreign currency transactions	**6.012**	7.318	**6.012**	7.318
Net gains/(losses) on revaluation of financial instruments:				
Debt securities at FVTPL	**38**	42	**-**	-
Equity securities at FVTPL	**9.287**	8.258	**6.592**	3.502
Derivatives at FVTPL	**10.166**	(189)	**10.166**	(189)
Net gains/(losses) on disposal of financial instruments:				
Debt securities at FVOCI	**-**	(754)	**-**	-
Debt securities at FVTPL	**788**	(24)	**-**	-
Equity securities at FVOCI	**-**	(6)	**-**	-
Equity securities at FVTPL	**(25)**	1	**-**	-
	26.266	14.646	**22.770**	10.631

The net gains on foreign currency transactions of the Group and the Bank results from the translation of monetary assets denominated in foreign currency at the reporting date and the realised gains on foreign currency transactions that were settled during the year.

10. NET INCOME FROM INSURANCE OPERATIONS

	The Group					
			2024			2023
	Life insurance	**Non-Life insurance**	**Total**	Life insurance	Non-Life insurance	Total
	€'000	**€'000**	**€'000**	€'000	€'000	€'000
Insurance service revenue	**22.147**	**43.734**	**65.881**	12.548	51.295	63.843
Insurance service expenses	**(8.495)**	**(30.724)**	**(39.219)**	(4.359)	(28.189)	(32.548)
Insurance service result from insurance contracts issued	**13.652**	**13.010**	**26.662**	8.189	23.106	31.295
Allocation of reinsurance premium	**(8.793)**	**(15.235)**	**(24.028)**	(5.344)	(19.301)	(24.645)
Amounts recoverable from reinsurers for incurred claims	**7.515**	**10.506**	**18.021**	3.044	7.376	10.420
Net expense from reinsurance contracts held	**(1.278)**	**(4.729)**	**(6.007)**	(2.300)	(11.925)	(14.225)
Net Insurance Service Result	**12.374**	**8.281**	**20.655**	5.889	11.181	17.070
Insurance finance expense	**(2.943)**	**(809)**	**(3.752)**	(1.374)	(1.540)	(2.914)
Reinsurance finance income	**125**	**253**	**378**	37	141	178
Net insurance claims and benefits	**(2.818)**	**(556)**	**(3.374)**	(1.337)	(1.399)	(2.736)
	9.556	**7.725**	**17.281**	4.552	9.782	14.334

11. OTHER INCOME

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Dividend income	**3.321**	3.045	**10.414**	13.072
Gain from the disposal of subsidiary company	**-**	-	**224**	628
Net gains from the disposal of stock of property	**6.350**	4.980	**6.350**	3.454
Net (losses)/gains from revaluation of investment properties (refer to Note 30)	**(460)**	931	**(557)**	688
Sundry income	**6.804**	17.254	**6.520**	17.218
	16.015	26.210	**22.951**	35.060

12. STAFF COSTS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Salaries	**109.342**	96.615	**108.399**	95.812
Employer's contributions	**16.778**	15.310	**16.522**	15.065
Provident Fund contributions	**8.036**	7.387	**7.937**	7.313
	134.156	119.312	**132.858**	118.190

The Group contributes in two different defined contribution retirement plans. Details are disclosed in Note 3.9.

On 31 December 2024, the number of staff employed by the Group was 2.265 (31 December 2023: 2.256) and by the Bank 2.163 (31 December 2023: 2.147). Out of the total number of staff employed by the Group, 2.225 were permanent staff and 40 were temporary staff (31 December 2023: 2.200 permanent staff, 56 temporary staff). The average number of staff employed by the Group and the Bank for 2024 was 2.263 and 2.156 respectively (2023: Group 2.230, Bank 2.120).

13. ADMINISTRATIVE AND OTHER EXPENSES

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Repairs, maintenance and other related costs	**31.465**	25.292	**31.351**	25.216
Other property expenses	**5.286**	5.563	**4.838**	5.334
Consultancy and other professional services fees	**16.451**	9.834	**15.480**	8.722
Insurance expenses	**4.373**	4.480	**4.166**	4.261
Advertising, PR and promotional expenses	**7.166**	4.213	**6.712**	3.832
Communication expenses	**6.680**	6.483	**6.600**	6.147
Staff and Directors fees and other expenses	**3.407**	3.452	**3.262**	3.253
(Release)/increase provision for pending litigations or complaints and/or claims (refer to Note 36)	**(1.471)**	187	**(1.471)**	187
Cash transfer and management of documents costs	**2.497**	2.268	**2.461**	2.249
Servicer's administration fees	**11.581**	9.911	**11.339**	12.244
Regulatory Supervisory fees	**3.591**	3.307	**3.587**	3.303
Deposit Guarantee Scheme contribution	**5.469**	8.014	**5.469**	8.014
Special Levy on Credit Institutions	**22.561**	23.606	**22.561**	23.606
Transformation costs	**5.550**	6.465	**5.550**	6.465
Other administrative expenses	**12.101**	4.375	**12.226**	4.466
	136.707	117.450	**134.131**	117.299

13. ADMINISTRATIVE AND OTHER EXPENSES (continued)

Fees of statutory auditors
The total fees for statutory auditors (inclusive of out of pocket expenses and VAT) are analysed as follows:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Audit of annual financial statements	**1.732**	1.314	**1.404**	1.018
Other assurance services	**437**	465	**395**	425
Tax compliance and advisory services	**62**	61	**62**	55
Other non-audit services	**245**	291	**245**	284
	2.476	2.131	**2.106**	1.782

Deposit Guarantee Scheme contribution
The Bank was subject to the contribution to Deposit Guarantee Fund (DGF) on a semi-annual basis from 2020 and until 3 July 2024. Contributions were paid at least until the target level laid down in Regulation 16(1) of the Deposit Guarantee and Resolution of Credit and Other Institutions Scheme (DGS) Regulations of 2016 to (No. 2) of 2020 is reached. Contributions were calculated and collected from credit institutions participating in the DGS twice a year from 2020 to 2023 and once for the year 2024, in order to reach the target level on time by 3 July 2024 (i.e. a total of nine six-month periods from 2020 to 2024, recognised in Income Statement in first quarter and third quarter in each financial year).

On July 2024, the Management Committee (MC) of the DGS introduced an approved new methodology on the calculation of the contributions to DGF paid by all the authorised credit institutions. The new methodology that was last reviewed in February 2023, entered into force from 3 July 2024. It is publicly available on the CBC's website and provides for the calculation and payment of contributions on frequency decided by the MC of the DGS, aiming to maintaining the target level (currently set at 0,8%) of covered deposits of all authorised credit institutions in line with the relevant legislation and EU Directive.

14. IMPAIRMENT LOSSES ON FINANCIAL INSTRUMENTS AND NON FINANCIAL ASSETS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Impairment losses on loans and advances to customers				
12 month expected credit losses (refer to Note 47)	**13.673**	18.248	**13.673**	18.248
Lifetime expected credit losses (Stage 2) (refer to Note 47)	**6.305**	4.145	**6.305**	4.145
Lifetime expected credit losses (Stage 3) (refer to Note 47)	**(14.443)**	(4.640)	**(14.443)**	(4.640)
Impact of net modification and cash flows re- estimation	**11.650**	11.233	**11.650**	11.233
Lifetime expected credit losses on the value of purchased or originated credit impaired (POCI) loan portfolio (refer to Note 47)	**(13.300)**	(26.378)	**(13.300)**	(26.378)
	3.885	2.608	**3.885**	2.608
Impairment losses on financial guarantees and loan commitments issued				
12 month expected credit losses (refer to Note 36)	**1.379**	3.122	**1.379**	3.122
Lifetime expected credit losses (Stage 2) (refer to Note 36)	**75**	877	**75**	877
Lifetime expected credit losses (Stage 3) (refer to Note 36)	**399**	(362)	**399**	(362)
Lifetime expected credit losses on the value of purchased or originated credit impaired (POCI) financial guarantees issued and loan commitments issued (refer to Note 36)	**(14)**	44	**(14)**	44
	1.839	3.681	**1.839**	3.681
Impairment losses on other financial assets				
12 month expected credit losses of other receivables	**33**	(13)	**34**	(13)
12 month expected credit losses on indemnification asset	**(1)**	5	**(1)**	5
Cash flows re-estimation of indemnification asset (refer to Note 30)	**6.903**	(6.259)	**6.903**	(6.259)
12 month expected credit losses on debt securities (refer to Note 23)	**672**	(597)	**672**	(597)
12 month expected credit losses on Balances with Central Banks and Placements with other banks (refer to Note 18 and 19)	**5**	228	**9**	228
Impairment losses on other receivables	**456**	(6.888)	**456**	(6.888)
	8.068	(13.524)	**8.073**	(13.524)
Impairment losses on financial instruments	**13.792**	(7.235)	**13.797**	(7.235)
Impairment losses on non financial assets				
Stock of property (refer to Note 27)	**(7.845)**	(8.133)	**(5.304)**	(5.677)
Property plant and equipment	**-**	(1.070)	**-**	(699)
Impairment losses on the cost of investment of a subsidiary company (refer to Note 25)	**-**	-	**(2.856)**	(3.087)
	(7.845)	(9.203)	**(8.160)**	(9.463)
Total impairment losses on financial instruments and non financial assets	**5.947**	(16.438)	**5.637**	**(16.698)**

15. TAXATION

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Current tax	**61.032**	47.489	**58.987**	44.943
Taxes withheld at source	**413**	210	**413**	210
Deferred tax	**17**	(337)	**(18)**	975
	61.462	47.362	**59.382**	46.128

According to the Income Tax Law 118(I)/2002 as amended, the Bank's taxable profit and that of its subsidiaries in Cyprus, is subject to income tax at the rate of 12,5%. Tax losses of group companies in Cyprus, other than companies affected by article 13(8)(d)(i) of the Income Tax Law, can be offset against taxable profits of other group companies in Cyprus of the same year and any tax losses not utilised can be carried forward and offset against the same entity's taxable profits of the next five years. Article 13(8)(d)(i) of the Income Tax Law provides that in the case where the disposal of shares held by one company in another company member of the same group is taxed as a trading transaction then the two companies are not considered group companies for loss relief purposes.

15. TAXATION (continued)

Profits earned by subsidiary companies abroad or/and permanent establishments outside Cyprus are subject to taxation at the rates applicable in the country in which the operations are carried out.

Tax exemptions, allowances, deductions and offsets pursuant to Articles 8, 9, 10 and 13 of the Income Tax Law 118(I)/2002 are taken into consideration for the calculation of the tax liability.

Pillar Two income taxes
On 12 December 2024 the Cyprus House of Representatives voted for the transposition into Law of the Council Directive (EU) 2022/2523 on ensuring a minimum global level of Taxation (minimum tax rate of 15%) for multinational enterprise groups and large-scale domestic groups in the Union with consolidated revenues over €750 million.

Following acquisition of 55,96% of the share capital of the Bank by Eurobank S.A., the Bank and its subsidiaries are subject to the Pillar Two provisions for the period, in 2024, in which the results of the Bank and its subsidiaries are consolidated with the results of Eurobank S.A. The Pillar Two effective tax rate is lower than 15% in respect of the Bank mainly due to the nominal corporate tax rates (CIT) applied in Cyprus being 12,5%. For the second half of 2024, the group entities in Cyprus have recognized a current tax expense of €6,4 million (Bank: €5,9 million) related to the top up tax applicable on the profits earned.

The Group has applied a temporary mandatory relief from deferred tax accounting for the impacts on the top up tax and accounts for it as a current tax when it is incurred.

Reconciliation of taxation based on taxable income and taxation based on accounting profits

The Group	**2024**	2023
	€'000	€'000
Group profit before taxation	**444.047**	412.803
Taxation based on applicable tax rates	**55.506**	51.600
Expenses non-tax deductible	**9.799**	13.271
Non-taxable income	**(11.670)**	(17.486)
Effect of tax losses for the year	**-**	104
Pillar Two income tax	**6.392**	-
Special defence contribution	**413**	210
Adjustment in respect of income tax of prior years	**1.005**	-
Deferred tax	**17**	(337)
Tax charge for the year	**61.462**	47.362

The Bank	**2024**	2023
	€'000	€'000
Bank profit before taxation	**438.792**	411.806
Taxation based on applicable tax rates	**54.849**	51.476
Expenses non-tax deductible	**9.488**	9.820
Non-taxable income	**(12.258)**	(16.353)
Adjustment in respect of income tax of prior years	**1.005**	-
Pillar Two income tax	**5.903**	-
Special defence contribution	**413**	210
Deferred tax	**(18)**	975
Tax charge for the year	**59.382**	46.128

15. TAXATION (continued)

Taxation recognised in other comprehensive income:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Deferred taxation on property revaluation	**(158)**	(1.095)	**(158)**	(1.009)

16. DISCONTINUED OPERATIONS

On 30 March 2023, the Bank announced the completion of Project Starlight, the agreement for which was announced on 11 April 2022 and also included the disposal of APS Debt Servicing Cyprus Ltd ("APS Ltd") a wholly owned subsidiary of the Group. The results of APS Ltd were consolidated in the group results for the year ended 31 December 2023 until the day of its disposal. In accordance with IFRS 5, discontinued operations were presented separately from the results of continuing operations in the income statement up to the date of the disposal of the entity and as held for sale in the statement of financial position.

The Group results of APS Debt Servicing Cyprus Ltd for the period up to its disposal are presented below:

		The Group	
		2024	2023
	Note	**€'000**	€'000
Discontinued Operations			
Fee and commission income		**-**	-
Net fee and commission income		**-**	-
Other income		**-**	91
Total net income		**-**	91
Staff costs		**-**	(1.324)
Depreciation and amortisation		**-**	(11)
Administrative and other expenses		**-**	(175)
Loss before taxation		**-**	(1.419)
Taxation		**-**	(131)
Loss for the year		**-**	(1.550)

16. DISCONTINUED OPERATIONS (continued)

Group gain on derecognition of disposal group classified as held for sale:

	Note	**2024** €'000	2023 €'000
Consideration received:			
Cash received		**-**	27.502
Disposable group held for sale derecognised:			
Assets			
Property, plant and equipment		-	136
Intangible assets		-	2.365
Deferred tax asset		-	711
Total group assets derecognised		**-**	3.212
Liabilities			
Tax payable		-	131
Other liabilities		-	1.390
Total group liabilities derecognised		**-**	1.521
Net assets of disposal group held for sale derecognised		**-**	1.691
Gain on the disposal of subsidiary before the recognition of balances to former subsidiary		**-**	25.811
Group liabilities recognised upon derecognition of disposal group			
Customer Deposits		**-**	(4.203)
Other Liabilities		**-**	(879)
		-	(5.082)
Gain on derecognition of disposal group classified as held for sale		**-**	20.729
Basic earnings per share (€cent)	17	**-**	4,65
Diluted earnings per share (€cent)	17	**-**	4,43

Group profit for the period from discontinued operations consist of:

	2024 €'000	2023 €'000
Loss for the period	**-**	(1.550)
Gain on derecognition	**-**	20.729
Profit for the period from discontinued operations	**-**	19.179

Bank gain on disposal of APS Debt Servicing Cyprus Ltd ("APS Ltd") as part of Project Starlight:

	The Bank	
	2024 €'000	2023 €'000
Total consideration received	**-**	32.002
Cost of investment of APS Ltd	**-**	(10.388)
	-	21.614
Basic earnings per share (cent)	**-**	5,24
Diluted earnings per share (cent)	**-**	4,99

16. DISCONTINUED OPERATIONS (continued)

The earnings per share of APS Ltd for the period are presented below:

	The Group		The Bank	
	2024	2023	**2024**	2023
Basic and diluted earnings per share from discontinued operations				
Profit attributable to owners of the parent company (€ thousand) from discontinued operations	**-**	19.179	**-**	21.614
Basic earnings per share from discontinued operations				
Weighted average number of ordinary shares for Basic EPS during the year (thousand) from discontinued operations	**-**	412.805	**-**	412.805
Basic earnings per share (€ cent) from discontinued operations	**-**	4,65	**-**	5,24
Diluted earnings per share from discontinued operations				
Weighted average number of ordinary shares for Basic EPS during the year (thousand)	**-**	412.805	**-**	412.805
Effect of dilution from the potential conversion of Convertible Capital Securities 1 and 2 (thousand)	**-**	19.949	**-**	19.949
Weighted average number of ordinary shares adjusted for the effect of dilution	**-**	432.754	**-**	432.754
Diluted earnings per share (€ cent) from discontinued operations	**-**	4,43	**-**	4,99

17. BASIC AND DILUTED EARNINGS PER SHARE

	The Group		The Bank	
	2024	2023	**2024**	2023
Profit attributable to owners of the parent company (€ thousand)	**382.587**	365.442	**379.410**	365.678
Basic earnings per share				
Weighted average number of ordinary shares for Basic EPS during the year (thousand)	**412.805**	412.805	**412.805**	412.805
Basic earnings per share (€ cent)	**92,68**	88,53	**91,91**	88,58
Diluted earnings per share				
Profit attributable to owners of the parent company (€ thousand) for Basic EPS	**382.587**	365.442	**379.410**	365.678
Interest on Convertible Capital Securities 1 and 2 (thousand) net of tax	**-**	11.498	**-**	11.498
Profit attributable to owners of the parent company (€ thousand) adjusted for the effect of dilution	**382.587**	376.940	**379.410**	377.176
Weighted average number of ordinary shares for Basic EPS during the year (thousand)	**412.805**	412.805	**412.805**	412.805
Effect of dilution from the potential conversion of Convertible Capital Securities 1 and 2 (thousand)	**-**	19.949	**-**	19.949
Weighted average number of ordinary shares adjusted for the effect of dilution	**412.805**	432.754	**412.805**	432.754
Diluted earnings per share (€ cent)	**92,68**	87,10	**91,91**	87,16

17. BASIC AND DILUTED EARNINGS PER SHARE (continued)

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Profit attributable to owners of the parent company from continuing operations	**382.587**	346.263	**379.410**	344.064
Basic earnings per share from continuing operations				
Weighted average number of ordinary shares for Basic EPS during the year (thousand) from continuing operations	**412.805**	412.805	**412.805**	412.805
Basic earnings per share (€ cent) from continuing operations	**92,68**	83,88	**91,91**	83,35
Diluted earnings per share from continuing operations				
Profit attributable to owners of the parent company from continuing operations (€ thousand) for Basic EPS	**382.587**	346.263	**379.410**	344.064
Interest on Convertible Capital Securities 1 and 2 (thousand) net of tax	**-**	11.498	**-**	11.498
Profit attributable to owners of the parent company (€ thousand) from continuing operations adjusted for the effect of dilution	**382.587**	357.761	**379.410**	355.562
Weighted average number of ordinary shares for Basic EPS during the year (thousand)	**412.805**	412.805	**412.805**	412.805
Effect of dilution from the potential conversion of Convertible Capital Securities 1 and 2 (thousand)	**-**	19.949	**-**	19.949
Weighted average number of ordinary shares adjusted for the effect of dilution	**412.805**	432.754	**412.805**	432.754
Diluted earnings per share (€ cent) from continuing operations	**92,68**	82,67	**91,91**	82,16

As at 31 December 2024 there was no effect on dilution since the convertible capital securities 1 and 2 were redeemed (refer to Note 38) and diluted earnings per share was equal to the basic earnings per share.

Basic EPS is calculated by dividing the profit for the year attributable to owners of the parent company by the weighted average number of ordinary shares outstanding during the year. Diluted EPS is calculated by dividing the profit attributable to ordinary equity holders of the parent company adjusted for the effect of dilution by the weighted average number of shares outstanding during the period plus the weighted average number of ordinary shares that would be ordinary issued on conversion of all the dilutive potential ordinary shares into ordinary shares. The diluted EPS for the comparative period has been restated, to reflect the profit attributable to the owners of the parent company adjusted for the effect of dilution. For this reason, the diluted EPS as at 31 December 2023 have been restated to €87,10 cents (previously reported as €84,45) for the Group and €87,16 cents (previously reported as €84,50) for the Bank and the diluted EPS from continuing operations for the Group to €82,67 cents (previously reported as €80,01).

18. CASH AND BALANCES WITH CENTRAL BANKS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Cash	**100.684**	95.336	**100.684**	95.336
Balances with Central Banks	**5.629.860**	8.127.509	**5.629.860**	8.127.509
	5.730.544	8.222.845	**5.730.544**	8.222.845

Cash and Balances with Central Banks of €5.730.544 thousand (31 December 2023: €8.222.845 thousand) mainly consist a deposit with CBC of €5.629.860 thousand (31 December 2023: €8.127.509 thousand), which represents 98% of the total balance (2023: 99% of total balance).

Total cash and balances with Central Banks are analysed to:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Cash and balances with Central Banks available for use	**5.578.561**	8.068.661	**5.578.561**	8.068.661
Restricted balances with Central Banks	**152.052**	154.300	**152.052**	154.300
	5.730.613	8.222.961	**5.730.613**	8.222.961
Accumulated Expected Credit Losses	**(69)**	(116)	**(69)**	(116)
Total cash and balances with Central Banks	**5.730.544**	8.222.845	**5.730.544**	8.222.845

Movement of Accumulated Expected Credit Losses:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Balance 1 January	**116**	124	**116**	124
Movement of the year (refer to Note 14)	**(47)**	(8)	**(47)**	(8)
Closing balance	**69**	116	**69**	116

Cash and balances with Central Banks are classified as Stage 1, for ECL calculation purposes.

19. PLACEMENTS WITH OTHER BANKS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Other placements with Banks	**179.247**	123.211	**175.040**	115.238
Interbank accounts	**176.169**	158.657	**176.169**	158.660
	355.416	281.868	**351.209**	273.898

The analysis of placements with other banks based on their remaining contractual maturity is as follows:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
On demand	**272.165**	225.650	**268.208**	217.930
Within three months	**250**	250	**-**	-
Between one year and five years	**52.926**	49.755	**52.926**	49.755
Over five years	**30.075**	6.213	**30.075**	6.213
	355.416	281.868	**351.209**	273.898

19. PLACEMENTS WITH OTHER BANKS (continued)

At 31 December 2024, an amount of €84.669 thousand (2023: €60.632 thousand) is pledged as collateral with other banks.

Amounts held with financial institutions are mainly with A- to AA institutions.

Total placements with other banks are analysed to:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Placement with other banks with original maturity less than 3 months	**272.574**	225.902	**268.359**	217.931
Other placements with other banks	**83.002**	56.084	**83.002**	56.081
	355.576	281.986	**351.361**	274.012
Accumulated Expected Credit Losses	**(160)**	(118)	**(152)**	(114)
Total placements with other banks	**355.416**	281.868	**351.209**	273.898

Movement of Accumulated Expected Credit Losses:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Balance 1 January	**118**	338	**114**	334
Movement of the year (refer to Note 14)	**42**	(220)	**38**	(220)
Closing balance	**160**	118	**152**	114

Placements with other banks are classified as Stage 1, for ECL calculation purposes.

20. CASH AND CASH EQUIVALENTS

Cash and cash equivalents include cash and available for use balances with Central Banks and placements with other banks, with original maturities of less than three months as follows:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Cash balances and non-obligatory balances with Central Banks	**5.578.561**	8.068.545	**5.578.561**	8.068.545
Placement with other banks with original maturity less than three months	**272.574**	225.902	**268.359**	217.931
Total cash and cash equivalents for the purposes of the statement of cash flows	**5.851.135**	8.294.447	**5.846.920**	8.286.476

20. CASH AND CASH EQUIVALENTS (continued)

Analysis of total cash and balances with Central Banks and Placements with other banks are presented below:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Cash balances and non-obligatory balances with Central Banks	**5.578.561**	8.068.545	**5.578.561**	8.068.545
Restricted balances with Central Banks	**152.052**	154.300	**152.052**	154.300
Total Cash and Balances with Central Banks (refer to Note 18)	**5.730.613**	8.222.845	**5.730.613**	8.222.845
Placement with other banks with original maturity less than three months	**272.574**	225.902	**268.359**	217.931
Other placements with other banks	**82.842**	55.966	**82.850**	55.967
Total Placements with other banks (refer to Note 19)	**355.416**	281.868	**351.209**	273.898

Restricted balances from Central Banks represent mandatory reserve deposit that are not available for use in the Bank's day-to-day operations.

21. REVERSE REPURCHASE AGREEMENTS

On 18 December 2024 the Bank entered into a Global Market Repurchase Agreement with Eurobank S.A with purchase price of €300 million, with maturity on 15 May 2026. The interest rate was set at 2,74% and bonds issued by Eurobank S.A were obtained as collateral, the fair value of which as at 31 December 2024 amounts to €321 million.

22. LOANS AND ADVANCES TO CUSTOMERS

Analysis of loans and advances to customers as per industry sector they operate, as at 31 December, is as follows:

	The Group and the Bank	
	2024	2023
	€'000	€'000
Trade	**411.220**	519.780
Construction and Real Estate	**376.106**	366.928
Manufacturing	**363.110**	424.843
Tourism	**444.042**	498.708
Retail	**3.314.197**	3.401.251
Other sectors	**941.117**	950.322
	5.849.792	6.161.832
Accumulated impairment losses	**(111.681)**	(137.711)
	5.738.111	6.024.121

22. LOANS AND ADVANCES TO CUSTOMERS (continued)

Analysis of loans and advances to customers based on their remaining contractual maturity as at 31 December is as follows:

	The Group and the Bank	
	2024	2023
	€'000	€'000
On demand	**576.888**	701.256
Within three months	**42.674**	39.028
Between three months and one year	**89.572**	54.372
Between one year and five years	**914.673**	964.705
Over five years	**4.225.985**	4.402.471
	5.849.792	6.161.832
Accumulated impairment losses	**(111.681)**	(137.711)
	5.738.111	6.024.121

As at 31 December 2024, there were no loans and advances held for sale. As at 31 December 2023, Net Loans and Advances amounting to €3.296 thousand were classified as Held for Sale. For more details refer to Note 29.

The value of collaterals of total loans and advances to customers is analysed as below:

	2024	2023
	€'000	€'000
Residential property	**9.716.456**	9.560.441
Commercial property	**4.794.716**	4.894.271
Land	**1.739.535**	2.283.795
Total property collaterals	**16.250.707**	16.738.507
Other collaterals	**2.020.732**	1.834.341
	18.271.439	18.572.848

23. DEBT SECURITIES

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Securities classified at fair value through other comprehensive income				
Listed	**35.229**	58.723	**35.229**	58.723
Accumulated expected credit losses	**(3)**	(38)	**(3)**	(38)
	35.226	58.685	**35.226**	58.685
Securities classified at amortised cost				
Listed	**5.628.915**	4.927.447	**5.628.915**	4.927.447
Accumulated expected credit losses	**(1.334)**	(1.971)	**(1.334)**	(1.971)
	5.627.581	4.925.476	**5.627.581**	4.925.476
Securities classified at fair value through profit and loss				
Listed	**12.867**	883	**-**	-
	5.675.674	4.985.044	**5.662.807**	4.984.161

Listed debt securities classified at fair value through profit and loss include an amount of €6.964 thousand (31 December 2023: €nil) that relate to assets held to cover liabilities of unit linked funds, held by the Group's Life insurance subsidiary.

The analysis of Debt securities is based on their remaining contractual maturity as at 31 December:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Within three months	**198.195**	249.787	**197.751**	249.787
Between three months and one year	**657.079**	639.532	**657.079**	639.532
Between one year and five years	**2.809.723**	2.600.852	**2.806.813**	2.599.969
Over five years	**2.010.677**	1.494.873	**2.001.164**	1.494.873
	5.675.674	4.985.044	**5.662.807**	4.984.161

Analysis of Debt securities by sector:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Concentration by sector:				
Governments	**1.310.402**	881.407	**1.301.389**	880.524
Banks	**2.696.523**	2.322.569	**2.696.523**	2.322.569
Other sectors	**1.668.749**	1.781.068	**1.664.895**	1.781.068
	5.675.674	4.985.044	**5.662.807**	4.984.161

As at 31 December 2024 the Group's and the Bank's exposure in Cyprus Government Bonds amounted to €771 million (31 December 2023: €571 million), rated at A3 Moody's equivalent credit rating (2023: Baa2).

The category "Other sectors" for the Group mainly consists of, 50%, €835 million securitisations, (31 December 2023: 57%, €1.018 million) 38%, €632 million Supranational organisations, (31 December 2023: 32%, €566 million) and 12%, €202 million Corporates, (31 December 2023: 11%, €197 million).

23. DEBT SECURITIES (continued)

The category "Other sectors" for the Bank mainly consists of, 50%, €835 million securitisations, (31 December 2023: 57%, €1.018 million) 38%, €628 million Supranational organisations, (31 December 2023: 32%, €566 million) and 12%, €202 million Corporates, (31 December 2023: 11%, €197 million).

The Group closely monitors developments in the international markets so that any measures needed are promptly taken to reduce credit risk.

As at 31 December 2024, for ECL calculation purposes, debt securities for the Group and the Bank amounting to €5.661 million (31 December 2023: €4.985 million) and €3 million (31 December 2023: €nil) were classified as Stage 1 and Stage 2 respectively. The debt securities classified as Stage 2 as at 31 December 2024, were transferred from Stage 1 during the year due to deterioration in their grading.

Movement of Accumulated Expected Credit Losses:

	The Group and the Bank	
	2024	2023
	€'000	€'000
Balance 1 January	**2.009**	1.412
Movement for the year (refer to Note 14)	**(672)**	597
Closing Balance	**1.337**	2.009

The Group's investment portfolio mainly consists of investments in debt securities. The following tables analyse the Group's debt securities' portfolio per type and Moody's credit ratings equivalents:

Credit Rating Band (in €million)	**2024**				2023			
	Total	**Amortised cost**	**FVOCI**	**FVTPL**	Total	Amortised cost	FVOCI	FVTPL
Aaa to Aa3	**4.336**	**4.323**	**-**	**13**	3.884	3.884	-	-
A1 to A3	**1.001**	**966**	**35**	**-**	219	219	-	-
Baa1 to Baa3	**95**	**95**	**-**	**-**	601	541	59	1
Ba1 to Ba3	**177**	**177**	**-**	**-**	168	168	-	-
<B1	**4**	**4**	**-**	**-**	13	13	-	-
Unrated	**63**	**63**	**-**	**-**	100	100	-	-
	5.676	**5.628**	**35**	**13**	4.985	4.925	59	1

Issuer Type (in €million)	**2024**				2023			
	Total	**Amortised cost**	**FVOCI**	**FVTPL**	Total	Amortised cost	FVOCI	FVTPL
Governments	**1.310**	**1.266**	**35**	**9**	881	821	59	1
Supranationals	**632**	**628**	**-**	**4**	566	566	-	-
Banks	**501**	**501**	**-**	**-**	746	746	-	-
Covered Bonds	**2.196**	**2.196**	**-**	**-**	1.577	1.577	-	-
Securitisations	**835**	**835**	**-**	**-**	1.018	1.018	-	-
Corporates	**202**	**202**	**-**	**-**	197	197	-	-
	5.676	**5.628**	**35**	**13**	4.985	4.925	59	1

Project Starlight

At completion, the Bank received cash consideration adjusted for the loan repayments received on the Portfolio since the reference date of 31 December 2020 and participated with a 66,7% position in the Senior debt and 5% in the Mezzanine and the Junior debt issued to finance the transaction.

24. EQUITY SECURITIES AND COLLECTIVE INVESTMENT UNITS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Equity securities and collective investment units at fair value through profit and loss				
Listed securities	**50.366**	41.762	**-**	-
Non listed securities	**29.747**	21.916	**29.747**	21.916
Collective investment units	**50.609**	54.380	**-**	-
	130.722	118.058	**29.747**	21.916
Equity securities classified at fair value through other comprehensive income				
Listed securities	**1.405**	1.396	**1.405**	1.396
Non listed securities	**13.549**	13.004	**13.549**	13.004
	14.954	14.400	**14.954**	14.400
	145.676	132.458	**44.701**	36.316

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Concentration by sector:				
Equity securities and collective investment units at fair value through profit and loss				
Other financial service activities, except insurance funds	**41.509**	38.821	**22.316**	15.785
Insurance	**7.431**	6.131	**7.431**	6.131
Energy	**1.074**	1.376	**-**	-
Governments	**22.224**	17.678	**-**	-
Consumer	**6.635**	7.994	**-**	-
Treasury	**13.299**	9.053	**-**	-
Materials	**1.341**	1.830	**-**	-
Real estate	**1.829**	1.796	**-**	-
Industrials	**5.298**	3.971	**-**	-
Health care	**2.774**	2.549	**-**	-
Utilities	**1.777**	1.934	**-**	-
Information technology	**4.636**	3.552	**-**	-
Communication services	**2.005**	1.998	**-**	-
Other	**18.890**	19.375	**-**	-
	130.722	118.058	**29.747**	21.916
Equity securities classified at fair value through other comprehensive income				
Other financial service activities, except insurance funds	**13.549**	13.004	**13.549**	13.004
Manufacture of bakery and farinaceous products	**1.118**	1.129	**1.118**	1.129
Manufacture of cement, lime and plaster	**6**	6	**6**	6
Hotels and similar accommodation	**277**	256	**277**	256
Other specialised wholesale	**4**	5	**4**	5
	14.954	14.400	**14.954**	14.400
	145.676	132.458	**44.701**	36.316

Equity securities classified at fair value through profit and loss
Group's listed equity securities at fair value through profit and loss relate to assets held to cover liabilities of unit linked funds, held by the Group's Life insurance subsidiary.

24. EQUITY SECURITIES AND COLLECTIVE INVESTMENT UNITS (continued)

Non listed equity securities at fair value through profit and loss include the Group's and the Bank's participation in Visa Inc. through the holding of Series C and Series A Convertible Preferred Stock into Class A Common Stock which as at 31 December 2024 amounted to €22,3 million (31 December 2023: €15,8 million) and the Group's and the Bank's 18,6% (31 December 2023: 18,6%) participation in Universal Life Insurance Public Company Limited which as at 31 December 2024 amounted to €7,4 million (31 December 2023: €6,1 million).

The Group's investments in collective investments units represent shares/units in exchange traded funds (ETFs), Money Market Funds (MMFs) and Mutual Funds (MFs).

Equity securities classified at fair value through other comprehensive income
The Group irrevocably made the election to classify its non-trading equity investments as equity investments at FVOCI. As at 31 December 2024 unlisted equity securities classified at fair value through other comprehensive income include the Bank's investment in JCC Payment Systems Ltd of €13.138 thousand (31 December 2023: €12.592 thousand).

Listed equity securities classified at fair value through other comprehensive income include the Bank's investment in securities listed in the Cyprus Stock Exchange, that are measured by reference to their quoted price as at 31 December 2024 and as at 31 December 2023 respectively.

25. INVESTMENTS IN SUBSIDIARY COMPANIES

Investments in subsidiary companies represent the cost of acquisition of shares or the cost of incorporation/investment net of any impairment of the investment, where applicable, in the following subsidiary companies:

	Line of Business	Country of operation and registration	Ownership %	Number of shares	The Bank **2024 €'000**	The Bank 2023 €'000
Hellenic Bank (Investments) Ltd	Inactive	Cyprus	100	3.750.000	**4.127**	4.127
Hellenic Bank Trust and Finance Corporation Ltd	Financing Services	Cyprus	100	50.000*	**-**	94
Pancyprian Insurance Ltd	General Insurance	Cyprus	99,96	15.700.000	**32.423**	32.423
Hellenic Life Insurance Company Ltd	Life Insurance	Cyprus	100	1.000.000	**7.179**	7.179
Hellenic Bank Insurance Holding Ltd	Insurance services	Cyprus	100	1.000	**1**	1
HB Data Analytics Ltd	Auxiliary services	Cyprus	100	110	**15**	15
Hellenic Insurance Agency Ltd	Insurance Intermediation	Cyprus	100	50.000	**86**	86
Ezmero Holdings Ltd	SPV	Cyprus	100	210/190*	**9.681**	10.312
Anolia Industrial Ltd	SPV	Cyprus	100	230/210*	**3.355**	3.671
Drypto Holdings Ltd	SPV	Cyprus	100	220/200*	**12.359**	13.000
Arzetio Holdings Ltd	SPV	Cyprus	100	160/150*	**3.755**	3.965
Ezelco Holdings Ltd	SPV	Cyprus	100	140*	**-**	3.958
Katlero Holdings Ltd	SPV	Cyprus	100	170/150*	**10.352**	10.905
Prunelox Holdings Ltd	SPV	Cyprus	100	120*	**-**	25
Shanlo Holdings Ltd	SPV	Cyprus	100	120*	**-**	25
Torki Holdings Ltd	SPV	Cyprus	100	120*	**-**	25
					83.333	89.811

*as at 31 December 2023

The Bank's movement of the carrying amount of the investment in subsidiaries:

	The Bank **2024 €'000**	The Bank 2023 €'000
1 January	**89.811**	98.881
Impairment losses on the cost of investment in SPV subsidiaries (refer to Note 14)	**(2.856)**	(3.087)
Reorganisation and dissolution of subsidiaries	**(4.127)**	(6.207)
Increase of investment in subsidiaries	**505**	224
31 December	**83.333**	89.811

Investment banking, asset management and brokerage
On 28 November 2016 the Board of Directors of Hellenic Bank (Investments) Ltd decided to discontinue all of its business activities, which primarily related to retail brokerage services. As at 31 December 2024 the company remains inactive.

25. INVESTMENTS IN SUBSIDIARY COMPANIES (continued)

On 30 June 2021 the Board of Directors of Hellenic Bank Trust and Finance Corporation Ltd decided the liquidation of the company. The liquidation process was completed within 2024 and the company was dissolved.

SPVs
The Bank, as part of its non-performing exposures management, is entering into a number of debt-to-asset swap transactions. Assets acquired in satisfaction of debt are acquired either directly or indirectly through wholly owned Special Purpose Vehicles (SPVs).

During 2024, Prunelox Holding Ltd, Shanlo Holdings Ltd, Torki Holdings Ltd and Ezelco Holdings Ltd were absorbed by the Bank. In addition, during 2024 there was an increase in the investment in some of the SPVs via the issue of new shares.

During 2023, Krolo Holdings Ltd and Malpax Holdings Ltd were disposed for a net consideration of €6.332 thousand, all settled in cash. In addition, during 2023 there was an increase in the investment in some of the SPVs via the issue of new shares.

The cost of investment of the SPVs was assessed at year end for impairment based on the fair valuation of the property held by each entity and an impairment loss on the cost of investment of the SPVs of €2.856 thousand was recognised in the income statement for the year (31 December 2023: €3.087 thousand).

Where necessary, the Bank provides financial support to all its subsidiaries either through the issuance of additional share capital or the financial support letters.

There are no restrictions on the Bank’s ability to access or use assets and settle liabilities of the Group.

Agreement with CNP Assurances on CNP Cyprus Insurance Holdings
On 24 April 2024, the Bank entered into exclusive negotiations and a put option with CNP Assurances for the acquisition of 100% of the shares in CNP Cyprus Insurance Holdings Limited (the “Transaction”), which operates in Cyprus and Greece and consists of amongst others: CNP Cyprialife Ltd, CNP Asfalistiki Ltd, CNP Zois SA and CNP Cyprus Properties Ltd. Under the put option, CNP Assurances had the option to sell and the Bank was irrevocably committed to acquire CNP Cyprus Insurance Holdings if such option was exercised. On 9 July 2024, following the completion of the consultation of CNP Assurances with its European Works Council, the Bank and CNP Assurances signed the relevant Sales and Purchase Agreement. The Bank is in the process of obtaining the relevant regulatory approvals to complete the Transaction.

25. INVESTMENTS IN SUBSIDIARY COMPANIES (continued)

The following analysis refers to intercompany balances between the Bank and its subsidiary companies:

	Fees and Commission paid	Net income from insurance operations	Other income	Total expenses	Other assets	Other liabilities	Deposits	Dividend paid
	2024	2024	2024	2024	2024	2024	2024	2024
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Hellenic Bank (Investments) Ltd	-	-	-	-	-	-	4.030	-
Pancyprian Insurance Ltd	1.632	11	241	335	492	142	3.057	-
Hellenic Life Insurance Company Ltd	3.582	-	235	-	313	-	6.123	7.700
Hellenic Insurance Agency Ltd	-	-	-	-	4	-	188	-
Hellenic Bank Insurance Holding Ltd	-	-	-	-	1.016	-	-	-
HB Data Analytics Ltd	-	-	25	-	4	-	3	-
Ezmero Holdings Ltd	-	-	-	-	-	-	96	-
Anolia Industrial Ltd	-	-	-	-	-	-	38	-
Drypto Holdings Ltd	-	-	-	-	-	-	120	-
Arzetio Holdings Ltd	-	-	-	-	-	-	28	-
Katlero Holdings Ltd	-	-	-	-	-	-	85	-
	5.214	**11**	**501**	**335**	**1.829**	**142**	**13.768**	**7.700**

25. INVESTMENTS IN SUBSIDIARY COMPANIES (continued)

	Interest paid	Fees and Commission paid	Net income from insurance operations	Other income	Total expenses	Other assets*	Other liabilities*	Deposits	Dividend paid
	2023	2023	2023	2023	2023	2023	2023	2023	2023
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Hellenic Bank (Investments) Ltd	-	-	-	-	-	-	-	4.104	-
Hellenic Bank Trust and Finance Corporation Ltd	-	-	-	-	-	-	-	809	-
Pancyprian Insurance Ltd	3	1.630	16	392	-	671	-	1.918	3.296
Hellenic Life Insurance Company Ltd	-	3.498	-	93	-	210	403	1.282	7.600
Hellenic Insurance Agency Ltd	-	-	-	-	-	-	-	188	-
Hellenic Bank Insurance Holding Ltd	-	-	-	-	-	653	-	-	-
APS Debt Servicing Cyprus Ltd*	-	-	-	(326)	2.395	-	-	-	4.500
HB Data Analytics Ltd	-	-	-	25	-	2	-	10	-
Ezmero Holdings Ltd	-	-	-	652	-	-	-	48	-
Krolo Holdings Ltd	-	-	-	(103)	-	-	-	-	-
Anolia Industrial Ltd	-	-	-	-	-	-	-	17	-
Drypto Holdings Ltd	-	-	-	-	-	-	-	78	-
Arzetio Holdings Ltd	-	-	-	-	-	-	-	28	-
Malpax Holdings Ltd	-	-	-	(78)	-	-	-	-	-
Ezelco Holdings Ltd	-	-	-	85	-	-	-	4.342	-
Katlero Holdings Ltd	-	-	-	-	-	-	-	71	-
Prunelox Holdings Ltd	-	-	-	-	-	-	-	10	-
Shanlo Holdings Ltd	-	-	-	-	-	-	-	9	-
Torki Holdings Ltd	-	-	-	-	-	-	-	9	-
	3	**5.128**	**16**	**740**	**2.395**	**1.536**	**403**	**12.923**	**15.396**

*APS Debt Servicing Cyprus Ltd was the Bank's subsidiary for the period from 1 January 2023 until the 30 March 2023 when it was disposed as part of project Starlight

26. PROPERTY, PLANT AND EQUIPMENT

The Group	Land and buildings 2024 €'000	Right of use asset 2024 €'000	Plant and equipment 2024 €'000	**Total 2024 €'000**
Net book value 1 January 2024	144.904	7.050	18.102	**170.056**
Additions	1.022	156	12.858	**14.036**
Contract modifications	-	838	-	**838**
Disposals/transfers	(489)	-	(4.824)	**(5.313)**
Depreciation for the year attributable	(94)	(19)	(117)	**(230)**
Transfer from investment properties (refer to Note 30)	4.243	-	-	**4.243**
Depreciation for the year	(1.634)	(1.726)	(7.162)	**(10.522)**
Net book value 31 December 2024	147.952	6.299	18.857	**173.108**
1 January 2024				
Cost or valuation	145.179	14.443	104.149	**263.771**
Accumulated depreciation	(275)	(7.393)	(86.047)	**(93.715)**
Net book value	144.904	7.050	18.102	**170.056**
31 December 2024				
Cost or valuation	149.953	14.922	109.138	**274.013**
Accumulated depreciation	(2.001)	(8.623)	(90.281)	**(100.905)**
Net book value	147.952	6.299	18.857	**173.108**

The Group	Land and buildings 2023 €'000	Right of use asset 2023 €'000	Plant and equipment 2023 €'000	**Total 2023 €'000**
Net book value 1 January 2023	138.425	7.393	21.359	**167.177**
Additions	3.175	887	8.804	**12.866**
Impairment (refer to Note 14)	(1.070)	-	-	**(1.070)**
Contract modification	-	713	-	**713**
Disposals/transfers	(47)	-	(4.218)	**(4.265)**
Depreciation for the year attributable	(110)	(21)	(122)	**(253)**
Revaluation	9.843	-	-	**9.843**
Transfer to investment properties (refer to Note 30)	(3.665)	-	-	**(3.665)**
Depreciation for the year	(1.647)	(1.922)	(7.721)	**(11.290)**
Net book value 31 December 2023	144.904	7.050	18.102	**170.056**
1 January 2023				
Cost or valuation	142.377	14.240	99.746	**256.363**
Accumulated depreciation	(3.952)	(6.847)	(78.387)	**(89.186)**
Net book value	138.425	7.393	21.359	**167.177**
31 December 2023				
Cost or valuation	145.179	14.443	104.149	**263.771**
Accumulated depreciation	(275)	(7.393)	(86.047)	**(93.715)**
Net book value	144.904	7.050	18.102	**170.056**

26. PROPERTY, PLANT AND EQUIPMENT (continued)

The Bank	Land and buildings 2024 €'000	Right of use asset 2024 €'000	Plant and equipment 2024 €'000	**Total 2024 €'000**
Net book value 1 January 2024	137.091	7.005	17.654	**161.750**
Additions	1.022	156	12.837	**14.015**
Contract modifications	-	840	-	**840**
Disposals/transfers	(452)	-	(4.805)	**(5.257)**
Transfers from investment property (refer to Note 30)	4.243	-	-	**4.243**
Depreciation for the year	(1.610)	(1.720)	(7.119)	**(10.449)**
Net book value 31 December 2024	140.294	6.281	18.567	**165.142**
1 January 2024				
Cost or valuation	137.225	14.284	100.945	**252.454**
Accumulated depreciation	(134)	(7.279)	(83.291)	**(90.704)**
Net book value	137.091	7.005	17.654	**161.750**
31 December 2024				
Cost or valuation	142.035	14.763	105.958	**262.756**
Accumulated depreciation	(1.741)	(8.482)	(87.391)	**(97.614)**
Net book value	140.294	6.281	18.567	**165.142**

The Bank	Land and buildings 2023 €'000	Right of use asset 2023 €'000	Plant and equipment 2023 €'000	**Total 2023 €'000**
Net book value at 1 January 2023	126.573	7.322	20.841	**154.736**
Additions	3.165	887	8.717	**12.769**
Contract modifications	-	714	-	**714**
Disposals/transfers	(62)	-	(4.230)	**(4.292)**
Revaluation	8.441	-	-	**8.441**
Impairment (refer to Note 14)	(699)	-	-	**(699)**
Transfers from investment property	1.313	-	-	**1.313**
Depreciation for the year	(1.640)	(1.918)	(7.674)	**(11.232)**
Net book value at 31 December 2023	137.091	7.005	17.654	**161.750**
1 January 2023				
Cost or valuation	130.067	14.080	96.634	**240.781**
Accumulated depreciation	(3.494)	(6.758)	(75.793)	**(86.045)**
Net book value	126.573	7.322	20.841	**154.736**
31 December 2023				
Cost or valuation	137.225	14.284	100.945	**252.454**
Accumulated depreciation	(134)	(7.279)	(83.291)	**(90.704)**
Net book value	137.091	7.005	17.654	**161.750**

Land and buildings
Land and buildings were revalued at 31 December 2023, by independent qualified valuers on a market value basis for their existing use. The impact of the property revaluation as at 31 December 2023 amounted to impairment losses in the profit and loss of €1.070 thousand (Bank: €699 thousand) and a net surplus in the revaluation reserve of €9.843 thousand (Bank: €8.441 thousand).

26. PROPERTY, PLANT AND EQUIPMENT (continued)

As at 31 December 2024 the value of the revalued freehold land, not subject to depreciation, amounted to €60.274 thousand (31 December 2023: €58.014 thousand) for the Group and €59.248 thousand (31 December 2023: €56.989 thousand) for the Bank.

The fair value of land and buildings is categorised as Level 3 of the fair value hierarchy.

The cost and net book value on a historic cost basis of the freehold land and buildings as at 31 December 2024 amounted to €130.078 thousand (31 December 2023: €129.992 thousand) and €112.114 thousand (31 December 2023: €113.412 thousand) respectively for the Group, and to €125.688 thousand (31 December 2023: €125.602 thousand) and €108.572 thousand (31 December 2023: €109.861 thousand) respectively for the Bank.

Plant and equipment
As at 31 December 2024, the renovation cost for branches, which is included under plant and equipment, amounted to €741 thousand for the Group and the Bank (31 December 2023: €378 thousand).

27. STOCK OF PROPERTY

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
1 January	**100.351**	130.535	**57.671**	75.796
Additions	**3.426**	2.212	**3.427**	2.212
Disposals	**(19.703)**	(24.263)	**(19.703)**	(14.660)
Impairment losses (refer to Note 14)	**(7.845)**	(8.133)	**(5.304)**	(5.677)
Closing balance	**76.229**	100.351	**36.091**	57.671

Stock of property includes houses, flats, offices and other commercial properties, industrial buildings and land (fields and plots). These properties were either acquired in satisfaction of debt or were previously used by the Group, which now intends to sell.

The Bank, as part of its non performing exposures management, is entering into a number of debt to asset swap transactions or repossess assets through the foreclosure process. Repossessed assets are acquired either directly or indirectly through wholly owned Special Purpose Vehicles (SPVs) which are formed with the purpose of holding and managing these immovable properties. Until title deeds are issued in the name of the Bank/SPVs, the ownership is ensured via filing of the acquisition agreement in the Land Registry. As at 31 December 2024, stock of property owned by the Bank indirectly through SPVs amounted to €39.225 thousand (31 December 2023: €41.766 thousand).

As at 31 December 2024, the Group's stock of property comprised stock of property acquired in satisfaction of debt amounting to €74.676 thousand (31 December 2023: €98.545 thousand) and owner occupied properties which are no longer in use and the Group intends to sell amounting to €1.553 thousand (31 December 2023: €1.806 thousand).

As at 31 December 2024, the Bank's stock of property comprised stock of property acquired in satisfaction of debt amounting to €35.451 thousand (31 December 2023: €56.778 thousand) and owner occupied properties which are no longer in use and the Bank intends to sell amounting to €640 thousand (31 December 2023: €893 thousand).

27. STOCK OF PROPERTY (continued)

The table below shows the result on the disposal of stock of property in the year, excluding stock of property held for sale and stock of property held by subsidiaries disposed of:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Net proceeds	**26.053**	23.211	**26.053**	18.219
Carrying value of stock of property disposed of	**(19.703)**	(18.935)	**(19.703)**	(14.660)
Net gains on disposal of stock of property	**6.350**	4.276	**6.350**	3.559

28. INTANGIBLE ASSETS

The Group	Computer software 2024 €'000	Goodwill 2024 €'000	Core deposits 2024 €'000	Customer relationships (Purchased credit cards and overdrafts) 2024 €'000	**Total 2024 €'000**
Net book value 1 January 2024	30.013	14.120	846	504	**45.483**
Additions	16.253	-	-	-	**16.253**
Amortisation for the year attributable	(738)	-	-	-	**(738)**
Amortisation for the year	(9.505)	-	(181)	(155)	**(9.841)**
Net book value 31 December 2024	36.023	14.120	665	349	**51.157**
1 January 2024					
Cost	87.637	25.263	2.801	7.731	**123.432**
Accumulated amortisation and impairment	(57.624)	(11.143)	(1.955)	(7.227)	**(77.949)**
Net book value	30.013	14.120	846	504	**45.483**
31 December 2024					
Cost	90.151	25.263	2.802	7.731	**125.947**
Accumulated amortisation and impairment	(54.128)	(11.143)	(2.137)	(7.382)	**(74.790)**
Net book value	36.023	14.120	665	349	**51.157**

28. INTANGIBLE ASSETS (continued)

The Group

	Computer software 2023 €'000	Goodwill 2023 €'000	Core deposits 2023 €'000	Customer relationships (Purchased credit cards and overdrafts) 2023 €'000	**Total 2023 €'000**
Net book value 1 January 2023	26.918	14.120	1.027	1.587	**43.652**
Additions	13.534	-	-	-	**13.534**
Amortisation for the year attributable	(667)	-	-	-	**(667)**
Amortisation for the year	(9.772)	-	(181)	(1.083)	**(11.036)**
Net book value 31 December 2023	30.013	14.120	846	504	**45.483**
1 January 2023					
Cost	79.597	25.263	2.801	7.731	**115.392**
Accumulated amortisation and impairment	(52.679)	(11.143)	(1.774)	(6.144)	**(71.740)**
Net book value	26.918	14.120	1.027	1.587	**43.652**
31 December 2023					
Cost	87.637	25.263	2.801	7.731	**123.432**
Accumulated amortisation and impairment	(57.624)	(11.143)	(1.955)	(7.227)	**(77.949)**
Net book value	30.013	14.120	846	504	**45.483**

On 31 December 2024, the Group assessed whether there is any impairment of goodwill arising on the acquisition of Pancyprian Insurance Ltd.

Goodwill includes the excess of the cost of the acquisition over the Group's interest in the net fair value of the identifiable assets, liabilities and contingent liabilities of the acquired entities at the date of acquisition of Pancyprian Insurance Ltd (PIL).

28. INTANGIBLE ASSETS (continued)

The Bank

	Computer software 2024 €'000	Core deposits 2024 €'000	Customer relationships (Purchased credit cards and overdrafts) 2024 €'000	**Total 2024 €'000**
Net book value 1 January 2024	27.667	846	504	**29.017**
Additions	15.969	-	-	**15.969**
Amortisation for the year	(9.462)	(181)	(155)	**(9.798)**
Net book value 31 December 2024	34.174	665	349	**35.188**
1 January 2024				
Cost	83.419	2.801	7.731	**93.951**
Accumulated amortisation and impairment	(55.752)	(1.955)	(7.227)	**(64.934)**
Net book value	27.667	846	504	**29.017**
31 December 2024				
Cost	85.649	2.801	7.731	**96.181**
Accumulated amortisation and impairment	(51.475)	(2.136)	(7.382)	**(60.993)**
Net book value	34.174	665	349	**35.188**

The Bank

	Computer software 2023 €'000	Core deposits 2023 €'000	Customer relationships (Purchased credit cards and overdrafts) 2023 €'000	**Total 2023 €'000**
Net book value 1 January 2023	24.372	1.027	1.587	**26.986**
Additions	13.032	-	-	**13.032**
Amortisation for the year	(9.737)	(181)	(1.083)	**(11.001)**
Net book value 31 December 2023	27.667	846	504	**29.017**
1 January 2023				
Cost	75.876	2.801	7.731	**86.408**
Accumulated amortisation and impairment	(51.504)	(1.774)	(6.144)	**(59.422)**
Net book value	24.372	1.027	1.587	**26.986**
31 December 2023				
Cost	83.419	2.801	7.731	**93.951**
Accumulated amortisation and impairment	(55.752)	(1.955)	(7.227)	**(64.934)**
Net book value	27.667	846	504	**29.017**

Core deposits

For the year ended 31 December 2024 and 31 December 2023, the Bank assessed that there was no indication for impairment on core deposits intangible asset. As at 31 December 2024 the core deposits intangible assets' remaining expected life is 4 years.

28. INTANGIBLE ASSETS (continued)

Customer relationships (Purchased credit cards and overdrafts)
For the year ended 31 December 2024 and 31 December 2023, the Bank assessed that there was no indication for impairment on customer relationships intangible asset. As at 31 December 2024 the customer relationships intangible assets' remaining expected life is 2,5 years.

29. ASSETS AND DISPOSAL GROUP CLASSIFIED AS HELD FOR SALE

During 2023, an NPE portfolio with gross carrying amount of €4,2 million was classified as assets held for sale. On 17 January 2024 a Sales & Purchases agreement was signed between the two parties, with an agreed 10% deposit paid by the buyer and the transaction was completed in the second quarter of 2024.

Loans and advances to customers held for sale were measured at amortised cost and were stated net of impairment provisions in the statement of financial position.

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Assets held for sale				
Gross loans	**-**	4.218	**-**	4.218
Accumulated impairment losses	**-**	(922)	**-**	(922)
Loans and advances to customers (refer to Note 47)	**-**	3.296	**-**	3.296

The movement analysis of loans and advances to customers classified as held for sale is presented as follows:

	Gross loans	Accumulated impairment losses	**Total**
	€'000	€'000	**€'000**
1 January 2024	4.218	(922)	**3.296**
Disposal during the year	(4.218)	922	**(3.296)**
31 December 2024	-	-	**-**

	Gross loans	Accumulated impairment losses	**Total**
	€'000	€'000	**€'000**
1 January 2023	740.289	(548.627)	**191.662**
Classified as held for sale during the year	(740.289)	548.627	**(191.662)**
Transfer from loans and advances to customers (refer to Note 22)	4.218	(922)	**3.296**
31 December 2023	4.218	(922)	**3.296**

Loans and advances to customers held for sale as per industry are analysed by sector below:

	The Group and the Bank	
	2024	2023
	€'000	€'000
Tourism	**-**	4.218
	-	4.218
Accumulated impairment losses	**-**	(922)
	-	3.296

29. ASSETS AND DISPOSAL GROUP CLASSIFIED AS HELD FOR SALE (continued)

The value of collaterals of loans and advances to customers held for sale is analysed as below:

	2024	2023
	€'000	€'000
Commercial property	**-**	11.973
Land	**-**	303
Total property collaterals	**-**	12.276
	-	12.276

Movement on the value of stock of property held for sale:

	The Group		The Group and the Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
1 January	**-**	14.950	**-**	14.950
Additions	**-**	302	**-**	302
Disposals	**-**	(15.252)	**-**	(15.252)
Total	**-**	-	**-**	-

The table below shows the result on the disposal of stock of property held for sale disposed of:

	The Group and the Bank	
	2024	2023
	€'000	€'000
Net proceeds	**-**	15.147
Carrying value of stock of property disposed of	**-**	(15.252)
Net (losses)/gains on disposal of stock of property held for sale	**-**	(105)

30. OTHER ASSETS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Derivative assets (refer to Note 37)	**21.605**	16	**21.605**	16
Prepaid expenses	**9.209**	10.484	**9.090**	10.536
Indemnification assets	**3.200**	-	**3.200**	-
Investment properties	**5.420**	10.123	**6.303**	11.103
Debtors and other receivables	**39.357**	47.617	**40.453**	47.574
	78.791	68.240	**80.651**	69.229

30. OTHER ASSETS (continued)

Indemnification Asset/(Liability)
Indemnification liabilities were recognised as a result of the ex-CCB acquisition. The movement of the carrying amount of the indemnification assets/liabilities is analysed below:

	The Group and the Bank	
	2024	2023
	€'000	€'000
1 January	**(1.634)**	10.936
Claims reclassified to Debtors and other receivables	**(2.675)**	(7.353)
Indemnification asset written off	**(371)**	-
Fees paid	**1.000**	1.000
Unwinding of discount	**(21)**	43
Cash flows re-estimation (refer to Note 14)	**6.903**	(6.259)
	3.202	(1.633)
Accumulated Expected Credit Losses	**(2)**	(1)
31 December	**3.200**	(1.634)
Estimated undiscounted amount	**3.740**	3.414

a) Indemnification asset – APS
Assets covered under the scheme
The APS Agreement signed between the Bank and ex-CCB on 3 September 2018 concerned €2.300 million of the acquired loan portfolio (fair value) and offers protection against future losses. Under the APS Agreement there are, two pools (APS Assets):

1. APS Pool 1 (APS1): Assets having at the inception of the APS Agreement a fair value of €1.385 million, covered for a 12-year period from the Completion Date with an option to extend by a fixed 2 year period; and

2. APS Pool 2 (APS2): Assets having at the inception of the APS Agreement a fair value of €915 million, covered for a 10-year from the Completion Date with an option to extend by a fixed 2-year period.

The gross value of APS Assets in APS2 pool after the date falling five years after the Completion Date should not exceed 500 million. Currently, the gross value is within the prescribed ceiling.

Furthermore, in accordance with the terms of the APS agreement, the Bank must pay a guarantee fee of €1 million (8 payments in total) until the eleventh anniversary of Completion. As the value of the APS indemnification asset reflects the net present value of the estimated future cash flows arising from claims to be made by the Bank in the event of APS losses and the fees payable to the RoC (''KEDIPES''), both discounted at the original effective interest rate , on 31 December 2023, the fees payable were higher than the net present value of the estimated future cash flows arising from claims which turned the APS Indemnification asset into a liability of €1.634 thousand.

As of 31 December 2024, and in accordance with the terms of the APS agreement, the Bank has submitted a number of claims, including clawbacks, covering the period up to 30 September 2024 in relation to APS Net Losses, the cumulative net amount of which is €102,8 million and has been deducted from the indemnification asset. As at 31 December 2024, the amount payable to KEDIPES amounted to €0,9 million (31 December 2023: €8,2 million receivable).

The estimated undiscounted amount of the APS indemnification asset as at 31 December 2024 amounted to €3.740 thousand (31 December 2023: €3.007 thousand).

30. OTHER ASSETS (continued)

b) Indemnification asset – certain off-balance items acquired

As at 31 December 2024, the indemnification asset relating to the off-balance sheet exposures amounting to €371 thousand and according to the provisions of the APS Agreement had expired and thus it was written off in the Income Statement (31 December 2023: €383 thousand). The estimated undiscounted amount of the indemnified off balance sheet assets as at 31 December 2023 amounted to €407 thousand.

Investment properties
Investment properties comprise of properties which are no longer occupied by the Bank and are held for rental yields. In 2019, pursuant to the BTA (Business Transfer Agreement) entered into between the Bank, ex-CCB and the RoC, the Bank acquired some properties from ex-CCB where, by virtue of the law, it became lessor for parts of these properties and hence also form part of investment properties.

Movement on the value of investment properties:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
1 January	**10.123**	5.527	**11.103**	11.728
Transfer (to)/from property, plant and equipment (refer to Note 26)	**(4.243)**	3.665	**(4.243)**	(1.313)
Net (losses)/gains from revaluation of investment properties (refer to Note 11)	**(460)**	931	**(557)**	688
Closing balance	**5.420**	10.123	**6.303**	11.103

The transfer from property, plant and equipment during the year ended 31 December 2023 relates to properties leased out to a company no longer within the consolidated Group. During 2024 that company vacated the property and it was transferred back to property, plant and equipment for own use. During the year ended 31 December 2024, an amount of €441 thousand was recognised as rental income in the income statement in "Other income" (31 December 2023: €567 thousand).

31. REINSURANCE CONTRACT ASSETS / INSURANCE CONTRACT LIABILITIES

The Group utilises all three measurement models under IFRS 17 Insurance Contracts for the measurement of its Insurance Contract Liabilities and Reinsurance Contract Assets, depending on the characteristics of each relevant group of contracts.

The tables below present the Group's Insurance Contact Liabilities and Reinsurance Contract Assets disaggregated between each measurement model, i.e. the premium allocation approach ("PAA"), the general measurement model ("GMM") and the variable fee approach ("VFA"), for each line of business (Life business and Non-Life business). These are also further disaggregated between the liability for remaining coverage ("LRC"), the liability for incurred claims ("LIC").

	2024			
	Life		Non-Life	
	Insurance contract liablities €'000	Reinsurance contract assets €'000	Insurance contract liablities €'000	Reinsurance contract assets €'000
GMM	(1.032)	11.976	639	13.241
VFA	61.347	-	-	-
PAA	8.674	124	36.686	3.148
	68.989	**12.100**	**37.325**	**16.389**

	2023			
	Life		Non-Life	
	Insurance contract liablities €'000	Reinsurance contract assets €'000	Insurance contract liablities €'000	Reinsurance contract assets €'000
GMM	(1.427)	11.608	542	5.394
VFA	48.489	-	-	-
PAA	9.294	(154)	30.632	6.666
	56.356	**11.454**	**31.174**	**12.060**

31. REINSURANCE CONTRACT ASSETS / INSURANCE CONTRACT LIABILITIES (continued)

	2024			
	Life		Non-Life	
	Liabilities for remaining coverage €'000	Liabilities for incurred claims €'000	Liabilities for remaining coverage €'000	Liabilities for incurred claims €'000
Insurance contract liabilities as at 1 January	**44.550**	**11.806**	**5.510**	**25.664**
Insurance revenue	(20.842)	-	(43.848)	-
Insurance service expense	2.545	9.481	6.482	26.381
Insurance service result	**(18.297)**	**9.481**	**(37.366)**	**26.381**
Insurance finance expenses	(4.523)	5.826	21	788
Total changes in the income statement	**(22.820)**	**15.307**	**(37.345)**	**27.169**
Premiums received	40.412	-	42.865	-
Claims and other insurance service expenses paid	(4.640)	(15.625)	(6.414)	(20.124)
Total cash flows	**35.772**	**(15.625)**	**36.451**	**(20.124)**
Insurance contract liabilities as at 31 December	**57.502**	**11.488**	**4.616**	**32.709**

	2023			
	Life		Non-Life	
	Liabilities for remaining coverage €'000	Liabilities for incurred claims €'000	Liabilities for remaining coverage €'000	Liabilities for incurred claims €'000
Insurance contract liabilities as at 1 January	**26.352**	**15.864**	**3.583**	**26.169**
Insurance revenue	(21.958)	-	(39.429)	-
Insurance service expense	2.643	9.893	6.417	18.444
Insurance service result	**(19.315)**	**9.893**	**(33.012)**	**18.444**
Insurance finance expenses	(965)	2.398	(14)	495
Total changes in the income statement	**(20.280)**	**12.291**	**(33.026)**	**18.939**
Premiums received	42.698	-	40.594	-
Claims and other insurance service expenses paid	(4.220)	(16.349)	(5.640)	(19.444)
Total cash flows	**38.478**	**(16.349)**	**34.954**	**(19.444)**
Insurance contract liabilities as at 31 December	**44.550**	**11.806**	**5.511**	**25.664**

31. REINSURANCE CONTRACT ASSETS / INSURANCE CONTRACT LIABILITIES (continued)

	2024							
	Life				Non-Life			
	Estimates of PV of future cash flows €'000	Risk adjustment €'000	Contractual service margin €'000	Total €'000	Estimates of PV of future cash flows €'000	Risk adjustment €'000	Contractual service margin €'000	Total €'000
Insurance contract liabilities as at 1 January	**34.573**	**1.360**	**11.128**	**47.061**	**197**	**41**	**308**	**546**
Contractual service margin (CSM) recognised for services provided	-	-	(2.014)	**(2.014)**	-	-	(487)	**(487)**
Risk, experience and other adjustments	381	(138)	-	**243**	29	(30)	-	**(1)**
Changes that relate to current services	**381**	**(138)**	**(2.014)**	**(1.771)**	**29**	**(30)**	**(487)**	**(488)**
Contracts initially recognised in the period	(4.105)	463	4.104	**462**	(337)	31	306	**-**
Changes in estimates reflected in the CSM	(4.284)	190	5.725	**1.631**	(88)	3	84	**(1)**
Changes in estimates that do not adjust the CSM	-	-	-	**-**	-	-	-	**-**
Changes in estimates that result in losses and reversal of losses on onerous contracts	(365)	(38)	-	**(403)**	-	-	-	**-**
Changes that relate to future services	**(8.754)**	**615**	**9.829**	**1.690**	**(425)**	**34**	**390**	**(1)**
Adjustments to liabilities for incurred claims	(1.814)	-	-	**(1.814)**	(174)	(15)	110	**(79)**
Insurance service result	**(10.187)**	**477**	**7.815**	**(1.895)**	**(570)**	**(11)**	**13**	**(568)**
Insurance finance expenses	1.088	23	120	**1.231**	20	33	17	**70**
Total changes in the income statement	**(9.099)**	**500**	**7.935**	**(664)**	**(550)**	**22**	**30**	**(498)**
Total cash flows	**13.918**	**-**	**-**	**13.918**	**592**	**-**	**-**	**592**
Insurance contract liabilities as at 31 December	**39.392**	**1.860**	**19.063**	**60.315**	**239**	**63**	**338**	**640**

31. REINSURANCE CONTRACT ASSETS / INSURANCE CONTRACT LIABILITIES (continued)

	2023							
	Life				Non-Life			
	Estimates of PV of future cash flows €'000	Risk adjustment €'000	Contractual service margin €'000	Total €'000	Estimates of PV of future cash flows €'000	Risk adjustment €'000	Contractual service margin €'000	Total €'000
Insurance contract liabilities as at 1 January	**16.682**	**1.129**	**9.800**	**27.611**	**170**	**61**	**330**	**561**
Contractual service margin (CSM) recognised for services provided	-	-	(1.382)	**(1.382)**	-	-	(224)	**(224)**
Risk, experience and other adjustments	(894)	(145)	-	**(1.039)**	(14)	(15)	-	**(29)**
Changes that relate to current services	**(894)**	**(145)**	**(1.382)**	**(2.421)**	**(14)**	**(15)**	**(224)**	**(253)**
Contracts initially recognised in the period	(3.807)	503	3.486	**182**	(167)	20	147	**-**
Changes in estimates reflected in the CSM	1.912	(177)	(235)	**1.500**	(52)	1	52	**1**
Changes in estimates that do not adjust the CSM	(19)	(14)	-	**(33)**	-	-	-	**-**
Changes that relate to future services	**(1.914)**	**312**	**3.251**	**1.649**	**(219)**	**21**	**199**	**1**
Adjustments to liabilities for incurred claims	248	-	-	**248**	75	(27)	-	**48**
Insurance service result	**(2.560)**	**167**	**1.869**	**(524)**	**(158)**	**(21)**	**(25)**	**(204)**
Insurance finance expenses	1.259	64	(32)	**1.291**	9	1	3	**13**
Total changes in the income statement	**(1.301)**	**231**	**1.837**	**767**	**(149)**	**(20)**	**(22)**	**(191)**
Total cash flows	**19.192**	**-**	**(509)**	**18.683**	**176**	**-**	**-**	**176**
Insurance contract liabilities as at 31 December	**34.573**	**1.360**	**11.128**	**47.061**	**197**	**41**	**308**	**546**

31. REINSURANCE CONTRACT ASSETS / INSURANCE CONTRACT LIABILITIES (continued)

The expected recognition of the CSM remaining at the end of reporting period in profit or loss is presented below:

2024	Less than 1 year €'000	In 1 to 2 years €'000	In 2 to 3 years €'000	In 3 to 4 years €'000	In 4 to 5 years €'000	>5years €'000	Total €'000
Insurance contracts							
Credit life	1.323	1.167	1.026	899	785	4.229	9.429
Savings	781	721	666	604	538	5.989	9.299
Other life	70	54	43	35	29	166	397
Property	254	80	4	-	-	-	338
Total CSM for insurance contracts	**2.428**	**2.022**	**1.739**	**1.538**	**1.352**	**10.384**	**19.463**
Reinsurance contracts							
Credit life	339	306	273	243	217	1.298	2.676
Accident and Sickness	(67)	(52)	(40)	(30)	(23)	(61)	(273)
Other life	(58)	(30)	(27)	(24)	(21)	(167)	(327)
Liability	(111)	-	-	-	-	-	(111)
Other	(26)	-	-	-	-	-	(26)
Property	(753)	(82)	(4)	-	-	-	(839)
Total CSM for reinsurance contracts	**(676)**	**142**	**202**	**189**	**173**	**1.070**	**1.100**

2023	Less than 1 year €'000	In 1 to 2 years €'000	In 2 to 3 years €'000	In 3 to 4 years €'000	In 4 to 5 years €'000	>5years €'000	Total €'000
Insurance contracts							
Credit life	348	288	288	261	224	1.990	3.399
Savings	41	33	25	21	17	93	230
Other life	1.100	961	837	728	629	3.277	7.532
Property	248	132	38	-	-	-	418
Total CSM for insurance contracts	**1.737**	**1.414**	**1.188**	**1.010**	**870**	**5.360**	**11.579**
Reinsurance contracts							
Credit life	277	194	182	169	154	1.008	1.984
Accident and Sickness	(32)	(28)	(25)	(22)	(19)	(95)	(221)
Other life	(27)	(24)	(20)	(18)	(15)	(92)	(196)
Liability	(112)	(6)	-	-	-	-	(118)
Other	(5)	-	-	-	-	-	(5)
Property	(1.232)	(175)	(40)	-	-	-	(1.447)
Total CSM for reinsurance contracts	**(1.131)**	**(39)**	**97**	**129**	**120**	**821**	**(3)**

32. DEPOSITS BY BANKS

	The Group and the Bank	
	2024	2023
	€'000	€'000
Interbank accounts	**26.661**	15.710
Cheque clearing	**26.481**	31.164
Money Market deposits	**138.362**	49.925
	191.504	96.799

The below analysis of deposits by banks is based on their remaining contractual maturity as at 31 December.

	The Group and the Bank	
	2024	2023
	€'000	€'000
On demand	**53.492**	47.365
Within three months	**115.758**	20.877
Between three months and one year	**22.254**	28.557
	191.504	96.799

On 31 December 2024, an amount of €21.957 thousand (31 December 2023: €nil) is pledged as collateral by banks, being common practice among financial institutions.

33. FUNDING BY CENTRAL BANKS

	The Group and the Bank	
	2024	2023
	€'000	€'000
Funding by Central Banks	**-**	2.355.508

The targeted longer-term refinancing operations (TLTRO) are Eurosystem operations that provide financing to credit institutions. In June 2021, the Bank participated in the 8th series of the TLTRO III by borrowing an amount of €2,3 billion. The borrowing was for 3 years duration with maturity date 26 June 2024.

In accordance with the terms of the programme the Bank's funding matured on 26 June 2024, leading to a full repayment of an amount of €2.400.450 thousand.

34. CUSTOMER DEPOSITS AND OTHER CUSTOMER ACCOUNTS

	The Group and the Bank	
	2024	2023
	€'000	€'000
Demand deposits	**5.025.348**	5.078.875
Savings deposits	**5.364.425**	5.449.721
Notice deposits	**839.782**	931.903
Time deposits	**4.428.530**	3.854.289
	15.658.085	15.314.788

34. CUSTOMER DEPOSITS AND OTHER CUSTOMER ACCOUNTS (continued)

The below analysis of customer deposits and other customer accounts is based on their remaining contractual maturity as at 31 December:

	The Group and the Bank	
	2024	2023
	€'000	€'000
On demand	**11.239.494**	11.460.281
Within three months	**1.921.855**	1.553.173
Between three months and one year	**2.442.970**	2.064.527
Between one year and five years	**53.598**	235.928
Over five years	**168**	879
	15.658.085	15.314.788

35. DEFERRED TAX LIABILITY

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Deferred tax asset	**(9.379)**	(10.768)	**(9.277)**	(10.768)
Deferred tax liability	**20.883**	22.097	**20.253**	21.604
	11.504	11.329	**10.976**	10.836

Deferred tax asset that arose as a result of:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Expected credit losses	**2.250**	3.678	**2.250**	3.678
Stock of property	**4.620**	4.697	**4.620**	4.697
Property revaluation	**2.358**	2.393	**2.358**	2.393
Other temporary differences	**151**	-	**49**	-
	9.379	10.768	**9.277**	10.768

35. DEFERRED TAX LIABILITY (continued)

Movement of Deferred tax asset:

2024	**The Group**				
	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Reclassification from Deferred tax liability €'000	Balance 31 December €'000
Expected credit losses	3.678	(1.428)	-	-	2.250
Stock of property	4.697	(77)	-	-	4.620
Property revaluation	2.393	-	(35)	-	2.358
Other temporary differences	-	210	-	(59)	151
	10.768	(1.295)	(35)	(59)	9.379

2023	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Balance 31 December €'000
Expected credit losses	4.343	(665)	-	3.678
Stock of property	4.684	13	-	4.697
Property revaluation	2.537	-	(144)	2.393
	11.564	(652)	(144)	10.768

2024	**The Bank**				
	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Reclassification from Deferred tax liability €'000	Balance 31 December €'000
Expected credit losses	3.678	(1.428)	-	-	2.250
Stock of property	4.697	(77)	-	-	4.620
Property revaluation	2.393	-	(35)	-	2.358
Other temporary differences	-	108	-	(59)	49
	10.768	(1.397)	(35)	(59)	9.277

2023	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Balance 31 December €'000
Expected credit losses	4.343	(665)	-	3.678
Stock of property	4.684	13	-	4.697
Property revaluation	2.537	-	(144)	2.393
	11.564	(652)	(144)	10.768

Given the legally enforceable right to offset deferred tax assets and liabilities relating to the same tax authorities, the Group recognised deferred tax asset only to the extent that this could be offset with the corresponding deferred tax liability relating to the negative goodwill on loans acquired as part of the business combination of the ex-CCB. This was due to the fact it is probable that taxable profit will be available against which a deductible temporary difference can be utilised, as there are sufficient taxable temporary differences relating to the same taxable entity, which are expected to reverse in the same period as the expected reversal of the deductible temporary difference. As at 31 December 2024, for both the Group and the Bank, there was an amount of €3,2 million (31 December 2023: €4,6 million) relating to unrecognised deferred tax asset with no expiry date.

The applicable tax rate is 12,5%.The tax losses relate to the same jurisdiction with the deferred tax asset.

35. DEFERRED TAX LIABILITY (continued)

Deferred tax liability that arose as a result of:

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Property revaluation differences and temporary difference between depreciation and capital allowances	**11.207**	11.008	**10.577**	10.515
Assets acquired in business combination	**9.676**	11.030	**9.676**	11.030
Other temporary differences	**-**	59	**-**	59
	20.883	22.097	**20.253**	21.604

Movement of Deferred tax liability:

2024 — The Group

	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Reclassification to deferred tax asset €'000	Balance 31 December €'000
Property revaluation differences and temporary difference between depreciation and capital allowances	11.008	76	123	-	11.207
Assets acquired in business combination	11.030	(1.354)	-	-	9.676
Other temporary differences	59	-	-	(59)	-
	22.097	(1.278)	123	(59)	20.883

2023

	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Balance 31 December €'000
Property revaluation differences and temporary difference between depreciation and capital allowances	7.771	2.286	951	11.008
Assets acquired in business combination	12.995	(1.965)	-	11.030
Other temporary differences - IFRS 17 impact on initial application	1.317	(1.317)	-	-
Other temporary differences	52	7	-	59
	22.135	(989)	951	22.097

35. DEFERRED TAX LIABILITY (continued)

2024	The Bank				
	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Reclassification to deferred tax asset €'000	Balance 31 December €'000
Property revaluation differences and temporary difference between depreciation and capital allowances	10.515	(61)	123	-	10.577
Assets acquired in business combination	11.030	(1.354)	-	-	9.676
Other temporary differences	59	-	-	(59)	-
	21.604	(1.415)	123	(59)	20.253

2023	Balance 1 January €'000	Effect on income statement €'000	Effect on revaluation reserve €'000	Balance 31 December €'000
Property revaluation differences and temporary difference between depreciation and capital allowances	7.369	2.281	865	10.515
Assets acquired in business combination	12.995	(1.965)	-	11.030
Other temporary differences	52	7	-	59
	20.416	323	865	21.604

36. OTHER LIABILITIES

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Derivative liabilities (refer to Note 37)	**205**	3.327	**205**	3.327
Accrued expenses	**45.646**	45.864	**44.029**	44.113
Financial guarantees and loan commitments	**13.057**	15.084	**13.057**	15.084
Provisions for pending litigations or complaints and/or claims	**3.549**	5.239	**3.549**	5.239
Lease liability	**6.876**	7.522	**6.859**	7.478
Other accounts payable and other provisions	**103.600**	155.238	**103.728**	155.296
Indemnification liability (refer to Note 30)	**-**	1.634	**-**	1.634
	172.933	233.908	**171.427**	232.171

Financial guarantees and loan commitments:
The table below discloses the movement of the value of financial guarantees and loan commitments acquired and issued:

36. OTHER LIABILITIES (continued)

	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased Credit Impaired €'000	**Total €'000**
1 January 2024	3.735	1.077	10.257	15	**15.084**
Transfer from Stage 1 to Stage 2	(11)	11	-	-	**-**
Transfer from Stage 1 to Stage 3	(34)	-	34	-	**-**
Transfer from Stage 2 to Stage 3	-	(12)	12	-	**-**
Transfer from Stage 3 to Stage 2	-	7	(7)	-	**-**
Transfer from Stage 2 to Stage 1	375	(375)	-	-	**-**
Transfer from Stage 3 to Stage 1	11	-	(11)	-	**-**
(Release)/charge for the year (refer to Note 14)	(1.379)	(75)	(399)	14	**(1.839)**
Exchange difference	3	-	(1)	-	**2**
Gain on derecognition of financial guarantees and loan commitments	(190)	-	-	-	**(190)**
31 December 2024	**2.510**	**633**	**9.885**	**29**	**13.057**

	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased Credit Impaired €'000	**Total €'000**
1 January 2023	6.691	1.097	11.042	59	**18.889**
Transfer from Stage 1 to Stage 2	(214)	214	-	-	**-**
Transfer from Stage 1 to Stage 3	(7)	-	7	-	**-**
Transfer from Stage 2 to Stage 3	-	(20)	20	-	**-**
Transfer from Stage 3 to Stage 2	-	1.173	(1.173)	-	**-**
Transfer from Stage 2 to Stage 1	491	(491)	-	-	**-**
Transfer from Stage 3 to Stage 1	60	-	(60)	-	**-**
(Release)/charge for the year (refer to Note 14)	(3.122)	(877)	362	(44)	**(3.681)**
Exchange difference	(7)	-	61	-	**54**
Gain on derecognition of financial guarantees and loan commitments	(157)	(19)	(2)	-	**(178)**
31 December 2023	**3.735**	**1.077**	**10.257**	**15**	**15.084**

Provisions for pending litigations or complaints and/or claims:

	The Group		The Bank	
	2024 €'000	2023 €'000	**2024 €'000**	2023 €'000
1 January	**5.239**	5.052	**5.239**	5.052
Net (release)/charge for the year (refer to Note 13)	**(1.471)**	187	**(1.471)**	187
Provision utilised	**(219)**	-	**(219)**	-
Closing balance	**3.549**	5.239	**3.549**	5.239

The amounts recognised as provisions are the best estimates of the expenditure required to settle the present obligation at the end of the reporting period, taking into account the risks and uncertainties surrounding the facts and circumstances of any pending litigations or complaints and/or claims. Any provision recognised does not constitute an admission of wrong doing or legal liability.

36. OTHER LIABILITIES (continued)

Lease liability

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
1 January	**7.522**	7.817	**7.478**	7.746
Additions	**156**	887	**156**	887
Payments	**(2.144)**	(2.304)	**(2.115)**	(2.276)
Interest expense (refer to Note 6)	**513**	465	**511**	463
Contract modifications	**829**	657	**829**	658
Closing balance	**6.876**	7.522	**6.859**	7.478

Other accounts payable and other provisions
Other accounts payable and other provisions include among others, provisions for representations and warranties relating to the disposal of certain portfolios of the Group. Where an individual provision is material, the fact that a provision has been made is stated and quantified, except to the extent that doing so would be seriously prejudicial on the outcome of the case or the negotiations in relation to provisions for representations and warranties. Also they include transit items that relate to banking operations.

37. DERIVATIVES

The Group uses the following derivative instruments:

- Foreign currency forwards: represent agreements for the purchase or sale of foreign currencies settled at a future date.
- Foreign currency swaps: represent agreements for the exchange of cash flows of different currencies.
- Interest rate swaps: represent agreements where one stream of future interest payments is exchanged for another based on a predetermined notional amount and time periods.

	The Group and the Bank		
		Fair value	
At 31 December 2024	Nominal value	Other assets	Other liabilities
	€'000	€'000	€'000
Foreign currency forwards	3.348	-	34
Foreign currency swaps	99.075	1.431	171
Interest rate swaps	600.000	20.174	-
	702.423	21.605	205

	The Group and the Bank		
		Fair value	
At 31 December 2023	Nominal value	Other assets	Other liabilities
	€'000	€'000	€'000
Foreign currency swaps	341.048	16	3.327
	341.048	16	3.327

Credit risk for derivatives arises from the possibility of the counterparty's failure to meet the terms of any contract. In the case of derivatives, credit losses are a significantly smaller amount compared to the derivatives' notional amount. In order to manage credit risk, the Group sets limits based on the creditworthiness of the involved counterparties and uses credit mitigation techniques such as netting and collateralisation.

37. DERIVATIVES (continued)

The Group has chosen the ISDA Master Agreement for documenting its derivatives activity. It provides the contractual framework within which dealing activity across a full range of over-the-counter (OTC) products is conducted and contractually binds both parties to apply close-out netting across all outstanding transactions covered by an agreement, if either party defaults. In most cases the parties execute a Credit Support Annex (CSA) in conjunction with the ISDA Master Agreement. Under a CSA, the collateral is passed between the parties in order to mitigate the market contingent counterparty risk inherent in their open positions.

As at 31 December 2024, all of the Group's derivative exposures are covered by ISDA netting arrangements.

The amount of cash collateral maintained by the Bank and the Group with respect to its derivative transactions under the CSAs in place at 31 December 2024 amounted to €21.430 thousand (31 December 2023: €4.580 thousand).

38. LOAN CAPITAL

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Tier 1 Capital				
Convertible Capital Securities 1	**-**	1.597	**-**	1.597
Convertible Capital Securities 2	**-**	128.069	**-**	128.069
	-	129.666	**-**	129.666
Tier 2 Capital Subordinated Notes	**209.178**	208.612	**209.178**	208.612
Senior Preferred Notes	**100.481**	103.537	**100.481**	103.537
Closing balance	**309.659**	441.815	**309.659**	441.815

Tier 1 Capital

Tier 1 Capital consisted of Convertible Capital Securities 1 (CCS1) and Convertible Capital Securities 2 (CCS2) which were perpetual securities with no maturity date. Under the terms of their issue, they bore an annual fixed interest rate of 11% and 10%, respectively, payable on a quarterly basis at the end of each Interest Payment period. Interest payment dates were set to be the 31 March, 30 June, 30 September and 31 December. CCS1 and CCS 2 were unsecured and subordinated obligations and the Bank could, at its sole discretion, redeem, following a notification of CCS holders and the Trustee, at par including accrued interest.

Pursuant to the terms of the Prospectus dated 30 September 2013, CCS1/CCS2 holders could have exercised the right to convert the CCS1/CCS2 into ordinary shares, during the periods between 15-31 January and 15-31 July of each year ("the Conversion Period") with the first Conversion Period commencing on 15 January 2016 and the last Conversion Period commencing on 15 July 2023.

For the year ended 31 December 2024 an amount of €12,9 million (31 December 2023: €13,0 million) has been recognised in the Bank's income statement relating to interest expenses on Convertible Capital Securities.

38. LOAN CAPITAL (continued)

Redemption of Contingent Convertible Securities 1 and 2

On 6 November 2024 the Bank announced that the Board of Directors of the Bank, decided that the Bank will proceed with the submission of an application to the competent authority (European Central Bank), pursuant to Articles 77(1) and 78(1) of Regulation (EU) 575/2013 on prudential requirements for credit institutions and investment firms (as amended from time to time), for prior permission for redemption of all outstanding Contingent Convertible Securities 1 and 2, at par including accrued interest, pursuant to the terms and conditions of the Prospectus dated 30 September 2013, at the next possible Interest Payment Date.

On 9 December 2024, the Bank announced that it would exercise its discretion to redeem on 31 December 2024 all of the outstanding Contingent Capital Securities 1 and the Contingent Capital Securities 2, with a nominal value of one Euro (€1,00) each and annual fixed interest rate of 11% and 10% respectively, at one Euro (€1,00) each, together with accrued interest for the period 1 October 2024 – 31 December 2024 (92 days, calculated on a 365 day basis), excluding any interest cancelled, until the Redemption Date, pursuant to Condition 9 (Redemption) of the Terms of CCS 1 and Condition 10 (Redemption) of the Terms of CCS 2, included in the Prospectus dated 30 September 2013.

The CCS 1 and CCS 2 were delisted from the Cyprus Stock Exchange (the “CSE”) following the completion of the redemption process on 31 December 2024.

Senior Preferred Notes

In July 2022 the Bank issued €100 million Senior Preferred Notes (the “Notes”) under its EMTN Programme. The Notes were priced at par with a fixed coupon of 9% per annum with the rest date on 15 July 2024, payable annually in arrears. The maturity date of the Notes is 15 July 2025, and the Notes are callable at par on 15 July 2024 (3NC2), subject to meeting certain regulatory conditions as specified in the terms and conditions of the Notes. The Notes were admitted to trading on the Euro Multilateral Trading Facility (MTF) Market of the Luxembourg Stock Exchange and listed on the Official List of the Luxembourg Stock Exchange. The Notes comply with the criteria for the minimum requirement for own funds and eligible liabilities (MREL) and contribute towards the Bank’s MREL requirements.

On 15 July 2024, the Bank exercised its option to redeem all of the outstanding Senior Preferred Notes issued on 15 July 2022, in accordance with their terms and conditions at the price specified in the Pricing Supplement of the relevant Notes together with accrued but unpaid interest. The listing of these Notes on the Official List of the Luxemburg Stock Exchange and their admission to trading on the Euro MTF were cancelled in July 2024.

On 11 September 2024, the Bank has successfully priced an issue of €100 million Senior Preferred Notes (the “Notes”) under the Bank’s €1,5 billion Euro Medium Term Note (EMTN) Programme, subject to satisfaction of customary conditions precedent. The Notes were issued at par with a fixed coupon of 4% per annum, payable annually in arrear. The fixed coupon will reset on 17 September 2025. The maturity date of the Notes will be 17 September 2026, and the Notes will, subject to satisfaction of certain conditions and compliance with applicable prudential rules, be callable by the Bank at par on 17 September 2025 (2NC1). Settlement took place on 17 September 2024 and the Notes are listed on the Luxemburg Stock Exchange’s Euro MTF market.

For the year ended 31 December 2024 an amount of €6,8 million (31 December 2023: €9,8 million) has been recognised in the Bank's income statement relating to interest expenses on the Senior Prefered Notes that were in issue during 2024.

38. LOAN CAPITAL (continued)

Tier 2 Subordinated Notes

On 8 March 2023, the Bank announced that it has successfully issued a new €200 million Tier 2 Subordinated Notes (the "Notes") under its EMTN Programme. This issue constitutes the Bank's inaugural Tier 2 transaction under the EMTN Programme.

The Notes were issued at par with a fixed coupon of 10,25% per annum. The maturity date of the Notes is 14 June 2033 and are callable at par for a 3-month period commencing on 14 March 2028. The Notes were admitted to trading on the Luxemburg Stock Exchange's Euro MTF Market and listed on the Official List of the Luxembourg Stock Exchange.

For the year ended 31 December 2024 an amount of €21,1 million (31 December 2023: €16,3 million) has been recognised in the Bank's income statement relating to interest expense on the Tier 2 Subortinated Notes.

The Notes are fully eligible for the Bank's minimum requirement for own funds and eligible liabilities (MREL) up to 17 September 2025, the call date, and are in line with the Bank's funding strategy. The Notes are rated 'Ba2' by Moody's Ratings and at 'BBB-' by Fitch Ratings.

For the fair value of the Loan Capital refer to Note 44.

39. SHARE CAPITAL

	The Group and the Bank			
	2024 €'000	**Number of shares (thousand)**	2023 €'000	Number of shares (thousand)
Authorised				
1.032 million shares €0,50 each	**516.000**	**1.032.000**	516.000	1.032.000

	The Group and the Bank			
	2024 €'000	**Number of shares (thousand)**	2023 €'000	Number of shares (thousand)
Issued				
Fully paid shares				
1 January	**206.403**	**412.805**	206.403	412.805
Issued share capital	**206.403**	**412.805**	206.403	412.805

At 31 December 2024, 412.805.230 fully paid shares were in issue, with a nominal value of €0,50 each (31 December 2023: 412.805.230 shares with a nominal value €0,50 each).

There are no restrictions on the transfer of the Bank's ordinary shares, other than the provisions of the Business of Credit Institutions Law of the Republic of Cyprus (RoC) which require the approval of the Central Bank of Cyprus (CBC) prior to acquiring shares of the Bank above certain thresholds and the requirements of the EU Market Abuse Regulation. Additionally, the Bank does not have any shares in issue which carry special control rights.

Reduction of share capital Reserve
The difference that emerged from the reduction of the nominal value of every ordinary share in 2013 (from €0,43 each to €0,01 each) was transferred from share capital to a reserve under the name "Reduction of share capital reserve" pursuant to the provisions of article 64(1)(e) of the Companies' Law (Chapter 113). There was no change in the balance of this reserve since then.

39. SHARE CAPITAL (continued)

Share premium reserve
The difference between the issue price of share capital and its nominal value is recognised in the share premium reserve. As at 31 December 2024 and as at 31 December 2023 there was no movement to the share premium reserve.

40. RETAINED EARNINGS

The balance of the retained earnings of the Bank is available for distribution to shareholders.

Any recommendations for dividend are subject to regulatory approval (refer to Note 46 "Supervisory Review and Evaluation Process (SREP)"). As such the Bank, did not proceed with the declaration of dividend for years 2024 and 2023 due to regulatory restriction.

Special Contribution for the Defence
According to the provisions of the Special Contribution for the Defence of the Republic Law, Companies that do not distribute 70% of their profits after tax, as these profits are defined by this Law, during the two years following the end of the year to which the profits refer, will be deemed to have distributed this amount as dividend. Special contribution for defence at 17% will be payable on such deemed dividends to the extent that the shareholders (individuals and companies), at the end of the period of two years from the end of the fiscal year to which the profits refer, are Cyprus residents and in the case of individuals, Cyprus domiciled as well. In addition General Health System (GHS) contribution will be payable on such deemed dividends at the rate of 2,65% to the extend that the shareholders are Cyprus Tax resident Individuals.

The amount of the deemed dividend distribution is reduced by any actual dividend already distributed in respect of the year to which the profits refer.

The special contribution for defence and GHS Contribution is paid by the Bank on account of the shareholders.

41. REVALUATION RESERVES

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Property revaluation reserve				
1 January	**48.954**	41.138	**45.426**	38.926
Surplus on revaluation of land and buildings	**-**	9.843	**-**	8.441
Deferred taxation on property revaluation	**(158)**	(1.095)	**(158)**	(1.009)
Transfer to retained earnings due to excess depreciation	**(595)**	(520)	**(595)**	(520)
Transfer to retained earnings due to disposal of immovable property	**(82)**	(412)	**(82)**	(412)
	48.119	48.954	**44.591**	45.426
Revaluation reserve of investments at fair value through Other Comprehensive income				
1 January	**14.078**	11.010	**13.999**	11.343
Net revaluation gain of investments in equity securities and collective investment units at fair value through other comprehensive income	**720**	2.674	**720**	2.674
Net revaluation loss of investments in debt securities at fair value through other comprehensive income	**(337)**	(120)	**(337)**	(120)
Transfer to the income statement on disposal of investments in debt securities measured at fair value through other comprehensive income	**-**	412	**-**	-
(Loss)/gain on disposal of equity securities at fair value through other comprehensive income	**(302)**	102	**(302)**	102
	14.159	14.078	**14.080**	13.999
Total revaluation reserves	**62.278**	63.032	**58.671**	59.425

Any gains arising on the revaluation of land and buildings is credited to the property revaluation reserve that is included in equity. If, after a revaluation, the depreciation charge is increased, then an amount equal to the increase (net of deferred taxation), is transferred annually from the property revaluation reserve to retained earnings. Upon disposal of revalued property, any relevant accumulated revaluation gains which remains in the property revaluation reserve is also transferred to retained earnings. The balance of the revaluation reserves is not available for distribution to shareholders.

42. CONTINGENT LIABILITIES AND COMMITMENTS

	The Group		The Bank	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Contingent liabilities				
Acceptances and endorsements	**276**	289	**276**	289
Guarantees	**223.681**	287.382	**223.703**	287.403
	223.957	287.671	**223.979**	287.692
Commitments				
Undrawn formal standby facilities	**762.793**	750.924	**762.872**	751.003
Undisbursed loan amounts	**435.340**	451.847	**435.340**	451.847
Other commitments	**2.247**	2.904	**2.247**	2.904
	1.200.380	1.205.675	**1.200.459**	1.205.754
	1.424.337	1.493.346	**1.424.438**	1.493.446

42. CONTINGENT LIABILITIES AND COMMITMENTS (continued)

Capital Commitments
At 31 December 2024, the Group's and the Bank's commitments for capital expenditure, not recognised in the consolidated statement of financial position, amounted to €2.035 thousand for the Group and €1.979 thousand for the Bank (Group 2023: €3.139 thousand and the Bank 2023: €3.114 thousand).

Contingent liabilities for pending litigations or complaints and/or claims
The Group is engaged in various legal proceedings and regulatory matters arising out of its normal business operations, where an obligation may be created for which an outflow of resources embodying economic benefits is possible. The existence of these obligations will be confirmed only by the occurrence, or non occurrence, of one or more uncertain future events not wholly within the control of the Group.

Hence the effect of the outcome of these matters cannot be predicted with certainty but may impact the Group's financial results. The Group is of the opinion that there are adequate defenses in place for a successful outcome, in the course of the relevant proceedings. It is not practicable to provide an aggregate estimate of potential liability for such legal proceedings to be disclosed as a class of contingent liabilities.

Consumer Protection Service
On 12 October 2017, the Consumer Protection Service (the "CPS") of the Ministry of Energy Commerce and Industry has issued, following a complaint from certain borrowers, a decision in relation to certain terms of the Bank's housing loan agreements regarding two housing loans granted in 2007 and in 2008. The CPS took the view that these agreements contain certain unfair/non transparent terms and has invited the Bank to inform the CPS of any actions it intends to take in relation to its findings. Although the Bank does not share the views of the CPS and/or disputes the interpretation given by the CPS to the agreements, it has nevertheless discussed in good faith with the CPS and provided a list of certain actions that addressed certain of the CPS's concerns. Notwithstanding the above, in August 2020 the CPS filed an application to the competent court seeking a court order ordering the Bank to immediately stop using certain terms which had been considered unfair by the CPS, which is still pending. The Bank is objecting this application and, based on information currently available, it does not consider any financial impact as material at the present time. However, the possible outcomes depend on various factors and as such, the final outcome cannot be known with certainty.

Cyprus Consumers' Association
In April 2021, the Cyprus Consumers' Association (CCA) filed a court application against the Bank, seeking, amongst other, (i) a court order ordering the Bank to stop using certain terms which have been considered unfair by the Consumer Protection Service (CPS), in the CPS decision against the Bank that was issued in October 2017 (decision relates to certain terms of the Bank's housing loan agreements for two housing loans granted in 2007 and in 2008), as well as in the CPS decision against ex-CCB that was issued in February 2018 (decision relates to certain terms of ex-CCB's loan agreements for loans granted during 2003-2010) and (ii) a court order ordering the Bank to proceed with any other corrective measures that the Court may deem appropriate, including a court order regarding the payment of reasonable / fair compensation to the affected consumers (subject to criteria to be decided by the Court). The Bank is objecting this application and, based on information currently available, it does not consider any financial impact as material at the present time. However, the possible outcomes depend on various factors and as such, the final outcome cannot be known with certainty.

The application by CCA against the Bank includes certain terms which were deemed unfair in the first instance court judgement issued against another bank in Cyprus and certain terms which have been included in the court application filed by the Consumer Protection Service against the Bank.

42. CONTINGENT LIABILITIES AND COMMITMENTS (continued)

Competition Authority of Cyprus
The Bank was served in January 2022, with a Complaint (‘Καταγγελία’) submitted to the Competition Authority of Cyprus (CPC), regarding the increase of fees & charges of banking services applicable as of 3 January 2022. The Complaint was filed by SYPRODAT (Borrowers’ Protection Association) against both Bank of Cyprus and the Bank, claiming -inter alia- breach of competition legislation as a result of the two Banks acting in co-ordination. The Bank’s position is that no such co-ordination ever took place and the Bank is currently liaising with its external lawyers in order to refute said Complaint. On the first hearing, SYPRODAT legal representatives requested to withdraw their petition for interim measures (by which they were requesting that the challenged charges are blocked from being applied by HB/BoC). The CPC formally issued their decision accepting the withdrawal at 28 March 2022; it is noted that withdrawal of the application for interim measures does not equate to withdrawal of the complaint. The Bank received an Request For Information by the CPC at 29 April 2022; initial deadline was set for 23 May 2022. However, given the substantial bulk of the deliverables, the Bank requested postponement to 30 July 2022, which was accepted by CPC. The Bank filed the response to the RFI on 29 July 2022 and the investigation is ongoing. As at the date of the Financial Statements, the Bank has assessed with its legal advisors the validity and subsequently, the possible financial impact of such complaint. Neither the resulting financial impact of such actions nor their consequent impact on the Bank and the Group, can be determined at present. Nevertheless, based on the current status of the assessment of the complaint, based on the information currently available, management believes that it is unlikely that the matter will have a material impact on the Bank’s and Group’s financial position.

Other cases
In December 2022, two lawsuits were served to the Bank by two companies with same beneficial ownership claiming the amounts of USD 740.258.989,01 and USD 256.593.137,80, respectively. On 19 February 2024 the lawsuit of USD 256.593.137,80 was withdrawn unreservedly by the Claimants. On 06 March 2024 a Statement of Claim was submitted for the remaining lawsuit and the total claim was reduced from USD 740,258,989.01 to USD 265.983.165,13; As at the date of the Financial Statements, the Bank has assessed with its legal advisors the validity and subsequently, the possible financial impact of such claim. Based on the current status of the assessment of the claim and the information currently available, management believes that it is unlikely that the matter will have a material impact on the Bank’s and Group’s financial position.

43. RELATED PARTY TRANSACTIONS

Members of the Board of Directors and connected persons
Connected persons include the spouse, the children, the parents and the companies in which Directors of the Bank hold, directly or indirectly, at least 20% of the voting rights at a general meeting.

	2024	2023
	€'000	€'000
Loans and advances	**-**	17
Collaterals	**-**	16
Deposits	**421**	1.773

The above table does not include year end balances of members of the Board of Directors and their connected persons who resigned during the year.

Additionally, as at 31 December 2024, there were contingent liabilities and commitments in respect of Members of the Board of Directors and their connected persons in the form of documentary credits, guarantees and unused limits amounting to €26 thousand which did not exceed 1% of the Bank’s net assets (2023: €47 thousand).

43. RELATED PARTY TRANSACTIONS (continued)

For the year ended 31 December 2024 interest income in relation to Members of the Board of Directors and their connected persons amounted to €0,2 thousand (31 December 2023: €0,3 thousand), while interest expense in respect of Members of the Board of Directors and their connected persons was €2,6 thousand (31 December 2023: €0,1 thousand).

Emoluments and fees of Members of the Board of Directors

	2024	2023
	€'000	€'000
Emoluments and fees of Members of the Board of Directors:		
Emoluments and benefits in executive capacity	**614**	811
Employer's contributions	**88**	61
Total emoluments for Executive Directors	**702**	872
Total fees and other benefits of members of the Board	**1.300**	1.328
Employer's contributions – Non Executive Directors	**31**	38

During the year a number of members of the Board of Directors resigned. Mr. K.R. Kraus, Mr. C. Themistocleous and Mr. M. Maratheftis resigned from the Board of Directors with immediate effect on 20 June 2024, 5 August 2024 and 8 August 2024 respectively. Mr. D. Efstathiou, Mr. J. G. Iossifides, Mr. M. Comastri. Mr. A. Persianis and Mr. C. Hadjistavris, either resigned or did not offer themselves for re-election at the Annual General Meeting of the Shareholders of the Bank held on 18 September 2024. Hence their term of office on the Board of Directors expired at the end of the AGM.

The Executive member of the Board, Mr. O. Gatzke resigned from his position with effect from 13 August 2023. In accordance with the provisions of Mr. Gatzke's employment agreement, the Bank placed Mr. Gatzke on garden leave with full pay for one year. The employment agreement of Mr Oliver Gatzke with the Bank expired on 22 July 2024.

Emoluments and fees include the payments relating to the board members of the Bank that resigned during the year ended 31 December 2024. The new members of the Board of Directors of the Bank were appointed on 18 September 2024, following the decision of the AGM.

Other transactions with Members of the Board of Directors and their connected persons
The sales of insurance policies for the year ended 31 December 2024 by the Group's Non-Life Insurance subsidiary, Pancyprian Insurance Ltd, to Members of the Board and their connected persons as defined above, amounted to €4 thousand (31 December 2023: €9 thousand), while the sales of insurance policies by the Group's Life Insurance subsidiary, Hellenic Life Insurance Company amounted to €nil (31 December 2023: €7 thousand). During the year ended 31 December 2024, interest expenses amounting to €6 thousand was due to Members of Board of Directors and their connected persons (31 December 2023: €nil).

For the year ended 31 December 2024 there was nil non-interest income earned which relates to Members of the Board of Directors and their connected persons (31 December 2023: €nil).

Key Management personnel who are not Directors and their connected persons
Key Management personnel are those persons who have the authority and the responsibility for the planning, management and control of the Banks' operations, directly or indirectly. The Group, according to the provisions of IAS 24 considers as Key Management personnel the members of the Executive Committee (ExCo) of the Bank who were not Directors.

Connected persons include spouses and minor children.

43. RELATED PARTY TRANSACTIONS (continued)

	2024	2023
	€'000	€'000
Loans and advances	**80**	87
Collaterals	**-**	28
Deposits	**766**	749

As at 31 December 2024, there were contingent liabilities and commitments to Key Management personnel who were not Directors and their connected persons amounting to €93 thousand (2023: €59 thousand).

Interest income in relation to Key Management personnel and their connected persons for the year ended 31 December 2024 amounted to €3 thousand (31 December 2023: €3 thousand), while interest expense in relation to Key Management personnel and their connected persons amounted to €0,8 thousand (31 December 2023: €0,2 thousand)

Emoluments of Key Management personnel of the Group
The emoluments of Key Management personnel who were not Directors were:

	2024	2023
	€'000	€'000
Emoluments of Key Management personnel who were not Directors:		
Salaries and other short term benefits	**784**	726
Employer’s contributions	**67**	60
Retirement benefits	**68**	61
	919	847

Other transactions with key Management personnel who are not Directors and their connected persons
The sales of insurance policies for the year ended 31 December 2024 by the Group’s Non-Life Insurance subsidiary, Pancyprian Insurance Ltd, to Key Management personnel and their connected persons, as defined above, amounted to €3,1 thousand (31 December 2023: €2,8 thousand) while the sales of insurance policies by the Group’s Life Insurance subsidiary, Hellenic Life Insurance Company amounted to €2,4 thousand (31 December 2023: €0,2 thousand).

Shareholders with significant influence and their connected persons
Pursuant to the provisions of IAS 24, related parties are considered, among others, the Shareholders who have significant influence to the Bank or/and hold directly or indirectly more than twenty percent (20%) of the nominal value of the issued capital of the Bank.

Connected persons include the entities controlled by Shareholders with significant influence as they are defined above.

	2024	2023
	€'000	€'000
Loans and advances	**15**	12
Deposits	**273**	272

On 31 December 2024, there were contingent liabilities and commitments in relation to Shareholders with significant influence and connected persons in the form of documentary credits, guarantees and unused limits amounting to €2,0 thousand (31 December 2023: € 5 thousand).

43. RELATED PARTY TRANSACTIONS (continued)

Other transactions with Shareholders with significant influence and their connected persons
The sales of insurance policies by the Group's Non-Life Insurance subsidiary, Pancyprian Insurance Ltd, to Shareholders with significant influence and their connected persons as defined above, amounted to € 17 thousand (31 December 2023: €18 thousand). There are no transactions between the Group's subsidiary, Hellenic Life Insurance Company and the Shareholders.

Shareholders with significant influence and their connected persons had in their possession CCS 1 that were redeemed on 31 December 2024 (31 December 2023: €23,4 thousand).

During the year ended 31 December 2024, interest of an amount of €2,6 thousand (31 December 2023: €2,6 thousand), was paid on the CCS1 holdings.

Shareholders with control and their connected persons

Related parties are considered, among others, the Shareholders who have control to the Bank or/and hold directly or indirectly more than fifty percent (50%) of the nominal value of the issued capital of the Bank.

On 25 November 2024 Eurobank S.A. (Eurobank) announced that following the ETYK transactions acquiring a shareholding of 12,85%, it has entered into share purchase agreements with Demetra Holdings PLC and Logicom Services Limited to acquire 24,66% in the Bank and in addition to the current holding of 55,96% will increase its holding to 93,47% after the completion of the transaction which was concluded on 10 February 2025.

The Bank entered into a Reverse Repurchase Agreement transaction with Eurobank on 18 December 2024 for a purchase amount of €300 million at an interest rate of 2,74% and with a maturity date on 15 May 2026. Equivalent value of collaterals with an agreed haircut were held by the Bank for this transaction. Due to daily valuation of the collaterals, the Bank recognised an amount of €1,0 million as collaterals which is reflected in the Placements with Other Banks. Interest income of €274 thousand was accrued on this transaction for the year ended 31 December 2024.

In addition on 30 December 2024 a €100 million interbank placement was made by a subsidiary of Eurobank at an interest rate of 2,509% which matured on 7 January 2025. Interest expense of €7 thousand was accrued on this transaction for the year ended 31 December 2024.

On 31 December 2024, there were contingent liabilities and commitments in relation to Shareholders with significant influence and connected persons in the form of documentary credits, guarantees and unused limits amounting to €2.775 thousand (31 December 2023: €452 thousand).

Other transactions with Shareholders with control and their connected persons

Shareholders with control and their connected persons had in their possession CCS 1 and CCS2 that were redeemed on 31 December 2024 (31 December 2023: €746,6 thousand and €25,9 million respectively). Also, as at 31 December 2024, Shareholders with control and their connected persons had in their possession Senior Preferred Notes ("SP") of value €34,0 million (31 December 2023: €34,0 million) and Tier 2 Notes of value €32,9 million. During the year ended 31 December 2024, interest of an amount of €82,4 thousand (31 December 2023: €60,7 thousand), €2,6 million (31 December 2023: €2,2 million), €2,3 million (31 December 2023: €2,3 million) and €1,0 million (31 December: €90 thousand) was paid on these holdings for CCS1, CCS2, SP and Tier 2 respectively.

43. RELATED PARTY TRANSACTIONS (continued)

All transactions with Members of the Board of Directors, Key Management personnel, Shareholders with significant influence and Shareholders with Control and their connected persons are at an arm's length basis. Regarding the Key Management personnel, facilities have been granted based on current terms as those applicable to the rest of the Group's personnel.

44. FAIR VALUE MEASUREMENT

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

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

Fair value of financial instruments

The tables below present, at Group and Bank level, the carrying amount and fair value of financial instruments on the basis of the three-level hierarchy by reference to the source of data used to derive the fair values. The fair value hierarchy categorises the inputs used in valuation techniques into the following levels:

- Level 1: Quoted prices (unadjusted) in active markets for identical assets or liabilities.
- Level 2: Data other than quoted prices included within level 1 that is observable for the asset or liability, either directly or indirectly.
- Level 3: Import data for the asset or liability that is not based on observable market data (non observable import data).

For assets and liabilities recognised at fair value in the Consolidated Financial Statements, the Group determines whether transfers have occurred between levels in the hierarchy by re-assessing categorisation at the end of each reporting period.

44. FAIR VALUE MEASUREMENT (continued)

Group

31 December 2024	Carrying amount €'000	Fair value €'000	Level 1 €'000	Level 2 €'000	Level 3 €'000
Financial Assets measured at fair value:					
Debt securities measured at fair value through other comprehensive income	35.226	35.226	35.226	-	-
Debt securities measured at fair value through profit and loss	12.867	12.867	12.867	-	-
Equity securities and collective investments measured at fair value through profit and loss	130.722	130.722	100.975	22.316	7.431
Equity securities measured at fair value through other comprehensive income	14.954	14.954	1.405	-	13.549
Derivatives	21.605	21.605	-	21.605	-
	215.374	**215.374**	**150.473**	**43.921**	**20.980**
Financial Assets not measured at fair value:					
Cash and balances with Central Banks	5.730.544	5.730.544	-	5.730.544	-
Placements with other banks	355.416	355.416	-	355.416	-
Reverse repurchase agreements	300.274	302.924	-	302.924	-
Loans and advances to customers	5.738.111	5.686.782	-	-	5.686.782
Debt securities measured at amortised cost	5.627.581	5.635.533	4.390.174	1.184.157	61.202
Indemnification asset	3.200	2.358	-	-	2.358
	17.755.126	**17.713.557**	**4.390.174**	**7.573.041**	**5.750.342**
Financial liabilities measured at fair value:					
Derivatives	205	205	-	205	-
Financial liabilities not measured at fair value:					
Deposits by banks	191.504	191.504	-	191.504	-
Customer deposits and other customer accounts	15.658.085	15.650.055	-	-	15.650.055
Other financial liabilities	943	943	-	-	943
Loan capital	309.659	350.737	-	350.737	-
	16.160.191	**16.193.239**	**-**	**542.241**	**15.650.998**

44. FAIR VALUE MEASUREMENT (continued)

Group

31 December 2023	Carrying amount €'000	Fair value €'000	Level 1 €'000	Level 2 €'000	Level 3 €'000
Financial Assets measured at fair value:					
Debt securities measured at fair value through other comprehensive income	58.685	58.685	58.685	-	-
Debt securities measured at fair value through profit and loss	883	883	883	-	-
Equity securities and collective investments measured at fair value through profit and loss	118.058	118.058	96.142	-	21.916
Equity securities measured at fair value through other comprehensive income	14.400	14.400	1.396	-	13.004
Derivatives	16	16	-	16	-
	192.042	**192.042**	**157.106**	**16**	**34.920**
Financial Assets not measured at fair value:					
Cash and balances with Central Banks	8.222.845	8.222.845	-	8.222.845	-
Placements with other banks	281.868	281.868	-	281.868	-
Loans and advances to customers	6.024.121	5.748.513	-	-	5.748.513
Debt securities measured at amortised cost	4.925.475	4.860.176	3.502.015	1.260.432	97.729
Financial assets held for sale	3.296	3.296	-	-	3.296
Other financial assets	8.180	8.180	-	-	8.180
	19.465.785	**19.124.878**	**3.502.015**	**9.765.145**	**5.857.718**
Financial liabilities measured at fair value:					
Derivatives	3.327	3.327	-	3.327	-
Financial liabilities not measured at fair value:					
Deposits by banks	96.799	96.799	-	96.799	-
Funding by Central Banks	2.355.508	2.355.508	-	2.355.508	-
Customer deposits and other customer accounts	15.314.788	15.314.788	-	-	15.314.788
Indemnification liability	1.634	3.845	-	-	3.845
Loan capital	441.815	436.826	-	436.826	-
	18.210.544	**18.207.766**	**-**	**2.889.133**	**15.318.633**

44. FAIR VALUE MEASUREMENT (continued)

Bank

31 December 2024	Carrying amount €'000	Fair value €'000	Level 1 €'000	Level 2 €'000	Level 3 €'000
Financial Assets measured at fair value:					
Debt securities measured at fair value through other comprehensive income	35.226	35.226	35.226	-	-
Equity securities measured at fair value through income statement	29.747	29.747	-	22.316	7.431
Equity and other securities at fair value through other comprehensive income	14.954	14.954	1.405	-	13.549
Derivatives	21.605	21.605	-	21.605	-
	101.532	**101.532**	**36.631**	**43.921**	**20.980**
Financial Assets not measured at fair value:					
Cash and balances with Central Banks	5.730.544	5.730.544	-	5.730.544	-
Placements with other banks	351.209	351.209	-	351.209	-
Reverse repurchase agreements	300.274	302.924	-	302.924	-
Loans and advances to customers	5.738.111	5.686.782	-	-	5.686.782
Debt Securities measured at amortised cost	5.627.581	5.635.533	4.390.174	1.184.157	61.202
Indemnification asset	3.200	2.358	-	-	2.358
	17.750.919	**17.709.350**	**4.390.174**	**7.568.834**	**5.750.342**
Financial liabilities measured at fair value:					
Derivatives	205	205	-	205	-
Financial liabilities not measured at fair value:					
Deposits by banks	191.504	191.504	-	191.504	-
Customer deposits and other customer accounts	15.658.085	15.650.055	-	-	15.650.055
Other financial liabilities	943	943	-	-	943
Loan capital	309.659	350.737	-	350.737	-
	16.160.191	**16.193.239**	**-**	**542.241**	**15.650.998**

44. FAIR VALUE MEASUREMENT (continued)

Bank

31 December 2023	Carrying amount €'000	Fair value €'000	Level 1 €'000	Level 2 €'000	Level 3 €'000
Financial Assets measured at fair value:					
Debt securities measured at fair value through other comprehensive income	58.685	58.685	58.685	-	-
Equity securities measured at fair value through profit and loss	21.916	21.916	-	-	21.916
Equity securities measured at fair value through other comprehensive income	14.400	14.400	1.396	-	13.004
Derivatives	16	16	-	16	-
	95.017	**95.017**	**60.081**	**16**	**34.920**
Financial Assets not measured at fair value:					
Cash and balances with Central Banks	8.222.845	8.222.845	-	8.222.845	-
Placements with other banks	273.898	273.898	-	273.898	-
Loans and advances to customers	6.024.121	5.748.513	-	-	5.748.513
Debt Securities measured at amortised cost	4.925.475	4.860.176	3.502.015	1.260.432	97.729
Financial assets held for sale	3.296	3.296	-	-	3.296
Other financial assets	8.180	8.180	-	-	8.180
	19.457.815	**19.116.908**	**3.502.015**	**9.757.175**	**5.857.718**
Financial liabilities measured at fair value:					
Derivatives	3.327	3.327	-	3.327	-
Financial liabilities not measured at fair value:					
Deposits by banks	96.799	96.799	-	96.799	-
Funding by Central Banks	2.355.508	2.355.508	-	2.355.508	-
Customer deposits and other customer accounts	15.314.788	15.314.788	-	-	15.314.788
Indemnification liability	1.634	3.845	-	-	3.845
Loan capital	441.815	436.826	-	436.826	-
	18.210.544	**18.207.766**	**-**	**2.889.133**	**15.318.633**

44. FAIR VALUE MEASUREMENT (continued)

The tables below present the movement of the fair value of securities categorised at level 3 hierarchy for the Group and the Bank:

	Equity securities at fair value through other comprehensive income	Equity securities and other collective investments at fair value through profit and loss	**Total**
	€'000	€'000	**€'000**
1 January 2024	13.004	21.916	**34.920**
Gains on revaluation	545	1.300	**1.845**
Transfer out of level 3 hierarchy	-	(15.785)	**(15.785)**
31 December 2024	13.549	7.431	**20.980**

	Equity securities at fair value through other comprehensive income	Equity securities and other collective investments at fair value through profit and loss	Total
	€'000	€'000	€'000
1 January 2023	10.367	18.851	29.218
Gains on revaluation	2.637	3.065	5.702
31 December 2023	13.004	21.916	34.920

During the year ended 31 December 2024 and the year ended 31 December 2023 there were no transfers between Level 1 and Level 2.

Fair Value of financial instruments measured at fair value on the statement of financial position

Debt securities at fair value through profit and loss and fair value through other comprehensive income
For the measurement of the fair value of investments in debt securities categorised as Level 1, the Group uses quoted prices from active markets. For the fair value of the investments in debt securities categorised as Level 2 hierarchy, the Group utilises the respective curve for each currency (swap curve or government curve) at each valuation date while also adding the applicable spread if any to fairly value these level 2 debt securities. Alternatively, if available, other indicative quotes from the Bank's counterparties are utilised to fairly price these Level 2 instruments.

Equity securities and collective investment units at fair value through profit and loss and fair value through other comprehensive income
Equity securities and collective investment units consists of quoted securities/units in active markets, which are classified as Level 1, quoted securities/units in inactive markets, which are classified at Level 2, and unquoted securities. For the latter, valuation techniques or pricing models are formulated on a case by case basis and incorporate both observable and non-observable data and as such are classified as Level 3. For Level 3 instruments, the Group uses discounted cash flows models. The valuation requires management to use unobservable inputs, including forecast cash flows, discount rates and illiquidity haircuts, where applicable.

44. FAIR VALUE MEASUREMENT (continued)

A change in the significant unobservable inputs by 15% used in the valuation techniques adopted for VISA Inc. shares, Universal Life shares and JCC shares would result in a change in the value of the equity securities by €3,3 million (31 December 2023: €2,4 million), €1,1 million (31 December 2023: €0,9 million) and €2,0 million (31 December 2023: €1,9 million) respectively.

Derivatives at fair value through profit and loss
Derivative financial instruments are valued using a valuation technique with observable market data. The valuation techniques most frequently used include forward pricing and swap models, using present value calculations. The models use various inputs including foreign exchange spot and forward rates and interest rate curves. Derivative instruments are generally classified as Level 2 on the basis that model inputs that are significant to their measurement are observable. Furthermore, it is essential to note that the vast majority of the Bank's derivative positions are performed with counterparties that the Bank has ISDA (International Swaps and Derivatives Association) and CSA (Credit Support Annex) agreements, exchanging cash collateral on a daily basis.

Fair Value of financial instruments not measured at fair value but for which fair value is disclosed

Loans and advances to customers
The fair value of loans and advances to customers is based on the present value of expected future risk adjusted cash flows.

The level of subjectivity and degree of management judgment required is significant in these discounted cash flow models given that management is required to exercise judgment in the selection and application of parameters and assumptions where some or all of the parameter inputs are less observable. Future cash flows have been based on the future expected loss rate per loan category, taking into account expectations in the credit quality of the borrowers. The discount rate includes components that capture: the funding cost, liquidity risk premium, cost of capital, regulatory MREL requirements and adjustments for operational costs which are dependent on the definition of the principal market specified by the Bank for fair value purposes. For the Bank's loan book, the principal market is defined as the Republic of Cyprus as it mainly includes local lending in euro to Retail, SME and Corporate clients and thus the average market participant is assumed to be a) Banks operating in Cyprus of similar size and capital structure for the performing portfolio and b) credit acquiring companies for the default portfolio.

The Bank updates its risk parameter models applied in the calculation of the fair value as part of the regular model update cycle. The model update takes into account the latest macroeconomic projections and the available data and information. The fair value parameters are in full alignment with the Bank's provisioning assumptions.

Reverse repurchase agreements
Fair values of reverse repurchase agreements are determined by calculating the present value of future cash flows. The cashflows are discounted using the risk-free rate at the reference date plus the appropriate credit spread.

Debt securities classified at amortised cost
For the calculation of the fair value of investments in debt securities categorised as Level 1 the Group uses quoted prices from active markets. For the fair value of the investments in debt securities categorised under Level 2 hierarchy, the Group utilises the respective curve for each currency (swap curve or government curve) at each valuation date while also adding the applicable spread if any to fairly value these Level 2 debt securities. Alternatively, if available, other indicative quotes from the Bank's counterparties are utilised to fairly price these Level 2 instruments. For its investments classified as Level 3, the Bank utilizes indicative quotes from counterparties maintaining a stake in these positions, or calculates fair values based on proxy parameters in accordance with the risk characteristics of each instrument.

44. FAIR VALUE MEASUREMENT (continued)

Financial assets and liabilities held for sale
The carrying value of financial assets and liabilities classified as held for sale is a close approximation of their fair value and they are categorised as Level 3.

Indemnification asset/liability
Indemnification asset/liability is included in other financial assets/liabilities and the fair value of which is determined based on the Income Approach.

Indemnification asset – APS
The fair value is estimated as the sum of:

a) The Present Value of claims to be made by the Bank in the event of APS Losses. The claims and timing of these claims reflect the measurement of the estimated future cash flows arising from claims to be made by the Bank in the event of APS losses. All calculations are made on an asset by asset basis, minus

b) The Present Value of fees payable by the Bank to KEDIPES.

The present value of the APS indemnification asset has been discounted at the equivalent prevailing market interest rate of sovereign exposures with similar maturity.

Indemnification asset – certain off-balance items acquired
The fair value is estimated on the recovery as a result of the estimated losses arising from the off-balance sheet exposures as described under the BTA agreement.

The expected recovery is the result of the estimated losses of the above elements, discounted at the equivalent prevailing market interest rates of sovereign exposures with similar maturity.

Other key inputs involved in the fair value measurement of the indemnification assets relating to APS and off-balance sheet exposures include the estimates and parameters involved in the measurement of ECL of the underlying loans and off-balance sheet exposures. The sensitivity of these is presented in Note 4.

Customer deposits and other customer accounts
The fair value of customer deposits and other customer accounts is measured using discounted cash flows, applying current rates offered for deposits of similar remaining maturities. Non-maturity deposits (NMDs) are allocated in overnight time bands/or the fair values of on-demand deposits are approximated by their carrying amount. The Bank uses forward rates to construct the curves and project the cost that could reprice its deposits at their maturity / repricing date, based on market expectations at the reporting date.

Loan Capital:
The fair value of CCS1 and CCS2 was based on the average transaction price that these instruments traded at during the period. CCS1 and CCS2 has been classified as Level 2. The Senior Preferred Notes and the Tier 2 Subordinated Notes are both listed on the Luxemburg Stock Exchange (active market) and as such are classified as Level 2.

Other financial instruments:
For the remaining financial assets and financial liabilities not described above or not separately disclosed in the above tables the fair value approximates to their carrying amounts.

44. FAIR VALUE MEASUREMENT (continued)

Fair Value of non financial assets

The fair value of properties held for own use and investment properties is based on valuations by independent qualified valuers and categorised as Level 3. As at 31 December 2024 the carrying amount of properties held for own use were €147.950 thousand (31 December 2023: €144.904 thousand). As at 31 December 2024 the carrying amount of investment properties were €5.420 thousand (31 December 2023: €10.123 thousand). Significant fluctuations in the estimated values per square meter for properties valued with the comparable approach or significant fluctuations in the estimated rental yields for properties valued with the income capitalisation approach could significantly impact the fair value of the properties.

45. SEGMENTAL ANALYSIS

For management purposes, the Group is organised into two operating segments based on the provision of services, as follows:

- Banking and financial services segment - principally providing banking and financial services, including financing and investment services, as well as custodian and factoring services.
- Insurance services segment - principally providing life and general insurance services in Cyprus.

The Group is currently operating in Cyprus.

There was no turnover deriving from transactions with a single external customer that amounted to 10% or more of Group revenue.

The table below presents income, expenses, impairment losses on financial instruments and non financial assets, profit/(loss) for the year from continuing operations, discontinued operations and taxation and information on assets, liabilities and capital expenditure regarding the Group's operating segments.

45. SEGMENTAL ANALYSIS (continued)

	Banking & Financial services		Insurance Services		Intersegment transactions/balances		Total	
	2024	2023	**2024**	2023	**2024**	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000	**€'000**	€'000	**€'000**	€'000
Continuing Operations								
Turnover	**860.116**	814.262	**17.693**	14.568	**(7.733)**	(11.239)	**870.076**	817.591
Of which: Third parties	***854.902***	*809.131*	***15.174***	*3.280*	**-**	-	***870.076***	*812.411*
Of which: Inter-segment	***5.214***	*5.131*	***2.519***	*11.288*	***(7.733)***	*(11.239)*	**-**	*5.180*
Net interest income	**598.602**	536.108	**292**	172	**16**	8	**598.910**	536.288
Net fees and commission income/(expenses)	**75.082**	77.982	**(22)**	(40)	**(5.192)**	(5.100)	**69.868**	72.842
Net gains on disposal and revaluation of foreign currencies and financial instruments	**22.769**	10.631	**3.497**	4.015	**-**	-	**26.266**	14.646
Net income from insurance operations	**-**	-	**12.006**	9.154	**5.275**	5.180	**17.281**	14.334
Other income/(expenses)	**21.928**	36.288	**1.880**	1.210	**(7.793)**	(11.288)	**16.015**	26.210
Total net income	**718.381**	661.009	**17.653**	14.511	**(7.694)**	(11.200)	**728.340**	664.320
Staff costs	**(132.858)**	(118.190)	**(1.298)**	(1.122)	**-**	-	**(134.156)**	(119.312)
Depreciation and amortisation	**(20.249)**	(22.233)	**(164)**	(104)	**50**	11	**(20.363)**	(22.326)
Administrative and other expenses	**(134.543)**	(115.492)	**(2.206)**	(2.004)	**42**	46	**(136.707)**	(117.450)
Total expenses	**(287.650)**	(255.915)	**(3.668)**	(3.230)	**92**	57	**(291.226)**	(259.088)
	430.731	405.094	**13.985**	11.281	**(7.602)**	(11.143)	**437.114**	405.232
Net gains on derecognition of financial assets measured at amortised cost	**986**	4.830	**-**	-	**-**	-	**986**	4.830
Reversal of impairment losses/(impairment losses) on financial instruments	**13.796**	(7.235)	**(1)**	-	**(3)**	-	**13.792**	(7.235)
Impairment losses on non financial assets	**(7.845)**	(9.203)	**-**	-	**-**	-	**(7.845)**	(9.203)
Profit/(loss) before taxation	**437.668**	393.486	**13.984**	11.281	**(7.605)**	(11.143)	**444.047**	393.624
Taxation	**(59.383)**	(46.128)	**(2.079)**	(1.234)	**-**	-	**(61.462)**	(47.362)
Profit/(loss) for the year from continuing operations	**378.285**	347.358	**11.905**	10.047	**(7.605)**	(11.143)	**382.585**	346.262
Discontinued operations								
Profit for the year from discontinued operations	**-**	19.179	**-**	-	**-**	-	**-**	19.179
Profit/(loss) for the year	**378.285**	366.537	**11.905**	10.047	**(7.605)**	(11.143)	**382.585**	365.441
Total assets	**18.204.481**	19.925.528	**168.921**	145.096	**(15.684)**	(8.699)	**18.357.718**	20.061.925
Total liabilities	**16.370.076**	18.468.168	**111.387**	91.816	**(11.964)**	(4.412)	**16.469.499**	18.555.572
Capital expenditure on land and buildings, property, plant & equipment and computer software	**25.222**	24.900	**308**	613	**-**	-	**25.530**	25.513

46. CAPITAL MANAGEMENT

The objective of the Bank's capital and leverage policy is to retain sufficient capital and leverage levels and ratios by complying with the legal and regulatory framework requirements as well as any internal capital buffers set while safeguarding the best interests of shareholders and supporting the Group's business strategy.

Regulatory framework and recent regulatory developments

In accordance with the European Council's Regulation 1024/2013, the ECB has taken on full responsibility for the supervision of important credit institutions in participating Member States, including amongst others the Group, with the assistance of the local supervisory authorities. The Central Bank of Cyprus (CBC), as part of its supervisory role, has adopted the recommendations of the Basel Committee and the European Directives on banking supervisory matters.

Effective from 1 January 2014, the Capital Requirements Directive 2013/36/EU (the "CRD IV") and the Capital Requirements Regulation (EU) No 575/2013 (the "CRR"), are in force and form the European regulatory package designed to transpose the new capital, liquidity and leverage standards of Basel III into the European Union's legal framework.

The CRR establishes the prudential requirements for capital, liquidity and leverage that credit institutions and investment firms need to abide by and is immediately binding on all EU Member States. The CRD IV governs access to deposit taking activities and internal governance arrangements including remuneration, board composition and transparency, while it also sets out additional capital buffer requirements. Unlike the CRR, the CRD IV was transposed into national law by EU Member States, and national regulators were allowed to impose additional capital buffer requirements. The CRR permits a transitional period for certain of the enhanced capital requirements and certain other measures, such as the leverage ratio, which are largely fully effective from 1 January 2018, and some other transitional provisions with phase in until 2024.

In March 2018, the ECB published an NPE addendum which supplements the NPL Guidance by specifying the ECB's supervisory expectations when assessing a bank's levels of prudential provisions for non-performing exposures. The ECB will, in this context, assess, among other things, the length of time an exposure has been classified as non-performing (vintage) as well as the collateral held. In April 2019, Regulation (EU) 2019/630 was issued, as regards to the minimum loss coverage for non-performing exposures, with an immediate effective date, prescribing the minimum provision coverages based on vintage and collateral held, for loans that originated after 26 April 2019.

On 27 June 2019, the revised rules on capital and liquidity (CRR II and CRD V) came into force, with CRR II being directly applicable in each EU MS, while CRD V should have been transposed into national law by each EU MS. Accordingly, CRD V has been transposed into the Cyprus national law. The CRR II is an amending regulation, therefore the existing provisions of CRR apply, unless they are specifically amended by CRR II. It is noted that certain CRR II provisions took immediate effect, while most amendments were applicable from 28 June 2021 onwards.

The CRR II amended significantly the CRR in several aspects such as the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, among others, and introduced some clarifications regarding disclosures on remuneration policies. It also includes new disclosure requirements on performing, non-performing and forborne exposures, and on collateral and financial guarantees received. The CRD V amended the CRD IV as regards to exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers and capital conservation measures.

46. CAPITAL MANAGEMENT (continued)

In October 2021, the European Commission adopted a review of EU banking rules and released legislative proposals for additional amendments to CRR, CRD IV and the Bank Recovery and Resolution Directive (BRRD or Directive 2014/59/EU) (the “2021 Banking Package”). The 2021 Banking Package will implement, amongst other things, the finalisation of the Basel III framework (known as Basel IV) in the EU effective from 1 January 2025, with some exceptions, which have not yet been transposed into EU law. The new banking package will strengthen the EU institutions’ risk-based capital framework, contributing as well to Europe's recovery from the COVID-19 pandemic and to the transition to climate neutrality. Moreover, the banking package envisages a further harmonisation of supervisory powers and enforcement tools and an increase of transparency and proportionality in the Pillar 3 disclosure requirements.

In April 2024, the EU Parliament has voted to adopt the Directive (EU) 2024/1619 (known as the “CRD VI”) and Regulation (EU) 2024/1623 (known as the “CRR III”). The legal texts have been confirmed by the Council and have been published on 19 June 2024 in the EU’s Official Journal.

CRR III entered into force on 9 July 2024 and most amended provisions of the CRR III will apply from 1 January 2025, while certain reforms are expected to be subject to transitional arrangements or to be phased-in over time. CRD VI entered into force on 9 July 2024, and EU MSs are required to adopt and publish the laws, regulations, and administrative provisions necessary to comply with CRD VI by 10 January 2026.

The Bank examined the revised framework and necessary steps are being taken to ensure timely compliance with the new regulation. The application of the new regulation is expected to have a decrease on RWAs and hence an increase in CET 1 ratio, stemming mainly from the changes in the methodologies for the calculation of operational RWAs and credit RWAs. During 2025 the publication of the revised ECB guidelines on options and discretions and EBA mandates might have additional impact on the CET1 ratios across the industry.

Supervisory Review and Evaluation Process (SREP)

As the Bank is a subsidiary of Eurobank S.A., and a member of the Eurobank Group, the ECB is not issuing a separate SREP decision for the 2024 SREP cycle for the Bank. As per the ECB’s decision communicated to the holding company, the capital requirements established by the Bank’s final 2023 SREP decision shall continue in full force and effect.

The final 2023 SREP decision, dated 30 November 2023, was based on the supervisory review and evaluation process conducted by the ECB with a reference date of 31 December 2022, and any other relevant information provided after that date. The SREP was conducted pursuant to Article 4(1)(f) of the SSM Regulation (i.e., Regulation (EU) No 1024/2013) and national legislation transposing Articles 73, 86, 97, 104a, 104b, 105 & 113 of the CRD considering the EBA SREP Guidelines. The SREP decision also considered the results of the supervisory stress test conducted in 2023. The 2023 SREP requirements were effective from 1 January 2024.

The Group is required to maintain for 2025, on a consolidated basis, a Total SREP Capital ratio requirement of 11,45% (2023: 11,45%), which includes:

- the minimum Pillar I own funds requirements of 8% in accordance with Article 92(1) of the CRR (of which up to 1,5% can be met with Additional Tier 1 Capital and up to 2% with Tier 2 Capital) and
- an own funds Pillar II requirement of 3,45% (2022 SREP: 3,45%) required to be held in excess of the minimum own fund requirement (P2R to be held in the form of 56,25% of CET 1 capital and 75% of Tier 1 capital).

46. CAPITAL MANAGEMENT (continued)

The Group is also required to maintain, effective from 1 January 2025, on a consolidated basis, a minimum phased-in Total Capital ratio requirement of 16,45% (31 December 2024: 16,20%), which includes the phased-in combined buffer requirement of 5% (31 December 2024: 4,75%), which for both years 2025 and 2024 comprises the Capital Conservation buffer (CCoB) of 2,5%, which has to be made up with CET 1 capital, the Other Systematically Important Institutions buffer (O-SII) of 1,5%, applicable as of 1 January 2025, (31 December 2024: 1,25%, applicable as of 1 January 2024) and the Countercyclical Capital buffer (CCyB) of approximately 1% (31 December 2024: approximately 1%).

Based on the final 2023 SREP letter which continues in full force and effect, the Pillar II requirement effective from 1 January 2025 has remained unchanged at 3,45%.

In addition, the ECB has provided on a consolidated basis, a non-public Pillar II capital guidance (P2G) ratio to be made up entirely of CET1 capital. Based on the final 2023 SREP decision which continues in full force and effect, the P2G effective from 1 January 2025 has remained unchanged.

As per the final 2023 SREP decision which continues in full force and effect, the Bank shall obtain the ECB's approval prior to making any distribution to its shareholders.

Taking the above into consideration, effective from 1 January 2025, the Group's minimum phased-in Total Capital Ratio, Tier 1 and CET 1 ratios, are set at 16,45% (31 December 2024: 16,20%), 13,59% (31 December 2024: 13,43%) and 11,44% (31 December 2024: 11,19%) respectively. These capital ratios exclude P2G and are based on the CBR of approximately 5,00% and 4,75% calculated as at 1 January 2025 and 31 December 2024, respectively.

Compliance with externally imposed capital requirements

The Group and the Bank have complied with the relevant minimum capital requirements (Pillar I and Pillar II) as at 31 December 2024 and 2023.

The insurance subsidiaries of the Group, Hellenic Life Insurance Company Limited and Pancyprian Insurance Limited, have complied with the requirements of Superintendent of Insurance and minimum solvency ratios as at 31 December 2024 and 2023. Therefore, there is no capital shortfall to be reported for the insurance subsidiaries of the Group, in accordance with Article 436 (g) of the CRR. The Solvency and Financial Condition Reports of Hellenic Life Insurance Company Limited and Pancyprian Insurance Limited are published annually on their official website.

Additional information on regulatory capital is disclosed in the unaudited Section "Additional Risk and Capital Management information for the year ended 31 December 2024", which is included in the Annual Financial Report.

47. RISK MANAGEMENT

Introduction and overview

The Group has exposure to the following risks from its operations and from the use of financial instruments:
- Credit risks
- Market risks
- Liquidity risks
- Operational risks

The Group is also exposed to insurance risk which arises from its insurance operations.

This note presents information about the Group's exposure to each of the above risks, the Bank's objectives, policies and processes for measuring and managing risk.

Risk Management Unit (RMU)

The management and monitoring of all Group's risks is centralised under a single unit, Risk Management, to which the following specialised risk management departments report:
- Enterprise Risk Management and Governance (ERMG)
- Credit Risk Management (CRM)
- Investment, Market and Liquidity Risk Management (IMLRM)
- Risk Strategy and Analytics (RSA)
- Operational Risk Management (ORM)
- Insurance Risk Management (IRM)

RMU consists of the above departments and is functionally independent from other units with executive authority and reports to the Board of Directors (BoD), through the Board Risk Management Committee (BRMC).

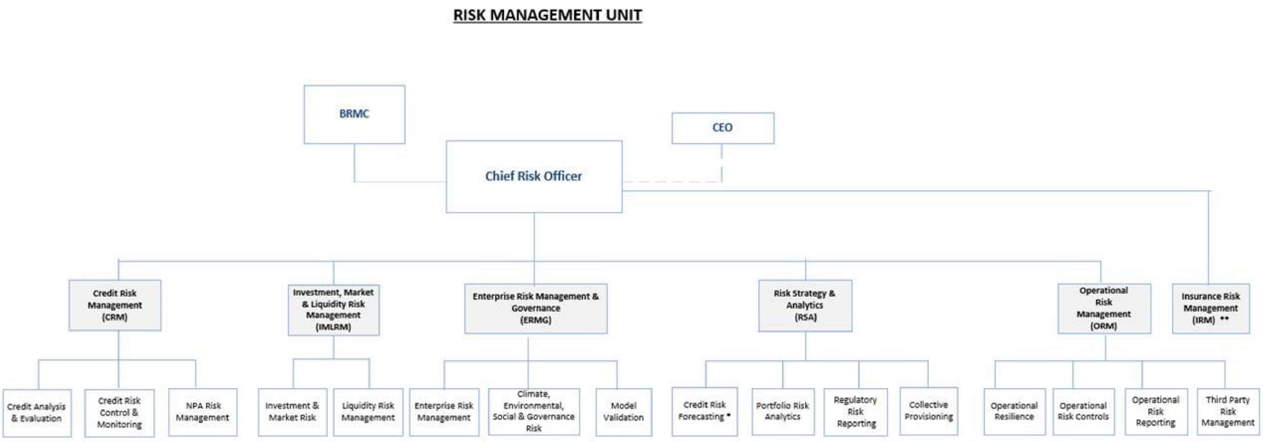
The departments cover all risk areas across the Group's operations and are intensively working to ensure that the Bank fully conforms to the provisions of the Accord of Basel III, the Directives of the regulatory authorities and international best practices.

The Risk Management Unit is organised in such a way as to cater for the needs of the Bank, in this dynamic landscape, cognisant of the intricacies of the Bank's business model and those of the external market and regulatory environment. The current structure aims to enhance the organisation of RMU and to reinforce the role of the second line of defence throughout the risk management cycle, with a special focus on the Bank's material risks.

47. RISK MANAGEMENT (continued)

Risk Management Unit (RMU) (continued)

Risk Management Unit Structure



* including Climate & Environmental credit risk measurement
** Provide services to the Bank's Insurance subsidiaries and functionally report to the respective Insurance subsidiaries' Board Committees

47.1 Enterprise Risk Management and Governance

The Enterprise Risk Management & Governance department serves as a horizontal function, that supports the holistic management of risks by bringing together all of RMU's practices under one integrated structure and to facilitate the development and review of the Risk Appetite Framework (RAF) and Risk Appetite Statement (RAS). The department also co-ordinates and drives cross-departmental and departmental projects (such as the Recovery Plan, ICAAP and other risk-based propositions) which enhance the management, monitoring of risks establishing a strong Risk Governance. Further to this the department ensures that a consistent approach is applied in Climate-related and Environmental (CE) Risks Identification and Assessment methodology and Materiality Assessments.

During the year, the 2024 RAS and RAF, approved in October 2023 by the Board of Directors, were applicable. The RAS and RAF were developed by the RMU in line with international standards and best practices. The RAF is part of the broader Enterprise Risk Management Framework (ERMF) and prescribes the process for risk appetite setting, feeding from the formulation of Material Risk Assessment following the updating of the Bank's Risk Taxonomy (broad risk register covering the whole spectrum of risk types and emerging risks).

47. RISK MANAGEMENT (continued)

47.1 Enterprise Risk Management and Governance (continued)

The Bank's RAS considers the resilience of risk limits and risk capacity under stress and makes the intrinsic link to the Bank's stress testing in the Internal Liquidity Adequacy Assessment Process (ILAAP) and the Internal Capital Adequacy Assessment Process (ICAAP). The outcomes of the stress tests are thereby incorporated into the capital metrics of the Risk Appetite, in the Strategic Plan, the Capital Plan and the Liquidity Contingency Plan (LCP) of the Bank. The RAS encompasses both Quantitative and Qualitative limits across an array of the risk types facing the Bank and delineates responsibilities for its implementation, monitoring and governance (which also escalation process) in line with the Three Lines of Defence model embedded within the ERMF. During this year's RAS Cycle, both Quantitative and Qualitative Statements were developed taking into consideration the Bank's Strategic focus and the Material Risks identified during the materiality assessment exercise. Following alignment with the Group, the new 2025 RAS structure is segmented in 3 Levels:

- Level 1 RAS cover the strategic view of the Bank's Management Body
- Level 2 RAS mainly cover the Bank's Material Risk categories as identified through the latest materiality assessment process
- Level 3 (Business Line Statements) represent the cascading of RAS into operational limits at business level, covering business segments, business lines and portfolios.

Within the department Model Validation activities are also incorporated where during the year, the unit conducted validation activities and prepared relevant reports with validation results assessing:

- the quantitative and qualitative adequacy of the models,
- the monitoring of performance and identification of limitations,
- the accurate development of the model based on its specified design and purpose,
- the application and use of the models by the relevant Units of the Bank.

Contingency Risk Management

The Bank continues to closely monitor the latest developments in Ukraine and Russia and Middle East and provides regular updates to the Executive Committees and Board Committees on contingency risk management actions and risk mitigation. The Bank is also taking all necessary and appropriate measures to manage all related risks and to comply with the applicable sanctions imposed. The monitoring of customers has also intensified, while transactions are strictly monitored and vetted accordingly. The Bank expects limited impact from its direct exposure, while any indirect impact will depend on the longevity and severity of crisis and its impact on the Cypriot economy. The Bank will continue to monitor the situation, taking all necessary measures to mitigate the impact on its operations and financial performance.

In response to the updated sanctions restrictions published by the European Union and the United Nations as well as by the authorities in the United States and the United Kingdom in 2024, the Bank remains fully committed to compliance with all applicable sanctions regulations, applying a zero-tolerance policy through rigorous and strict controls and measures.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk

Credit risk is the risk of financial loss to the Bank if a customer and/or other counterparty to a financial instrument fail to meet their contractual obligations. This risk principally arises from lending, trade finance activities and treasury operations. The management of credit risk is one of the most important areas in the Bank's operations and is essential for its long-term soundness. The Credit Risk management department (CRM) involves detecting, evaluating, measuring and observing/controlling credit risk, based on the strategic objectives of the Bank.

CRM is responsible for the holistic credit risk management of the Corporate, Commercial, Retail and International sectors, as well as for specialised lending such as Ship Finance and Factoring. The department has 3 sub-units: a. Credit Analysis & Evaluation; b. Credit Risk Control and Monitoring; and c. NPA Risk.

- CRM responsibilities focus on credit risk portfolio management in order to maximise Bank's risk-adjusted rate of return by maintaining credit risk exposure within acceptable risk appetite thresholds. In particular, CRM is inter-alia engaged in the following areas:
- Provides independent Credit Assessment, and specifically:
  - provides independent second line of defence advice and recommendations to the Approving Authorities for all credit applications, according to the terms of reference of each Committee;
  - ensures that risk opinions and recommendations are adequately recorded/acknowledged at the Approving Authorities' approval level;
  - liaises with the Credit Risk Control and Monitoring sub-unit for the review and update of credit policies.
- Leads the establishment and review of credit risk policies related to the performing and non-performing portfolio and ensures that these are in line with internal and external regulatory requirements;
- Defines credit risk methodology, reviews assumptions and validates Individual Impairment assessment of clients/group preliminarily performed by all business/front-line units;
- Monitors areas identified, measured, assessed and monitored through Key Risk Indicators and controlled until they are reduced within tolerance limits;
- Monitors the effectiveness of the Arrears Management Strategy by measuring and controlling risks (KRIs) as well as reducing / eliminating the risks identified;
- Provides independent second line of defence advice and recommendations to the respective Approving Authority for all restructuring applications which fall within the limits of Arrears and Property Management Committee;
- Supports the formulation and delivery of the de-risking and deleveraging activities of the Bank relating to NPA risk Management.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

Risk Strategy and Analytics (RSA)

Risk Strategy and Analytics is supporting Risk Management in credit risk modelling matters. It focuses on the analytically related elements of Risk Management with a focus on credit risk such as collective provisioning, rating and scoring models and regulatory and internal reporting.

Risk Strategy & Analytics, is a critical risk department, structured into the following four pillars and respective sub-units:

a. Credit Risk Forecasting,

b. Collective Provisioning

c. Portfolio Risk Analytics, and

d. Regulatory Risk Reporting.

Risk Strategy & Analytics assesses the strategy's robustness, coherence and compatibility with the Bank's current business model and environment to identify relevant risks and their impact on Bank's risk profile and to ensure alignment with the Risk Appetite metrics which RSA sets and monitors. The department also participates in specialised projects of strategic significance to the Bank along with the involvement in stress testing exercises, Early Warning and Forecasting.

RSA also maintains ownership of ECL, Collective provisioning process, specifically with respect to probabilities of default (PDs), Loss Given Default (LGDs) and Exposure at Default (EAD) models and parameters. Furthermore, RSA through the Portfolio Risk Analytics sub-unit is responsible for the preparation of the credit risk reporting and other credit related reporting as this is requested by the Committees under RSA responsibilities. In addition, the Regulatory Risk Reporting sub-unit is involved in CRR responsibilities such as COREP submissions, CRR Compliance, Basel IV implementation, completion of FINREP credit risk related templates and other credit risk standalone regulatory reports submissions.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

47.2.1 Exposure to credit risk

47.2.1.1 Loans per staging

Movement of gross loans between stages according to the increase in credit risk level as at 31 December is analysed in the table below.

	The Group and the Bank - 2024				
	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased or originated credit impaired €'000	**Total** **€'000**
1 January	5.198.834	404.409	269.845	288.744	**6.161.832**
Transfer from Stage 1 to Stage 2	(53.180)	53.180	-	-	**-**
Transfer from Stage 1 to Stage 3	(23.884)	-	23.884	-	**-**
Transfer from Stage 2 to Stage 3	-	(25.616)	25.616	-	**-**
Transfer from Stage 3 to Stage 2	-	19.663	(19.663)	-	**-**
Transfer from Stage 2 to Stage 1	163.351	(163.351)	-	-	**-**
Transfer from Stage 3 to Stage 1	9.855	-	(9.855)	-	**-**
Write offs net of recoveries of loan impairment losses	(949)	(30)	(27.224)	(14.345)	**(42.548)**
Interest accrued and other adjustments	263.410	13.811	17.209	17.463	**311.893**
New loans originated or purchased and drawdowns of existing facilities	1.080.667	14.772	7.577	11.176	**1.114.192**
Loans derecognised or repaid & other movements (excluding write-offs)	(1.515.314)	(79.092)	(52.973)	(61.468)	**(1.708.847)**
Exchange difference	13.708	14	(456)	4	**13.270**
31 December	5.136.498	237.760	233.960	241.574	**5.849.792**

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

	The Group and the Bank - 2023				
	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased or originated credit impaired €'000	**Total €'000**
1 January	4.949.898	571.388	380.560	321.083	**6.222.929**
Transfer from Stage 1 to Stage 2	(88.410)	88.410	-	-	**-**
Transfer from Stage 1 to Stage 3	(14.045)	-	14.045	-	**-**
Transfer from Stage 2 to Stage 3	-	(16.529)	16.529	-	**-**
Transfer from Stage 3 to Stage 2	-	38.659	(38.659)	-	**-**
Transfer from Stage 2 to Stage 1	248.029	(248.029)	-	-	**-**
Transfer from Stage 3 to Stage 1	13.238	-	(13.238)	-	**-**
Write offs net of recoveries of loan impairment losses	(299)	(77)	(47.376)	(16.402)	**(64.154)**
Interest accrued	215.457	17.384	18.845	15.595	**267.281**
New loans originated or purchased and drawdowns of existing facilities	980.003	35.510	8.403	33.563	**1.057.479**
Loans derecognised or repaid & other movements (excluding write-offs)	(1.096.715)	(82.315)	(66.323)	(65.096)	**(1.310.449)**
Exchange difference	(8.322)	8	1.277	1	**(7.036)**
Transfer to assets held for sale (refer to Note 29)	-	-	(4.218)	-	**(4.218)**
31 December	5.198.834	404.409	269.845	288.744	**6.161.832**

The table below discloses the accumulated impairment losses on the value of loans and advances:

	The Group and the Bank - 2024				
	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased or originated credit impaired €'000	**Total €'000**
1 January	17.186	20.597	99.848	80	**137.711**
Transfer from Stage 1 to Stage 2	(459)	459	-	-	**-**
Transfer from Stage 1 to Stage 3	(293)	-	293	-	**-**
Transfer from Stage 2 to Stage 3	-	(1.544)	1.544	-	**-**
Transfer from Stage 3 to Stage 2	-	4.397	(4.397)	-	**-**
Transfer from Stage 2 to Stage 1	5.691	(5.691)	-	-	**-**
Transfer from Stage 3 to Stage 1	1.805	-	(1.805)	-	**-**
Write offs net of recoveries of loan impairment losses	(949)	(30)	(26.963)	(14.345)	**(42.287)**
Contractual interest on impaired loans	320	647	15.486	17.319	**33.772**
Unwinding of discount	(251)	(396)	(8.534)	(16.650)	**(25.831)**
(Decrease)/increase due to derecognition	(227)	(4)	(123)	1.068	**714**
Charge/(reversal) for the year (refer to Note 14)	(13.673)	(6.305)	14.443	13.300	**7.765**
Exchange difference	34	-	(195)	(2)	**(163)**
31 December	9.184	12.130	89.597	770	**111.681**

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

	The Group and the Bank - 2023				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	**Total**
	€'000	€'000	€'000	€'000	**€'000**
1 January	24.543	26.958	144.809	(6.651)	**189.659**
Transfer from Stage 1 to Stage 2	(828)	828	-	-	**-**
Transfer from Stage 1 to Stage 3	(183)	-	183	-	**-**
Transfer from Stage 2 to Stage 3	-	(1.268)	1.268	-	**-**
Transfer from Stage 3 to Stage 2	-	7.927	(7.927)	-	**-**
Transfer from Stage 2 to Stage 1	9.798	(9.798)	-	-	**-**
Transfer from Stage 3 to Stage 1	2.679	-	(2.679)	-	**-**
Write offs net of recoveries of loan impairment losses	(299)	(77)	(47.376)	(16.402)	**(64.154)**
Contractual interest on impaired loans	249	932	17.988	15.688	**34.857**
Unwinding of discount	(194)	(713)	(9.246)	(15.306)	**(25.459)**
Decrease due to derecognition	(293)	(47)	(178)	(3.626)	**(4.144)**
Charge/(reversal) for the year (refer to Note 14)	(18.248)	(4.145)	4.640	26.378	**8.625**
Exchange difference	(38)	-	(712)	(1)	**(751)**
Transfer to assets held for sale (refer to Note 29)	-	-	(922)	-	**(922)**
31 December	17.186	20.597	99.848	80	**137.711**

Unwinding of discount amounting to €25,8 million (2023: €25,5 million) relates to interest income on impaired loans and advances to customers and is recognised in the income statement.

The contractual amount outstanding that was written off which relates to non contractual write offs in 2024 amounted to €24,3 million (2023: €50,9 million).

The value of collaterals of loans and advances to customers classified as Stage 3 and purchased or originated credit impaired is analysed as below:

	2024	2023
	€'000	€'000
Residential property	**775.886**	872.411
Commercial property	**317.023**	337.668
Land	**172.173**	206.782
Total property collaterals	**1.265.082**	1.416.861
Other collaterals	**57.577**	61.692
	1.322.659	1.478.553

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

Forborne Exposures
Consistent with the European Banking Authority's (EBA) technical standards the Group and the Bank consider forbone exposures to be (i) exposures which involve changes in their terms and/or conditions and (ii) the forbearance measures consist of concessions towards a debtor which aim to address existing or anticipated difficulties on the part of the borrower to service debt in accordance with the current repayment schedule. Changes in the terms and conditions of a contract that do not occur because the customer is not able to meet the terms and conditions of the contract due to financial difficulties do not constitute forbearance measures.

Loans and advances with forbearance measures are analysed, by industry sector, below:

	Gross Loans		Carrying amount	
	2024	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000
Trade	**33.446**	40.164	**26.164**	31.483
Construction and Real Estate	**23.696**	34.895	**17.532**	29.125
Manufacturing	**4.829**	3.781	**4.346**	3.599
Tourism	**8.368**	55.365	**7.749**	52.486
Retail	**187.942**	236.932	**155.246**	205.244
Other sectors	**16.595**	28.945	**16.212**	23.347
	274.876	400.082	**227.249**	345.284

The value of collaterals of loans and advances to customers with forbearance measures is analysed below:

	2024	2023
	€'000	€'000
Residential property	**342.985**	470.272
Commercial property	**209.209**	331.063
Land	**89.625**	130.874
Total property collaterals	**641.819**	932.209
Other collaterals	**43.540**	23.659
	685.359	955.868

47.2.1.2 Loans by risk categories

Risk categories
The loans and advances, are presented in risk categories based on the credit risk assessment system of the Group. The risk categories are as follows:

Grade 1 (Low Risk):
An immediate ability to repay the credit facility is assumed.

Grade 2 (Medium Risk):
The probability of indirect recovery of the credit facility is assumed.

Grade 3 (High Risk):
The debtor presents a higher risk compared to Grade 1 and 2 on the existence of direct and indirect recovery of the credit facility.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

Past due loans and advances
Represent loans and advances for which the contractual interest or principal repayments are past due.

Based on the above categories, loans and advances to customers are presented below:

	The Group and the Bank - 2024				
	Stage 1	Stage 2	Stage 3	Purchased or originated credit impaired	**Total**
	€'000	€'000	€'000	€'000	**€'000**
Grade 1 (low risk)	4.909.323	139.411	2.673	33.687	**5.085.094**
Grade 2 (medium risk)	221.461	84.514	123.125	149.921	**579.021**
Grade 3 (high risk)	5.714	13.835	108.162	57.966	**185.677**
Gross amount	5.136.498	237.760	233.960	241.574	**5.849.792**
Accumulated Impairment losses	(9.184)	(12.130)	(89.597)	(770)	**(111.681)**
Carrying amount	5.127.314	225.630	144.363	240.804	**5.738.111**
Past due exposures					
0+ up to 30 days	58.315	17.325	9.398	10.538	**95.576**
30+ up to 60 days	481	17.472	5.154	4.258	**27.365**
60+ up to 90 days	69	4.636	8.126	1.502	**14.333**
90 days+	329	1.135	148.866	111.081	**261.411**
Gross amount	59.194	40.568	171.544	127.379	**398.685**
Accumulated Impairment losses	(1.140)	(2.411)	(71.934)	(30.479)	**(105.964)**
Carrying amount	58.054	38.157	99.610	96.900	**292.721**
Forborne exposures					
Carrying amount	10.583	49.524	41.888	125.254	**227.249**

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

	The Group and the Bank - 2023				
	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased or originated credit impaired €'000	**Total €'000**
Grade 1 (low risk)	5.005.977	265.319	2.706	36.998	**5.311.000**
Grade 2 (medium risk)	185.298	125.586	130.009	172.234	**613.127**
Grade 3 (high risk)	7.559	13.504	137.130	79.512	**237.705**
Gross amount	5.198.834	404.409	269.845	288.744	**6.161.832**
Accumulated Impairment losses	(17.186)	(20.597)	(99.848)	(80)	**(137.711)**
Carrying amount	5.181.648	383.812	169.997	288.664	**6.024.121**
Past due exposures					
0+ up to 30 days	87.414	16.528	5.862	10.576	**120.380**
30+ up to 60 days	1.157	17.139	7.351	5.556	**31.203**
60+ up to 90 days	135	5.738	7.062	2.252	**15.187**
90 days+	1	1.900	197.797	149.015	**348.713**
Gross amount	88.707	41.305	218.072	167.399	**515.483**
Accumulated Impairment losses	(1.694)	(3.218)	(86.083)	(30.310)	**(121.305)**
Carrying amount	87.013	38.087	131.989	137.089	**394.178**
Forborne exposures					
Carrying amount	452	117.095	61.382	166.355	**345.284**

Based on the above categories, loans and advances to customers held for sale are presented below. There were no loans and advances to customers held for sale as at 31 December 2024.

	2023				
	Stage 1 €'000	Stage 2 €'000	Stage 3 €'000	Purchased or originated credit impaired €'000	**Total €'000**
Grade 1 (low risk)	-	-	-	-	**-**
Grade 2 (medium risk)	-	-	-	-	**-**
Grade 3 (high risk)	-	-	4.218	-	**4.218**
Gross amount	-	-	4.218	-	**4.218**
Accumulated Impairment losses	-	-	(922)	-	**(922)**
Carrying amount	-	-	3.296	-	**3.296**
Past due exposures					
0+ up to 30 days	-	-	-	-	**-**
30+ up to 60 days	-	-	-	-	**-**
60+ up to 90 days	-	-	-	-	**-**
90 days+	-	-	4.218	-	**4.218**
Gross amount	-	-	4.218	-	**4.218**
Accumulated Impairment losses	-	-	(922)	-	**(922)**
Carrying amount	-	-	3.296	-	**3.296**
Forborne exposures					
Carrying amount	-	-	3.141	-	**3.141**

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

Movement of carrying amount of loans and advances classified as Stage 3 and purchased or originated credit impaired (POCI):

	The Group and the Bank - 2024		
	Stage 3	Purchased or originated credit impaired	**Total**
	€'000	€'000	**€'000**
1 January	169.997	288.664	**458.661**
Transfer from Stage 1 to Stage 3	23.591	-	**23.591**
Transfer from Stage 2 to Stage 3	24.072	-	**24.072**
Transfer from Stage 3 to Stage 2	(15.266)	-	**(15.266)**
Transfer from Stage 3 to Stage 1	(8.050)	-	**(8.050)**
Net movement during the year	(49.720)	(47.866)	**(97.586)**
Exchange difference	(261)	6	**(255)**
31 December	144.363	240.804	**385.167**

	The Group and the Bank - 2023		
	Stage 3	Purchased or originated credit impaired	**Total**
	€'000	€'000	**€'000**
1 January	235.751	327.734	**563.485**
Transfer from Stage 1 to Stage 3	13.862	-	**13.862**
Transfer from Stage 2 to Stage 3	15.261	-	**15.261**
Transfer from Stage 3 to Stage 2	(30.732)	-	**(30.732)**
Transfer from Stage 3 to Stage 1	(10.559)	-	**(10.559)**
Net movement during the year	(52.279)	(39.072)	**(91.351)**
Exchange difference	1.989	2	**1.991**
Transfer to assets held for sale	(3.296)	-	**(3.296)**
31 December	169.997	288.664	**458.661**

47.2.1.3 Concentration of credit risk

The Group monitors concentration of credit risk by sector and by geographic location.

The concentration by geographic location for loans and advances to customers is measured based on the geographical location of the customer. The concentration by geographic location for investments and placements with other banks is based on the geographical location of the risk country of the issuer of the security and counterparty, respectively.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

The analysis of concentration of credit risk by sector of the Group is shown below:

	Loans and advances to customers		Loans and advances held for sale		Placements with other banks	
	2024	2023	**2024**	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000	**€'000**	€'000
Carrying amount	**5.738.111**	6.024.121	**-**	3.296	**355.416**	281.868
Businesses	**2.535.595**	2.760.581	**-**	4.218	**-**	-
Individuals	**3.314.197**	3.401.251	**-**	-	**-**	-
Banks	**-**	-	**-**	-	**355.576**	281.986
	5.849.792	6.161.832	**-**	4.218	**355.576**	281.986
Accumulated impairment losses	**(111.681)**	(137.711)	**-**	(922)	**(160)**	(118)
	5.738.111	6.024.121	**-**	3.296	**355.416**	281.868

Businesses in the above table include trade, construction and real estate, manufacturing, tourism and other companies as disclosed in Note 22.

The table below presents the geographical concentration of Loans and advances to customers, Loans and advances held for sale and Placements with other banks by country of risk based on the country of residency for individuals and the country of registration for companies:

	Loans and advances to customers		Loans and advances held for sale		Placements with other banks	
	2024	2023	**2024**	2023	**2024**	2023
	€'000	€'000	**€'000**	€'000	**€'000**	€'000
Carrying amount	**5.738.111**	6.024.121	**-**	3.296	**355.416**	281.868
Eurozone	**5.428.968**	5.787.729	**-**	4.218	**138.119**	81.499
Other European countries	**89.065**	86.833	**-**	-	**59.876**	53.631
America	**183.745**	149.346	**-**	-	**154.878**	143.464
Oceania	**50.987**	32.438	**-**	-	**-**	-
Asia	**244**	295	**-**	-	**2.560**	3.021
Middle East	**2.778**	2.250	**-**	-	**113**	189
Africa	**94.005**	102.941	**-**	-	**30**	182
	5.849.792	6.161.832	**-**	4.218	**355.576**	281.986
Accumulated expected credit losses	**(111.681)**	(137.711)	**-**	(922)	**(160)**	(118)
	5.738.111	6.024.121	**-**	3.296	**355.416**	281.868

47.2.1.4 Group's exposure in countries with high credit risk

The Group closely monitors developments in the international markets so that any measures needed to reduce credit risk are promptly taken.

The monitoring of exposures in countries of high risk is centralised through systems that fully and on an ongoing basis cover all material exposures to these countries such as interbank placements, debt securities, other investments etc. Also, maximum acceptable levels are specified taking into account the countries' credit ratings, political, economic and other factors.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

For the classification of a country as "High Risk" country, the Non-Investment Grade status of the country which as per the CRR is the worst, out of the best two ratings from Moody's, Fitch and S&P as well as its Credit Rating Outlook or the rating of the dependent territory are primarily considered.

Category "Other countries" includes less material exposures in a number of countries.

The analysis of concentration of credit risk in countries with high credit risk at the reporting date is shown below:

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2024	Bahrain €'000	Lebanon €'000	Liberia €'000	Marshall Islands €'000	Panama €'000	Iran €'000	Belarus €'000	South Africa €'000	Russia €'000	Ukraine €'000	Other countries €'000	**Total €'000**
Financial assets at amortised cost												
Placements with other Banks												
Carrying amount (amortised cost)	26	-	-	-	-	-	-	29	5	-	20	**80**
Accumulated Expected Credit Losses	-	-	-	-	-	-	-	-	-	-	-	**-**
Fair value	26	-	-	-	-	-	-	29	5	-	20	**80**
Loans and advances to customers												
Carrying amount (amortised cost)	-	183	93.416	50.756	72.141	298	316	479	1.599	119	49	**219.356**
Accumulated Expected Credit Losses	-	-	(71)	(154)	(73)	(529)	(1)	-	(489)	(53)	(43)	**(1.413)**
Fair value	-	177	88.809	47.842	67.333	257	313	480	1.547	110	48	**206.916**
Total book value	**26**	**183**	**93.416**	**50.756**	**72.141**	**298**	**316**	**508**	**1.604**	**119**	**69**	**219.436**

At 31 December 2023	Jordan €'000	Lebanon €'000	Liberia €'000	Marshall Islands €'000	Egypt €'000	Iran €'000	Belarus €'000	South Africa €'000	Russia €'000	Ukraine €'000	Other countries €'000	**Total €'000**
Financial assets at amortised cost												
Placements with other Banks												
Carrying amount (amortised cost)	39	-	-	-	-	-	-	182	5	-	-	**226**
Accumulated Expected Credit Losses	-	-	-	-	-	-	-	-	-	-	-	**-**
Fair value	39	-	-	-	-	-	-	182	5	-	-	**226**
Loan and advances to customers												
Carrying amount (amortised cost)	-	191	102.069	32.305	34	289	359	586	1.942	171	21	**137.967**
Accumulated Expected Credit Losses	-	(1)	(202)	(52)	(4)	(516)	(1)	(37)	(309)	(3)	(36)	**(1.161)**
Fair value	-	172	100.529	32.170	34	256	334	530	1.840	154	21	**136.040**
Total book value	**39**	**191**	**102.069**	**32.305**	**34**	**289**	**359**	**768**	**1.947**	**171**	**21**	**138.193**

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

47.2.1.5 Loans and advances at amortised cost by product

The tables below present a breakdown of loans and advances at amortised cost and their corresponding accumulated impairment losses with stage allocation by asset classification.

The coverage ratio represents the accumulated impairment losses divided by gross amount of loans and advances.

At 31 December 2024	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Gross amount of loans and advances							
Loans and advances	5.136.498	197.192	17.324	23.244	237.760	233.960	241.574
General Governments*	17.788	-	-	-	-	-	270
Other financial corporations	118.999	2.449	2	-	2.451	1.355	60
Non-financial corporations	2.055.546	145.957	4.846	3.539	154.342	55.778	42.002
of which: Small and Medium-sized enterprises	*1.530.865*	*144.880*	*4.846*	*3.537*	*153.263*	*48.730*	*42.001*
of which: Commercial real estate	*1.215.095*	*131.860*	*3.284*	*2.811*	*137.955*	*41.152*	*31.479*
By sector							
1. Construction	127.667	7.749	18	5	7.772	7.569	13.408
2. Wholesale and retail trade repair of motor vehicles and motorcycles	332.698	33.167	507	772	34.446	24.204	6.261
3. Real estate activities	192.414	9.382	848	1	10.231	3.530	4.768
4. Accommodation and food service activities	394.512	73.616	80	182	73.878	8.558	6.319
5. Manufacturing	337.792	7.560	995	326	8.881	4.192	6.199
6. Other	670.463	14.483	2.398	2.253	19.134	7.725	5.047
Households	2.944.165	48.786	12.476	19.705	80.967	176.827	199.242
of which: Residential mortgage loans	*2.328.462*	*34.923*	*9.468*	*15.593*	*59.984*	*129.116*	*159.498*
of which: Credit for consumption	*278.809*	*5.413*	*2.561*	*1.770*	*9.744*	*24.698*	*19.383*

*General governments include central governments, state or regional governments, and local governments, including administrative bodies and non-commercial undertakings, but excluding public companies and private companies held by these administrations that have a commercial activity, social security funds; and international organisations, such as the European Community, the International Monetary Fund and the Bank for International Settlements.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2024	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Accumulated impairment losses							
Loans and advances	9.184	9.718	515	1.897	12.130	89.597	770
General Governments*	23	-	-	-	-	-	(326)
Other financial corporations	427	58	-	-	58	458	51
Non-financial corporations	4.889	8.676	111	194	8.981	20.928	(1.333)
of which: Small and Medium-sized enterprises	*3.583*	*8.605*	*111*	*193*	*8.909*	*16.984*	*(1.335)*
of which: Commercial real estate	*2.975*	*8.088*	*68*	*152*	*8.308*	*13.987*	*(1.343)*
By sector							
1. Construction	319	95	1	1	97	3.372	3.236
2. Wholesale and retail trade repair of motor vehicles and motorcycles	1.078	3.006	13	52	3.071	10.892	(276)
3. Real estate activities	277	140	15	-	155	933	(114)
4. Accommodation and food service activities	753	4.803	2	10	4.815	1.087	825
5. Manufacturing	872	240	27	27	294	903	(1.572)
6. Other	1.590	392	53	104	549	3.741	(3.432)
Households	3.845	984	404	1.703	3.091	68.211	2.378
of which: Residential mortgage loans	*2.043*	*598*	*237*	*1.106*	*1.941*	*42.198*	*6.701*
of which: Credit for consumption	*907*	*245*	*146*	*243*	*634*	*13.494*	*238*

*General governments include central governments, state or regional governments, and local governments, including administrative bodies and non-commercial undertakings, but excluding public companies and private companies held by these administrations that have a commercial activity, social security funds; and international organisations, such as the European Community, the International Monetary Fund and the Bank for International Settlements.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2024	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Carrying amount of loans and advances							
Loans and advances	5.127.314	187.474	16.809	21.347	225.630	144.363	240.804
General Governments*	17.765	-	-	-	-	-	596
Other financial corporations	118.572	2.391	2	-	2.393	897	9
Non-financial corporations	2.050.657	137.281	4.735	3.345	145.361	34.850	43.335
of which: Small and Medium-sized enterprises	*1.527.282*	*136.275*	*4.735*	*3.344*	*144.354*	*31.746*	*43.336*
of which: Commercial real estate	*1.212.120*	*123.772*	*3.216*	*2.659*	*129.647*	*27.165*	*32.822*
By sector							
1. Construction	127.348	7.654	17	4	7.675	4.197	10.172
2. Wholesale and retail trade repair of motor vehicles and motorcycles	331.620	30.161	494	720	31.375	13.312	6.537
3. Real estate activities	192.137	9.242	833	1	10.076	2.597	4.882
4. Accommodation and food service activities	393.759	68.813	78	172	69.063	7.471	5.494
5. Manufacturing	336.920	7.320	968	299	8.587	3.289	7.771
6. Other	668.873	14.091	2.345	2.149	18.585	3.984	8.479
Households	2.940.320	47.802	12.072	18.002	77.876	108.616	196.864
of which: Residential mortgage loans	*2.326.419*	*34.325*	*9.231*	*14.487*	*58.043*	*86.918*	*152.797*
of which: Credit for consumption	*277.902*	*5.168*	*2.415*	*1.527*	*9.110*	*11.204*	*19.145*

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47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2024	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
Coverage ratio							
Loans and advances	0,2%	4,9%	3,0%	8,2%	5,1%	38,3%	0,3%
General Governments*	0,1%	0,0%	0,0%	3,4%	3,4%	0,0%	(120,8)%
Other financial corporations	0,4%	2,3%	9,4%	18,4%	2,3%	33,8%	86,0%
Non-financial corporations	0,2%	5,9%	2,3%	5,5%	5,8%	37,5%	(3,2)%
of which: Small and Medium-sized enterprises	*0,2%*	*5,9%*	*2,3%*	*5,5%*	*5,8%*	*34,9%*	*(3,2)%*
of which: Commercial real estate	*0,2%*	*6,1%*	*2,1%*	*5,4%*	*6,0%*	*34,0%*	*(4,3)%*
By sector							
1. Construction	0,2%	1,2%	4,9%	25,4%	1,3%	44,5%	24,1%
2. Wholesale and retail trade repair of motor vehicles and motorcycles	0,3%	9,1%	2,5%	6,7%	8,9%	45,0%	(4,4)%
3. Real estate activities	0,1%	1,5%	1,8%	22,2%	1,5%	26,4%	(2,4)%
4. Accommodation and food service activities	0,2%	6,5%	2,7%	5,4%	6,5%	12,7%	13,1%
5. Manufacturing	0,3%	3,2%	2,7%	8,2%	3,3%	21,5%	(25,4)%
6. Other	0,2%	2,7%	2,2%	4,6%	2,9%	48,4%	(68,0)%
Households	0,1%	2,0%	3,2%	8,6%	3,8%	38,6%	1,2%
of which: Residential mortgage loans	*0,1%*	*1,7%*	*2,5%*	*7,1%*	*3,2%*	*32,7%*	*4,2%*
of which: Credit for consumption	*0,3%*	*4,5%*	*5,7%*	*13,7%*	*6,5%*	*54,6%*	*1,2%*

*General governments include central governments, state or regional governments, and local governments, including administrative bodies and non-commercial undertakings, but excluding public companies and private companies held by these administrations that have a commercial activity, social security funds; and international organisations, such as the European Community, the International Monetary Fund and the Bank for International Settlements.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2023	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Gross amount of loans and advances							
Loans and advances	5.198.834	363.104	16.528	24.777	404.409	269.845	288.744
General Governments*	3.864	-	-	-	-	-	-
Other financial corporations	129.286	5.540	13	11	5.564	2.906	102
Non-financial corporations	2.174.387	243.574	4.762	3.266	251.602	55.076	48.727
of which: Small and Medium-sized enterprises	*1.546.003*	*243.570*	*4.762*	*3.266*	*251.598*	*47.384*	*48.727*
of which: Commercial real estate	*1.223.881*	*214.576*	*2.022*	*1.561*	*218.159*	*39.472*	*34.842*
By sector							
1. Construction	105.706	25.510	80	623	26.213	7.154	14.414
2. Wholesale and retail trade repair of motor vehicles and motorcycles	418.294	48.845	444	1.163	50.452	26.244	8.121
3. Real estate activities	175.553	16.269	2.406	-	18.675	3.495	5.298
4. Accommodation and food service activities	410.418	114.257	158	101	114.516	7.013	7.712
5. Manufacturing	390.623	14.319	459	901	15.679	2.818	7.082
6. Other	673.793	24.374	1.215	478	26.067	8.352	6.100
Households	2.891.297	113.990	11.753	21.500	147.243	211.863	239.915
of which: Residential mortgage loans	*2.278.177*	*89.001*	*7.150*	*17.274*	*113.425*	*148.623*	*185.737*
of which: Credit for consumption	*271.558*	*12.312*	*3.371*	*2.099*	*17.782*	*29.584*	*24.703*

*General governments include central governments, state or regional governments, and local governments, including administrative bodies and non-commercial undertakings, but excluding public companies and private companies held by these administrations that have a commercial activity, social security funds; and international organisations, such as the European Community, the International Monetary Fund and the Bank for International Settlements.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2023	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Accumulated impairment losses							
Loans and advances	17.186	17.379	748	2.470	20.597	99.848	80
General Governments*	22	-	-	-	-	-	-
Other financial corporations	1.272	270	1	-	271	561	44
Non-financial corporations	10.029	15.052	193	391	15.636	22.224	(1.018)
of which: Small and Medium-sized enterprises	*7.206*	*15.052*	*193*	*391*	*15.636*	*18.248*	*(1.018)*
of which: Commercial real estate	*5.700*	*13.580*	*74*	*122*	*13.776*	*14.560*	*(1.771)*
By sector							
1. Construction	598	1.024	6	57	1.087	3.704	2.569
2. Wholesale and retail trade repair of motor vehicles and motorcycles	2.244	4.315	28	224	4.567	11.427	(563)
3. Real estate activities	518	398	79	-	477	1.173	74
4. Accommodation and food service activities	1.331	7.845	5	11	7.861	1.199	1.120
5. Manufacturing	2.051	445	19	69	533	1.190	(1.225)
6. Other	3.287	1.025	56	30	1.111	3.531	(2.993)
Households	5.863	2.057	554	2.079	4.690	77.063	1.054
of which: Residential mortgage loans	*3.241*	*1.286*	*276*	*1.318*	*2.880*	*44.385*	*4.430*
of which: Credit for consumption	*1.170*	*397*	*210*	*264*	*871*	*13.960*	*(35)*

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47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2023	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Carrying amount of loans and advances							
Loans and advances	5.181.648	345.725	15.780	22.307	383.812	169.997	288.664
General Governments*	3.842	-	-	-	-	-	-
Other financial corporations	128.014	5.270	12	11	5.293	2.345	58
Non-financial corporations	2.164.358	228.522	4.569	2.875	235.966	32.852	49.745
of which: Small and Medium-sized enterprises	*1.538.797*	*228.518*	*4.569*	*2.875*	*235.962*	*29.136*	*49.745*
of which: Commercial real estate	*1.218.181*	*200.996*	*1.948*	*1.439*	*204.383*	*24.912*	*36.613*
By sector							
1. Construction	105.108	24.486	74	566	25.126	3.450	11.845
2. Wholesale and retail trade repair of motor vehicles and motorcycles	416.050	44.530	416	939	45.885	14.817	8.684
3. Real estate activities	175.035	15.871	2.327	-	18.198	2.322	5.224
4. Accommodation and food service activities	409.087	106.412	153	90	106.655	5.814	6.592
5. Manufacturing	388.572	13.874	440	832	15.146	1.628	8.307
6. Other	670.506	23.349	1.159	448	24.956	4.821	9.093
Households	2.885.434	111.933	11.199	19.421	142.553	134.800	238.861
of which: Residential mortgage loans	*2.274.936*	*87.715*	*6.874*	*15.956*	*110.545*	*104.238*	*181.307*
of which: Credit for consumption	*270.388*	*11.915*	*3.161*	*1.835*	*16.911*	*15.624*	*24.738*

*General governments include central governments, state or regional governments, and local governments, including administrative bodies and non-commercial undertakings, but excluding public companies and private companies held by these administrations that have a commercial activity, social security funds; and international organisations, such as the European Community, the International Monetary Fund and the Bank for International Settlements.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

At 31 December 2023	Stage 1	Stage 2			Total Stage 2	Stage 3	Purchased or originated credit impaired
		Not past due	<=30 days past due	>30 days past due			
Coverage ratio							
Loans and advances	0,3%	4,8%	4,5%	10,0%	5,1%	37,0%	0,0%
General Governments*	0,6%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
Other financial corporations	1,0%	4,9%	10,3%	4,0%	4,9%	19,3%	43,5%
Non-financial corporations	0,5%	6,2%	4,0%	12,0%	6,2%	40,4%	(2,1)%
of which: Small and Medium-sized enterprises	*0,5%*	*6,2%*	*4,0%*	*12,0%*	*6,2%*	*38,5%*	*(2,1)%*
of which: Commercial real estate	*0,5%*	*6,3%*	*3,7%*	*7,8%*	*6,3%*	*36,9%*	*(5,1)%*
By sector							
1. Construction	0,6%	4,0%	7,2%	9,1%	4,1%	51,8%	17,8%
2. Wholesale and retail trade repair of motor vehicles and motorcycles	0,5%	8,8%	6,2%	19,3%	9,1%	43,5%	(6,9)%
3. Real estate activities	0,3%	2,4%	3,3%	0,8%	2,6%	33,6%	1,4%
4. Accommodation and food service activities	0,3%	6,9%	3,0%	10,6%	6,9%	17,1%	14,5%
5. Manufacturing	0,5%	3,1%	4,2%	7,6%	3,4%	42,2%	(17,3)%
6. Other	0,5%	4,2%	4,6%	6,2%	4,3%	42,3%	(49,1)%
Households	0,2%	1,8%	4,7%	9,7%	3,2%	36,4%	0,4%
of which: Residential mortgage loans	*0,1%*	*1,4%*	*3,9%*	*7,6%*	*2,5%*	*29,9%*	*2,4%*
of which: Credit for consumption	*0,4%*	*3,2%*	*6,2%*	*12,6%*	*4,9%*	*47,2%*	*(0,1)%*

*General governments include central governments, state or regional governments, and local governments, including administrative bodies and non-commercial undertakings, but excluding public companies and private companies held by these administrations that have a commercial activity, social security funds; and international organisations, such as the European Community, the International Monetary Fund and the Bank for International Settlements.

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

47.2.1.6 LTV buckets (retail and Mortgage segment)

The following table shows the ranges of loan-to value (LTV) ratio for Residential mortgage loans split between stages according to the increase in credit risk level. LTV is calculated as the ratio of the gross carrying amount to the value of the total real estate collateral.

	Gross Loans	
	2024	2023
	€ 'millions	€ 'millions
Stage 1 and Stage 2		
Less than 50%	**1.594**	1.552
51%-70%	**609**	625
71%-90%	**144**	162
91%-100%	**18**	21
More than 100%	**24**	32
Unsecured	**-**	-
Total	**2.389**	2.392
	2024	2023
	€ 'millions	€ 'millions
Stage 3		
Less than 50%	**54**	58
51%-70%	**24**	31
71%-90%	**21**	19
91%-100%	**10**	13
More than 100%	**20**	28
Unsecured	**-**	-
Total	**129**	149
	2024	2023
	€ 'millions	€ 'millions
Purchased or originated credit impaired		
Less than 50%	**94**	108
51%-70%	**32**	43
71%-90%	**21**	23
91%-100%	**6**	7
More than 100%	**6**	5
Unsecured	**-**	-
Total	**159**	186
	2.677	2.727

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

47.2.1.7 Maximum exposure to credit risk

The following table shows the maximum exposure to credit risk of loans and advances to customers and contingent liabilities and commitments:

31 December 2024	**Loans and advances to customers**				**Financial guarantees and loan commitments**
	Stage 1 and Stage 2 €'000	Stage 3 €'000	Purchased Credit Impaired €'000	**Total portfolio €'000**	**€'000**
Maximum exposure to credit risk	5.352.944	144.363	240.804	**5.738.111**	**1.424.338**
Fair value of collateral and credit enhancements held by the Group					
Cash	345.351	6.844	1.637	**353.832**	**130.213**
Letters of credit / Guarantees	272.861	8.504	23.499	**304.864**	**24.467**
Property	14.439.015	523.358	737.257	**15.699.630**	**551.077**
Other	1.126.385	429	1.490	**1.128.304**	**79.052**
Surplus collateral	(11.594.759)	(338.449)	(530.344)	**(12.463.552)**	**-**
Net collateral	4.588.853	200.686	233.539	**5.023.078**	**784.809**
Net exposure to credit risk	764.091	(56.323)	7.265	**715.033**	**639.529**

31 December 2023	**Loans and advances to customers**				**Financial guarantees and loan commitments**
	Stage 1 and Stage 2 €'000	Stage 3 €'000	Purchased Credit Impaired €'000	**Total portfolio €'000**	**€'000**
Maximum exposure to credit risk	5.565.460	169.997	288.664	**6.024.121**	**1.493.346**
Fair value of collateral and credit enhancements held by the Group					
Cash	348.903	6.436	2.350	**357.689**	**133.414**
Letters of credit / Guarantees	313.829	10.312	26.030	**350.171**	**24.068**
Property	14.686.989	574.405	837.302	**16.098.696**	**639.811**
Other	892.728	2.308	14	**895.050**	**73.949**
Surplus collateral	(11.525.424)	(369.854)	(587.700)	**(12.482.978)**	**-**
Net collateral	4.717.025	223.607	277.996	**5.218.628**	**871.242**
Net exposure to credit risk	848.435	(53.610)	10.668	**805.493**	**622.104**

47. RISK MANAGEMENT (continued)

47.2 Credit Risk (continued)

The following table shows the maximum exposure to credit risk of loans and advances to customers and contingent liabilities and commitments held for sale.

There were no loans and advances to customers and contingent liabilities and commitments held for sale as at 31 December 2024.

	Loans and advances to customers held for sale				Financial guarantees and loan commitments
31 December 2023	Stage 1 and Stage 2 €'000	Stage 3 €'000	Purchased Credit Impaired €'000	**Total portfolio €'000**	**€'000**
Maximum exposure to credit risk	-	3.296	-	**3.296**	**-**
Fair value of collateral and credit enhancements held by the Group					
Property	-	12.276	-	**12.276**	**-**
Surplus collateral	-	(8.102)	-	**(8.102)**	**-**
Net collateral	-	4.174	-	**4.174**	**-**
Net exposure to credit risk	-	(878)	-	**(878)**	**-**

For assets other than loans and advances to customers, the Group's maximum and net exposure to credit risk equals their carrying amount.

47.3 Market Risk

Market risk is the risk that the fair value or future cash flows of financial instruments will fluctuate due to changes in market variables such as interest rates, foreign exchange rates and security prices.

Market risk is managed by the Investment, Market and Liquidity Risk Management (IMLRM) department, an independent second line of defence department, which is responsible to identify, assess, monitor and control the Group's exposure to investment, market and liquidity risks emanating from the statement of financial position and accordingly ensure adherence with the approved risk frameworks and policies, the regulatory limits and the internal limits set by the Risk Appetite Statement (RAS) and by the Assets and Liabilities Management Committee (ALCO).

IMLRM consists of the Investment & Market Risk sub-unit and the Liquidity Risk sub-unit.

The Group's approach towards market risk management is to concentrate these risks for all Group business units under the Treasury department. Treasury manages risks using a framework of activities and limits approved by ALCO which is responsible for the implementation of the policy of the Bank's Board of Directors regarding the risks and profitability arising from the Group's assets and liabilities. The Risk Management Unit is responsible for developing frameworks, policies and processes for managing the risks and for their daily assessment and monitoring. Frameworks and policies are reviewed at regular time intervals and are approved by ALCO, the Board Risk Management Committee and the Board of Directors itself.

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

All investment related risks are monitored and controlled by the Investment & Market Risk sub-unit which is responsible for reviewing and updating the general principles and guidelines for the effective management of the Bank's investments as established through the Bank's Investment Framework.

Investment & Market Risk constantly monitors the Bank's investment portfolios ensuring that they are maintained within the approved risk profile, while performing relevant reports to the Bank's ALCO, BRMC and the BoD. Additionally, the Unit reviews, updates and constantly monitors all relevant investment limits, including all country and counterparty limits as set through the Hellenic Bank Investment Framework (HBIF), while ensuring timely escalation and rectification of any limit breaches.

Through the HBIF, the Bank aims to provide the principles and guidelines for the effective management of the Bank's investments, in order to:

- Manage the risks arising from the Bank's investment decisions and practices;
- Actively promote a risk-sensitive investment culture;
- Determine appropriate methods for managing risks from investments;
- Ensure sufficient diversification and avoid excessive concentrations;
- Establish adequate limits and controls that enable effective investment risk management of the investment portfolios;
- Set and monitor counterparty and country limits;
- Ensure that all investment activities are consistent with the Bank's Risk Appetite and investment strategy.

47.3.1 Foreign Exchange Risk
Foreign exchange risk results from the undertaking of an open position, in one or more foreign currencies, arising from the total assets and liabilities of the Group. The Investment, Market and Liquidity Risk Management Unit monitors foreign currency positions on an ongoing basis within the risk management framework and the limits set by ALCO and the regulatory authorities. Within this framework, there are nominal limits (by currency, in total, during the day, end-of-day), gain/loss limits and Value-at-Risk (VaR) limits. The regulatory limits for open positions during working hours exceed the limits for open positions during non- working hours.

The VaR methodology is an important tool for the monitoring of foreign exchange risk. With this methodology, the Group calculates the maximum potential loss that may be incurred as a result of changes in market conditions, at a confidence level of 99% and over a one-day period (using the parametric method) based on the historical data of foreign exchange rate parities over a period of one year.

The table below presents VaR figures for the Group's foreign exchange risk:

	2024	2023
	€'000	€'000
At 31 December	**3**	7
Average for the year	**4**	8
Maximum amount for the year	**5**	10
Minimum amount for the year	**2**	7

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

The limitations of the VaR methodology arise from the fact that the historical data used in the calculation may not be indicative of future events.

Analysis of assets and liabilities of the Group by currency as at 31 December 2024

	Euro €'000	US Dollar €'000	British pound €'000	Russian Rouble €'000	Swiss Franc €'000	Other currencies €'000	**Total €'000**
Assets							
Cash and balances with Central Banks	5.724.904	3.302	2.057	6	10	265	**5.730.544**
Placements with other banks	90.404	217.027	29.949	838	5.320	11.878	**355.416**
Reverse repurchase agreements	300.274	-	-	-	-	-	**300.274**
Loans and advances to customers	5.424.493	303.131	2.182	2	7.401	902	**5.738.111**
Debt securities	5.475.063	200.611	-	-	-	-	**5.675.674**
Equity securities and collective investment units	123.360	22.316	-	-	-	-	**145.676**
Property, plant and equipment	173.108	-	-	-	-	-	**173.108**
Stock of property	76.229	-	-	-	-	-	**76.229**
Intangible assets	51.157	-	-	-	-	-	**51.157**
Tax receivable	4.249	-	-	-	-	-	**4.249**
Other assets	77.302	1.339	150	-	-	-	**78.791**
Reinsurance contract assets	28.489	-	-	-	-	-	**28.489**
Total assets	17.549.032	747.726	34.338	846	12.731	13.045	**18.357.718**
Liabilities							
Deposits by banks	190.846	658	-	-	-	-	**191.504**
Customer deposits and other customer accounts	14.694.940	841.826	103.962	837	4.350	12.170	**15.658.085**
Tax payable	19.500	-	-	-	-	-	**19.500**
Deferred tax liability	11.504	-	-	-	-	-	**11.504**
Other liabilities	170.691	1.961	72	-	22	187	**172.933**
Insurance contract liabilities	106.314	-	-	-	-	-	**106.314**
Loan capital	309.659	-	-	-	-	-	**309.659**
	15.503.454	844.445	104.034	837	4.372	12.357	**16.469.499**
Equity							
Share capital	206.403	-	-	-	-	-	**206.403**
Reserves	1.681.806	-	-	-	-	-	**1.681.806**
Equity attributable to shareholders of the parent company	1.888.209	-	-	-	-	-	**1.888.209**
Non-controlling interests	10	-	-	-	-	-	**10**
	1.888.219	-	-	-	-	-	**1.888.219**
Total liabilities and equity	17.391.673	844.445	104.034	837	4.372	12.357	**18.357.718**
Total position	157.359	(96.719)	(69.696)	9	8.359	688	
Effect of foreign currency derivatives on position	(159.971)	97.673	69.758	-	(7.426)	(34)	
Net currency position	(2.612)	954	62	9	933	654	

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

Analysis of assets and liabilities of the Group by currency at 31 December 2023

	Euro €'000	US Dollar €'000	British pound €'000	Russian Rouble €'000	Swiss Franc €'000	Other currencies €'000	**Total €'000**
Assets							
Cash and balances with Central Banks	8.218.947	2.008	1.578	8	25	279	**8.222.845**
Placements with other banks	47.844	183.561	26.245	1.260	3.902	19.056	**281.868**
Loans and advances to customers	5.779.719	229.295	3.319	3	10.602	1.183	**6.024.121**
Debt securities	4.794.570	190.474	-	-	-	-	**4.985.044**
Equity securities and collective investment units	116.703	15.755	-	-	-	-	**132.458**
Property, plant and equipment	170.056	-	-	-	-	-	**170.056**
Stock of property	100.351	-	-	-	-	-	**100.351**
Intangible assets	45.483	-	-	-	-	-	**45.483**
Tax receivable	4.648	-	-	-	-	-	**4.648**
Assets and disposal group held for sale	3.296	-	-	-	-	-	**3.296**
Other assets	68.018	216	-	-	-	6	**68.240**
Reinsurance contract assets	23.515	-	-	-	-	-	**23.515**
Total assets	19.373.150	621.309	31.142	1.271	14.529	20.524	**20.061.925**
Liabilities							
Deposits by banks	92.080	498	400	-	11	3.810	**96.799**
Funding by Central Banks	2.355.508	-	-	-	-	-	**2.355.508**
Customer deposits and other customer accounts	14.332.209	854.554	108.165	1.239	3.994	14.627	**15.314.788**
Tax payable	13.896	-	-	-	-	-	**13.896**
Deferred tax liability	11.329	-	-	-	-	-	**11.329**
Other liabilities	220.962	12.555	69	-	274	48	**233.908**
Insurance contract liabilities	87.529	-	-	-	-	-	**87.529**
Loan capital	441.815	-	-	-	-	-	**441.815**
	17.555.328	867.607	108.634	1.239	4.279	18.485	**18.555.572**
Equity							
Share capital	206.403	-	-	-	-	-	**206.403**
Reserves	1.299.938	-	-	-	-	-	**1.299.938**
Equity attributable to shareholders of the parent company	1.506.341	-	-	-	-	-	**1.506.341**
Non-controlling interests	12	-	-	-	-	-	**12**
	1.506.353	-	-	-	-	-	**1.506.353**
Total liabilities and equity	19.061.681	867.607	108.634	1.239	4.279	18.485	**20.061.925**
Total position	311.469	(246.298)	(77.492)	32	10.250	2.039	
Effect of foreign currency derivatives on position	(313.090)	248.193	77.566	-	(11.566)	(1.103)	
Net currency position	(1.621)	1.895	74	32	(1.316)	936	

47.3.2 Interest rate risk

Interest rate risk is the Bank's exposure to adverse movements in interest rates and it arises mainly as a result of timing differences on the interest rate repricing of assets, liabilities and off-balance sheet items.

Interest rate risk is managed through the monitoring of the interest rate gaps by currency, by time interval and in total (gap analysis).

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

Interest rate risk is assessed as one of the most material risks for the Bank, while its importance has grown significantly during the past couple of years as a result of material increases in monetary policy rates by Central Banks as a response to elevated inflation rates. More specifically, the European Central Bank (ECB) increased its Deposit Facility Rate (DFR) from -0,50% to 4,00% in the period July 2022 to September 2023, contributing significantly towards the increase in the Bank's Net Interest Income (NII) as well as towards the increase in its profitability. During 2024 however, and as inflation rate subsided closer to the central bank's targets, the ECB revised its monetary policy reducing the DFR to 3.75% in June 2024, 3.50% in September 2024, 3.25% in October 2024, 3.00% in December 2024 and 2.75% in February 2025.

As a consequence, the Bank's NII sensitivity to a negative change in interest rates has also increased and is expected to negatively impact the Bank's profitability in the near future as market rates drop. More specifically, during 2025 market rates are expected to drop further as inflation subsides closer to ECB's target rate. Increased geopolitical risks, however, could keep prices elevated through a supply side shock (energy crisis, food prices, freight costs), causing market rates to remain at higher levels than what international markets are projecting.

The Bank performs several scenarios analysing the impact of changes in interest rates on the Bank's Economic Value and on its Net Interest Income, while also monitoring and controlling Credit Spread Risk in the Banking Book (CSRBB).

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

Analysis of financial assets and financial liabilities of the Group based on their repricing profile as at 31 December 2024

The repricing profile of financial assets and financial liabilities for the Group is determined by analysing the repricing frequency of financial assets and liabilities with a contractually defined maturity profile, the behavioral duration of financial assets and liabilities without a contractually defined maturity profile, and by taking into consideration various financial options (e.g. call or put options).

	Non-interest bearing €'000	Within one month €'000	Between one and three months €'000	Between three months and one year €'000	Between one and five years €'000	Over five years €'000	**Total €'000**
Financial assets							
Cash and balances with Central Banks	100.684	5.629.860	-	-	-	-	**5.730.544**
Placements with other banks	40.352	3.373	-	-	311.691	-	**355.416**
Reverse repurchase agreements	-	300.274	-	-	-	-	**300.274**
Loans and advances to customers	-	810.911	381.330	3.826.931	368.581	350.358	**5.738.111**
Debt securities	-	697.678	132.716	742.552	2.254.486	1.848.242	**5.675.674**
Equity securities and collective investment units	91.510	583	12.600	3.033	31.996	5.954	**145.676**
Derivatives	21.605	-	-	-	-	-	**21.605**
Indemnification asset	3.200	-	-	-	-	-	**3.200**
Total financial assets	257.351	7.442.679	526.646	4.572.516	2.966.754	2.204.554	**17.970.500**
Financial liabilities							
Deposits by banks	-	153.469	1.886	8.673	26.842	634	**191.504**
Customer deposits and other customer accounts	-	5.780.396	2.172.007	3.385.032	2.248.854	2.071.796	**15.658.085**
Tax payable	19.500	-	-	-	-	-	**19.500**
Deferred tax liability	11.504	-	-	-	-	-	**11.504**
Derivatives	-	205	-	-	-	-	**205**
Other financial liabilities	943	-	-	-	-	-	**943**
Loan capital	-	-	-	100.481	209.178	-	**309.659**
Total financial liabilities	31.947	5.934.070	2.173.893	3.494.186	2.484.874	2.072.430	**16.191.400**
Total position	225.404	1.508.609	(1.647.247)	1.078.330	481.880	132.124	**1.779.100**
Nominal value of interest rate derivatives	(600.000)	-	-	-	600.000	-	**-**
Net position	(374.596)	1.508.609	(1.647.247)	1.078.330	1.081.880	132.124	**1.779.100**

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

Analysis of financial assets and financial liabilities of the Group based on their contractual repricing or maturity dates at 31 December 2023

	Non-interest bearing €'000	Within one month €'000	Between one and three months €'000	Between three months and one year €'000	Between one and five years €'000	Over five years €'000	**Total €'000**
Financial assets							
Cash and balances with Central Banks	95.336	8.127.509	-	-	-	-	**8.222.845**
Placements with other banks	22.756	259.112	-	-	-	-	**281.868**
Loans and advances to customers	-	887.965	4.221.462	279.007	336.941	298.746	**6.024.121**
Debt securities	-	796.512	267.794	660.072	2.186.346	1.074.320	**4.985.044**
Equity securities and collective investment units	83.144	-	15.628	6.924	24.796	1.966	**132.458**
Financial assets held for sale	-	-	-	3.296	-	-	**3.296**
Derivatives	16	-	-	-	-	-	**16**
Other financial assets	8.180	-	-	-	-	-	**8.180**
Total financial assets	209.432	10.071.098	4.504.884	949.299	2.548.083	1.375.032	**19.657.828**
Financial liabilities							
Deposits by banks	-	47.004	2.475	8.830	34.671	3.819	**96.799**
Funding by Central Banks	-	2.355.508	-	-	-	-	**2.355.508**
Customer deposits and other customer accounts	-	5.540.904	2.142.278	3.134.505	2.408.994	2.088.107	**15.314.788**
Other financial liabilities	1.634	-	-	-	-	-	**1.634**
Derivatives	3.327	-	-	-	-	-	**3.327**
Loan capital	-	-	-	103.537	208.612	129.666	**441.815**
Total financial liabilities	4.961	7.943.416	2.144.753	3.246.872	2.652.277	2.221.592	**18.213.871**
Total position	204.471	2.127.682	2.360.131	(2.297.573)	(104.194)	(846.560)	**1.443.957**
Nominal value of interest rate derivatives	-	-	-	-	-	-	**-**
Net position	204.471	2.127.682	2.360.131	(2.297.573)	(104.194)	(846.560)	**1.443.957**

In addition to monitoring interest rate gaps, interest rate risk management is carried out mainly by monitoring the sensitivity of the Group's Economic Value of Equity (EVE) and Net Interest Income (NII), under various scenarios of interest rate changes.

The Investment and Market Risk sub-unit monitors interest rate positions on a continuous basis, within the risk management framework, the policies and the limits set by RAS and ALCO. ALCO is regularly informed about the magnitude of interest rate risk and makes decisions for the management of the risk based on this information. Scenario calculations for interest rate changes consider both parallel and non-parallel shifts of the yield curve.

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

The tables below present the impact on the Group's Economic Value of Equity (EVE) from a set of six interest rate shock scenarios defined by ITS 2022/631, the new EBA Guidelines on IRRBB and CSRBB (EBA/GL/2022/14)[1], the Final draft RTS on SOT (EBA/RTS/2022/10) and the Final draft RTS on Standardised Methodologies on IRRBB (EBA/RTS/2022/09), for the significant currencies, which are the EUR and the USD at year end:

	EVE Sensitivity 2024 Interest rate scenarios					
	Parallel Up	**Parallel Down**	**Steepener**	**Flattener**	**Short rates down**	**Short rates up**
Change	**€'000**	**€'000**	**€'000**	**€'000**	**€'000**	**€'000**
Euro	(198.433)	95.516	47.468	(98.388)	73.004	(139.052)
US Dollar	887	(1.875)	573	(805)	(572)	(183)

	EVE Sensitivity 2023 Interest rate scenarios					
	Parallel Up	**Parallel Down**	**Steepener**	**Flattener**	**Short rates down**	**Short rates up**
Change	**€'000**	**€'000**	**€'000**	**€'000**	**€'000**	**€'000**
Euro	(40.633)	(60.059)	60.415	(65.663)	17.799	(56.364)
US Dollar	1.222	(2.533)	148	(493)	(1.180)	305

Note 1: According to the EBA IRRBB Guidelines, the shocks for EUR are 200 bps for parallel moves, 250 bps for short rate moves and 100 bps for long rate moves. The shocks for USD are 200 bps for parallel moves, 300 bps for short rate moves and 150 bps for long rate moves. The steepener and flattener rate shocks are a combination of the short rates and the long rate moves.

Based on the above results, the largest negative sensitivity of Economic Value of Equity at the end of 2024 was under the "Parallel up" scenario and amounted to €198,0 million or 11,5% of the Bank's Tier 1 Capital. The EVE sensitivity has increased compared to the end of 2023, especially due the increased sensitivity in bonds due to new acquisitions, the repayment of the CCS, the Reverse Repos with ERB S.A. and the Interest Rate Swaps.

The aggregation of the impact on EVE for each interest rate scenario is performed based on the EBA IRRBB guidelines according to which, positive changes per scenario and material currency are weighted by a factor of 50%.

In the calculation of EVE sensitivity, for the discounting needed to perform the calculations, the risk-free yield curve was used for each currency.

It is also noted that for the calculation of both EVE and NII sensitivity under scenarios with interest rate reductions, the EBA IRRBB Guidelines were followed for currencies with negative interest rates (a post shock floor of -1,5% was assumed) and, in addition, floors were inserted to specific products for which interest rates cannot be reduced below zero.

47. RISK MANAGEMENT (continued)

47.3 Market Risk (continued)

It is noted that the most significant assumption which affects the calculation results for both the EVE and NII sensitivities concerns the treatment of non-maturity deposits (NMDs). These deposits (current and savings accounts) do not have a contractual maturity, and to this effect, depositors may withdraw the available balance without prior notice. However, a significant share of these deposits is stable over time and is thus defined as ‘core deposits’. Core deposits are highly unlikely to reprice as a result of changes in interest rates. Therefore, core deposits are allocated in longer term time buckets. The Bank has modelled NMDs through simulating deposit volumes for different categories to identify core deposits and their maturity.

The tables below present the impact on Net Interest Income (over the next 12 months) as a result of a change of ±200 basis points in interest rates for the significant currencies, which are the EUR and USD at year end:

2024	**Euro**	**US Dollar**	**Total**
Non-derivatives financial assets	**€'000**	**€'000**	**€'000**
+200 basis points	34.129	(2.221)	**14.843**
-200 basis points	(131.876)	(5.463)	**(137.339)**

2023	**Euro**	**US Dollar**	**Total**
Non-derivatives financial assets	**€'000**	**€'000**	**€'000**
+200 basis points	75.584	391	**37.988**
-200 basis points	(180.138)	(10.463)	**(190.601)**

47.3.3 Price Risk
Price risk is derived from the undertaking of an open position in equities, bonds or derivatives. The Group manages this risk through policies and procedures of setting and monitoring open position limits, stop loss limits on trading positions, as well as concentration limits by issuer.

The table below presents the impact on financial results and own funds (including the impact from changes in net profits) from reasonably possible changes in equity prices which are traded on stock exchanges:

	2024		2023	
	Net profits	**Own Funds**	Net profits	Own Funds
	€'000	**€'000**	€'000	€'000
+15% change in index	**4.462**	**2.243**	3.287	2.160
-15% change in index	**(4.462)**	**(2.243)**	(3.287)	(2.160)

47.4 Liquidity Risk

Liquidity risk is the risk arising from the Bank encountering difficulty to meet its immediate financial obligations.

The Group’s approach in managing liquidity risk is to ensure, to the extent possible (considering that the main role of the Bank as an intermediary is to accept short term deposits and grant long term loans), that there is adequate liquidity in order to satisfy its obligations, when they arise, under “normal” circumstances as well as under stress conditions, without the Group incurring any additional costs.

47. RISK MANAGEMENT (continued)

47.4 Liquidity Risk (continued)

The Group currently operates in Cyprus. The management of the liquidity of the Group's banking units (including compliance with regulatory limits), is undertaken by the Treasury department and is locally effected depending on the conditions prevailing in the markets.

The Group places emphasis on the maintenance of stable customer deposits, as they represent its main funding source. This is effectively achieved through the maintenance of good and long-standing relationships of trust with customers and through competitive and transparent pricing strategies, also taking into consideration the liquidity position of the Bank.

Regular stress testing scenarios are performed to simulate extreme conditions and appropriate measures are taken whenever necessary.

The liquidity risk of the Bank is monitored daily by Investment, Market and Liquidity Risk Management. The Group must comply with the Liquidity Coverage Ratio (LCR) as per the provisions of the Commission Delegated Regulation (EU) 2018/1620 of 13 July 2018 amending Delegated Regulation (EU) 2015/61 (which supplements Regulation (EU) No 575/2013 (CRR) of the European Parliament and the Council with regards to the liquidity coverage requirement for Credit Institutions).

For more details refer to the unaudited "Additional Risk and Capital Management Information" for the year ended 31 December 2024.

Analysis of the liabilities of the Group based on their remaining contractual maturity as at 31 December 2024

	Carrying amount €'000	Gross nominal (inflows)/ outflows €'000	On demand €'000	Within three months €'000	Between three months and one year €'000	Between one and five years €'000	Over five years €'000
Total liabilities							
Deposits by banks	**191.504**	192.015	53.491	102.389	8.687	26.815	633
Customer deposits and other customer accounts	**15.658.085**	15.673.469	11.478.137	1.686.643	2.454.123	54.402	164
Derivatives	**205**						
- Cash inflows		(44.359)	(10.000)	(34.359)	-	-	-
- Cash outflows		44.549	10.000	34.549	-	-	-
Tax payable	**19.500**	19.500	19.500	-	-	-	-
Deferred tax liability	**11.504**	11.504	-	-	-	11.504	-
Other liabilities	**172.728**	173.872	125.805	3.757	13.443	29.194	1.673
Insurance contract liabilities	**106.314**	106.314	106.314	-	-	-	-
Loan capital	**309.659**	300.000	-	-	-	100.000	200.000
	16.469.499	16.476.864	11.783.247	1.792.979	2.476.253	221.915	202.470

47. RISK MANAGEMENT (continued)

47.4 Liquidity Risk (continued)

Analysis of the liabilities of the Group based on their remaining contractual maturity at 31 December 2023

	Carrying amount €'000	Gross nominal (inflows)/ outflows €'000	On demand €'000	Within three months €'000	Between three months and one year €'000	Between one and five years €'000	Over five years €'000
Total liabilities							
Deposits by banks	**96.799**	97.654	47.365	2.977	8.848	34.645	3.819
Funding by Central Banks	**2.355.508**	2.355.508	-	-	2.355.508	-	-
Customer deposits and other customer accounts	**15.314.788**	15.322.031	11.615.549	1.397.156	2.053.324	255.155	847
Derivatives	**3.327**						
- Cash inflows		(317.830)	-	(317.830)	-	-	-
- Cash outflows		321.030	-	321.030	-	-	-
Tax payable	**13.896**	13.896	13.896	-	-	-	-
Deferred tax liability	**11.329**	11.329	-	-	-	11.329	-
Other liabilities	**207.975**	207.964	167.048	3.226	37.613	77	-
Insurance contract liabilities	**87.529**	87.529	87.529	-	-	-	-
Loan capital	**441.815**	430.769	-	-	-	100.000	330.769
	18.532.966	18.529.880	11.931.387	1.406.559	4.455.293	401.206	335.435

47. RISK MANAGEMENT (continued)

47.4 Liquidity Risk (continued)

The tables below present the encumbered and unencumbered assets as at the reporting date:

31 December 2024	The Group				The Bank			
	Carrying amount of encumbered assets		Carrying amount of unencumbered assets		Carrying amount of encumbered assets		Carrying amount of unencumbered assets	
		of which European Central Bank's eligible		of which European Central Bank's eligible		of which European Central Bank's eligible		of which European Central Bank's eligible
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Cash and balances with Central Banks	-	-	5.730.544	-	-	-	5.730.544	-
Placements with other banks	84.669	-	270.747	-	84.669	-	266.540	-
Reverse repurchase agreements	-	-	300.274	-	-	-	300.274	-
Loans and advances to customers	-	-	5.738.111	-	-	-	5.738.111	-
Debt securities	-	-	5.675.674	4.165.113	-	-	5.662.807	4.165.113
Equity securities *	-	-	145.676	-	-	-	44.701	-
Other assets	-	-	412.023	-	-	-	404.865	-
Total assets	**84.669**	**-**	**18.273.049**	**4.165.113**	**84.669**	**-**	**18.147.842**	**4.165.113**

* Equity securities on Group include collective investment units

31 December 2023	The Group				The Bank			
	Carrying amount of encumbered assets		Carrying amount of unencumbered assets		Carrying amount of encumbered assets		Carrying amount of unencumbered assets	
		of which European Central Bank's eligible		of which European Central Bank's eligible		of which European Central Bank's eligible		of which European Central Bank's eligible
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Cash and balances with Central Banks	-	-	8.222.845	-	-	-	8.222.845	-
Placements with other banks	60.632	-	221.236	-	60.632	-	213.266	-
Loans and advances to customers	-	-	6.024.121	-	-	-	6.024.121	-
Debt securities	2.492.047	2.492.047	2.492.997	930.484	2.492.047	2.492.047	2.492.114	-
Equity securities *	-	-	132.458	-	-	-	36.316	-
Other assets	-	-	415.589	-	-	-	415.633	-
Total assets	**2.552.679**	**2.492.047**	**17.509.246**	**930.484**	**2.552.679**	**2.492.047**	**17.404.295**	**-**

* Equity securities on Group include collective investment units

47. RISK MANAGEMENT (continued)

47.5 Operational Risk

Operational risk is defined as the risk of direct or indirect financial impact (costs/losses), business and/or reputational impacts resulting from inadequate or failed internal governance and business processes, people and systems/infrastructure or from external events. For the Bank, this definition includes legal and conduct risks, but excludes strategic risk. External events include floods, fires, earthquakes, vandalism and particularly external fraud and events related to vendors/suppliers.

The Bank has adopted the principles and provisions set out in the guidelines of the Directives of the Central Bank of Cyprus, the Single Supervisory Mechanism, Basel III framework as adopted by the EU and EBA.

The Bank within the context of its capital calculation process holds capital for its Operational Risks and complies with all regulatory requirements.

The Bank classifies operational risk as one of the significant risks it faces, as it is inherent in all activities, processes and systems and to its general behavior towards its customers. To this end, its actions focus on cultivating an appropriate culture as well as defining / implementing appropriate procedures and systems to effectively identify, evaluate and manage / mitigate operational risk, always in line with its risk appetite.

The Operational Risk Management Framework (ORMF) has been adopted as part of the Bank's Enterprise Risk Management Framework (ERMF). The ORMF sets out the principles, governance, structure and overall management architecture of the Bank's exposure to operational risk and it is developed based on the principles governed by the regulatory framework, best practices and direction set by the Board of Directors. The financial insurance coverage held by the Bank is considered as an effective tool of transferring operational risk and is part of this framework. The implementation of the ORMF is supported by the policies that fall under it and overseen by Operational Risk Management (ORM).

The Board of Directors supports the development of a robust operational risk management culture where the roles of business and control functions, under a three line of defence model, are well defined and respected. The Board encourages open discussion, challenge and thorough analysis of operational risks identified, so as to ensure that they are appropriately managed within the Bank’s risk appetite.

The development and monitoring of Key Risk Indicators (KRIs) and Risk Appetite Statement (RAS) Limits as a control monitoring mechanism continues to be applied across the Bank. Concurrently, the operational risk incident management processes continue to be further enhanced.

Operational risk losses are monitored by ORM on a monthly basis for identification of trends, breaches of RAS limits and relevant escalations for their prompt management.

Business Continuity is continuously enhanced and particularly in 2024, by the completion of broader Business Impact Assessments across the Bank, the recording of critical systems and processes, the compilation of Business Continuity Plans as well as adequate testing.

Third Party risk continues to pose a significant risk for the Bank and to this effect ORM in 2024 strived to enhance further the surrounding controls and mechanisms for its effective oversight and management. In particular the risk assessments were broader and deeper.

ORM continues to devote resources in various areas to become aware, provide support and ensure measures are taken to minimise relevant operational risks, while adhering to related regulatory reporting obligations by ECB.

47. RISK MANAGEMENT (continued)

47.6 Environmental, Social and Governance (ESG) Risks

The Bank recognizes that climate-related and environmental (CE) risks are a source of financial risks with several possible economic consequences in the Bank's business models and financial performance. The Bank considers relevant ESG principles when evaluating business risks and opportunities. The key sources of climate risks have been identified as physical and transition risks. Physical risks arise as the result of acute weather events such as hurricanes, floods and wildfires, and longer-term shifts in climate patterns, such as sustained higher temperatures, heat waves, droughts and rising sea levels and risks. Transition risks may arise from the adjustments to a net-zero economy, e.g., changes to laws and regulations, litigation due to failure to mitigate or adapt, and shifts in supply and demand for certain commodities, products and services due to changes in consumer behaviour and investor demand. These risks are receiving increasing regulatory, political and societal scrutiny, both within the country and internationally. While certain physical risks may be predictable, there are significant uncertainties as to the extent and timing of their manifestation. For transition risks, uncertainties remain as to the impacts of the impending regulatory and policy shifts, changes in consumer demands and supply chains.

The Bank has already enhanced its overall Risk Framework to include climate-related and environmental risks and it is continuously updating ESG risk quantification methodologies. A dedicated ESG department of the Bank is responsible for the development and delivery of the Bank's sustainability and ESG strategy and monitoring the Climate and Environmental Risk Action Plan following ECB guidelines. Policies, processes, controls, risk appetite statements & metrics have been developed to incorporate climate-related and environmental risks and encapsulate all relevant aspects into the overall risk management.

47.7 Insurance Risk

The Group through its Insurance Subsidiaries (Hellenic Life Insurance Company Ltd and Pancyprian Insurance Ltd), provides life and non-life insurance services and as such it is exposed to risks arising from these activities. These risks are managed by the Insurance Risk Management Unit, which is responsible for the entirety of the risk management function of the Insurance subsidiaries, under a Service Level Agreement signed between the Bank and each subsidiary.

The Manager of Insurance Risk Management Unit acts as the Chief Risk Officer (CRO) of the Bank's Insurance subsidiaries and reports to the Group Chief Risk Officer for alignment of approach (where possible) and consolidation of risk at Group level, as well as the Investments, Risk Management and Reserving Committee of each Insurance subsidiary.

The objective of the Insurance Risk Management Unit is the efficient and effective management of risks in accordance with the risk appetite of each insurance subsidiary. To achieve its mission, the Insurance Risk Management Unit designs and implements strategies, policies, processes and reporting procedures necessary to identify, measure, monitor and report the risks on an individual basis as well as on an aggregate level.

The roles and the responsibilities of the Insurance Risk Management Unit for each insurance subsidiary are set out in the corresponding Risk Management Charter (annually reviewed and approved by the corresponding Board of Directors).

The key risks faced by the Insurance Subsidiaries are Insurance, Market, Credit and Liquidity risk. Insurance is the core business of the insurance subsidiaries of the Group and as such a risk they are willing and well-placed to assess, accept and manage. The Insurance Subsidiaries protect themselves against all risks faced by applying strong mitigation techniques, such as appropriate reinsurance arrangements and asset diversification. They assess their risk and capital requirements using the EIOPA's Solvency II Standard Formula, Stress & Scenario Testing and other quantitative and qualitative risk management tools.

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

Market, Credit and Liquidity risks arising from the Group's insurance subsidiaries are disclosed in the relevant section for each of those risks. Insurance risk and how this is managed is described below.

Insurance risk arises from the possibility of an adverse financial result due to actual experience being different from that expected when an insurance product was designed and priced. The actual performance of insurance contracts is subject to inherent uncertainty in the occurrence, timing and amount of the final insurance liabilities. The risk arises due to the possibility of insurance contracts being under-priced, under-reserved or subject to unexpected claims experience (including catastrophe claims). Insurance risk comprises of underwriting and reserving risks.

47.7.1 Underwriting Risk

Underwriting risk is defined as the risk that insurance premiums will not be sufficient to cover the future losses and associated expenses. It arises from the fluctuations in the frequency and severity of financial losses incurred through the underwriting process as a result of unpredictable events or from accepting risks for premiums which are insufficient to cover the ultimate claims which result from such policies. It comprises of catastrophe risk (whereby the unpredictable events refer to a single one-off large-scale event or a series of unusually large events) and non-catastrophe risk.

Both insurance subsidiaries manage and mitigate their exposure to underwriting risk via regular portfolio monitoring to ensure the risks accepted and exposures are in line with the strategy and risk appetite set by the respective Board of Directors, including regular pricing and profitability review. The Board of Directors of each insurance subsidiary has developed underwriting guidelines and applies clear delegation of underwriting and claims authorities which are binding upon all staff authorized to underwrite and settle claims. Executive and Board Committees, at the level of the Group's insurance subsidiaries, monitor adherence to these and assess the underwriting performance.

In order to limit underwriting risk, contracts may contain certain features like exclusions and maximum indemnity limit. Furthermore, the subsidiaries use whole-account treaties, facultative and catastrophe reinsurance covers and monitor market and emerging risks/trends.

Compliance is monitored and assessed through both a peer review process and periodically by the Group's Internal Audit Function, which is entirely independent of the underwriting department.

47.7.2 Reserving Risk

Reserving risk is defined as the risk that future claims, premiums and/or associated expense cash flows differ materially from those anticipated in estimating the insurance contract liabilities.

This is a key risk for both insurance subsidiaries as insurance contract liabilities represent a significant component of the subsidiaries' liabilities and are inherently uncertain.

Whilst the case reserves are generally expected to be sufficient to meet the claims amount when the claims are settled, additional reserves may be required to allow for incurred but not reported claims as well as the uncertainty about the amount and timing of the cash flows that arises from future claims settlement. Appropriate actuarial techniques are employed by the insurance subsidiaries' Actuarial Functions to determine and set these reserves.

Reserving risk is controlled through a range of processes:

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

- the Claims Divisions validate policy terms and conditions, adjust claims, and set reserves and investigate any suspicious or disputed claims as per each Insurance Subsidiary's Claims Management and Reserving risk policy;
- case reserves are set based on the experience of the Claims Officers, with input from external subject matter experts, where required;
- data reconciliation aim to ensure completeness, accuracy and appropriateness;
- regular reviews of the outstanding claims to ensure that the latest available claim specific and market information has been incorporated;
- assessment of reserves for incurred but not reported claims and expected future premiums;
- actuarial assessment of the uncertainties through a variety of techniques; and
- strong corporate governance in relation to the oversight of the reserving process.

47.7.3 Concentration Risk

Life insurance subsidiary

The Life insurance subsidiary monitors insurance risk per class of business. An analysis of the Life insurance subsidiary's insurance and reinsurance risk concentrations to each class of business is provided in the following table:

		2024			2023	
	Assets	**Liabilities**	**Net**	Assets	Liabilities	Net
	€'000	**€'000**	**€'000**	€'000	€'000	€'000
Insurance contracts issued						
Credit life	**1.242**	**(7.479)**	**(6.237)**	1.457	(8.165)	(6.708)
Other life	**-**	**(575)**	**(575)**	-	(677)	(677)
Savings	**-**	**(60.985)**	**(60.985)**	-	(46.016)	(46.016)
Accident and sickness	**-**	**(665)**	**(665)**	-	(316)	(316)
Total insurance contracts issued	**1.242**	**(69.704)**	**(68.462)**	1.457	(55.174)	(53.717)
Reinsurance contracts held						
Credit Life	**9.577**	**-**	**9.577**	9.343	-	9.343
Other life	**1.343**	**(16)**	**1.327**	1.662	(16)	1.646
Accident and sickness	**826**	**-**	**826**	277	-	277
Total reinsurance contracts held	**11.746**	**(16)**	**11.730**	11.282	(16)	11.266

The portfolio enjoys high levels of diversification with respect to age, gender, occupation, level of life insurance cover, degree of underwriting applied at inception of the cover and geographical location within Cyprus.

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

The Life Insurance Subsidiary currently distributes its products exclusively via the Bank. As such, concentration is observed in that respect, however it is not deemed to be significant on the policyholder level, given the Bank's large customer base.

Non-Life insurance subsidiary

The Non-life insurance subsidiary issues insurance contracts directly via its branches and head office, through a number of agents and intermediaries and the Group's branches network (bancassurance). It has therefore access to a diverse customer base comprising of both retail and commercial customers.

The table below sets out the concentration of insurance liabilities by type of contract:

	2024			2023		
	Assets €'000	**Liabilities €'000**	**Net €'000**	Assets €'000	Liabilities €'000	Net €'000
Insurance contracts issued						
Accident and Health	**-**	**(94)**	**(94)**	-	(139)	(139)
Property	**-**	**(11.646)**	**(11.646)**	-	(3.792)	(3.792)
Liability	**-**	**(5.847)**	**(5.847)**	-	(6.478)	(6.478)
Motor	**-**	**(16.679)**	**(16.679)**	-	(18.211)	(18.211)
Other	**-**	**(75)**	**(75)**	-	(204)	(204)
Combined	**-**	**(3.585)**	**(3.585)**	-	(3.021)	(3.021)
Total insurance contracts issued	**-**	**(37.926)**	**(37.926)**	-	(31.845)	(31.845)
Reinsurance contracts held						
Accident and Health	**-**	**(38)**	**(38)**	-	(122)	(122)
Property	**13.358**	**(1.533)**	**11.825**	4.923	(1.510)	3.413
Liability	**561**	**(137)**	**424**	642	-	642
Motor	**1.867**	**(52)**	**1.815**	2.679	(42)	2.637
Other	**3.209**	**(431)**	**2.778**	3.749	(398)	3.351
Total reinsurance contracts held	**18.995**	**(2.191)**	**16.804**	11.993	(2.072)	9.921

47.7.4 Sensitivity Analysis

47.7.4.1 Life Insurance Business

The table below analyses how the CSM, profit and loss and equity would have increased/(decreased) if changes in risk variables that were reasonably possible at the reporting date had occurred. This analysis presents the sensitivities on both insurance contracts issued and reinsurance contracts held and is based on a change in one risk variable with all other variables held constant. Sensitivity analysis assumes that changes to variables can be made independently, which is very unlikely to occur in practice.

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

Key assumption	Change in assumption	Impact on profit before tax gross of reinsurance €'000	Impact on profit before tax net of reinsurance €'000	Impact on equity gross of reinsurance €'000	Impact on equity net of reinsurance €'000
Year ended 2024					
Insurance contract liabilities					
Mortality rates	5%	(77)	(39)	(73)	(34)
Mortality rates	(5)%	78	39	73	34
Expenses	10%	(72)	(72)	(63)	(63)
Expenses	(10)%	72	72	63	63
Lapse rates	10%	(116)	(108)	(102)	(94)
Lapse rates	(10)%	136	126	120	111
Year ended 2023					
Insurance contract liabilities					
Mortality rates	5%	(42)	(20)	(39)	(18)
Mortality rates	(5)%	42	-	42	-
Expenses	10%	(64)	(46)	(59)	(40)
Expenses	(10)%	64	43	59	37
Lapse rates	10%	(72)	(203)	(47)	(178)
Lapse rates	(10)%	87	72	78	63

47.7.4.2 Accident and Sickness Business – Life Insurance subsidiary

For accident and sickness business the table below presents the impact gross and net of reinsurance, profit, and equity for reasonably possible movements in key assumptions with all other assumptions held constant.

Key assumption	Change in assumption	Impact on profit before tax gross of reinsurance €'000	Impact on profit before tax net of reinsurance €'000	Impact on equity gross of reinsurance €'000	Impact on equity net of reinsurance €'000
Year ended 2024					
IBNR expected losses	10%	(30)	(9)	(29)	(7)
IBNR expected losses	(10)%	30	9	29	7
Year ended 2023					
IBNR expected losses	10%	(16)	(5)	(15)	(5)
IBNR expected losses	(10)%	173	533	107	467

47.7.4.3 Non-Life Business (excluding accident and sickness)

The table below analyses how profit and loss and equity would have increased/(decreased) if changes in risk variables that were reasonably possible at the reporting date had occurred. This analysis presents the sensitivities both gross and net of reinsurance held and is based on a change in one risk variable with all other variables held constant. Sensitivity analysis assumes that changes to variables can be made independently, which is very unlikely to occur in practice.

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

Key assumption	Change in assumption	Impact on profit before tax gross of reinsurance €'000	Impact on profit before tax net of reinsurance €'000	Impact on equity gross of reinsurance €'000	Impact on equity net of reinsurance €'000
Year ended 2024					
Loss rate	10%	(639)	(588)	(565)	(515)
Loss rate	(10)%	238	201	213	176
Inflation rate	1%	(391)	(240)	(361)	(210)
Inflation rate	(1)%	391	258	358	226
Interest Rate	+100bps	624	435	570	381
Interest Rate	-100bps	(648)	(444)	(592)	(388)
Year ended 2023					
Loss rate	10%	(555)	(534)	(489)	(458)
Loss rate	(10)%	315	294	278	258
Inflation rate	1%	(314)	(246)	(283)	(215)
Inflation rate	(1)%	314	257	282	225
Interest Rate	+100bps	512	403	462	352
Interest Rate	-100bps	(528)	(410)	(477)	(358)

47.7.5 Claims development

The following tables show the estimates of cumulative incurred claims, including both claims notified for each successive accident year at each reporting date, together with cumulative payments to date. In setting claims provisions, each insurance subsidiary considers the probability and magnitude of future experience being more adverse than assumed which is reflected in the risk adjustment.

In general, the uncertainty associated with the ultimate cost of settling claims is greatest when the claim is at an early stage of development. As claims develop, the ultimate cost of claims becomes more certain.

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

47.7.5.1 Life Insurance Subsidiary

Gross Undiscounted Liability for Incurred Claims

Accident year	Before 2020 €'000	2020 €'000	2021 €'000	2022 €'000	2023 €'000	2024 €'000	Total €'000
Estimates of undiscounted gross cumulative claims							
At end of accident year	4.742	1.372	3.875	1.819	3.725	5.102	20.635
One year later	13.117	6.566	9.272	8.606	8.442		
Two years later	18.458	10.579	11.301	9.310			
Three years later	19.498	11.598	12.009				
Four years later	19.751	11.943					
Five years later	20.092						
Claims Incurred	**20.280**	**11.943**	**12.009**	**9.310**	**8.442**	**5.102**	**67.086**
Accumulated payments 31/12/2024	**(19.505)**	**(11.556)**	**(11.364)**	**(8.915)**	**(6.135)**	**(2.416)**	**(59.891)**
Outstanding Claims in statement of financial position	**775**	**387**	**645**	**395**	**2.307**	**2.686**	**7.195**
Outstanding Claims with previous AY before 2014							**252**
Outstanding claims reserve in statement of financial position							**7.447**

Net Undiscounted Liability for Incurred Claims

Accident year	Before 2020 €'000	2020 €'000	2021 €'000	2022 €'000	2023 €'000	2024 €'000	Total €'000
Estimates of undiscounted gross cumulative claims							
At end of accident year	768	238	604	401	689	855	3.555
One year later	1.954	1.058	1.502	1.570	1.528		
Two years later	2.786	1.556	1.906	1.722			
Three years later	2.934	1.753	1.976				
Four years later	2.995	1.783					
Five years later	3.053						
Claims Incurred	**3.074**	**1.783**	**1.976**	**1.722**	**1.528**	**855**	**10.938**
Accumulated payments 31/12/2024	**(2.957)**	**(1.742)**	**(1.869)**	**(1.630)**	**(1.096)**	**(421)**	**(9.715)**
Outstanding Claims in statement of financial position	**117**	**41**	**107**	**92**	**432**	**434**	**1.223**
Outstanding Claims with previous AY before 2014							**79**
Outstanding claims reserve in statement of financial position							**1.302**

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

47.7.5.2 Non-life Insurance Subsidiary

Gross undiscounted liability for incurred claims

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Gross Claims	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Last valuation of claims incurred financial year											
1	10.764	10.043	10.496	12.677	13.195	10.711	12.415	15.762	16.169	26.966	
2	10.756	10.517	11.495	14.748	13.813	11.085	13.244	15.080	15.126		
3	10.661	10.264	12.150	15.022	13.372	11.388	13.383	14.336			
4	10.165	9.729	11.800	16.633	13.563	11.658	13.136				
5	10.000	9.604	12.409	15.510	13.602	11.539					
6	9.893	10.143	12.332	15.329	13.396						
7	10.582	9.965	12.263	15.066							
8	10.217	10.446	12.289								
9	10.424	10.222									
10	10.469										
Claims Incurred	**10.469**	**10.222**	**12.289**	**15.066**	**13.396**	**11.539**	**13.136**	**14.336**	**15.126**	**26.966**	**142.545**
Accumulated payments until 31/12/2024	**(9.537)**	**(9.852)**	**(10.223)**	**(13.651)**	**(12.133)**	**(10.725)**	**(11.831)**	**(12.900)**	**(12.267)**	**(9.472)**	**(112.591)**
Outstanding claims in Statement of financial position	**932**	**370**	**2.066**	**1.415**	**1.263**	**814**	**1.305**	**1.436**	**2.859**	**17.494**	**29.954**
Outstanding claims compared with Previous Years before 2015											**1.801**
Outstanding claims reserve in Statement of financial position											**31.755**

47. RISK MANAGEMENT (continued)

47.7 Insurance Risk (continued)

Net undiscounted liability for incurred claims

	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
Net Claims	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Last valuation of claims incurred financial year											
1	8.448	8.316	8.917	10.693	10.925	8.944	10.062	12.879	13.554	16.546	
2	8.516	8.581	9.581	11.689	11.601	9.336	10.760	12.014	12.966		
3	8.475	8.362	9.583	12.026	11.319	9.659	11.076	11.531			
4	8.175	8.125	9.609	14.013	11.615	9.917	10.797				
5	8.149	8.096	10.209	12.656	11.872	9.798					
6	8.110	8.507	9.900	12.530	11.656						
7	8.531	8.443	9.857	12.223							
8	8.459	8.754	9.941								
9	8.459	8.639									
10	8.544										
Claims Incurred	**8.544**	**8.639**	**9.941**	**12.223**	**11.656**	**9.798**	**10.797**	**11.531**	**12.966**	**16.546**	**112.641**
Accumulated payments until 31/12/2024	**(7.851)**	**(8.386)**	**(8.868)**	**(11.062)**	**(10.541)**	**(9.144)**	**(9.886)**	**(10.354)**	**(10.913)**	**(8.298)**	**(95.303)**
Outstanding claims in Statement of financial position	**693**	**253**	**1.073**	**1.161**	**1.115**	**654**	**911**	**1.177**	**2.053**	**8.248**	**17.338**
Outstanding claims compared with Previous Years before 2015											**1.152**
Outstanding claims reserve in Statement of financial position											**18.490**

48. CATEGORISATION OF FINANCIAL INSTRUMENTS

The Group

31 December 2024	Carrying amount €'000	Securities classified at fair value through profit and loss €'000	Securities at amortised cost €'000	Securities classified at fair value through other comprehensive income €'000	Financial instruments at amortised cost €'000
Assets					
Cash and balances with Central Banks	5.730.544	-	-	-	5.730.544
Placements with other banks	355.416	-	-	-	355.416
Reverse repurchase agreements	300.274	-	-	-	300.274
Loans and advances to customers	5.738.111	-	-	-	5.738.111
Debt securities	5.675.674	12.867	5.627.581	35.226	-
Equity securities and collective investment units	145.676	130.722	-	14.954	-
Derivatives	21.605	21.605	-	-	-
Indemnification asset	3.200	-	-	-	3.200
Other financial assets	-	-	-	-	-
	17.970.500	165.194	5.627.581	50.180	12.127.545
Liabilities					
Deposits by banks	191.504	-	-	-	191.504
Customer deposits and other customer accounts	15.658.085	-	-	-	15.658.085
Derivatives	205	205	-	-	-
Other financial liabilities	943	-	-	-	943
Loan capital	309.659	-	-	-	309.659
	16.160.396	205	-	-	16.160.191

48. CATEGORISATION OF FINANCIAL INSTRUMENTS (continued)

The Group

	Carrying amount €'000	Securities classified at fair value through profit and loss €'000	Securities at amortised cost €'000	Securities classified at fair value through other comprehensive income €'000	Financial instruments at amortised cost €'000
31 December 2023					
Assets					
Cash and balances with Central Banks	8.222.845	-	-	-	8.222.845
Placements with other banks	281.868	-	-	-	281.868
Loans and advances to customers	6.024.121	-	-	-	6.024.121
Debt securities	4.985.044	883	4.925.476	58.685	-
Equity securities and collective investment units	132.458	118.058	-	14.400	-
Assets held for sale	3.296	-	-	-	3.296
Derivatives	16	16	-	-	-
Other financial assets	8.180	-	-	-	8.180
	19.657.828	118.957	4.925.476	73.085	14.540.310
Liabilities					
Deposits by banks	96.799	-	-	-	96.799
Funding by Central Banks	2.355.508	-	-	-	2.355.508
Customer deposits and other customer accounts	15.314.788	-	-	-	15.314.788
Other financial liabilities	1.634	-	-	-	1.634
Derivatives	3.327	3.327	-	-	-
Loan capital	441.815	-	-	-	441.815
	18.213.871	3.327	-	-	18.210.544

48. CATEGORISATION OF FINANCIAL INSTRUMENTS (continued)

The Bank

31 December 2024	Carrying amount €'000	Securities classified at fair value through profit and loss €'000	Securities at amortised cost €'000	Securities classified at fair value through other comprehensive income €'000	Financial instruments at amortised cost €'000
Assets					
Cash and balances with Central Banks	5.730.544	-	-	-	5.730.544
Placements with other banks	351.209	-	-	-	351.209
Reverse repurchase agreements	300.274	-	-	-	300.274
Loans and advances to customers	5.738.111	-	-	-	5.738.111
Debt securities	5.662.807	-	5.627.581	35.226	-
Equity securities	44.701	29.747	-	14.954	-
Derivatives	21.605	21.605	-	-	-
Indemnification asset	3.200	-	-	-	3.200
	17.852.451	51.352	5.627.581	50.180	12.123.338
Liabilities					
Deposits by banks	191.504	-	-	-	191.504
Customer deposits and other customer accounts	15.658.085	-	-	-	15.658.085
Derivatives	205	205	-	-	-
Other financial liabilities	943	-	-	-	943
Loan capital	309.659	-	-	-	309.659
	16.160.396	205	-	-	16.160.191

48. CATEGORISATION OF FINANCIAL INSTRUMENTS (continued)

The Bank

	Carrying amount €'000	Securities classified at fair value through profit and loss €'000	Securities at amortised cost €'000	Securities classified at fair value through other comprehensive income €'000	Financial instruments at amortised cost €'000
31 December 2023					
Assets					
Cash and balances with Central Banks	8.222.845	-	-	-	8.222.845
Placements with other banks	273.898	-	-	-	273.898
Loans and advances to customers	6.024.121	-	-	-	6.024.121
Debt securities	4.984.161	-	4.925.476	58.685	-
Equity securities	36.316	21.916	-	14.400	-
Assets held for sale	3.296	-	-	-	3.296
Derivatives	16	16	-	-	-
Other financial assets	8.180	-	-	-	8.180
	19.552.833	21.932	4.925.476	73.085	14.532.340
Liabilities					
Deposits by banks	96.799	-	-	-	96.799
Funding by Central Banks	2.355.508	-	-	-	2.355.508
Customer deposits and other customer accounts	15.314.788	-	-	-	15.314.788
Other financial liabilities	1.634	-	-	-	1.634
Derivatives	3.327	3.327	-	-	-
Loan capital	441.815	-	-	-	441.815
	18.213.871	3.327	-	-	18.210.544

49. EVENTS AFTER THE REPORTING PERIOD

Voluntary early exit scheme
On 17 February 2025, the Bank announced the launch of a Voluntary Early Exit Scheme (the "Scheme") that was in force until 11 March 2025. The Scheme takes the form of voluntary retirement and concerns the permanent staff of the Bank, Pancyprian Insurance Limited and Hellenic Life Insurance Company Limited. The maximum amount of compensation that will be granted to those who join the Scheme will be up to €200 thousand.

Upon completion of the Scheme, 154 employees (approximately 7% of the Group’s employees) were approved to participate in it, leading to a total cost to the Group of c. €24,2 million and an estimated annual saving of c. €11,2 million of payroll costs.

DECLARATION BY THE MEMBERS OF THE BOARD OF DIRECTORS AND THE BANK OFFICIALS RESPONSIBLE FOR THE DRAFTING OF THE FINANCIAL STATEMENTS

In accordance with article 9(3)(c) and (7) of the 2007 Law (L190(I)/2007) on Transparency Requirements (Securities Listed for Trading on a Regulated Market) (the "Law"), we the Members of the Board of Directors and the Bank officials responsible for the drafting of the Financial Statements of Hellenic Bank Public Company Ltd (the "Bank") and its subsidiaries (together with the Bank the "Group") for the year ended 31 December 2024, confirm that to the best of our knowledge:

(a) the annual Financial Statements presented on pages 32 to 206

- (i) have been prepared in accordance with the IFRS Accounting Standards as adopted by the European Union and the provisions of article 9, paragraph (4) of the Law, and
- (ii) give a true and fair view of the assets and liabilities, the financial position and the profits or losses of Hellenic Bank Public Company Ltd and of the entities included in the Consolidated Financial Statements, as a whole and

(b) the Management Report presented on pages 1 to 23 provides a fair review of the developments and performance of the business as well as the financial position of Hellenic Bank Public Company Ltd and of the entities included in the Financial Statements, as a whole, together with a description of the major risks and uncertainties that they face.

Members of the Board of Directors:

Petros Christodoulou	Non-Executive Chairman of the Board..................................
Robert Anastassis Kyprianou	Non-Executive Vice Chairman of the Board…........................
Oliver Bernard Ellingham	Non-Executive Member of the Board...
Stephen John Albutt	Non-Executive Member of the Board...
Miranda Xafa	Non-Executive Member of the Board...
Maria Charalambous	Non-Executive Member of the Board...
Sofronis Clerides	Non-Executive Member of the Board...
Charalambos Constantinou	Non-Executive Member of the Board...
Kenneth Howard Prince-Wright	Non-Executive Member of the Board...
Michalis Louis	Executive Member of the Board..
Antonis K. Rouvas	Executive Member of the Board..

Company official responsible for the drafting of the Financial Statements

Antonis K. Rouvas, Chief Financial Officer………………………………….

Nicosia, 20 March 2025

GLOSSARY AND DEFINITIONS OF PERFORMANCE MEASURES

Name	Definition
Acquisition of ex-CCB	On 3 September 2018, pursuant to a BTA (Business Transfer Agreement) the Bank completed the acquisition of certain assets and liabilities of the ex-CCB.
Acquisition of RCB	On 21 March 2022, the Bank signed a Business Transfer Agreement to acquire part of RCB Bank's banking operations was completed in two tranches.
Adjusted cost to income ratio	Adjusted ratio after excluding Special Levy, DGS contribution and Transformation costs
Basic earnings/(loss) per share (EPS)	Profit/(loss) attributable to shareholders of the parent company divided by the weighted average number of ordinary shares during the year.
Capital adequacy ratio	Total capital divided by Risk Weighted Assets
CET 1 ratio	Common Equity Tier 1 capital divided by Risk Weighted Assets
Cost of risk ratio (CoR)	Impairment losses on loans and advances to customers (excluding the impact of net modification and cash flows re-estimation) divided by gross loans at the end of the period (annualised).
Cost to income ratio (CIR)	Total expenses (as defined) divided by total net income (as defined).
Cyprus Cooperative Bank	Cooperative Asset Management Company Ltd, previously known as Cyprus Cooperative Bank Ltd (the ex-CCB)
Debt to asset	Debt to asset arrangement between the Bank and the borrower
Exposures classified as HFS (held for sale)	Exposures classified as held for sale, that met the criteria of IFRS 5 for which the Bank is expected to sell within 12 months from the classification date.
Green New Lending	As per Bank's Green Lending definition which includes loans with the following purposes: •Business Energy efficiency: loans regarding energy efficiency upgrades on business premises •Business Green Car: loans for hybrid or electric business cars •Green commercial building: loans for commercial buildings in line with local legislation on the energy performance of buildings •Green mortgage: loans for residential buildings in line with local legislation on the energy performance of buildings •Home Energy efficiency: loans for energy efficiency upgrades on residential property •Private Green Car: loans for hybrid or electric cars for individuals •Public Transport: loans regarding public transportation infrastructure •Renewable energy: loans regarding production of energy through renewable resources
Gross accumulated impairment losses	Accumulated impairment losses on loans and advances to customers excluding positive impairment on purchased credit-impaired loans and advances.
Gross loans	Gross carrying amount of loans and advances before deducting accumulated impairment losses
Gross loans with forbearance measures	Forborne exposures (EBA definition)
Interest-bearing assets (average)	Consist of Cash and balances with Central Banks, placements with other banks, reverse repurchase agreements, loans and advances to customers (including loans and advances to customers classified as held for sale), investments in debt securities (excluding any accrued interest) and indemnification assets. For calculating the average of the interest-bearing assets, the Bank uses the arithmetic average of total interest-bearing assets at each reporting date from the beginning of each quarter.
Investment assets	Investment assets comprise of cash and balances with Central Banks, placements with other banks, reverse repurchase agreements, investments in debt securities and investments in equity securities and collective investment units.

GLOSSARY AND DEFINITIONS OF PERFORMANCE MEASURES (continued)

Name	Definition
Leverage ratio (LR)	Tier 1 capital measure divided by the total exposure measure, defined in accordance with the Regulation (EU) No 575/2013, as amended by Regulation (EU) 2019/876 (Tier 1/total exposure measure).
Liquidity Coverage ratio (LCR)	Liquidity Coverage ratio (LCR) is the ratio of the Bank's high quality liquid assets over the Bank's expected net liquidity outflows during the next 30 days, as these net outflows are specified under a liquidity stress scenario. The ratio is calculated as per the provisions of the Commission Delegated Regulation (EU) 2018/1620 amending Commission Delegated Regulation (EU) 2015/61 (which supplements Regulation (EU) No 575/2013, as amended by Regulation (EU) 2019/876 with regards to the liquidity coverage requirements for Credit Institutions). At times of stress, credit institutions may use their liquid assets to cover their net liquidity outflows.
Loan portfolio	Consists of loans and advances to customers and financial guarantees and loan commitments issued
Net fee and commission income	Fee and commission income less fee and commission expense.
Net gains/(losses) on disposal and revaluation of foreign currencies and financial instruments	Consist of net gains on foreign currency transactions, net gains/(losses) on disposal of financial instruments at fair value through other comprehensive income and at fair value through profit and loss, net gains/(losses) on revaluation of financial instruments at fair value through profit and loss.
Net interest income (NII)	Interest income less interest expense.
Net Interest Margin ratio (NIM)	Net interest income (annualised) divided by the average interest-bearing assets (as defined).
Net loans and advances	Loans and advances to customers net of accumulated impairment losses on loans and advances.
Net loans to deposits ratio	Net loans and advances (as defined) divided by customer deposits and other customer accounts.
Net Stable Funding Ratio (NSFR)	NSFR is calculated as the amount of available stable funding (the portion of capital and liabilities expected to be reliable over the one-year horizon) over the amount of required stable funding (based on the liquidity characteristics and residual maturities of the various assets held and off-balance sheet exposures).
Net NPE ratio	NPEs less accumulated impairment losses divided by Net Loans
Net NPEs	NPEs less accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments (disclosed on the statement of financial position within other liabilities).
Net NPEs collateral coverage ratio	NPEs Collateral (taking into account tangible collateral, based on open market values, capped at client exposure) divided by NPEs net of accumulated impairment losses.
Net NPEs collateral coverage ratio (excl. APS-NPEs)	NPEs Collateral (excl. APS-NPEs collateral) (taking into account tangible collateral, based on open market values, capped at client exposure) divided by NPEs net of accumulated impairment losses (excl. APS-NPEs).
Net NPEs collateral coverage ratio (excl. APS-NPEs) (restated to "NPEs overall coverage (excl. APS-NPEs)")	NPEs Collateral (excl. APS-NPEs collateral) (taking into account tangible collateral, based on open market values, capped at client exposure) divided by NPEs net of accumulated impairment losses (excl. APS-NPEs).
Net NPEs collateral coverage ratio (restated to "NPEs overall coverage")	NPEs Collateral (taking into account tangible collateral, based on open market values, capped at client exposure) divided by NPEs net of accumulated impairment losses.
Net NPEs to total assets ratio	Net NPEs (as defined) divided by total assets.

Name	Definition
Net NPEs excl. APS-NPEs	NPEs (excl. APS-NPEs) less accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments (disclosed on the statement of financial position within other liabilities) (excl. APS-NPEs).
Net NPEs excl. APS-NPEs to total assets ratio	Net NPEs (excl. APS-NPEs) (as defined) divided by total assets.
Net Stable Funding Ratio (NSFR)	NSFR is calculated as the amount of available stable funding (the portion of capital and liabilities expected to be reliable over the one-year horizon) over the amount of required stable funding (based on the liquidity characteristics and residual maturities of the various assets held and off balance sheet exposures).
Non- financial corporation (NFC)	A non financial corporation (NFC) is a corporation or quasi-corporation that is not engaged in financial intermediation but is active primarily in the production of market goods and non-financial services.
Non-interest income	Consists of net fee and commission income, net gains/(losses) on disposal and revaluation of foreign currencies and financial instruments, net income from insurance operations and other income.
Non-performing exposures (NPEs)	Gross non-performing exposures as per EBA definition.
NPEs excl. APS-NPEs	NPEs (as defined) excluding NPEs covered by the APS.
NPEs provision coverage ratio	Accumulated impairment losses divided by gross non-performing exposures.
NPEs provision coverage ratio (excl. APS-NPEs)	Accumulated impairment losses (excl. accumulated impairment losses of APS-NPEs) divided by gross NPEs (excl. APS-NPEs).
NPEs ratio	Gross non-performing exposures as per EBA definition divided by gross loans (as defined).
NPEs ratio excl. APS-NPEs	Gross non-performing exposures as per EBA definition excluding NPEs covered by the APS, divided by gross loans (as defined).
NPL	Non-performing loans
NPEs coverage ratio (previously "NPEs provision coverage ratio")	Gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments (disclosed on the statement of financial position within other liabilities), divided by gross NPEs including positive impairment on purchased credit-impaired NPEs.
NPEs coverage ratio (excl. APS-NPEs) (previously "NPEs provision coverage ratio (excl. APS-NPEs)")	Gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments (disclosed on the statement of financial position within other liabilities) (excl. gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments, of APS-NPEs) divided by gross NPEs including positive impairment on purchased credit-impaired NPEs (excl. APS-NPEs).
NPEs overall coverage (previously "Net NPEs collateral coverage ratio")	Gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments plus collateral (taking into account tangible collateral, based on open market values capped at client exposure) divided by gross NPEs including positive impairment on purchased credit-impaired NPEs.
NPEs overall coverage (excl. APS-NPEs) (previously "Net NPEs collateral coverage ratio (excl. APS-NPEs)")	Gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments plus collateral (excl. gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments, of APS-NPEs) (taking into account tangible collateral, based on open market values capped at client exposure) divided by gross NPEs including positive impairment on purchased credit-impaired NPEs (excl. APS-NPEs).
NPEs overall coverage	Gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments plus collateral (taking into account tangible collateral, based on open market values capped at client exposure) divided by gross NPEs including positive impairment on purchased credit-impaired NPEs.

GLOSSARY AND DEFINITIONS OF PERFORMANCE MEASURES (continued)

Name	Definition
NPEs overall coverage (excl. APS-NPEs)	Gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments plus collateral (excl. gross accumulated impairment losses (as defined) and liabilities for financial guarantees and loan commitments, of APS-NPEs) (taking into account tangible collateral, based on open market values capped at client exposure) divided by gross NPEs including positive impairment on purchased credit-impaired NPEs (excl. APS-NPEs).
NPEs provision coverage ratio (restated to "NPEs coverage ratio")	Accumulated impairment losses divided by gross non-performing exposures.
NPEs provision coverage ratio (excl. APS-NPEs) (restated to "NPEs coverage ratio (excl. APS-NPEs)")	Accumulated impairment losses (excl. accumulated impairment losses of APS-NPEs) divided by gross NPEs (excl. APS-NPEs).
Other income	Consists of dividend income, net gain from the disposal of stock of property, net gains from revaluation of investment properties and sundry income.
Pro forma for HFS (held for sale)	References to pro forma figures and ratios refer to non-performing exposures classified as held for sale.
Project Starlight	Project Starlight refers to the sale of a NPE portfolio (c.€1,4 billion of total contractual amount and €0,8 billion of gross book value, including properties acquired for satisfaction of debt) and the disposal of APS Cyprus, completed in March 2023.
Return on tangible equity (ROTE)	Profit attributable to shareholders of the parent company for the period (annualised) divided by average tangible equity attributable to shareholders of the parent company.
Tangible book value per share (TBVPS)	Equity attributable to shareholders of the parent company less intangible assets divided by the number of issued shares
Tangible Equity	Equity attributable to shareholders of the parent company minus Intangible assets.
Terminated loans	The loan contract has been terminated by the Bank and such termination has been notified to the borrower and enforcement proceedings are initiated.
Tier 1 ratio	Tier 1 capital divided by Risk Weighted Assets
Total Capital ratio	Total capital divided by Risk Weighted Assets
Total expenses	Consist of staff costs, depreciation and amortisation and administrative and other expenses (as defined).
Total net income	Consists of net interest income (as defined) and non-interest income (as defined).
Total non-interest income	Consist of net fee and commission income, other income and net gains on disposal and revaluation of foreign currencies and financial instruments
Transformation costs	Comprise mainly fees to external advisors in relation to: (i) the prospective disposal of assets held for sale and the acquisition of part of the performing loan portfolio from RCB Bank (ii) the Transformation of the Bank as a result of the Strategic Plan announced on 21 December 2021.

ABBREVIATIONS

ALCO	Assets and Liabilities Management Committee
API	Alternative Performance Indicators
APS	Asset Protection Scheme
APS Cyprus	APS Debt Servicing Cyprus Ltd
ATMs	Automatic Teller Machines
AUM	Assets Under Management
Bps	Basis points
BoD	Board of Directors
BRMC	Board Risk Management Committee
BRRD	Bank Recovery and Resolution Directive
BTA	Business Transfer Agreement
BTC	Board Transformation Committee
CapEx	Capital Expenditure
CBC	Central Bank of Cyprus
CBR	Combined buffer requirement
CCB	Cyprus Cooperative Bank
CCC	Customer Contact Centre
CCoB	Capital Conservation Buffer
CCS1	Convertible Capital Securities 1
CCS2	Convertible Capital Securities 2
CCyB	Countercyclical capital buffer
CE	Climate Related and Environmental
CEO	Chief Executive Officer
CET 1	Common Equity Tier 1 capital
CGBs	Cyprus Government Bonds
CLOs	Collateralised loan obligations
COLA	Cost of Living Adjustment
CPD	Central Procurement Department
CP&IA	Credit Policies & Individual Assessments
CR	Compliance risk
CRD	Capital Requirements Directive (Directive 2013/36/EU, as amended by Directive 2019/878/EU)
CRE	Commercial real estate

ABBREVIATIONS (continued)

CRD IV	Capital Requirements Directive IV
CRM	Credit Risk Management
CRR	Capital Requirements Regulation (Regulation (EU) No 575/2013, as amended by Regulation (EU) 2019/876)
CSE	Cyprus Stock Exchange
CSM	Contractual service margin
CyCac	Credit acquiring Companies
CYSTAT	Cyprus Statistical Service
D2A	Debt to asset
DGS	Deposit Guarantee Scheme
DoLR	Department of Labour relations
DMA	Double Materiality Assessment
DPO	Data Protection Office
EBA	European Banking Authority
ECB	European Central Bank
ECL	Expected Credit Losses
EIB	European Investment Bank
EnMS	Energy Management System
EMTN Programme	Euro Medium-Term Note Programme
ERMG	Enterprise Risk Management and Governance
ESG	Environmental, Social and Governance
ESOMAR	European Society for Opinion and Marketing Research
ESRS	European Sustainability Reporting Standards
E-waste	Electronic waste
EU	European Union
Eurobank	Eurobank S.A.
Ex-CCI/CCB	ex-Cooperative Credit Institutions/Cooperative Central Bank
ExCo	Executive Committee
EZ	Eurozone
FY	Financial year
GDP	Gross Domestic Product
GR	Global Reporting Initiative
GRI	Global Reporting Initiative

ABBREVIATIONS (continued)

GHG	Greenhouse Gas
GISS	Goddard Institute for Space Studies
GWP	Global Warming Potential
HICP	Harmonized Index of Consumer Prices
H&S	Health & Safety
IA	Internal Audit
ICAAP	Internal Capital Adequacy Assessment Process
ICCPR	International Covenant on Civil and Political Rights
ICESCR	International Covenant on Economic Social and Cultural Rights
ICT	Information and communications technology
ILAAP	Internal Liquidity Adequacy Assessment Process
IRRBB	Interest Rate Risk in the Banking Book
ILS	Legal services
ISF	Information Security and Fraud
ICMA	International Capital Market Association
IFRSs	International Financial Reporting Standards
KEDIPES	Cyprus Asset Management Company
KPIs	Key Performance Indicators
KFH	Key Function Holder
LGD	Loss Given Default
LRE	Leverage Ratio Exposures
MC	Management Committee
MRA	Materiality Risk Assessment
MREL	Minimum requirement for own funds and eligible liabilities
MSPA	Mystery Shopping Professional Association
MTF	Multilateral Trading Facility
MTT	Medium-Term Targets
NDG Index	Notre Dame Global Adaptation Initiative Country Index
NEL	Net Eligible Lending
NFRD	Non-Financial Reporting Directive
NGFS	Network for Greening the Financial System
NII	Net interest income
NPEs	Non-Performing Exposures

ABBREVIATIONS (continued)

NPLs	Non-Performing Loans
O-SII	Other Systemically Important Institution
OFAC	Office of Foreign Assets Control
OpEx	Operational Expenditure
ORM	Operational Risk Management
P2G	Pillar II guidance
P2R	Pillar II requirement
PCAF	Partnership for Carbon Accounting Financials
PD	Probability of default
PEs	Performing Exposures
P.p	Percentage points
PPA	Purchase Price Allocation
PPE	Property, Plant and Equipment
QoQ	Quarter on quarter
RAF	Risk Appetite Framework
RAS	Risk Appetite Statement
RCSA	Risk and Control Self-Assessment
RFA	Request For Approval
RMC	Risk Management Committee
RCB	Russian Commercial Bank
REO	Real Estate Owned
RMBS	Residential mortgage backed security
RRMO	Reporting Receiving Monitoring Officer
RoC	Republic of Cyprus
RRF	Recovery and Resilience Facility
RWAs/TREA	Risk Weighted Assets/Total risk exposure amounts
SBG	Sustainability Bond Guidelines
SBTi	Scienced-Based Targets Initiative
SDG	Sustainable Development Goals
SFTs	Securities financing transactions
SMEs	Small and Medium sized enterprises
SP	Senior Preferred
SRB	Single Resolution Board

ABBREVIATIONS (continued)

SREP	Supervisory Review and Evaluation Process
SSM	Single Supervisory Mechanism
S&C	Suggestions and Complaints unit
TLTROs	Targeted longer-term refinancing operations
TREA	Total risk exposure amounts
TMC	Transformation Management Committee
TS	Technical Services
UDHR	Universal Declaration of Human Rights
UK	United Kingdom
US	United States
UN	United Nations
UNGP	UN Guiding Principles on Business and Human Rights
VaR	Value-at-Risk
VEES	Voluntary Early Exit Scheme
YoY	Year on year
WAPOR	World Association for Public Opinion Research

RECONCILIATIONS

The below tables present reconciliations of the APIs with the reported results calculated and presented in accordance with IFRSs in these Annual Financial Statements. For the definition of APIs, refer to "Glossary and Definitions of Performance Measures".

References to "Note" relate to the respective note in the Financial Statements for the year ended 31 December 2024.

Apart from the reconciliations below, ratios stated in the Management Report for the year ended 31 December 2024 can be calculated based on figures disclosed in the Financial Statements for the year ended 31 December 2024.

1.Reconciliation of loans and advances to customers:

1.1. Reconciliation of gross loans (excluding held for sale) (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Gross PEs		**5.467.433**	5.702.295
Gross NPEs		**382.359**	459.537
Gross loans	22	**5.849.792**	6.161.832

1.2. Reconciliation of gross loans classified as held for sale (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Gross PEs - classified as held for sale		**-**	-
Gross NPEs - classified as held for sale		**-**	4.218
Gross loans classified as held for sale	29	**-**	4.218

1.3. Reconciliation of total gross loans (including held for sale) (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Gross PEs - including loans and advances classified as held for sale		**5.467.433**	5.702.295
Gross NPEs - including loans and advances classified as held for sale		**382.359**	463.755
Total gross loans - including loans and advances classified as held for sale	22	**5.849.792**	6.166.050

1.4. Reconciliation of Accumulated Impairment losses on loans and advances to customers (including held for sale) and liabilities for financial guarantees and loan commitments (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Accumulated impairment losses on loans and advances to customers	22	**111.681**	137.711
Accumulated impairment losses on loans and advances to customers classified as held for sale	29	**-**	922
Total Accumulated impairment losses on loans and advances to customers		**111.681**	138.633
Liabilities for financial guarantees and loan commitments		**13.057**	15.084
Total accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments		**124.738**	153.717

RECONCILIATIONS (continued)

1.5. Reconciliation of Accumulated Impairment losses on loans and advances to customers with Gross Accumulated Impairment losses on loans and advances to customers (including held for sale) and liabilities for financial guarantees and loan commitments (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Accumulated impairment losses on loans and advances to customers	22	**111.681**	137.711
Accumulated impairment losses on loans and advances to customers classified as held for sale	29	**-**	922
Total accumulated impairment losses on loans and advances to customers		**111.681**	138.633
Positive impairment on purchased credit-impaired loans and advances		**46.118**	46.719
Gross accumulated impairment losses on loans and advances to customers		**157.799**	185.352
Liabilities for financial guarantees and loan commitments	36	**13.057**	15.084
Total gross accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments		**170.856**	200.436

2. Reconciliation of gross NPEs (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Total gross loans (including held for sale) classified as Stage 3		**233.960**	274.063
Add: Purchased or originated credit impaired NPEs		**148.399**	189.692
Total gross NPEs-including Loans and advances to customers classified as held for sale		**382.359**	463.755
Gross loans held for sale classified as Stage 3	47	**-**	4.218
Add: Purchased or originated credit impaired NPEs - classified as held for sale		**-**	-
Gross NPEs - classified as held for sale		**-**	4.218
Gross loans classified as Stage 3 (excluding held for sale)	47	**233.960**	269.845
Add: Purchased or originated credit impaired NPEs (excluding held for sale)		**148.399**	189.692
Gross NPEs-excluding held for sale		**382.359**	459.537

3. Ratios' components reconciliations

3.1. Net Interest Margin ratio (NIM)

		The Group		The Bank	
	Note	**2024 €'000**	2023 €'000	**2024 €'000**	2023 €'000
Interest income	5	**729.572**	680.287	**729.262**	680.100
Interest expense	6	**130.662**	143.999	**130.660**	143.992
Net interest income		**598.910**	536.288	**598.602**	536.108
Interest bearing assets (average)		**18.075.103**	19.507.662	**18.055.871**	19.492.832
Funding by Central Banks (TLTROs) (average)		**946.854**	2.313.606	**946.854**	2.313.606
Interest bearing assets - adjusted for funding by Central Banks (TLTROs) (average)		**17.128.249**	17.194.056	**17.109.017**	17.179.226

RECONCILIATIONS (continued)

3.2. Cost to income ratio

	Note	The Group **2024** **€'000**	 2023 €'000	The Bank **2024** **€'000**	 2023 €'000
Total expenses		**291.226**	259.088	**287.236**	257.722
Less:					
Special Levy	13	**22.561**	23.606	**22.561**	23.606
DGS contribution	13	**5.469**	8.014	**5.469**	8.014
Adjusted expenses for Special Levy and DGS contribution		**263.196**	227.468	**259.206**	226.102
Transformation costs	13	**5.550**	6.465	**5.550**	6.465
Adjusted total expenses		**257.646**	221.003	**253.656**	219.637
Total net income		**728.340**	664.320	**719.405**	659.782

3.3. Cost of risk ratio (Group and Bank)

	Note	**2024** **€'000**	2023 €'000
Reversal of impairment losses on loans and advances to customers for the year	14	**3.885**	2.608
Less:			
Impact of net modification and cash flows re- estimation	14	**11.650**	11.233
Charge of impairment losses on loans and advances to customers for the year excluding the Impact of net modification and cash flows re-estimation		**(7.765)**	(8.625)
Add/(less):			
Cash flows re-estimation of the APS indemnification asset	14	**6.903**	(6.259)
Charge of impairment losses on loans and advances to customers adjusted for the cash flows re-estimation of the APS indemnification asset for the year		**(862)**	(14.884)

RECONCILIATIONS (continued)

3.4. NPEs ratios (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Excluding loans and advances classified as held for sale			
Gross NPEs		**382.359**	459.537
Less: Accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments		**124.738**	152.795
Net NPEs		**257.621**	306.742
Gross NPEs - Covered by APS		**239.723**	305.943
Less: Accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments relating to APS-NPEs		**70.240**	75.553
Net NPEs covered by APS		**169.483**	230.390
Gross NPEs - excluding APS		**142.636**	153.594
Less: Accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments - excluding APS-NPEs		**54.498**	77.243
Net NPEs - excluding APS		**88.138**	76.351
Including loans and advances classified as held for sale			
Gross NPEs		**382.359**	463.755
Less: Accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments		**124.738**	153.717
Net NPEs		**257.621**	310.038
Gross NPEs - covered by APS		**239.723**	305.943
Less: Accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments relating to APS-NPEs		**70.240**	75.553
Net NPEs covered by APS		**169.483**	230.390
Gross NPEs - excluding APS		**142.636**	157.812
Less: Accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments - excluding APS-NPEs		**54.498**	78.165
Net NPEs - excluding APS		**88.138**	79.647

RECONCILIATIONS (continued)

3.5. NPEs coverage ratios (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Excluding loans and advances classified as held for sale			
Total gross accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments		**170.856**	199.515
Gross NPEs		**382.359**	459.537
Positive impairment on purchased credit-impaired NPEs		**10.501**	12.174
Gross NPEs plus positive impairment on purchased credit-impaired NPEs		**392.860**	471.711
NPEs coverage ratio %		**43%**	42%
Total gross accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments - excluding APS-NPEs		**90.226**	112.118
Gross NPEs - excluding APS-NPEs		**142.636**	153.594
Positive impairment on purchased credit-impaired NPEs - excluding APS-NPEs		**111**	330
Gross NPEs plus positive impairment on purchased credit-impaired NPEs		**142.747**	153.924
NPEs coverage ratio - excluding APS-NPEs %		**63%**	73%
Including loans and advances classified as held for sale			
Total gross accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments		**170.856**	200.437
Gross NPEs		**382.359**	463.755
Positive impairment on purchased credit-impaired NPEs		**10.501**	12.174
Gross NPEs plus positive impairment on purchased credit-impaired NPEs		**392.860**	475.929
NPEs coverage ratio %		**43%**	42%
Total gross accumulated impairment losses on loans and advances to customers and liabilities for financial guarantees and loan commitments - excluding APS-NPEs		**90.226**	113.040
Gross NPEs - excluding APS-NPEs		**142.636**	157.812
Positive impairment on purchased credit-impaired NPEs - excluding APS-NPEs		**111**	330
Gross NPEs plus positive impairment on purchased credit-impaired NPEs		**142.747**	158.142
NPEs coverage ratio - excluding APS-NPEs %		**63%**	71%

3.6. Net loans to deposits ratio (Group and Bank)

	Note	**2024 €'000**	2023 €'000
Loans and advances to customers	22	**5.738.111**	6.024.121
Loans and advances to customers - including loans and advances classified as held for sale	22	**5.738.111**	6.027.417
Customer deposits and other customer accounts	34	**15.658.085**	15.314.788

RECONCILIATIONS (continued)

3.7. Return on tangible equity (ROTE) (Group)

	Note	**2024 €'000**	2023 €'000
Profit attributable to shareholders of the parent company		**382.587**	365.442
Less:			
Gain on derecognition of disposal group classified as held for sale	16	**-**	(20.729)
Profit attributable to shareholders of the parent company - adjusted for the Gain on derecognition of disposal group classified as held for sale		**382.587**	344.713
Average equity attributable to the shareholders of the parent company		**1.697.275**	1.318.028
Less: Intangible assets (average)		**48.320**	44.568
Average tangible equity attributable to shareholders of the parent company		**1.648.955**	1.273.460
ROTE (%)		**23,2%**	28,7%
ROTE - adjusted for the Gain on derecognition of disposal group classified as held for sale (%)		**23,2%**	27,1%

3.8. Basic earnings per share (EPS)

		The Group		The Bank	
	Note	**2024 €'000**	2023 €'000	**2024 €'000**	2023 €'000
Profit attributable to shareholders of the parent company		**382.587**	365.442	**379.410**	365.678
Weighted average number of ordinary shares during the year		**412.805**	412.805	**412.805**	412.805
EPS (€ cent)	17	**92,68**	88,53	**91,9**	88,6

3.9. Tangible Book Value per Share (TBVPS) (Group)

	Note	**2024 €'000**	2023 €'000
Equity attributable to shareholders of the parent company		**1.888.209**	1.506.341
Less: Intangible assets	28	**51.157**	45.483
Tangible Equity		**1.837.052**	1.460.858
Number of issued shares		**412.805**	412.805
TBVPS (€)		**4,45**	3,54

4. Investment assets

		The Group		The Bank	
	Note	**2024 €'000**	2023 €'000	**2024 €'000**	2023 €'000
Cash and balances with Central Banks	18	**5.730.544**	8.222.845	**5.730.544**	8.222.845
Placements with other banks	19	**355.416**	281.868	**351.209**	273.898
Reverse repurchase agreements	21	**300.274**	-	**300.274**	-
Debt securities	23	**5.675.674**	4.985.044	**5.662.807**	4.984.161
Equity securities and collective investment units	24	**145.676**	132.458	**44.701**	36.316
Total Investment assets		**12.207.584**	13.622.215	**12.089.535**	13.517.220

ADDITIONAL RISK AND CAPITAL MANAGEMENT INFORMATION FOR THE YEAR ENDED 31 DECEMBER 2024

The Additional Risk and Capital Management Information for the year ended 31 December 2024 is unaudited.

The Group is exposed to a variety of risks, the most important of which are described and analysed in Note 47 of the Annual Financial Statements for the year ended 31 December 2024 and Pillar III disclosures for the year ended 31 December 2024.

The following disclosures provide additional risk and capital management information ("Additional Disclosures") for the year ended 31 December 2024.

1. Credit risk

1.1. Loans and advances

The tables below provide analysis of loans and advances as per EBA guidelines.

Analysis of loan portfolio according to the counterparty sector as at 31 December 2024

	Total loan portfolio				Cumulative Impairment losses			
		of which non-performing exposures	of which exposures with forbearance measures			of which non-performing exposures	of which exposures with forbearance measures	
				of which on non-performing exposures				of which on non-performing exposures
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Loans and advances*	**5.849.792**	**382.359**	**274.876**	**181.001**	**111.681**	**124.479**	**47.628**	**49.517**
General Governments	18.058	-	-	-	(303)	-	-	-
Other financial corporations	122.865	1.415	869	120	994	509	21	9
Non-financial corporations	2.307.668	84.557	81.892	42.271	33.465	27.615	15.035	12.775
of which: Small and Medium-sized enterprises	1.774.859	77.510	78.165	38.543	28.141	23.669	12.947	10.688
of which: Commercial real estate	1.425.681	61.272	69.469	31.865	23.927	19.189	12.518	10.229
By sector								
1. Construction	156.416	19.757			7.024			
2. Wholesale and retail trade	397.609	28.527			14.765			
3. Real estate activities	210.943	7.660			1.251			
4. Accommodation and food service activities	483.267	11.303			7.480			
5. Manufacturing	357.064	6.385			497			
6. Other sectors	702.369	10.925			2.448			
Households	3.401.201	296.387	192.115	138.610	77.525	96.355	32.572	36.733
of which: Residential mortgage loans	2.677.060	223.414	155.260	111.169	52.883	65.134	26.088	29.172
of which: Credit for consumption	332.635	36.352	16.980	11.906	15.273	16.689	3.003	3.422

*Excluding loans and advances to central banks and credit institutions.

1. Credit risk (continued)

1.1. Loans and advances (continued)

Analysis of loan portfolio according to the counterparty sector as at 31 December 2023

	Total loan portfolio				Cumulative Impairment losses			
		of which non-performing exposures	of which exposures with forbearance measures			of which non-performing exposures	of which exposures with forbearance measures	
				of which on non-performing exposures				of which on non-performing exposures
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Loans and advances*	**6.161.832**	**459.537**	**400.082**	**239.320**	**137.711**	**133.467**	**54.798**	**56.547**
General Governments	3.864	-	-	-	22	-	-	-
Other financial corporations	137.858	3.008	1.930	956	2.148	605	397	231
Non-financial corporations	2.529.792	86.340	148.090	54.019	46.871	28.921	19.494	16.221
of which: Small and Medium-sized enterprises	1.893.712	78.648	143.813	49.742	40.072	24.945	17.283	14.010
of which: Commercial real estate	1.516.354	59.117	126.601	41.912	32.265	18.831	15.851	12.795
By sector								
1. Construction	153.487	20.423			7.958			
2. Wholesale and retail trade	503.111	30.789			17.675			
3. Real estate activities	203.021	7.962			2.242			
4. Accommodation and food service activities	539.659	10.551			11.511			
5. Manufacturing	416.202	5.152			2.549			
6. Other sectors	714.312	11.463			4.936			
Households	3.490.318	370.189	250.062	184.345	88.670	103.941	34.907	40.095
of which: Residential mortgage loans	2.725.962	267.535	193.312	137.883	54.936	64.202	23.263	26.966
of which: Credit for consumption	343.627	45.942	22.426	16.202	15.966	17.234	3.295	3.870

*Excluding loans and advances to central banks and credit institutions.

1. Credit risk (continued)

1.1. Loans and advances (continued)

Analysis of loan portfolio* on the basis of loan origination date as at 31 December 2024

Loan origination date**	Total loan portfolio			Loans to non-financial corporations			Loans to other financial corporations			Loans to households		
	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Within 1 year	693.849	1.551	2.608	420.796	698	1.691	10.936	-	71	262.117	853	846
1 - 2 years	782.930	1.302	1.707	385.147	226	939	26.640	-	126	371.143	1.076	642
2 - 3 years	636.078	1.839	1.806	291.473	652	1.089	2.370	5	8	342.235	1.182	709
3 - 5 years	832.251	7.558	3.058	289.039	4.262	1.479	72.389	-	276	470.823	3.296	1.303
5 - 7 years	537.382	10.491	406	214.188	1.587	551	3.612	843	225	319.582	8.061	(370)
7 - 10 years	810.477	99.270	9.868	289.577	15.041	(615)	3.487	8	8	517.413	84.221	10.475
Over 10 years	1.538.767	260.348	92.531	417.448	62.091	28.331	3.431	559	280	1.117.888	197.698	63.920
Total	5.831.734	382.359	111.984	2.307.668	84.557	33.465	122.865	1.415	994	3.401.201	296.387	77.525

*Excluding loans and advances to general governments.
**Loan origination date is defined as the contractual loan origination date for each account. For restructured loans the origination date was derived based on the origination date of the original loan that was restructured. For the acquired portfolio as a result of the Acquisition the origination date is defined as the origination date of the loan as of the Acquisition date.

1. Credit risk (continued)

1.1. Loans and advances (continued)

Analysis of loan portfolio* on the basis of loan origination date as at 31 December 2023

Loan origination date**	Total loan portfolio			Loans to non-financial corporations			Loans to other financial corporations			Loans to households		
	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Within 1 year	751.809	1.536	3.544	394.517	305	2.529	25.306	-	345	331.986	1.231	670
1 - 2 years	742.901	962	2.933	383.031	259	2.236	4.383	5	15	355.487	698	682
2 - 3 years	637.890	1.531	2.466	345.242	220	1.873	4.071	-	9	288.577	1.311	584
3 - 5 years	886.174	3.268	5.191	401.955	470	3.179	76.672	806	910	407.547	1.992	1.102
5 - 7 years	695.837	30.683	5.337	309.474	6.449	5.669	11.603	598	72	374.760	23.636	(404)
7 - 10 years	663.996	109.753	12.696	209.556	12.094	(355)	3.721	236	34	450.719	97.423	13.017
Over 10 years	1.779.361	311.804	105.522	486.017	66.543	31.740	12.102	1.363	763	1.281.242	243.898	73.019
Total	6.157.968	459.537	137.689	2.529.792	86.340	46.871	137.858	3.008	2.148	3.490.318	370.189	88.670

*Excluding loans and advances to general governments.
**Loan origination date is defined as the contractual loan origination date for each account. For restructured loans the origination date was derived based on the origination date of the original loan that was restructured. For the acquired portfolio as a result of the Acquisition the origination date is defined as the origination date of the loan as of the Acquisition date.

1. Credit risk (continued)

1.2. Assets held for sale

The tables below provide analysis of loans and advances that were classified as held for sale as per EBA guidelines.

Analysis of loan portfolio held for sale according to the counterparty sector as at 31 December 2023

	Total loan portfolio				Cumulative Impairment losses			
		of which non-performing exposures	of which exposures with forbearance measures			of which non-performing exposures	of which exposures with forbearance measures	
				of which on non-performing exposures				of which on non-performing exposures
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Loans and advances*	**4.218**	**4.218**	**3.808**	**3.808**	**922**	**922**	**667**	**667**
General Governments	-	-	-	-	-	-	-	-
Other financial corporations	-	-	-	-	-	-	-	-
Non-financial corporations	4.218	4.218	3.808	3.808	922	922	667	667
of which: Small and Medium-sized enterprises	4.218	4.218	3.808	3.808	922	922	667	667
of which: Commercial real estate	4.218	4.218	3.808	3.808	922	922	667	667
By sector								
1. Construction	-	-			-			
2. Wholesale and retail trade	-	-			-			
3. Real estate activities	-	-			-			
4. Accommodation and food service activities	4.218	4.218			922			
5. Manufacturing	-	-			-			
6. Other sectors	-	-			-			
Households	-	-	-	-	-	-	-	-
of which: Residential mortgage loans	-	-	-	-	-	-	-	-
of which: Credit for consumption	-	-	-	-	-	-	-	-

*Excluding loans and advances to central banks and credit institutions.

ADDITIONAL RISK AND CAPITAL MANAGEMENT INFORMATION FOR THE YEAR ENDED 31 DECEMBER 2024 (continued)

1. Credit risk (continued)

1.2. Assets held for sale (continued)

Analysis of loan portfolio* held for sale on the basis of loan origination date as at 31 December 2023

	Total loan portfolio			Loans to non-financial corporations			Loans to other financial corporations			Loans to households		
Loan origination date**	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses	Total exposures	Non-performing exposures	Cumulative Impairment losses
	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000	€'000
Within 1 year	-	-	-	-	-	-	-	-	-	-	-	-
1 - 2 years	-	-	-	-	-	-	-	-	-	-	-	-
2 - 3 years	-	-	-	-	-	-	-	-	-	-	-	-
3 - 5 years	-	-	-	-	-	-	-	-	-	-	-	-
5 - 7 years	-	-	-	-	-	-	-	-	-	-	-	-
7 - 10 years	-	-	-	-	-	-	-	-	-	-	-	-
Over 10 years	4.218	4.218	922	4.218	4.218	922	-	-	-	-	-	-
Total	4.218	4.218	922	4.218	4.218	922	-	-	-	-	-	-

*Excluding loans and advances to general governments.
**Loan origination date is defined as the contractual loan origination date for each account. For restructured loans the origination date was derived based on the origination date of the original loan that was restructured. For the acquired portfolio as a result of the Acquisition the origination date is defined as the origination date of the loan as of the Acquisition date.

2. Capital management

The objective of the Bank's capital and leverage policy is to retain sufficient capital and leverage levels and ratios by complying with the legal and regulatory framework requirements as well as any internal capital buffers set while safeguarding the best interests of shareholders and supporting the Group's business strategy.

2.1. Regulatory framework and recent regulatory developments

In accordance with the European Council's Regulation 1024/2013, the ECB has taken on full responsibility for the supervision of important credit institutions in participating Member States, including amongst others the Group, with the assistance of the local supervisory authorities. The Central Bank of Cyprus (CBC), as part of its supervisory role, has adopted the recommendations of the Basel Committee and the European Directives on banking supervisory matters.

Effective from 1 January 2014, the Capital Requirements Directive 2013/36/EU (the "CRD IV") and the Capital Requirements Regulation (EU) No 575/2013 (the "CRR"), are in force and form the European regulatory package designed to transpose the new capital, liquidity and leverage standards of Basel III into the European Union's legal framework.

The CRR establishes the prudential requirements for capital, liquidity and leverage that credit institutions and investment firms need to abide by and is immediately binding on all EU Member States. The CRD IV governs access to deposit taking activities and internal governance arrangements including remuneration, board composition and transparency, while it also sets out additional capital buffer requirements. Unlike the CRR, the CRD IV was transposed into national law by EU Member States, and national regulators were allowed to impose additional capital buffer requirements. The CRR permits a transitional period for certain of the enhanced capital requirements and certain other measures, such as the leverage ratio, which are largely fully effective from 1 January 2018, and some other transitional provisions with phase in until 2024.

In March 2018, the ECB published an NPE addendum which supplements the NPL Guidance by specifying the ECB's supervisory expectations when assessing a bank's levels of prudential provisions for non-performing exposures. The ECB will, in this context, assess, among other things, the length of time an exposure has been classified as non-performing (vintage) as well as the collateral held. In April 2019, Regulation (EU) 2019/630 was issued, as regards to the minimum loss coverage for non-performing exposures, with an immediate effective date, prescribing the minimum provision coverages based on vintage and collateral held, for loans that originated after 26 April 2019.

On 27 June 2019, the revised rules on capital and liquidity (CRR II and CRD V) came into force, with CRR II being directly applicable in each EU MS, while CRD V should have been transposed into national law by each EU MS. Accordingly, CRD V has been transposed into the Cyprus national law. The CRR II is an amending regulation, therefore the existing provisions of CRR apply, unless they are specifically amended by CRR II. It is noted that certain CRR II provisions took immediate effect, while most amendments were applicable from 28 June 2021 onwards.

The CRR II amended significantly the CRR in several aspects such as the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, among others, and introduced some clarifications regarding disclosures on remuneration policies. It also includes new disclosure requirements on performing, non-performing and forborne exposures, and on collateral and financial guarantees received. The CRD V amended the CRD IV as regards to exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers and capital conservation measures.

2. Capital management (continued)

In October 2021, the European Commission adopted a review of EU banking rules and released legislative proposals for additional amendments to CRR, CRD IV and the Bank Recovery and Resolution Directive (BRRD or Directive 2014/59/EU) (the “2021 Banking Package”). The 2021 Banking Package will implement, amongst other things, the finalisation of the Basel III framework (known as Basel IV) in the EU effective from 1 January 2025, with some exceptions, which have not yet been transposed into EU law. The new banking package will strengthen the EU institutions’ risk-based capital framework, contributing as well to Europe's recovery from the COVID-19 pandemic and to the transition to climate neutrality. Moreover, the banking package envisages a further harmonisation of supervisory powers and enforcement tools and an increase of transparency and proportionality in the Pillar 3 disclosure requirements.

In April 2024, the EU Parliament has voted to adopt the Directive (EU) 2024/1619 (known as the “CRD VI”) and Regulation (EU) 2024/1623 (known as the “CRR III”). The legal texts have been confirmed by the Council and have been published on 19 June 2024 in the EU’s Official Journal.

CRR III entered into force on 9 July 2024 and most amended provisions of the CRR III will apply from 1 January 2025, while certain reforms are expected to be subject to transitional arrangements or to be phased-in over time. CRD VI entered into force on 9 July 2024, and EU MSs are required to adopt and publish the laws, regulations, and administrative provisions necessary to comply with CRD VI by 10 January 2026.

The Bank examined the revised framework and necessary steps are being taken to ensure timely compliance with the new regulation. The application of the new regulation is expected to have a decrease on RWAs and hence an increase in CET 1 ratio, stemming mainly from the changes in the methodologies for the calculation of operational RWAs and credit RWAs. During 2025 the publication of the revised ECB guidelines on options and discretions and EBA mandates might have additional impact on the CET1 ratios across the industry.

2.2. Regulatory capital

The Group’s regulatory capital under Pillar I is calculated in accordance with the provisions of the CRR, where applicable, and is analysed in this section of the Report.

The capital base of the Group, as at the reporting date, for regulatory purposes is divided into three main categories, namely the Common Equity Tier 1 (CET1) capital, the Additional Tier 1 (AT1) capital and the Tier 2 (T2) capital, which are described below in detail. The Group’s CET1 instruments consist only of ordinary shares (refer to Note 39 of the Annual Financial Report).

I.Common Equity Tier 1 capital

Common Equity Tier 1 capital includes the Bank’s share capital, share premium, retained earnings including the profit and loss for the year, accumulated other comprehensive income (i.e., revaluation reserve of investments in debt securities, revaluation reserve of investments in equity securities and property revaluation reserve) and other reserves such as reduction of share capital reserve. As per Article 26 (1) of the CRR and EBA Guidelines on prudent valuations, a part of property revaluation reserve is not allowed to be included in CET 1 capital.

Additional information on the prudential filters and deductions from CET 1 capital, as well as items not deducted from CET1 capital is disclosed in the Pillar III disclosures for the year ended 31 December 2024, which will be published on the Bank’s website: Pillar III Disclosures (hellenicbank.com) (Investor Relations).

2. Capital management (continued)

II.Additional Tier 1 capital

Additional Tier 1 capital includes hybrid instruments, composed by Convertible Capital Securities 1 (CCS1) and Convertible Capital Securities 2 (CCS2) (refer to Note 38 of the Annual Financial Report). On 9 December 2024, the Bank announced that it will exercise its discretion to redeem on 31 December 2024 all of the outstanding CCS1 and CCS2 securities. The CCS 1 and CCS 2 securities were delisted from the CSE following the completion of the redemption process.

III.Tier 2 capital

Tier 2 capital includes subordinated loan capital.

In March 2023, the Bank successfully priced a new €200 million Tier 2 Subordinated Notes (the "T2 Notes"), under its EMTN Programme (refer to Note 38 of the Annual Financial Report).

IV.Regulatory capital position

The Group and the Bank have complied with the relevant minimum capital requirements (Pillar I and Pillar II) as at 31 December 2024 and 2023. The insurance subsidiaries of the Group have complied with the requirements of Superintendent of Insurance and minimum solvency ratios as at 31 December 2024 and 2023.

Throughout these Additional Disclosures, the capital and leverage ratios as at 31 December 2024, include audited profits for the year ended 31 December 2024 following permission granted by the Supervisory Authorities, in accordance with the ECB Decision (EU) 2015/656 on the conditions under which credit institutions are permitted to include interim or year-end profits in CET1 capital in accordance with Article 26(2) of the CRR. These ratios have been calculated in accordance with the legal framework in relation to the CRR capital requirements.

The position of the Group and the Bank's regulatory capital, risk weighted assets (RWA), capital and leverage ratios, as at the reporting date, which are above the minimum regulatory requirements, is presented below:

2. Capital management (continued)

	The Group		The Bank	
	2024[1]	2023[2]	**2024[1]**	2023[2]
Regulatory capital	**€'000**	€'000	**€'000**	€'000
Own funds				
Common Equity Tier 1 (CET 1)	**1.725.891**	1.363.256	**1.722.833**	1.359.454
Additional Tier 1 (AT1)	**-**	129.666	**-**	129.666
Tier 1 (T1)	**1.725.891**	1.492.922	**1.722.833**	1.489.120
Tier 2 (T2)	**209.178**	200.000	**209.178**	200.000
Total regulatory capital	**1.935.069**	1.692.922	**1.932.011**	1.689.120
Risk weighted assets				
Credit risk	**4.878.434**	5.086.726	**4.884.664**	5.093.092
Market risk	**2.496**	589	**2.496**	589
Operational risk	**1.111.530**	877.140	**1.114.935**	880.739
Total risk exposure amount for credit valuation adjustments (CVA)	**16.841**	3.837	**16.841**	3.837
Total risk weighted assets	**6.009.301**	5.968.292	**6.018.936**	5.978.257
Capital and Leverage ratios				
Total Capital ratio	**32,20%**	28,37%	**32,10%**	28,25%
Tier 1 ratio	**28,72%**	25,01%	**28,62%**	24,91%
Common Equity Tier 1 ratio	**28,72%**	22,84%	**28,62%**	22,74%
Leverage ratio	**9,43%**	7,17%	**9,41%**	7,15%

1.As per the regulatory reporting submission, for which audited profits for the year ended 31 December 2024 are included, following permission granted by the Supervisory Authorities.
2.As per the Pillar III disclosures for the year ended 31 December 2023, including audited profits for the year ended 31 December 2023 following permission granted by the Supervisory Authorities.

The Group's CET 1 ratio increased by 588 bps reaching 28,72%, compared to 22,84% as at 31 December 2023. The increase is mainly driven by the increase in CET1 capital, mainly due to the inclusion of current year's profits, despite the increase in RWA. The Group's regulatory Total Capital ratio increased by 383 bps reaching 32,20%, compared to 28,37% as at 31 December 2023. The redemption of €130 million Additional Tier 1 (AT1) capital, which consisted of Contingent Convertible Securities 1 (CCS1) and Contingent Convertible Securities 2 (CCS2) on 31 December 2024, as per the Bank's announcement on 9 December 2024, had a negative capital impact of 216 bps on the Total Capital ratio, as well as Tier 1 ratio.

Specifically, the net increase in CET1 capital (net effect of 608 bps increase in CET1 ratio) was mainly due to the (i) current year's profits, following permission granted by the Supervisory Authorities, mainly driven by the higher total net income and lower impairment losses, partially offset by higher total expenses (ii) the change in prudential provision for non-performing exposures and the change in intangible assets deducted from CET 1 capital.

Additionally, there has been an overall increase in the total RWAs (net effect of 20 bps decrease in CET1 ratio), primarily due to the increase in operational RWAs, partially offset by the net decrease in credit RWAs.

The increase in operational RWAs was mainly due to higher net interest income and non-interest income during the year. The net decrease in credit RWAs, was mainly the result of the net decrease of loan portfolio due to repayments, which offset new lending, as well as the decrease in RWAs of securitisation exposures mostly due to redemptions and disposals.

The agreement with CNP Assurances on CNP Cyprus Insurance Holdings Limited, is expected to have a negative capital impact of approximately 2,5 p.p, therefore the Group's pro forma Total Capital ratio as at 31 December 2024 is expected at approximately 29,7%, upon completion of the acquisition.

2. Capital management (continued)

Leverage Ratio

During the year ended 31 December 2024, the Group's Leverage ratio has increased by 226 bps to 9,43% compared to 7,17% as at 31 December 2023, which continues to be above the minimum leverage ratio requirement of 3%.

The increase in the Group's Leverage ratio was due to the decrease in "Leverage ratio total exposure measure" by 12% as well as the increase in Tier 1 capital by 15%. The increase in Tier 1 capital was the result of the main drivers for the change in CET1 capital, as explained above, partially offset by the decrease due to the redemption of €130 million Additional Tier 1 (AT1) capital on 31 December 2024. The redemption of AT1 capital had a negative impact of 71 bps on the Leverage ratio.

The main reason for the decrease in "Leverage ratio total exposure measure" was the change in the Group's total assets. The decrease in the Group's total assets was mainly driven by the reduction in balances with Central banks, partially offset by the increase in investments in debt securities. The decrease in balances with Central banks was primarily due to the TLTRO repayment in June 2024, the inception of a reverse repurchase agreement and the funds utilised to increase the investments in debt securities, partially offset by the increase in placements with other banks and the level of customer deposits.

The agreement with CNP Assurances on CNP Cyprus Insurance Holdings Limited, is expected to have a negative impact of approximately 0,3 p.p, therefore the Group's Leverage ratio as at 31 December 2024 is expected at approximately 9,1%, upon completion of the acquisition.

V.Minimum Capital Requirements

The minimum regulatory capital requirements (phase-in) of the Group and the Bank are presented in the table set out below. In addition to the capital requirements disclosed below, the Bank notes that the ECB provided a non-public Pillar II capital guidance (P2G), on a consolidated basis, to be made up entirely of CET 1 capital.

2. Capital management (continued)

	1 January 2025[1] %	2024[2] %	2023[3] %
Pillar I			
CET 1	4,50	4,50	4,50
AT 1[4]	1,50	1,50	1,50
Tier 1	6,00	6,00	6,00
Tier 2	2,00	2,00	2,00
Total Capital Requirement – Pillar I	**8,00**	**8,00**	**8,00**
Pillar II			
CET 1	1,94	1,94	1,94
AT 1	0,65	0,65	0,65
Tier 1	2,59	2,59	2,59
Tier 2	0,86	0,86	0,86
Total Capital Requirement – Pillar II	**3,45**	**3,45**	**3,45**
Combined buffer requirement (CBR)			
Capital conservation buffer (CCoB)	2,50	2,50	2,50
Countercyclical capital buffer (CCyB)	1,00	1,00	0,53
Other systematically important institutions buffer (O-SII)	1,50	1,25	1,00
	5,00	**4,75**	**4,03**
Minimum CET 1 Regulatory Requirement	**11,44**	**11,19**	**10,47**
Minimum Tier 1 Regulatory Requirement	**13,59**	**13,34**	**12,62**
Minimum Total Capital Regulatory Requirement	**16,45**	**16,20**	**15,48**

1.The capital requirements established by the Bank's final 2023 SREP decision shall continue in full force and effect as the ECB is not issuing a separate SREP decision for the 2024 SREP cycle for the Bank.
2. As per 2023 final SREP letter, the new capital requirements were effective from 1 January 2024.
3. As per 2022 final SREP letter, the new capital requirements were effective from 1 April 2023.
4. Based on the current capital structure, following the redemption of CCS 1 and CCS 2 instruments on 31 December 2024, the minimum requirement for AT1 for 1 January 2025 and 31 December 2024 shall be covered by higher quality capital.

Combined buffer requirement (CBR)
Based on the provisions of the Macroprudential Oversight of Institutions Law of 2015 to 2022 which came into force on 1 January 2016, the CBC is the designated Authority responsible for setting the macroprudential buffers that derive from the CRD.

Capital Conservation buffer (CCoB)
The CCoB buffer was fully phased-in on 1 January 2019 at 2,50%.

Countercyclical Capital buffer (CCyB)
The CCyB is determined by CBC at the beginning of each quarter. On 30 November 2022, the CBC, following the revised methodology described in its macroprudential policy and consultation with the ECB, decided to increase the CCyB rate from 0% to 0,5%, for the risk weighted exposures in the Republic of Cyprus of each licensed credit institution incorporated in the Republic. The new rate of 0,5% was applicable from 30 November 2023. In June 2023, the CBC announced its decision to raise the CCyB rate from 0,5% to 1,0%, with effect as from 2 June 2024. In January 2025, the CBC announced its decision to increase the CCyB rate from 1% to 1,5%, with effect as from 14 January 2026.

The CCyB rate for the risk weighted exposures in the Republic of Cyprus, where most of the Bank's exposures are located, was set by the CBC at 1% as at 31 December 2024, effective from 2 June 2024 and at 0,5% as at 31 December 2023, effective from 30 November 2023. For the year 2025, the CCyB rate remains unchanged at 1%. The CCyB rate presented in the table above, assumes that from 1st January 2025, all the Bank's exposures are located in the Republic of Cyprus.

2. Capital management (continued)

As at 31 December 2024, the Group's CCyB has been calculated at approximately 1% (31 December 2023: approximately 1%).

Therefore, based on the above, as from 14 January 2026 the CCyB rate of the Group is expected to increase further and accordingly the minimum regulatory capital requirements.

Other Systematically Important Institutions (O-SII) buffer
The CBC as the designated national macroprudential authority, is also responsible for the designation of Other Systemically Important Institutions (O-SIIs) and for the setting of the O-SII buffer requirement for these institutions, on an annual basis. The methodology for the determination of the O-SII buffer requirement is based on the above-mentioned laws and the relevant EBA Guidelines (EBA/GL/2014/10).

In February 2024, the CBC revised its Policy for the designation of credit institutions that meet the definition of O-SII institutions and the methodology for the determination of the O-SII buffer requirement for each credit institution. Following this revised Policy, the Bank continues to be designated as an O-SII institution and the Bank's O-SII buffer rate, as per CBC circular received in April 2024, was set at 1,75% (and which was effective from 1 January 2024), compared to 1,50% that was communicated in October 2023 (for the year 2023 the O-SII buffer requirement was set at 1%). The O-SII buffer requirement is phased-in in two annual increases of 25 bps which is set to 1,50% effective from 1 January 2025 and to 1,75% effective from 1 January 2026. Therefore, for the year 2024 the Bank's phased-in O-SII buffer requirement was 1,25%.

Therefore, based on the above, effective from 1 January 2026 the O-SII buffer requirement of the Group is expected to increase further and accordingly the minimum regulatory capital requirements.

Additional information on regulatory capital will be provided in the Pillar III disclosures for the year ended 31 December 2024, which will be published on the Bank's website: Pillar III Disclosures (hellenicbank.com) (Investor Relations).

2.3. Internal Capital Adequacy Assessment Process (ICAAP), Internal Liquidity Assessment Process (ILAAP), Pillar II and Supervisory Review and Evaluation Process (SREP)

ICAAP and ILAAP

Pillar II covers the assessment of the Group's risk management processes, capital and liquidity adequacy and governance framework as part of the ICAAP and ILAAP. The Bank prepares its ICAAP and ILAAP exercises on an annual basis, as well as providing updates on a quarterly basis to ensure any proactive adjustments to material changes occurring.

The ICAAP is an integral part within the holistic risk management approach of the Group, and it is integrated with the Bank's strategic processes, including the Risk Appetite Framework and the business and capital planning. The Bank assesses the adequacy of its internal capital on an annual basis through the ICAAP exercise, while it also caters for quarterly monitoring or more frequent stress tests depending on any material deviations and in line with the ICAAP Governance Framework. The ICAAP is an integral part of Pillar II of the Basel III regulatory framework (CRR). The ICAAP allows the Bank to arrive at a forward-looking assessment of its capital requirements taking into account the business strategy, risk profile and risk appetite utilising internal stress tests. The ICAAP incorporates the assessment of the Bank's risk management processes and governance framework.

2. Capital management (continued)

The ILAAP is an integral part of the Bank's liquidity risk management framework, analysing its liquidity adequacy both under a normative and an economic perspective, in line with ECB's Guide to ILAAP published in November 2018. Its purpose is to identify and measure the material risks that the Bank is exposed to with regards to liquidity risk, extending beyond those covered within the regulatory framework, e.g. LCR and NSFR. The ILAAP ensures that the Bank holds sufficient liquidity to support its current banking operations and the implementation of its Strategic Plan under stressed conditions/adverse scenarios, while also defining a suitable risk appetite by articulating the Risk Appetite Statement ("RAS") for liquidity risk.

The Bank undertakes quarterly stress testing on its capital and liquidity adequacy considering the latest actual and forecasted information. The quarterly review identifies key vulnerabilities of the Bank and assesses whether the Bank has adequate capital levels to withstand stress reinforcing the adequate and timely decision making.

The ICAAP and the ILAAP incorporate the assessment of the Bank's risk management processes and governance framework.

Both ICAAP and ILAAP exercises for 2024 were submitted to the ECB in March 2024 following their approval by the Board of Directors. Additionally, both ICAAP and ILAAP for 2025 will be submitted to the ECB in March 2025, following their approval by the Board of Directors.

Pillar II and SREP

Pillar II is reviewed and evaluated by the Single Supervisory Mechanism (SSM) as part of its SREP, which occurs periodically and contributes to SSM's assessment of capital adequacy and additional own funds requirements. The Supervisory Review and Evaluation Process assesses the Group's internal capital adequacy and aims at enhancing the link between an institution's risk profile, risk management, risk mitigation systems and its capital planning.

As the Bank is a subsidiary of Eurobank S.A., and a member of the Eurobank Group, the ECB is not issuing a separate SREP decision for the 2024 SREP cycle for the Bank. As per the ECB's decision communicated to the holding company, the capital requirements established by the Bank's final 2023 SREP decision shall continue in full force and effect.

The final 2023 SREP decision, dated 30 November 2023, was based on the supervisory review and evaluation process conducted by the ECB with a reference date of 31 December 2022, and any other relevant information provided after that date. The SREP was conducted pursuant to Article 4(1)(f) of the SSM Regulation (i.e., Regulation (EU) No 1024/2013) and national legislation transposing Articles 73, 86, 97, 104a, 104b, 105 & 113 of the CRD considering the EBA SREP Guidelines. The SREP decision also considered the results of the supervisory stress test conducted in 2023. The 2023 SREP requirements were effective from 1 January 2024.

The Group is required to maintain for 2025, on a consolidated basis, a Total SREP Capital ratio requirement of 11,45% (2023: 11,45%), which includes:

- the minimum Pillar I own funds requirements of 8% in accordance with Article 92(1) of the CRR (of which up to 1,5% can be met with Additional Tier 1 Capital and up to 2% with Tier 2 Capital) and
- an own funds Pillar II requirement of 3,45% (2022 SREP: 3,45%) required to be held in excess of the minimum own fund requirement (P2R to be held in the form of 56,25% of CET 1 capital and 75% of Tier 1 capital).

2. Capital management (continued)

The Group is also required to maintain, effective from 1 January 2025, on a consolidated basis, a minimum phased-in Total Capital ratio requirement of 16,45% (31 December 2024: 16,20%), which includes the phased-in combined buffer requirement of 5% (31 December 2024: 4,75%), which for both years 2025 and 2024 comprises the Capital Conservation buffer (CCoB) of 2,5%, which has to be made up with CET 1 capital, the Other Systematically Important Institutions buffer (O-SII) of 1,5%, applicable as of 1 January 2025, (31 December 2024: 1,25%, applicable as of 1 January 2024) and the Countercyclical Capital buffer (CCyB) of approximately 1% (31 December 2024: approximately 1%).

Based on the final 2023 SREP letter which continues in full force and effect, the Pillar II requirement effective from 1 January 2025 has remained unchanged at 3,45%.

In addition, the ECB has provided on a consolidated basis, a non-public Pillar II capital guidance (P2G) ratio to be made up entirely of CET1 capital. Based on the final 2023 SREP decision which continues in full force and effect, the P2G effective from 1 January 2025 has remained unchanged.

As per the final 2023 SREP decision which continues in full force and effect, the Bank shall obtain the ECB's approval prior to making any distribution to its shareholders.

Taking the above into consideration, effective from 1 January 2025, the Group's minimum phased-in Total Capital Ratio, Tier 1 and CET 1 ratios, are set at 16,45% (31 December 2024: 16,20%), 13,59% (31 December 2024: 13,43%) and 11,44% (31 December 2024: 11,19%) respectively. These capital ratios exclude P2G and are based on the CBR of approximately 5,00% and 4,75% calculated as at 1 January 2025 and 31 December 2024, respectively.

The Group's capital ratios remain above the minimum capital requirements.

2.4. Stress Test

2025 ECB SREP Stress Test

Every two years the EBA carries out an EU-wide stress test in cooperation with the ECB, the European Systemic Risk Board (ESRB) and the national supervisory authorities. It is noted that the stress test does not contain a pass or fail threshold, and no threshold is set to define the failure or success of banks for the purpose of the exercise. Results are used to assess the bank's P2G capital needs in the context of the SREP, taking the Bank's specific risk profile and sensitivity towards the stress scenarios.

The Bank has been excluded from the 2025 sample of banks participating in the exercise from January to June 2025 due to the acquisition of the Bank by Eurobank S.A.

2024 CYBER RESILIENCE STRESS TEST

In 2024, the ECB conducted its first-ever cyber resilience stress test. This exercise assessed how banks respond to and recovered from a cyberattack, rather than simply looking at their ability to prevent it.

Under the stress test scenario, a cyberattack successfully disrupted the Bank's daily business operations, and the Bank tested its response and recovery measures. This included activating emergency procedures and contingency plans and restoring normal operations. Supervisors assessed the extent to which the Bank could cope under this scenario.

The stress test showed that banks have response and recovery frameworks in place, but areas for improvement remain. This is a predominantly qualitative exercise, which has helped increase the banks' awareness of the strengths and weaknesses of their cyber resilience frameworks, that will not have an impact on capital through the P2G. The results will feed into the banks' 2024 SREP.

3. Bank Recovery and Resolution Directive (BRRD)

Minimum requirement for own funds and eligible liabilities (MREL)

The Bank, within the framework of the Bank Recovery and Resolution Directive (BRRD), is subject to the minimum requirement for own funds and eligible liabilities (MREL), that entered into effect on 1 January 2016. On 27 June 2019, Directive 2019/879/EU (BRRD II) came into effect and it was then transposed into National Law. The BRRD provides authorities with a credible set of tools to intervene sufficiently early and quickly in an unsound or failing institution so as to ensure the continuity of the institution’s critical financial and economic functions, while minimising the impact of a failure on the economy and financial system. MREL refers to the funding structure banks are required to maintain, that includes a certain proportion of liabilities that can be written-off or converted into new equity in the event of a bank failure (that is: “bailed in”). Such liabilities, in combination with equity, are known as MREL.

In January 2024, the Bank received notification from the Single Resolution Board (SRB) of its decision for the binding MREL requirement for the Group. Accordingly, the MREL target was set at 25,17% of total risk exposure amount (TREA), plus combined buffer requirement (CBR) while the MREL target of leverage ratio exposure (LRE) was set at 5,91%, both to be met by 31 December 2025. No MREL subordination requirement has been communicated to the Bank.

Furthermore, the Bank must continue to meet MREL requirements equal to 16,57% of TREA and 5,91% of LRE that were set as intermediate targets in the previous resolution planning cycle for 1 January 2022. The own funds used by the Bank to meet the combined buffer requirements (CBR) will not be eligible to meet its MREL requirements expressed in terms of risk weighted assets.

Taking into consideration the applicable CBR requirements of 4,75% as at 31 December 2024, the intermediate binding target for MREL requirements resulted to 21,3% and the final target to 29,9% of TREA to be met by 31 December 2025. These are expected to increase further following the increase of the O-SII buffer rate to 1,50% effective from 1 January 2025, taking the MREL requirements for the final target to 30,17%. This final binding MREL requirement is based on the final decision of the SRB received from CBC in January 2024 and the CBR requirements calculated at approximately 5,00% as at 31 December 2025. For further information regarding the components of the CBR requirements refer to Note 2 of this Report.

Throughout these Additional Disclosures, the MREL ratio as at 31 December 2024, includes audited profits for the year ended 31 December 2024, in accordance with the ECB Decision (EU) 2015/656 on the conditions under which credit institutions are permitted to include interim or year-end profits in CET1 capital in accordance with Article 26(2) of the CRR.

As at 31 December 2024, the Group’s MREL ratio was 34,3% of TREA and 11,3% of LRE. The redemption of €130 million AT1 capital (CCS1 and CCS2 securities) on 31 December 2024, as per the Bank’s announcement on 9 December 2024, had a negative impact of 216 bps on MREL TREA ratio.

The agreement with CNP Assurances on CNP Cyprus Insurance Holdings Limited (refer to Note 39 of the Annual Financial Report) is expected to have a negative impact of approximately 2,7 p.p, therefore the Group’s pro forma MREL ratio as at 31 December 2024 is expected at approximately 31,7% of TREA, upon completion.

The Bank has established a Euro Medium Term Note (EMTN) program of a €1,5 billion size to issue MREL. In July 2022 the Bank issued €100 million Senior Preferred Notes (the “SP Notes”), with a fixed coupon of 9%, maturing on 15 July 2025 and with call-at-par date of 15 July 2024 (3NC2). On 15 July 2024, the SP Notes were called at par. In March 2023 the Bank issued a €200 million Tier 2 Subordinated Notes (the “T2 Notes”), with a fixed coupon of 10,25%, maturing on 14 June 2033 and callable at par during a 3-month period commencing on 14 March 2028 (10,25NC5,25). In September 2024, the Bank issued €100 million Senior Preferred notes (the “SP2024 Notes”), with a 4% coupon and maturity of 2 years with 1 year non-callable (2NC1).

3. Bank Recovery and Resolution Directive (BRRD) (continued)

Following draft communication from SRB, it is expected that from 30 June 2025, the Single Point of Entry will remain as the preferred resolution strategy for the Eurobank Group after the Bank's consolidation and therefore the Bank will be covering its MREL requirements by obtaining funding from the Group. The Bank's final MREL TREA target is expected to be decreased to 24,69% plus CBR applicable as at 30 June 2025 where its MREL LRE target is expected to remain the same.

4. Liquidity requirements

The CRD/CRR sets forth the guidelines for calculating liquidity measures such as the Liquidity Coverage Requirement Ratio (LCR) and the Net Stable Funding Ratio (NSFR). As at 31 December 2024, the Group was in compliance with all regulatory liquidity requirements.

The Group's LCR stood at 519% as at 31 December 2024, compared to 542% as at 31 December 2023, which is considerably higher than the minimum regulatory limit of 100%. The liquidity surplus in LCR as at 31 December 2024 amounted to €7,7 billion, compared to €7,4 billion as at 31 December 2023.

The Group's NSFR stood at 225% as at 31 December 2024 compared to 217% as at 31 December 2023. This is considerably higher than the minimum regulatory requirement of 100%. The NSFR liquidity surplus for 31 December 2024 amounted to €8,6 billion compared to €8,1 billion as at 31 December 2023.

Additional information on liquidity requirements will be provided in the Pillar III disclosures for the year ended 31 December 2024, which will be available on the Bank's website Pillar III Disclosures (hellenicbank.com) (Investor Relations).

FORWARD LOOKING STATEMENTS DISCLAIMER

Certain statements in this Announcement of the Group Financial Results which include discussions with respect to the business strategy and plans of the Hellenic Bank Group (term which includes the Hellenic Bank Public Company Ltd and its subsidiary companies) (the “Group”), its current goals and expectations, its projections, beliefs, possibilities relating to its future financial condition and performance are forward-looking.

By their nature, forward-looking statements involve risks and uncertainties because they relate to events and depend on circumstances that will occur in the future. Therefore, these risks and uncertainties could adversely affect the outcome and financial effect of what is described herein, and the audience of this Announcement are cautioned not to place undue reliance on such forward-looking statements. When relying on forward-looking statements, readers should carefully consider that there are important factors that could cause actual results to differ materially from those in forward-looking statements, certain of which are beyond the control of the Group, including, but not limited to, domestic and global economic and business conditions, market related risks such as interest or exchange rate risk, unexpected changes to regulation, competition, technological conditions and other. The forward-looking statements contained in this Announcement are made as at the date of this publication and the Group undertakes no obligation to update or revise any of same unless otherwise required by applicable law. Analyses and opinions contained herein may be based on assumptions and projections that, if altered, can change the analyses or opinions expressed.

Report of the Board of Directors on Corporate Governance for the year 2024

INTRODUCTION

The Board of Directors of Hellenic Bank Public Company Limited (the “Company” or the “Bank” and together with its subsidiaries, the “Group”) fully adopted the Code of Corporate Governance, which was published by the Cyprus Stock Exchange (6th edition – April 2024), hereinafter referred to as the “Code”. In compliance with the provisions included in the Code’s introduction, the Board of Directors of the Company (the “Board” or “BOD”) incorporates the present Report on Corporate Governance in the Company’s 2024 Annual Financial Report.

PART A

The Company states that the full implementation of the Code’s principles constitutes the Company’s policy and that it had already taken the initiative of applying many of these principles well before the establishment of the Code. The Board believes that good corporate governance, based on the Code, in conjunction with the terms of reference and the practices followed by the various Board Committees, constitutes a fundamental factor in achieving the corporate goal of maximising shareholder value. The Board acknowledges that there is an on-going process of formulating principles of corporate governance based on both international and local conditions. As such, the Board continually follows a policy of reviewing and readjusting the various aspects of corporate governance accordingly.

PART B

The Company confirms that it has complied with the provisions of the Code.

The Company applies the provisions of the Code throughout the Group i.e., and to its subsidiary companies through Board Committees of the Company or the subsidiary companies. As at the date of this Report the significant subsidiary companies, Pancyprian Insurance Ltd and Hellenic Life Insurance Company Ltd, maintain an Audit Committee and a Risk Management Committee as shown in paragraph (13) (Board Committees) below. The non-significant subsidiary companies of the Group (owned Special Purpose Vehicles used for debt to asset swaps, companies with insignificant turnover, dormant companies) apply the provisions of the Code through Committees of the Bank.

In light of the above, the following confirmations and reports are made:

Board of Directors

The Company is governed and controlled by the Board of Directors, which operates on the basis of the Code, the relevant Companies, Stock Exchange and Business of Credit Institutions Laws and the Company’s Articles of Association.

The Board of Directors sets the strategic aims of the Group and ensures that the necessary financial and human resources are in place to meet the strategic and operational objectives of the Group.

The Board of Directors has the overall responsibility for:

- Setting and overseeing the values and standards of the Group.
- Setting and overseeing the business model of the Group.
- Maintaining effective systems and controls to ensure effective operation of the Group and compliance with applicable laws and regulations.
- Setting the framework and policy for effective governance and oversight of the Group.
- Monitoring business performance against the strategic objectives, risk appetite and expected standards.

The BoD is responsible for ensuring that Board and Committees composition and organisation are appropriate.

The Bank’s Corporate Governance Framework includes a list of matters reserved for the Board. Such matters include, inter alia, setting of the Group’s overall strategy and targets, approval of the annual budget, approval of capital and funding plans, decisions relating to the capital structure of the Company, decisions on important matters and material transactions, transactions with Board Members and Senior Executives or major shareholders, appointment or removal of the Chief Executive Officer, matters concerning the composition and organisation of the Board and Board Committees, governance matters, etc.

On 31st December 2024, the Board was composed of nine Non-Executive Directors and two Executive Directors, being sufficiently diversified in terms of age, educational and professional background in order to reflect a sufficiently wide range of experiences and facilitate the extraction of a variety of independent opinions and critical challenges. The Board's composition as at 31st December 2024, as well as the changes in the composition and distribution of responsibilities of the Board throughout the year and up to the date of the present Report, are presented in the Management Report included in the Annual Financial Report for the year 2024.

During 2024, the Board of Directors held twenty-seven meetings, ten of which were special meetings. Two of the abovementioned Board meetings were held without the presence of the Executive Directors. In accordance with the provisions of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus (the "Internal Governance Directive"), one of the abovementioned meetings was held without the presence of the Chairman of the Board of Directors and without the presence of the Executive Directors, was chaired by the Senior Independent Director and its purpose was to assess the performance of the Chairman. The overall attendance record at the 2024 Board meetings, scheduled and special, was 96%.

It is ensured that all Members of the Board are duly informed in writing of forthcoming Board meetings and all necessary documentation related to the meeting is provided, so that they have sufficient time to review it.

The participation of the Board Members in other boards is such, so as, to allow them to devote the necessary time and attention to their duties as Members of the Board of the Company.

There is a clear division of responsibilities between the Chairperson of the Board of Directors and the Chief Executive Officer.

The Chairperson of the Board of Directors leads and manages the Board of Directors in a manner such as to ensure that it discharges its legal and regulatory responsibilities fully and effectively. The primary role of the Chairperson of the Board of Directors is to ensure that the Board of Directors is organised and operates properly and efficiently, to promote the required team spirit to the Board of Directors, to promote high standards of corporate governance and probity and to ensure that appropriate management information is provided to the Board to enable it to discharge its management and supervisory roles.

The Chief Executive Officer, under the delegated authority from the Board of Directors, has the responsibility for the day-to-day running of the Group, leads and directs the implementation of the Group strategy, which is determined by the Board of Directors and ensures that the Group's activities are executed in line with the performance targets set by the Board of Directors, the Laws, Regulations and Group Policies. The Chief Executive Officer of the Group is accountable to the Board of Directors.

The Board of Directors appoints an Independent Director as the Senior Independent Director. The Senior Independent Director is available to shareholders if they have concerns, which have failed to be resolved through normal communication channels. In addition, the Senior Independent Director, at least annually, chairs a meeting with the Non-Executive Directors without the Chairperson present, in order to appraise the performance of the Chairperson.

The Company Secretary and the Executive Officer ensuring compliance with the Code of Corporate Governance provide information and advisory services to the Members of the Board related to board procedures and the Code.

Based on the provisions of the Code and for the purposes of this Report, the following are the Directors in 2024 and up to the date of the Report:

(1) Independent Non-Executive Directors in 2024

- Petros Christodoulou, Chairman (appointed Member of the Board and Chairman on 8th January 2024)

- Robert Anastassis Kyprianou, Vice-Chairman (elected Member of the Board and appointed Vice-Chairman on 18th September 2024)

- Christos Themistocleous, Vice-Chairman (served as Acting Chairman of the Board from 28th June 2023 until 8th January 2024, resigned on 5th August 2024)

- Oliver Bernard Ellingham, Senior Independent Director (elected Member of the Board and appointed Senior Independent Director on 18th September 2024)

- John Gregory Iossifidis, Senior Independent Director (resigned on 18th September 2024)
- Stephen John Albutt
- Miranda Xafa
- Maria Charalambous (elected Member of the Board on 18th September 2024)
- Sofronis Clerides (elected Member of the Board on 18th September 2024)
- Charalambos Constantinou (elected Member of the Board on 18th September 2024)
- Kenneth Howard Prince-Wright (elected Member of the Board on 18th September 2024).
- Kristofer Richard Kraus[1] (Member of the Board until 20th June 2024)
- Marios Maratheftis[1] (Member of the Board until 8th August 2024)
- Marco Comastri (Member of the Board until 18th September 2024)
- Demetrios Efstathiou (Member of the Board until 18th September 2024)
- Andreas Persianis (Member of the Board until 18th September 2024)
- Christodoulos Hadjistavris[1] (Member of the Board until 18th September 2024).

A relevant "Confirmation of Independence" based on the minimum independence criteria in accordance with provision A.2.3. of the Code is signed by each of the Independent Non-Executive Directors and is submitted to the Cyprus Stock Exchange together with the present Report on Corporate Governance.

(2) Non-Independent Non-Executive Directors in 2024

- None.

(3) Executive Directors in 2024

- Antonis Rouvas, Executive Director / Chief Financial Officer (from 18th September 2024), Interim Chief Executive Officer (until18th September 2024)
- Michalis Louis, Executive Director / Chief Executive Officer (elected / appointed on 18th September 2024).

At least 50% of the Board of Directors (excluding the Chairperson) consists of Independent Non-Executive Directors.

(4) Chief Executive Officer

- Oliver Gatzke, Chief Executive Officer (on garden leave from 1st August 2023 until 22nd July 2024 when his employment contract expired)
- Antonis Rouvas, Interim Chief Executive Officer (from 1st August 2023 until 18th September 2024)
- Michalis Louis, Chief Executive Officer (from 18th September 2024).

Note:

1 Under the independence criteria listed in the Directive on the Assessment of Suitability of the Members of the Management Body and Key Function Holders of Authorised Credit Institutions of 2020, as amended, of

the Central Bank of Cyprus, which differ from those of the Corporate Governance Code, Messrs Kristofer Richard Kraus, Marios Maratheftis and Christodoulos Hadjistavris were not independent until the end of their tenure on 20th June 2024, 8th August 2024 and 18th September 2024 respectively.

(5) Application of best possible practices of Corporate and Internal Governance in the Company

Directors' Induction and Ongoing Development

All newly appointed Board Members receive an induction and training. They receive an induction information pack, participate in an induction programme and have the opportunity to meet with senior officers of the Bank, be briefed by them and participate in introductory presentations.

In addition, the Chairperson of the Board, with the assistance of the Company Secretary, must ensure that the Members of the Board possess at all times sufficient knowledge and skills to perform their duties and that their education and development needs are addressed on a continuing basis. For this purpose, at the beginning of each year, a Board annual training schedule is prepared, which includes specialised programmes covering technical matters and matters for the development of business and personal skills. In addition, depending on the responsibilities and personal training needs of each Board Member, they are given the opportunity to participate in specialised induction programmes and seminars that relate to their responsibilities as Members of Board Committees.

Evaluation of Performance of the Board of Directors

Pursuant to the provisions of the Internal Governance Directive and best practices on Corporate Governance, the Board performs an assessment of the Board of Directors and its Committees at least on an annual basis.

In addition, in accordance with the Internal Governance Directive, the Bank must assign at least every three years the review and evaluation of the composition, efficiency and effectiveness of the Board and its Committees to an independent external consultant. Both the internal and external evaluations are submitted to the Central Bank of Cyprus.

The Bank has established policies and procedures that govern the evaluation of the performance of the Board and its Committees.

In the first quarter of 2024 the Board of Directors performed the annual evaluation of the Board and its Committees for 2023.The external Board evaluation carried out by external advisors every three years has been completed during the first quarter of 2024.

The Board's Chairperson ensures that a clear improvement plan is put in place, which includes clear actions to address the development areas and it is regularly monitored by the Board.

The results of each annual self-assessment and the progress on the implementation of the actions in the improvement plan will constitute the basis for a review in the following year.

Corporate Governance Framework

The Bank has established a Corporate Governance Framework purporting to provide a comprehensive document, which clearly sets out the Company's corporate governance arrangements.

The Corporate Governance Framework provides information on the structures, responsibilities and processes established that ensure proper and effective management and oversight of the Company's affairs.

The Company's corporate governance policies purport to ensure the independence of the Board of Directors and its ability to effectively supervise Management's orderly operation of the Company. The policies are reviewed annually and in accordance with changing regulation and emerging best practice information.

The Corporate Governance Framework is reviewed at least annually by the Board.

Approval, Revision and Review of Policies, Frameworks and Charters

During 2024 and 2025 until the date of this Report, taking into account the provisions of the Internal Governance Directive and within the framework of the continuous efforts of the Company to improve its Corporate Governance, the Board has approved or revised or reviewed, inter alia, the following Policies and/or Frameworks and/or Charters:

- Corporate Governance Framework
- Board Nomination, Evaluation, Selection, Succession and Ongoing Assessment Policy
- Board Diversity Policy
- Board Induction / Ongoing Education Policy
- Self-Assessment and External Evaluation (Board of Directors, Board Committees and Individual Board Members) Policy
- Group Remuneration Policy
- Recruitment, Selection and Ongoing Assessment of Key Function Holders Policy
- Code of Business Conduct and Ethics Framework
- Anti-Bribery & Corruption Policy
- General Principles for the prevention of Money Laundering, Terrorism Financing & Implementation of Economic Sanctions Policy
- Conflicts of Interest Policy
- Whistleblowing Policy
- Market Abuse Policy
- Compliance Charter and Framework
- Compliance Policy
- Internal Audit Charter
- Data Protection Office Charter
- Personal Data Protection Policy
- Dividends Policy
- Customer Acceptance Policy
- Risk Appetite Framework
- Risk Appetite Statement
- Credit Risk Management Framework
- Liquidity and Funding Risk Management Framework
- Market Risks Management Framework
- Operational Risk Management Framework
- Enterprise Risk Management Framework
- Model Validation Framework
- Compliance Policy to the Pillar III Disclosure Requirements as per CRR / CRD IV
- Credit Policy - various Chapters
- Credit Monitoring Policy Manual
- Information Security & Fraud Charter
- Information Security & Fraud Policy
- IT Governance Policy
- Stress Testing Policy & Program and Governance
- Investment Framework
- Operational Risk Policies Manual - various Chapters
- Insurance Distribution Policy
- Arrears Management Policies Manual - various Chapters

The Chairperson of the Board of Directors, the Chief Executive Officer, the Company Secretary and the Executive Officer ensuring compliance with the Corporate Governance Code confirm that compliance with the relevant laws, regulations and directives, the implementation of best practices of corporate governance within the Company and the application of an adequate and transparent framework of internal governance are amongst the priorities of the Bank.

Percentages of Major Shareholders as at 17th March 2025

The percentages of the Shareholders holding more than 5% of the Company's issued share capital as at 17th March 2025 were as follows:

EUROBANK S.A.	93,47%

(6) Remuneration Policy Report

The Remuneration Policy Report was prepared by the Board of Directors following a proposal by the Remuneration Committee in accordance with Appendix 1 of the Code. It is presented after the present Board of Directors' Report on Corporate Governance. The Remuneration Policy Report will be presented to the Annual General Meeting of the Shareholders for approval.

Information on the remuneration / fees of the Members of the Board of Directors and the Executive Directors for the year 2024 is disclosed in the notes to the Financial Statements (Note 43) contained in this Annual Financial Report as well as in the Remuneration Policy Report itself.

(7) Going Concern

The Board of Directors states that the Company intends to continue to operate on a going concern basis for the next twelve months.

(8) System of Internal Control

The Board of Directors has ensured the existence on a continuous basis of an adequate and effective System of Internal Control in 2024. The adequacy and effectiveness of the System of Internal Control are assessed by the Board at least annually. The risk-based assessment covers all systems of internal control, including financial and operational systems, as well as compliance systems and systems for the management of risks that threaten the attainment of the Group's objectives.

To meet this requirement, procedures have been designed for safeguarding the Group's assets, for maintaining proper accounting records and for ensuring the accuracy, completeness and validity of the information provided to the Group's stakeholders. These procedures can only provide reasonable but not absolute assurance against material misstatement, errors, losses, fraud or breaches of laws and regulations.

In this context, all Group operational management units are suitably staffed and responsible for the introduction and operation of appropriate control systems according to their respective business and responsibilities. Within this framework, the abovementioned management units:

- Operate on the basis of a specific organisational structure and allocation of responsibilities.
- Prepare and monitor the implementation of the strategic and business plans and annual budgets.
- Follow written procedures, receive and disseminate information and advice through circulars and training programmes.
- Adopt a policy of adequate segregation of duties in order to avoid potential conflict(s) of interest wherever this is deemed necessary.
- Apply, at branch level, performance evaluation and measurement models based on specific targets.
- Are supported by appropriate software and hardware systems.
- Are subject to regular internal and external audits.

The effectiveness of the System of Internal Control is reviewed on a more regular basis by the Audit and Risk Management Committees through regular reports to the Board. In carrying out their reviews, the Audit and Risk Management Committees receive reports on internal controls, both financial and non-financial, internal audit reports, external audit reports and regulatory reports.

The Executive Management of the Group is responsible for addressing weaknesses arising out of these reviews and for ensuring that mitigating actions are implemented within an appropriate and agreed timetable.

The Internal Audit Unit reports directly to the Audit Committee and the Board of Directors. It consists of 41 persons and is headed by Mrs Niki Nicolaidou-Hadjixenophontos (B.Sc. Honours in Financial Services, M.B.A., A.C.I.B., F.C.C.A.).

The following audit assignments have been outsourced in 2024 to external audit firms:

(a) Audit of the Insurance subsidiary companies of the Group (Pancyprian Insurance Ltd and Hellenic Life Insurance Company Ltd).
(b) Internal Audit Services in the areas of:
  - ESG Stress Testing for ICAAP
  - Oracle Databases and AIX Operating systems

- PSD2.

(9) Confirmation in Accordance with the Provision C.2.1. of the Code

In relation to paragraph (8) above (System of Internal Control), the Members of the Board of Directors confirm that they have assessed the effectiveness of the systems of internal control of the Company as well as of the procedures for verification of the accuracy, completeness and validity of the information provided to investors.

The Board also confirms that, to its knowledge, no violation of the Cyprus Securities and Stock Exchange Laws and Regulations has occurred, except those related to cases already reported to the relevant authorities (where this applies).

(10) Independent Auditors – Provision C.2.2. of the Code

In 2024, Ernst & Young Cyprus Limited, Independent Auditors of the Company, offered non-audit services e.g., tax compliance and advisory services, assurance on various regulatory returns, etc. Their objectivity and independence are ensured in the following ways:

(i) Ernst & Young Cyprus Limited and its professional team members comply with the independence requirements, for assurance engagements, outlined in the EY Global Independence Policy, which is in line with the IESBA Code of Ethics for professional accountants, the EU Audit Regulation 537/2014 and the EU Audit Directive 2006/43/EC.

(ii) Relevant procedures are also performed, as required by their Conflict of Interest Policy, and they have not identified any potential independence issues or any conflict of interest threat, which would impact on their ability to provide an independent and unbiased opinion.

(iii) In addition, Ernst & Young Cyprus Limited monitors, on an ongoing basis, the commercial banking relationship between the Independent Auditors and Hellenic Bank Group and fee dependency.

(iv) The offering of non-audit services by the Independent Auditors is monitored by the Audit Committee in a manner aiming to ensure that their objectivity and independence are not compromised.

Ernst & Young Cyprus Limited have confirmed in writing to the Company items (i) to (iii) above. The Independent Auditors do not offer internal audit services to the Company.

(11) Credit Facilities to Directors

Information as to credit facilities provided to Company Directors (and related parties) is to be found in the relevant notes to the Financial Statements (Note 43) contained within the present Annual Financial Report. It is confirmed that credit facilities to Company Directors (and related parties) or to its subsidiary or associated company Directors are granted in the normal course of the Company's business, under normal commercial and employment terms and with transparency. Furthermore, it is confirmed that all relevant cases of Bank facilities to Company Directors and its subsidiary company Directors are forwarded for approval to the Board, after the relevant proposal of the Board's Audit Committee on the "arm's length" nature of the cases. The interested Member of the Board is neither present nor participates in the procedure.

(12) Executive Officer ensuring compliance with the Code of Corporate Governance

The Company has appointed Mrs Maria Vovides-Iliescu, Assistant Company Secretary, as Executive Officer ensuring compliance with the Code of Corporate Governance.

(13) Board Committees

The following Board Committees operate within the Company:

(a) Audit Committee

Chairperson: Oliver Bernard Ellingham (from 18th September 2024)
Christos Themistocleous (from 30th January 2024 until 5th August 2024)

John Gregory Iossifidis (Chairman until 30th January 2024)

Members: Stephen John Albutt (from 18th September 2024)
Robert Anastassis Kyprianou (from 18th September 2024)
Maria Charalambous (from 18th September 2024)
John Gregory Iossifidis (Member from 30th January 2024 until 18th September 2024)
Andreas Persianis (until 18th September 2024)
Demetrios Efstathiou (until 18th September 2024)
Christodoulos Hadjistavris (until 18th September 2024).

(b) Remuneration Committee
Chairperson: Kenneth Howard Prince-Wright (from 18th September 2024)
Petros Christodoulou (from 30th January 2024 until 18th September 2024)
Andreas Persianis (until 30th January 2024)

Members: Charalambos Constantinou (from 18th September 2024)
Maria Charalambous (from 18th September 2024)
Miranda Xafa
Christos Themistocleous (until 30th January 2024)
Marco Comastri (until 18th September 2024)
Kristofer Richard Kraus (from 30th January 2024 until 20th June 2024).

(c) Nominations / Internal Governance Committee
Chairperson: Petros Christodoulou (from 30th January 2024)
Christos Themistocleous (Chairman until 30th January 2024)

Members: Miranda Xafa (from 18th September 2024)
Kenneth Howard Prince-Wright (from 18th September 2024)
Sofronis Clerides (from 18th September 2024)
Stephen John Albutt (until 30th January 2024)
Marios Maratheftis (until 8th August 2024)
John Gregory Iossifidis (until 18th September 2024)
Christos Themistocleous (Member from 30th January 2024 until 5th August 2024).

(d) Risk Management Committee
Chairperson: Robert Anastassis Kyprianou (from 18th September 2024)
Stephen John Albutt (Chairman until 18th September 2024)

Members: Stephen John Albutt (Member from 18th September 2024)
Oliver Bernard Ellingham (from 18th September 2024)
Charalambos Constantinou (from 18th September 2024)
Demetrios Efstathiou (until 18th September 2024)
Marios Maratheftis (until 8th August 2024)
Kristofer Richard Kraus (until 20th June 2024)
Miranda Xafa (until 18th September 2024).

(e) Transformation Committee (*abolished on 18th September 2024*)
Chairperson: Marco Comastri (until 18th September 2024)

Members: Christodoulos Hadjistavris (until 18th September 2024)
Stephen John Albutt (until 18th September 2024)
Andreas Persianis (from 30th January 2024 until 18th September 2024).

The terms of reference of the above Committees (except the temporary / ad hoc Transformation Committee) are based both on the relevant provisions of the Code pertaining to them and the relevant guiding Directives of the Central Bank of Cyprus. They are published in paragraph 14 below while those of the Remuneration Committee are included in the Remuneration Policy Report. Within the framework of the provisions of the Code concerning relations with shareholders, the Chairpersons of these Committees are available to answer any questions at the Annual General Meeting, at which all shareholders are encouraged to participate. The Chairpersons and Members of the Committees periodically submit reports or proposals to the Board of Directors following meetings of the corresponding Committees, depending on the subjects being addressed.

The **Audit Committee** meets before the announcement of the quarterly financial results, to monitor the integrity, accuracy and reliability of the Group's quarterly and annual financial reporting process as well as any formal announcements relating to the Group's financial performance and other disclosures, to assess the adequacy of the provisions on financial and non-financial assets and on material litigation against the Bank in line with accounting policies and standards and to monitor the establishment of accounting policies and practices, paying particular attention to (i) changes to critical accounting policies and practices, (ii) decisions requiring a significant element of judgement and (iii) unusual transactions and how these are disclosed. It then proceeds with the relevant suggestions to the Board of Directors through a memo.

The Audit Committee submits proposals to the Board regarding the appointment, compensation, terms and scope of engagement and substitution or rotation of the Statutory Auditors. The Committee monitors and ensures the independence and effectiveness of the Statutory Auditors and oversees the relationship between them and the Bank.

The Audit Committee also meets (without the presence of Members of the Executive Management, unless the Audit Committee deems their attendance necessary, but with the presence of the Control Functions that report to it) to review matters that are within its responsibility and terms of reference, especially in relation to the design, operation, adequacy, effectiveness, and assessment of the Systems of Internal Control and Compliance, and the monitoring of Management's corrective actions to address control weaknesses, non-compliance with Company policies, laws and regulations and other weaknesses identified by external and internal auditors. The Committee makes recommendations or suggestions to the Board on issues under its jurisdiction.

The Audit Committee assesses and monitors the independence, adequacy and effectiveness of the Internal Audit and Compliance Functions and also of the Data Protection Office.

It is noted that Pancyprian Insurance Ltd and Hellenic Life Insurance Company Ltd also maintain an Audit Committee.

During 2024, the Audit Committee held twenty-one meetings, two of which were held jointly with the Risk Management Committee and one of which was held jointly with the Risk Management Committee and the Nominations / Internal Governance Committee.

The Committee's current Chairman (from 18th September 2024) holds a Bachelor of Arts degree in Business Studies and he is a Chartered Accountant - Member of the Institute of Chartered Accountants in England and Wales. He has pursued a career in corporate finance / investment banking and, following retirement, he has held a number of non-executive directorships / memberships of board committees. The Committee's previous Chairman (from 30th January 2024 to 5th August 2024) holds a Bachelor of Science degree in Economics (Accounting & Finance) from the London School of Economics and Political Science and he is a Fellow Member of the Institute of Chartered Accountants in England and Wales. He retired as a partner from PwC Cyprus in 2017 following a 36-year career as an Accountant and Auditor, and he has extensive audit experience of local and international companies in the hotel, construction & development, manufacturing and retail industries. The Committee's previous Chairman (until 30th January 2024) holds a Bachelor's degree in Economics (Accounting major, Economics minor) and a Master's degree in Business Administration (Executive MBA) and has extensive experience, predominantly in the Financial Sector, in large multinational and regional financial institutions.

A Committee Member holds a Master of Arts degree in Philosophy, Politics and Economics from the University of Oxford, and he has pursued a 32-year asset / investment management career in multinational groups in London. Another Member holds a Bachelor of Commerce degree, he is a Chartered Accountant - Member of the Institute of Chartered Accountants in England and Wales, and he has experience in auditing & advisory work in London and extensive investment banking experience in London and Hong Kong. Another Member holds a Bachelor of Arts degree in Economics, she is a Fellow Member of the Institute of Chartered Accountants in England and Wales, and she has pursued a 35-year career in the Finance Division of an independent public corporation in Cyprus, retiring in 2023 as Executive Manager Finance (CFO).

The **Risk Management Committee** assists the Board of Directors in fulfilling its responsibilities and obligations concerning the identification, measurement, monitoring and effective management of all the Group's risks (including but not limited to credit, interest-rates, operational, market, liquidity, foreign exchange, reputation, capital, information communication technology (ICT), security & fraud, environmental, social and governance (ESG), outsourcing, data aggregation & reporting and other risks). Amongst other duties, the Committee prepares and submits proposals for approval to the Board concerning the principles, framework, policies, recovery plan and risk appetite in relation to undertaking and managing all forms of risk and the use of capital that corresponds to the business objectives of the Company, the Group and/or each subsidiary company separately. The Committee's mission includes promoting a culture of risk awareness and appropriate risk undertaking across the Group and assisting the Board of Directors in overseeing the effective implementation of the Risk Appetite Framework and Strategy.

It is noted that Pancyprian Insurance Ltd and Hellenic Life Insurance Company Ltd also maintain a Risk Management Committee.

The Risk Management Committee meets whenever necessary and at least twice every quarter. During 2024, the Committee held fifteen meetings.

The **Remuneration Committee** defines and recommends for approval by the Board of Directors the Remuneration Policy, including pensions and variable compensation and the Remuneration Principles of the Group, which are aligned to the Group's strategic objectives and values. The Committee meets whenever it is necessary to fix or review the remuneration of Executive and Non-Executive Members of the Board of Directors, the Company Secretary, the Chief Executive Officer, Key Function Holders including the Heads of Control Functions, and the Anti-Money Laundering Compliance Officer, and it makes relevant recommendations to the Board. After considering all relevant parameters and data, it makes relevant recommendations to the Board for making decisions, in the absence of the involved Executive Member(s) of the Board or other Officers involved. It is also engaged in reviewing and making proposals on the remuneration of the Non-Executive Members of the Board of Directors of the subsidiaries or associated companies of the Group.

The Committee's suggestions and the Group's Remuneration Policy take into consideration the relevant responsibilities, workload, qualifications, know-how, academic background, experience, individual performance, remuneration of comparable positions in the market, especially in areas where the Group is active, remuneration at other levels in the Group as well as non-financial criteria e.g., compliance with applicable rules and procedures. The Committee's aim is to attract and retain good quality officers at Executive and Key Function Holder levels, in order to better serve the interests of the Group as well as those of its Shareholders and other stakeholders.

The Committee also reviews and recommends for approval by the Board of Directors the Directors' Remuneration Policy, which is voted at the Annual General Meeting of the Shareholders in accordance with the provisions of the Encouragement of the Long-Term Active Participation of the Shareholders Law of 2021, Law 111(I)/2021.

The Remuneration Committee proposes to the Board of Directors the Annual Remuneration Policy Report, as part of the Annual Financial Report of the Company, which is submitted to the Annual General Meeting of the Shareholders for approval. The Committee also reviews and approves the Disclosure of Information regarding the Annual Remuneration of the Directors, which is prepared by Human Resources for inclusion in the notes to the annual Financial Statements of the Company and the Remuneration Policy Report itself.

During 2024, the Remuneration Committee held four meetings.

The **Nominations / Internal Governance Committee** is engaged in selecting fit and proper individuals for appointment as Board Members of the Company or its subsidiaries or associated companies of the Group or any other company in which the Company has the right to appoint Members of the Board, either for positions extraordinarily vacated or after the retirement of Board Members. The Committee then submits its suggestion(s) to the Board of Directors for reaching a relevant decision. The new Members of the Board undergo a detailed induction programme.

The Committee is also engaged in identifying, evaluating and recommending for approval by the Board of Directors candidates for the position of the CEO of the Company or any other company in which the Bank has the right to appoint and/or recommend the CEO, as well as in evaluating and recommending for approval by the Board of Directors the appointment of Key Function Holders excluding the Heads of Control Functions, following a relevant recommendation by the CEO.

The Committee also has the responsibility of implementing the Group's policies on Internal Governance as well as to oversee the Board's Evaluation and Succession Plan. The Committee has the overall responsibility for the development and implementation of the Bank's Environmental, Social and Governance (ESG) strategy. The Nominations / Internal Governance Committee meets whenever issues within its competency arise.

During 2024, the Nominations / Internal Governance Committee held eight meetings.

The Board of Directors established a temporary / ad hoc Transformation Committee of the Board on 4th May 2020, which was abolished on 18th September 2024. The primary role of this Committee was to oversee the implementation of the Bank's Transformation Strategy, with special emphasis on the monitoring of the implementation of the Digital Transformation Strategy which forms part of the Bank's overall Transformation

Strategy and to keep the Board of Directors informed of the progress, risks and mitigating plans of such implementation.

The Transformation Committee met whenever necessary. During 2024, the Committee held six meetings.

(14) Terms of Reference of the Board of Directors' Committees (except the Remuneration Committee and the temporary / ad hoc Transformation Committee)

Terms of Reference of the Audit Committee (exact copy)

1. Establishment / Mission

The Board Audit Committee (the 'Committee') was established to fulfil the following mission in relation to Hellenic Bank Public Company Limited (the 'Company' or the 'Bank' or the 'Group'):

The primary mission of the Committee is to ensure compliance with the applicable legal and regulatory framework, including but not limited to the requirements of the Business of Credit Institutions Laws, the relevant Central Bank of Cyprus and European Central Bank Directives and requirements and the Cyprus Stock Exchange Code of Corporate Governance, in relation to Internal Audit and Compliance. The Committee also ensures compliance with the General Data Protection Regulation in relation to Personal Data Protection.

The Committee reviews and challenges, where necessary, Group Policies / Frameworks, practices, controls as well as actions and judgements of the Management team that contribute to the sound management and conduct of the operations and activities of the Company.

The Committee is responsible for assisting the Board of Directors (the 'Board') in the effective monitoring of the activities and operations of the Group.

The detailed duties and responsibilities of the Committee are set out in section 5.

To accomplish its mission, the Committee has under its direct monitoring and control Internal Audit, which is independent of the Executive Management and accountable to the Committee. Also, the Compliance Unit and the Data Protection Office reports quarterly to the Committee on matters related to the adequacy and effectiveness of the Compliance Framework and the Framework for Business Conduct and the Data Protection Framework respectively.

The Committee has adequate access to the Internal Control Functions, and it obtains independent professional advice whenever it deems this necessary.

2. Composition and Term-in-Office of Members of the Audit Committee

The Board appoints at least three and up to five non-Executive Directors as Members of the Committee. The majority of the Members of the Committee must be independent non-Executive Members of the Board.

The Committee should have:

(a) Recent and relevant practical experience in financial markets or professional experience directly linked to financial markets activity and

(b) Knowledge of the Group's broader business environment, including information systems, technology, compliance and internal audit.

Members of the Committee must not hold any other posts or positions or conduct transactions which could be considered to be in conflict with the Terms of Reference of the Committee.

Members of the Committee cannot participate in more than two (2) statutory committees, including the Committee.

The Chairperson of the Committee shall be independent and have specialist knowledge and experience in the application of accounting principles and internal control processes and will be appointed by the Board.

The Chairperson of the Board shall not be a Member of the Committee.

The term-in-office of the Members of the Committee is decided by the Board.

3. Meetings of the Audit Committee

The Committee holds meetings, at least quarterly, which, where appropriate, must coincide with important financial reporting dates.

For unforeseen issues the Committee may convene via teleconferencing / videoconferencing. A Committee resolution in writing signed or approved by email or any other means of transmission (e.g., Diligent) by ALL Committee Members shall be valid and effectual as if it had been passed at a meeting of the Committee duly convened and held.

Every effort shall be made to carry out a regular meeting at least once a year with the physical presence of all Committee Members.

The arrangement for attending regular or extraordinary meetings via teleconference / videoconference shall not be used abusively but with caution at member or committee level ensuring that, as a rule and unless there are special circumstances to justify the opposite, at least the majority of Committee Members are physically present at each regular or extraordinary meeting.

Committee Members shall not be absent from the regular and extraordinary meetings either physically or via teleconference / videoconference, for more than two (2) consecutive meetings or twenty-five percent (25%) of the annual meetings.

The next integral number of one half of the Members comprises a quorum.

The Committee invites regularly to its meetings the Head of Internal Audit, the Head of the Compliance Unit, the Manager of the Data Protection Office and any executives of the Group, whose input / opinion it considers necessary to enable it to best discharge its duties and comply with its terms of reference.

The Chairperson of the Committee shall ensure that no person other than its Members is present at a meeting, including other Board Members, unless he/she is formally invited for a specific item or items on the agenda to contribute towards that specific item. Such person is present only during the discussion of the specific item and leaves the meeting immediately after, without any participation in the decision-making process.

Prior to the commencement of a Committee meeting, the Chairperson shall read all the items on the agenda and request that any Member, who has a potential interest and/or conflict of interest in any of the agenda items, to explain such conflict and not participate in the discussion of such agenda topic. Also, during a committee meeting, a Member must declare any potential interest and/or conflict of interest as soon as it becomes apparent. For any agenda item / other specific issue with conflicts of interest by a Committee Member, he/she is asked to leave the meeting when discussing / voting for that agenda item / specific issue and the relevant material and minutes relating to that agenda item / specific issue are restricted to be viewed by that Member.

The Company Secretariat must be closely involved in the preparation of the meeting's agenda and ensure it is distributed, including supporting papers where relevant, at least three (3) business days in advance of the meeting, except of the supporting papers regarding the quarterly and annual financial results, for which Company Secretariat must ensure that are distributed at least two (2) business days in advance of the meeting. Any envisaged late material submission, deemed necessary and justified, must be authorised by the Chairperson in advance.

The material submitted should include summarising cover memos or executive summaries and/or dashboards and should highlight the risks, opportunities, costs, and benefits of the various items on which the Committee is expected to make recommendations to the Board.

The Committee reports regularly to the Board. The Company Secretariat must ensure that minutes and decisions are kept for each Committee meeting, they are finalised not later than fifteen (15) business days following the meeting and are formally approved at the next scheduled meeting or by a Committee resolution.

The Company Secretariat must ensure that the approved minutes of the Board Audit Committee meetings are submitted to the Central Bank of Cyprus (in accordance with paragraphs 12 and 19 of the Internal

Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus) within one (1) month from the date of the meeting. In case no Committee meeting is held within one (1) month, the minutes shall be approved by written procedure by all Members present at the meeting and submitted within the specified deadline to the Central Bank of Cyprus. The approved and signed minutes are subsequently circulated to all Board Members (by uploading on Diligent Board Resources).

4. <u>Operational and Decision-making Process of the Audit Committee</u>

4.1 The Committee is authorised by the Board to:

(a) Investigate any activity within its Terms of Reference,

(b) Seek any information and clarifications from any employee of the Company. All employees are required to co-operate with any request made by this Committee.

4.2 The Committee should follow the arrangements established / approved and supervised by the Board that are intended to ensure the internal operation of the Committee, for the proper flow of information, including the verification documents for the Committee’s recommendations and conclusions, and the reference channels between the Committee and the Board, the Central Bank of Cyprus, and other parties.

4.3 The Committee, in exercising its supervisory responsibilities, shall have adequate access to resources and information relevant to its duties. The Committee shall follow the framework and appropriate and transparent procedures for such access, and appropriate and transparent procedures in the event that it allows the Committee Members to communicate individually and directly with senior management and/or members of staff, in exercising their supervisory responsibilities as Members of the Committee (abovementioned framework / procedures are established by the Board).

4.4 The Chairperson of the Committee is responsible for the efficient operation of the Committee and for adhering to proper governance procedures. He/She encourages and promotes open discussions with a critical spirit, ensuring that divergent views can be expressed and discussed within the decision-making process. The Chairperson of the Committee sets and prioritises the items on the agenda and ensures that Committee decisions are taken on a sound basis based on sufficient information received in a timely manner before meetings. He/She also ensures that sufficient time is provided to Committee Members for examining important issues and receiving answers to any questions or concerns they may have, without being confronted with unrealistic deadlines for decision making.

4.5 The Committee should interact with other committees in an appropriate way. Subject to subparagraph (4) of paragraph 18 of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus, such interaction may take the form of multiple participation so that the Chairperson or a Member of the Committee may also be a member of another committee.

4.6 The decisions of the Committee are taken by majority voting. In the event of an equality of votes, the Chairperson of the meeting shall not have a second or casting vote and the item in discussion must be escalated to the Board.

4.7 The Committee, in exercising its duties, needs to ensure, to the extent possible and on an ongoing basis, that decision making is not dominated by one individual or by a small group of individuals in a way that it affects the interests of the Company as a whole.

5. <u>Duties and Responsibilities of the Audit Committee</u>

The duties and responsibilities of the Committee are the following:

5.1 Financial Statements

5.1.1 It monitors the integrity, accuracy and reliability of the Group’s quarterly and annual financial reporting process, as well as any formal announcements relating to the Group’s financial performance and other disclosures and makes relevant recommendations to the Board. It reviews the quarterly Financial Results and the annual Financial Statements of the main subsidiaries of the Group.

5.1.2 It assesses the adequacy of the provisions on financial and non-financial assets and on material litigation against the Bank in line with applicable accounting policies and standards and submits a relevant report to the Board and the Board Risk Management Committee on a quarterly basis.

5.1.3 It monitors the establishment of applicable accounting policies and practices, paying particular attention to the following:

(a) Changes to critical accounting policies and practices,
(b) Decisions requiring a significant element of judgement,
(c) Unusual transactions and how these are disclosed.

5.1.4 It monitors the effectiveness of the internal quality control and risk management systems and its Internal Audit function in relation to the Group's quarterly and annual financial reporting.

5.2 Statutory Audit

5.2.1 It submits proposals to the Board regarding the appointment, compensation, terms and scope of engagement and substitution or rotation of the Statutory Auditors. It is responsible for the selection process of the Statutory Auditors and proposal for approval to a General Meeting of Shareholders of the Bank regarding their appointment, in accordance with relevant regulatory requirements, their remuneration and termination.

It reviews the scope of the Statutory Audit of the Annual Financial Statements.

5.2.2 It monitors and ensures the independence and effectiveness of the Statutory Auditors, including:

(a) Seeking from the Auditors information about the policies and procedures for maintaining independence and compliance with relevant requirements, at least on an annual basis.

(b) Seeking reassurance that the Auditors and their staff have no family, financial, employment or business relationship with the Company (other than in the normal course of business).

(c) Discussing with the Auditors the threats to independence, applicable safeguards and mitigation actions, evaluating the independence of the Auditors, and providing its memo to the Board of Directors along with its recommendation for the appointment or re-appointment of the Auditors.

(d) Reviewing with the Auditors any threats to independence and applicable safeguards, the key issues related to independence, the list of non-audit services rendered during the year and the Auditors' confirmation of independence, included in the Auditors' Additional Report to the Board Audit Committee presented at the end of the statutory audit.

(e) Taking account of the Audit Firm's Partners rotation policy.

(f) Overseeing the Auditors' compliance with the reporting requirements in relation to the Audit Report and the Auditors' Additional Report to the Board Audit Committee.

(g) Monitoring the history of new key management staff joining the Group in relation to previous employment by the incumbent Auditors.

5.2.3 It oversees the relationship between the Bank and its Statutory Auditors.

5.2.4 It evaluates the extent and effectiveness of the audits and examines ways to better co-ordinate the audit effort to ensure complete coverage, avoidance of overlapping work and the best use of available audit resources (cost effectiveness).

5.2.5 It monitors the Statutory Audit of the Annual Financial Statements, and in particular its performance, considering any findings and conclusions of the Cyprus Public Audit Oversight Board.

5.2.6 It informs the Board of the outcome of the Statutory Audit, explaining its contribution to the integrity of the Group Financial Statements and what was the role of the Committee in this procedure.

5.2.7 It evaluates and considers the statements made / matters identified in the Audit Report and the Statutory Auditors' Additional Report to the Board Audit Committee and any other audit reports.

The Committee liaises and holds meetings with the Statutory Auditors frequently to discuss matters arising from their audit findings.

5.2.8 It evaluates the comments and proposals of the Statutory Auditors regarding the management of the Group, the preparation and presentation of its Financial Statements and the monitoring of their application.

5.2.9 It is responsible for the oversight of permissible non-audit services ('NAS') to the Bank and its subsidiary or affiliated companies by their Statutory Auditors, considering into account the nature of the services offered, the threats to their independence and the safeguards applied.

5.2.10 The Committee Members must satisfy themselves that the NAS provided by the Statutory Auditors do not compromise the Auditors' independence. Factors that the Committee Members consider include:

(a) The level of fees paid for the provision of NAS as a proportion of total fees paid to the Auditors. The Committee is informed quarterly by Finance and the Auditors about the nature, extent and fees of NAS or other advisory assignments of the Auditors.

(b) Regarding the NAS provided, the aim is to maintain the balance between objectivity and the value added by the NAS at Group level.

(c) In the case where NAS are offered to a subsidiary or affiliated company of the Bank and the volume is such that it downgrades the objectivity of their audits, the Committee informs the corresponding Committee (where it exists) of the subsidiary company or its Board of Directors.

(d) Written confirmation of independence provided by the Auditors for each NAS, approved by the appropriate authority within the audit firm (typically the principal engagement partner).

5.2.11 It is responsible for confirming that the Group's NAS provided by the Statutory Auditors are permissible and ensuring the Auditors' independence by monitoring the volume, nature and fees of NAS. All requests for review of NAS provided by the Auditors are submitted to the Committee through Finance.

5.2.12 As per the Framework for Related-Party Transactions - NAS by the Statutory Auditors approved by the Board, the Board delegated to the Chief Financial Officer the approval of NAS, if certain criteria are met, including the arm's length assessment of NAS by the Auditors and the evaluation of independence and permissibility of NAS by the Auditors (instead of the latter being performed by the Committee as above).

Finance provides relevant quarterly reports to the Committee as part of the quarterly analysis of the NAS and fees by the Auditors, and the Board is informed retrospectively by the Committee.

5.2.13 Finance prepares annually a report in which the audit services and NAS are recorded by category, timing, duration and fees paid to the Statutory Auditors. The report is submitted to the Committee for review and subsequent submission to the Board, along with the relevant comments of the Committee and its recommendation for the independence of the Auditors.

5.3 Internal Audit

5.3.1 It reviews the Internal Audit Charter and recommends it for approval to the Board.

5.3.2 Internal Audit submits its annual audit plan (risk-based) and budget to the Committee for review and approval, including any outsourcing arrangements, ensuring appropriate coverage, prioritisation, and flexibility to adapt to variations in response to developments. Changes to the annual audit plan and/or the budget during the year must have the prior approval of the Committee.

5.3.3 It submits to the Board its recommendations on the appointment and replacement of the Head of Internal Audit.

5.3.4 It assesses, on an annual basis, the performance of the Head of Internal Audit and submits his/her annual appraisal to the Board.

5.3.5 It makes recommendations regarding the remuneration of the Head of Internal Audit and submits them to the Board via the Board Remuneration Committee.

It reviews recommendations regarding the remuneration of the Senior Staff of Internal Audit, if the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms). These recommendations may be submitted to the Board Remuneration Committee / Board, if deemed appropriate by the Committee, otherwise they are approved by the Committee itself.

5.3.6 It assesses and monitors the independence, adequacy, and effectiveness of Internal Audit and submits the assessment report to the Board.

It also submits the assessment report to the Board Nominations / Internal Governance Committee for the review of the composition, authority and independence of Internal Audit.

5.3.7 It monitors the effectiveness of the Group's internal quality control and risk management systems and its Internal Audit function, with regards to the Group's financial reporting, without compromising its independence.

5.3.8 It reviews the quarterly and annual reports submitted by the Chief Internal Auditor, which are subsequently submitted for the Board's review, as well as all other Internal Audit reports submitted by the Chief Internal Auditor. Internal Audit reports relating to the main subsidiaries of the Group are also included in the quarterly and annual reports.

5.3.9 It submits to the Board reports regarding the following:

(a) Proposals for addressing any weaknesses of the internal control systems and information systems, which have been identified based on reports of Internal Audit and the observations and comments of the Statutory Auditors and the regulatory authorities.

(b) Matters relating to the independence and smooth execution of the audit work carried out by Internal Audit.

5.3.10 (a) It confirms that the Company assigns the assessment, at least once every three years, of the adequacy and effectiveness of the internal control framework, on an individual and consolidated base, to external auditors, other than the Bank's Statutory Auditors, who have the necessary know-how to carry out the required assessment in accordance with paragraph 82 of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus.

(b) It evaluates the findings of the above assessment and proposes corrective measures to the Board.

5.3.11 It ensures that Internal Audit has appropriate standing and authority within the Company and adequate resources.

5.3.12 It reviews, assesses, and approves any changes in the organisation structure of Internal Audit prepared by the Head of Internal Audit in consultation with Human Resources.

5.3.13 It safeguards the functioning of the Internal Audit in accordance with the International Standards for the Professional practice of Internal Auditing of the International Institute of Internal Auditors.

5.3.14 It monitors the timely taking of the necessary corrective actions by Management to address control weaknesses, non-compliance with policies, laws and regulations and other weaknesses identified by Internal Audit and external auditors.

5.4 Compliance

5.4.1 It reviews the Compliance Charter & Framework and recommends it for approval to the Board.

5.4.2 It assesses and monitors the independence, adequacy, and effectiveness of the Compliance Unit and submits the assessment report to the Board.

It also submits this assessment report to the Board Nominations / Internal Governance Committee for the review of the composition, authority and independence of the Compliance Unit.

5.4.3 It submits to the Board its recommendations on the appointment and replacement of the Head of the Compliance Unit.

5.4.4 It assesses, on an annual basis, the performance of the Head of the Compliance Unit and submits his/her annual appraisal to the Board.

5.4.5 It makes recommendations regarding the remuneration of the Head of the Compliance Unit and submits them to the Board via the Board Remuneration Committee.

It reviews recommendations regarding the remuneration of the Senior Staff of the Compliance Unit, if the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms). These recommendations may be submitted to the Board Remuneration Committee / Board, if deemed appropriate by the Committee, otherwise they are approved by the Committee itself.

5.4.6 It advises the Board, drawing on the work of the Compliance Unit, on the adequacy and effectiveness of the Code of Business Conduct and Ethics.

5.4.7 It advises the Board, drawing on the work of the Compliance Unit and the Statutory Auditors, on the adequacy and effectiveness of the Compliance Framework (including the Compliance Monitoring Programme and Compliance Policies). Anti-Money Laundering Compliance is also included therein, following delegation by the Board of its direct responsibility for monitoring Anti-Money Laundering Compliance, to the Committee.

5.4.8 The Compliance Unit submits its annual Compliance action plan and monitoring programme and budget to the Committee for approval, ensuring that they are sufficiently flexible to adapt to variations in response to developments. Changes to the action plan and monitoring programme and/or the budget during the year must have the prior approval of the Committee.

5.4.9 It reviews the quarterly and annual compliance reports submitted by the Head of the Compliance Unit, which are subsequently submitted for the Board's review. It also reviews the annual reports and risk assessments of the Anti-Money Laundering Compliance Officer, which are subsequently submitted for the Board's consideration and approval of their adoption by the Bank. Issues relating to the main subsidiaries of the Group are also included in the abovementioned reports.

5.4.10 It ensures that the Compliance Unit has appropriate standing and authority within the Company and adequate resources.

5.4.11 It reviews, assesses, and approves any changes in the organisation structure of the Compliance Unit prepared by the Head of the Compliance Unit in consultation with Human Resources.

5.4.12 It reviews and submits to the Board the Head of the Compliance Unit's recommendation on the appointment and replacement of the Anti-Money Laundering Compliance Officer (AMLCO).

The Head of the Compliance Unit submits, on an annual basis, the performance appraisal of the AMLCO to the Committee for notification.

It reviews / makes recommendations regarding the remuneration of the AMLCO, if the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms), and it submits them to the Board Remuneration Committee / Board for approval.

5.5 Data Protection

5.5.1 It reviews the Data Protection Office Charter and recommends it for approval to the Board.

5.5.2 It assesses and monitors the independence, adequacy, and effectiveness of the Data Protection Office and notifies the Board accordingly.

5.5.3 It approves the appointment and replacement of the Manager of the Data Protection Office and notifies the Board accordingly.

5.5.4 It assesses, on an annual basis, the performance of the Manager of the Data Protection Office and notifies the Board accordingly.

5.5.5 It reviews / makes and approves recommendations regarding the remuneration of the Manager of the Data Protection Office, if the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms).

5.5.6 The Data Protection Office submits its annual Data Protection action plan and budget to the Committee for approval, ensuring that they are sufficiently flexible to adapt to variations in response to developments. Changes to the action plan and/or the budget during the year must have the prior approval of the Committee.

5.5.7 It reviews the quarterly and annual Data Protection Office reports submitted by the Manager of the Data Protection Office, which are subsequently submitted for the Board's review.

5.5.8 It ensures that the Data Protection Office has appropriate standing and authority within the Company and adequate resources. It supports and empowers the Manager of the Data Protection Office to ensure implementation of any General Data Protection Regulation-related remedial actions.

5.6 Miscellaneous Issues

5.6.1 It assigns to Internal Audit or to independent experts, the investigation of any matters, which fall within its mission and responsibilities, and it obtains independent professional advice whenever it deems this necessary. The Committee has an annual budget of €100.000 to use for the services of independent experts / consultants. In case the annual budget needs to be exceeded, the Committee should request the approval of the Board before any additional expenditure is incurred.

5.6.2 It requests information from Senior Management on the significant risks to which the Group is exposed; it evaluates the measures taken by Senior Management and the Board to minimise these risks and submits its recommendations for the improvement of those measures.

5.6.3 It investigates any other important data, information or facts that concern and influence the performance and operation of the Company or its compliance with the relevant legal and regulatory framework that govern it.

5.6.4 It oversees that Senior Management takes the necessary corrective actions in a timely manner to address control weaknesses, non-compliance with policies, laws and regulations and other weaknesses identified by external auditors, Internal Audit, the Compliance Unit, and the regulatory authorities.

5.6.5 Following a decision of the Committee, the Chairperson of the Committee convenes a joint meeting with the Members of the Board Audit Committee of a subsidiary company to discuss and study any matters concerning that company as may be deemed necessary.

5.6.6 The Committee has the responsibility for examining any significant transactions, of any nature, carried out by the Bank and/or its subsidiary companies, in which a Member of the Board, the Chief Executive Officer, a Senior Executive, the Company Secretary, the Statutory Auditors or a major shareholder of the Company (who directly or indirectly holds more than 5% of the issued share capital of the Company or its voting rights) has, directly or indirectly, any significant interest, so as to ensure that these transactions are carried out within the framework of the Company's normal commercial practices (at arm's length).

The above definition includes the Members of the Board of subsidiary companies.

5.6.7 It prepares, with the assistance of the Executive Officer responsible for ensuring compliance with the Corporate Governance Code, the Report of the Board of Directors on Corporate Governance to be included in the Group's Annual Financial Report.

5.6.8 It handles any eponymous or anonymous reports by employees / associated third parties, submitted in the context of the Group's relevant policy.

5.6.9 It assesses the adequacy and effectiveness of the appeals process, based on reports of the Appeals Committee, and of the Appeals Committee itself. It identifies any weaknesses or gaps in the loans restructuring process and it subsequently informs the executive Management and the Board on further action as it considers necessary.

5.6.10 It carries out an annual self-assessment and reports to the Board its conclusions and recommendations for improvements and changes in relation to the structure, the responsibilities, and the work of the Committee.

5.6.11 The Chairperson of the Committee is available for personal, telephone, electronic or written communication, upon request of the Company's shareholders, regarding issues concerning the work of the Committee. He/She is also available to answer any questions raised during the Annual General Meeting or any other informative meeting of the Company's shareholders.

5.6.12 Information regarding the structure and work of the Committee is also included in the Annual Corporate Governance Report of the Board of Directors of Hellenic Bank Public Company Limited.

6. Duty & Responsibility of the Audit Committee's Chairperson arising from Article 58D of the Prevention and Combating of Money Laundering Law of 2007

The Chairperson of the Committee is appointed by the Board, according to the requirements of Article 58D of the Prevention and Combating of Money Laundering Law of 2007, to be responsible at Board level for the implementation of the laws, regulations and administrative provisions required to be complied with for the purposes of compliance with the Prevention and Combating of Money Laundering Law of 2007, and the Directives and/or circulars and/or regulations issued thereunder, including any relevant acts of the European Union, including the relevant arrangements and procedures of the credit institution for preventing and combating money laundering.

7. Validity and Amendments of the Terms of Reference of the Audit Committee

The Terms of Reference are reviewed regularly, at least annually, to ensure continuing appropriateness. The reviews must be documented and include, where necessary, recommendations to the Board on revisions to reflect any new practices that may be adopted by the Group. These may include organisational restructuring, Directives of the Central Bank of Cyprus, amendments in the relevant legislation, new Directives of the Securities and Exchange Commission or new Regulations of the Cyprus Stock Exchange which are added to the Code.

8. Corporate Governance Code issued by the Cyprus Stock Exchange

Notwithstanding the above, the Committee will function strictly within the framework of the relevant provisions of the Corporate Governance Code issued by the Cyprus Stock Exchange, as determined in Chapter C of the Code.

Terms of Reference of the Risk Management Committee (exact copy)

1. Establishment / Mission

The Board Risk Management Committee ('BRMC' or the 'Committee') of Hellenic Bank Public Company Limited (the 'Company' or the 'Bank' or the 'Group') was established to fulfil the following mission:

1.1 Set a well-defined and clearly communicated strategy for risk management and information security and fraud throughout the Group and embedding of the Risk Appetite Framework ('RAF') and the Risk Appetite Statement ('RAS').

1.2 Promote and embed a culture of risk / information security and fraud awareness and appropriate risk taking across the Group and assist the Board of Directors of the Bank in implementing the strategy.

1.3 Promote risk-informed decision making across the Group.

1.4 Ensure compliance with all required laws and regulations including but not limited to the requirements of the Business of Credit Institutions Laws, the relevant Central Bank of Cyprus' and European Central Bank's Directives and requirements, and the Cyprus Stock Exchange's Code of Corporate Governance in relation to Risk Management and Information Security & Fraud.

1.5 Periodically review the Group's Enterprise Risk Management Framework and the Information Security & Fraud Framework (Policy).

1.6 Ensure that the Risk Management and Information Security & Fraud Functions fulfill their responsibilities and obligations concerning the identification, measurement, monitoring and effective management of all Group risks.

2. Composition of the Risk Management Committee

The Committee is appointed by the Board of Directors ('BoD' or 'Board') and consists of three to five Non-Executive Directors with sufficient knowledge and experience in the Risk Management sector. The majority of the Members of the Committee must be independent Non-Executive Members of the Board.

Members of the Risk Management Committee can be members of only one other Board Committee.

The Chairperson of the Committee is appointed by the Board and should be an independent Non-Executive Member.

The term-in-office of the Members of the Committee is decided by the Board.

The Board can, during the term-in-office of the Committee: (a) replace any Member of the Committee, including the Chairperson and (b) fill positions in the Committee which are vacated for any reason.

Committee Members shall not hold any other posts or positions or conduct transactions which could be considered to be in conflict with the Terms of Reference of the Committee.

Committee Members shall have, individually and collectively, appropriate knowledge, skills and expertise to fully understand and monitor the risk strategy and the risk appetite of the Company, as well as the risk management and control practices.

3. <u>Meetings / Decision-making Process of the Risk Management Committee</u>

The Committee shall meet whenever necessary and at least twice every quarter. The arrangement for attending regular or extraordinary meetings via teleconferencing / videoconferencing shall not to be used abusively but with caution at member or committee level ensuring that, as a rule and unless there are special circumstances to justify the opposite, at least the majority of Committee Members are physically present at each regular or extraordinary meeting.

For unforeseen issues, the Committee may convene via teleconferencing / videoconferencing. A Committee resolution in writing signed or approved by email, text message, fax or any other means of transmission (e.g., Diligent) by ALL Committee Members shall be valid and effectual as if it had been passed at a meeting of the Committee duly convened and held.

Every effort shall be made to carry out a regular meeting at least once a year with the physical presence of all Committee Members.

Committee Members shall not be absent from the regular and extraordinary meetings either physically or via teleconferencing / videoconferencing, for more than two (2) consecutive meetings or twenty-five percent (25%) of the annual meetings.

The Committee, in exercising its supervisory responsibilities, shall have adequate access to resources and information relevant to their duties from within the Company. The Committee shall establish a framework and appropriate and transparent procedures for such access, and appropriate and transparent procedures in the event that it allows Committee Members to communicate individually and directly with senior management and/or members of staff, in exercising their supervisory responsibilities.

The Committee, in exercising its duties, shall take into account, to the extent possible and on an ongoing basis, the need to ensure that decision making is not dominated by one individual or by a small group of individuals in a way that it affects the interests of the Company as a whole.

Prior to the commencement of a Committee meeting, the Chairperson shall read all the items on the agenda and request that any Member, who has a potential interest and/or conflict of interest in any of the agenda items, to explain such conflict and not participate in the discussion of such agenda topic. Also, during a Committee meeting, a Member must declare any potential interest and/or conflict of interest as soon as it becomes apparent. For any agenda item / other specific issue with conflicts of interest by a Committee Member, he/she is asked to leave the meeting when discussing / voting for that agenda item / specific issue and the relevant material and minutes relating to that agenda item / specific issue are restricted to be viewed by that Member.

The majority of Committee Members shall comprise a quorum. A majority of Committee Members shall be considered to be the next integral number of one half of the Members. A decision of the Committee may be adopted by the majority of attending Committee Members. In the case of a tie, the Chairperson shall not have a second or casting vote and the item in discussion must be escalated to the Board.

The Committee Secretariat must be closely involved in the preparation of the meeting's agenda and ensure it is distributed, including any supporting papers where relevant, at least three (3) business days in advance of the meeting. Any envisaged late material submission, deemed necessary and justified, must be authorised by the Chairperson in advance.

The material submitted should include summarising cover memos or executive summaries and/or dashboards and should highlight the risks, opportunities, costs and benefits of the various items on which the Committee is expected to make recommendations to the Board.

The Committee reports regularly to the Board. The Committee Secretariat must ensure that the final minutes of the Committee meetings are submitted to the Central Bank of Cyprus (and they must be in accordance with Paragraphs 12 and 19 of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus) within one (1) month from the date of the meeting. In case no Committee meeting is held within one (1) month, the minutes shall be approved by written procedure by all Members present at the meeting and submitted within the specified deadline to the Central Bank of Cyprus.

The Committee Secretariat works in close cooperation with Risk Management and Information Security & Fraud Functions to coordinate: (i) the submission of support material and information to the Risk Management Committee and (ii) the communication between the Risk Management Committee and relevant stakeholders.

The Committee has the amount of €100.000 per year as a budget to use for obtaining independent professional advice whenever it deems this necessary. In case the annual budget is exceeded, the Committee should request the approval of the Board for any additional expenditure to be incurred.

The Committee may formally invite to any of its meetings, for a specific item or items on the agenda, any person who may contribute towards that specific item. Such person is present only during the discussion of the specific item and leaves the meeting immediately after without any participation in the decision-making process.

The Committee should follow the arrangements established / approved and supervised by the Board that are intended to ensure the internal operation of the Committee, for the proper flow of information, including the verification documents for the Committee's recommendations and conclusions, and the reference channels between the Committee and the Board, the Central Bank of Cyprus and other parties.

The Committee, in exercising its supervisory responsibilities, shall have adequate access to resources and information relevant to its duties. The Committee shall follow the framework and appropriate and transparent procedures for such access, and appropriate and transparent procedures in the event that it allows the Committee Members to communicate individually and directly with senior management and/or members of staff, in exercising their supervisory responsibilities as Members of the Committee (above mentioned framework / procedures are established by the Board).

The Committee should interact with other committees in an appropriate way. Subject to subparagraph (4) of paragraph 18 of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus, such interaction may take the form of multiple participation so that the Chairperson or a Member of the Committee may also be a member of another committee.

4. Chairperson of the Risk Management Committee

The Chairperson of the Committee is responsible for the efficient operation of the Committee and for adhering to proper governance procedures. He/She encourages and promotes open discussions with a critical spirit, ensuring that divergent views can be expressed and discussed within the decision-making process. The Chairperson of the Committee sets and prioritises the items on the agenda and ensures that Committee decisions are taken on a sound basis based on sufficient information received on time before meetings. He/She also ensures that sufficient time is provided to Committee Members for examining important issues and receiving answers to any questions or concerns they may have, without being confronted with unrealistic deadlines for decision making.

The Chairperson of the Committee shall ensure that no person other than its Members is present at a meeting, including other Board Members, unless he/she is formally invited for a specific item or items on the agenda to contribute towards that specific item. Such person is present only during the discussion of the specific item and leaves the meeting immediately afterwards, without any participation in the decision-making process.

The Chairperson of the Committee shall be available for personal, telephone, electronic or written communication, which shareholders of the Company may request, regarding issues concerning the work of the Committee. The Chairperson shall also be available to answer any questions during the Annual General Meeting of the Shareholders or any meeting for the purposes of briefing the Shareholders of the Company. Information concerning the structure and work of the Committee will also be given in the Annual Corporate Governance Report of the Board of Directors of Hellenic Bank Public Company Limited.

5. Duties and Responsibilities of the Risk Management Committee

The Committee shall carry out the duties set out below:

Frameworks and Policies

5.1 Define and submit for periodic review, prior to Board approval:

5.1.1 The principles which should govern risk management as set out by the Enterprise Risk Management Framework (‘ERMF’), the framework for undertaking all forms of risk, and the risk frameworks covering individual risks.

5.1.2 The principles which should be considered in the recruitment of employees, the selection of vendors, the development of products, services, and processes as well as in the implementation and operation of information systems and information processing facilities as set out by the Information Security & Fraud Framework (Policy) itself.

5.1.3 The appropriate allocation of capital across the various divisions of the Group that would enable the Company, Group and/or each subsidiary separately to achieve their business objectives, in accordance with the Strategic Plan of the Group, and within the constraints and guidelines laid out in the Capital Plan and in the Risk Appetite Framework and Statement.

5.1.4 The policies of the Bank with regard to the limits and pricing of undertaking Bank risks.

5.1.5 All other risk related policies cascading from ERMF and the risk frameworks.

5.2 Cultivate an internal environment of risk management, information security and fraud, appropriate risk taking and control, that will govern the business decision-making processes across the activities and Units of the Bank and its subsidiaries, and which will be consistent with the Board’s communicated Business Strategy and Risk Appetite Statement.

Risk Appetite / Risk Strategy

5.3 Review and recommend approval of the Risk Appetite Statement (‘RAS’) and Risk Appetite Framework (‘RAF’) to the Board

- for regular updates, arising through the annual review process and
- ad-hoc updates, induced by material changes or events.

5.4 Advise, support and develop recommendations for the Board regarding the monitoring of the Group’s overall actual and future risk strategy and risk appetite, taking into account all types of risks, to ensure that they are in line with the business strategy, objectives, corporate culture and values of the Group, ensuring that the Bank maintains at all times sufficient capital at both Bank and Group level.

5.5 Assist the Board in overseeing the effective implementation of the risk appetite framework and strategy and the corresponding risk limits set by senior management including:

(i) The development of mechanisms to ensure material exposures that are close to or exceed approved risk limits are managed and, where necessary, mitigated in an effective and timely manner.
(ii) The escalation of breaches (Red Zone) and Early Warnings (Amber Zone) in Risk Appetite limits and of material risk exposures in a timely manner.
(iii) Submitting proposals and recommendations for corrective actions whenever weaknesses are identified in implementing the risk appetite and the risk strategy.
(iv) Embedding attitudes around risk taking, management and control in line with the Board’s communicated Strategy and Risk Appetite Statement.

5.6 Provide the Board with recommendations on necessary adjustments to the risk strategy resulting from, inter alia, changes in the business model of the Bank, market developments or recommendations made by the Risk Management Function.

5.7 Timely escalation from BRMC to the Board, where applicable, of RAS breaches (Red Zone) and Early Warnings (Amber Zone), as per the approved Risk Appetite Escalation Process as described within the Risk Appetite Framework (‘RAF’).

5.8 Oversee the implementation of the strategies for capital and liquidity management as well as for all other relevant risks, such as market, credit, operational (including legal and IT risks) and reputational risks, and drawing on the work of the Board Audit Committee, Risk Management Function and External Auditors, assess:

(i) Their adequacy against the approved risk strategy and risk appetite.
(ii) The adequacy of the provisions.
(iii) The effectiveness of strategies and policies regarding the maintenance, on an ongoing basis, of sufficient amounts, types and distribution of internal capital and equity to cover the risks of the Bank / Group.

5.9 Review a number of possible scenarios, including stressed scenarios, to assess how the Bank and/or Group's risk profile would react to external and internal events.

5.10 Oversee the alignment between all material financial products and services offered to clients and the business model and risk strategy of the Bank taking into consideration European Banking Authority's Guidelines on product oversight and governance arrangements for retail banking products.

5.11 Assess the risks associated with the offered financial products and services and take into account the alignment between the prices assigned to and the profits gained from those products and services.

5.12 Assess / oversee whether the prices of liabilities and assets offered to clients fully take into account the business model and risk strategy of the Bank. In case the prices do not accurately reflect the risks according to the business model and risk strategy, the Committee review and submit a corrective action plan to the Board.

5.13 Collaborate with other Board Committees whose activities may have an impact on the risk strategy (e.g., the Audit and Remuneration Committees) and regularly communicate with the Bank / Group's Control Functions, in particular the Risk Management and Information Security & Fraud Functions.

Recovery Plan

5.14 Review and recommend approval of the Recovery Plan to the Board
(i) for regular updates arising through the annual review process and
(ii) ad-hoc updates induced by material changes or events as these are defined herein.

Capital Management

5.15 Review and recommend to the Board for approval relevant regulatory submissions after review and approval at Executive level such as the Group's Internal Capital Adequacy Assessment Process ('ICAAP'), the Banks Stress Testing Process and the Bank's Recovery Plan.

5.16 Approve the methodology, assumptions and parameters used for the calculation of the provisions by the Risk Management Function.

Liquidity Management

5.17 Review and recommend to the Board for approval relevant regulatory submissions after review and approval at Executive level such as the Group's Internal Liquidity Adequacy Assessment Process ('ILAAP') and the Group's Liquidity Contingency Plan.

Environmental, Social and Governance (ESG) Risk

5.18 Monitor ESG risk through the semi-annual submission and discussion of the Bank's ESG Action Plan.

5.19 While reviewing relevant strategy / policies, assess whether ESG risk considerations are taken into account.

5.20 Ensure that ESG risk is adequately managed through the Bank's Risk Appetite Framework and through embedding ESG-related matters within the relevant risk frameworks.

Risk Data Aggregation and Reporting

5.21 Oversee the implementation of Data Governance and the BCBS 239 Principles for effective Risk Data Aggregation and Reporting.

Pillar III Disclosures

5.22 Review and recommend to the Board for approval the Group's Compliance Policy to the Pillar III Disclosure Requirements as per CRR / CRD IV, as amended by CRR II / CRD V.

5.23 Review and endorse statements in relation to risk disclosures of the Pillar III Disclosures.

Remuneration

5.24 Review, without prejudice to the tasks of the Remuneration Committee, whether incentives provided by the remuneration policies and practices take into consideration Bank's risk, capital, liquidity and the likelihood and timing of earnings.

5.25 Review the process for Identified Staff as per the requirements of the CRR / CRD IV and the Regulatory Technical Standards (RTS) set by EBA, to identify all staff members whose professional activities have or may have a material impact on the Bank's / Group's risk profile.

Control Functions

5.26 Assess and monitor the independence, adequacy and effectiveness of the Risk Management and Information Security & Fraud Functions, including carrying out the annual appraisals of the Heads of the Risk Management and Information Security & Fraud Functions, and submit the relevant reports to the Board. It also submits the assessment reports to the Board Nominations / Internal Governance Committee for the review of the composition, authority and independence of the Risk Management and Information Security & Fraud Functions. The Committee assesses as well the adequacy and effectiveness of the Information Security Framework, which, among other things, ensures the adequate protection of the confidential and proprietary information of the Group.

5.27 Submit to the Board recommendations for the appointment or removal of the Heads of the Risk Management and Information Security & Fraud Functions.

5.28 Make recommendations regarding the remuneration of the Heads of Risk Management and Information Security & Fraud and submit them to the Board via the Board Remuneration Committee.

Review recommendations regarding the remuneration of the Senior Staff of Risk Management and Information Security & Fraud, if the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms). These recommendations may be submitted to the Board Remuneration Committee / Board, if deemed appropriate by the Committee, otherwise they are approved by the Committee itself.

5.29 Advise the Board, drawing on the work of the Board Audit Committee, Risk Management Function, Information Security & Fraud Function and External Auditors, on:

(i) The adequacy and effectiveness of the risk management and information security and fraud frameworks and propose improvements where necessary.
(ii) The adequacy and robustness of information and communication systems to enable identification, measurement, assessment and reporting of risk in a timely and accurate manner and ensure the adequate protection of the Company's confidential and proprietary information.
(iii) The adequacy of provisions and effectiveness of strategies and policies with respect to maintaining, on an ongoing basis, amounts, types and distribution of both internal capital and own funds, adequate to cover the risks of the Company.

5.30 Review and approve the budgets of the Risk Management and Information Security & Fraud Functions, ensuring that they are sufficiently flexible to adapt to variations in response to developments.

Risk Management and Information Security & Fraud Information

5.31 Determine the nature, the amount, the format and the frequency of the information which it is to receive on the risk situation of the Company and for each type of risk and each business unit. The Committee must:

(i) Approve metrics or a process to satisfy itself that the risk reports and information it receives are accurate, comprehensive and depict an appropriate view of the Company's risk profile.
(ii) Ensure that risk parameters and risk models developed and used to quantify them are subject to periodic independent validation.

5.32 Review and make recommendations and requests considering the Group's risk profile in relation to its strategy and risk appetite and monitor material risks, key risk trends, concentrations and exposures by evaluating all appropriate information and reports including but not limited to the following:

(i) The quarterly reports submitted by the Chief Risk Officer within two (2) months from the end of each quarter and inform the Board accordingly.
(ii) The Flash Risk Report submitted eight (8) working days following each calendar month end and submit this to the Board.
(iii) The monthly RAS Reporting by 22nd of the month following each calendar month end and by the end of the month submit this to the Board.
(iv) The annual report submitted by the Head of the Risk Management Function within two (2) months from the end of each year and submit this to the Board, accompanied by the Committee's assessment of the report.
(v) The quarterly reports submitted by the Chief Information Security Officer within two (2) months from the end of each quarter and inform the Board accordingly.
(vi) The annual report submitted by the Head of the Information Security & Fraud Function within one (1) month from the end of each year and submit this to the Board, accompanied by the Committee's assessment of the report.
(vii) The relevant reports prepared by the Internal Audit Unit, Subsidiaries Boards and/or Risk Committees, other Executive Committees of the Bank and the Regulators, and oversee that corrective measures are implemented where these are necessary.

5.33 Promote the development of relevant Early Warning Indicators and other loan portfolio management tools, analytics and strategies.

Evaluation of Risks

5.34 The Committee reviews the evaluation and recommendations of the Risk Management Function related to the involvement of the Group in new markets, new companies or business ventures and submit its respective recommendations to the Board.

5.35 The Committee shall evaluate the Arrears Management Strategy and its underlying hypothesis and assumptions, as well as ensure appropriate control mechanisms to effectively monitor and manage NPE and Forborne loans, via the quarterly reports submitted by the Chief Risk Officer and the Head of GGS, NPA Management & Transactions Advisory (via Risk Management), or other such reporting as agreed by the Committee, and report to the Board accordingly.

5.36 The Risk Management Committee shall work with the Board Audit Committee to ensure that a global view is taken in the management of risk.

5.37 Provide advice on the appointment of external consultants that the Board may decide to engage for advice or support.

5.38 Assess the recommendations of internal or external auditors and follow up on the appropriate implementation of measures taken.

5.39 Have access to all relevant information and data necessary to perform their role, including information and data from relevant corporate and Control Functions (e.g., legal, finance, human resources, IT, internal audit, risk, compliance, including information on AML / CTF compliance and aggregated information on suspicious transaction reports, and ML / TF risk factors).

5.40 The Committee shall receive regular reports, ad hoc information, announcements and the opinion of the Heads of Control Functions in relation to the Company's existing risk profile, risk culture and limits as well as any significant violations that may have emerged, with detailed information and recommendations on the corrective action taken.

5.41 The Committee shall review on a periodic basis and decide on the content, form and frequency of the information to be provided regarding risk and where necessary, to ensure the necessary participation of the Control Functions and other related functions (Human Resources, Legal Services, Economic Research) within their respective fields of expertise and/or to seek advice from external advisors.

Executive Committees

5.42 The Committee will:

(i) Review and approve material changes in the Terms of Reference and the Composition of the Executive Risk Management Committee and Asset Liability Committee.
(ii) Review and recommend to the Board material changes in the Terms of Reference of the Extended Executive Loan Committee and Extended Arrears & Property Management Committee.
(iii) Review and approve changes in the Composition of the Extended Executive Loan Committee and Extended Arrears & Property Management Committee.
(iv) Review and approve material changes in the Composition of the Executive Loan Committee, Senior Loan Committee and Arrears & Property Management Committee.

6. Committee Governance

6.1 The Committee shall conduct a self-assessment and report its conclusions and recommendations for improvements and changes to the Board.

6.2 The Committee shall review its Terms of Reference regularly, at least annually, to ensure continuing appropriateness. The reviews must be documented and include, where necessary, recommendations to the Board on revisions. Earlier update may be deemed necessary following relevant recommendations by the Regulatory Authorities and the Board.

Terms of Reference of the Nominations / Internal Governance Committee (exact copy)

1. Role of the Nominations / Internal Governance Committee

The Nominations / Internal Governance Committee is primarily responsible to prepare proposals for the Board of Directors (the “Board”) regarding the selection of individuals for nomination as Members of the Board of the Company or of any other company in which Hellenic Bank Public Company Limited (the “Company”) has the right to appoint any member of the board, either to fill extraordinarily vacated or vacant seats or after the retirement of a Member in accordance with the retirement policy due to age.

In addition, the Committee is responsible to prepare proposals for the Board regarding the selection of the Chief Executive Officer (“CEO”) of the Company or any other company in which the Company has the right to appoint a CEO or the appointment of any Executive Member of the Board. The Committee is also responsible for the development, implementation and oversight of policies of internal governance arrangements within the Group.

The Committee also ensures that the Company complies with the requirements of the Business of Credit Institutions Laws, the relevant Central Bank of Cyprus’ Directives and the Cyprus Stock Exchange’s Code of Corporate Governance.

2. Composition of the Nominations / Internal Governance Committee

The Committee is appointed by the Board and consists of three to five exclusively non-Executive Directors. The majority of the Members of the Committee must be independent non-Executive Members of the Board.

Members of the Nominations / Internal Governance Committee can be members of only one other Board Committee.

The Chairperson of the Committee is appointed by the Board and should be an independent Non-Executive Member.

The term-in-office of the Members of the Committee is decided by the Board.

Committee Members should have, individually and collectively, appropriate knowledge, skills and expertise regarding the selection process and the suitability requirements of individuals for nomination as Members of the Board of the Company or of any other company in which the Company has the right to appoint any member of the Board.

Committee Members shall not hold any other posts or positions or conduct transactions which could be considered to be in conflict with the Terms of Reference of the Committee.

3. Meetings / Decision-making Process of the Nominations / Internal Governance Committee

The Committee shall meet whenever necessary and at least on a quarterly basis. The Committee may convene via teleconferencing / videoconferencing. A Committee resolution in writing signed or approved by email, text message, fax or any other means of transmission (e.g., Diligent) by ALL Committee Members shall be valid and effectual as if it had been passed at a meeting of the Committee duly convened and held.

Every effort shall be made to carry out a regular meeting at least once a year with the physical presence of all Committee Members.

The arrangement for attending regular or extraordinary meetings via teleconferencing / videoconferencing shall not be used abusively but with caution at member or committee level ensuring that, as a rule and unless there are special circumstances to justify the opposite, at least the majority of Committee Members are physically present at each regular or extraordinary meeting.

Committee Members shall not be absent from the regular and extraordinary meetings either physically or via teleconferencing / videoconferencing, for more than two (2) consecutive meetings or twenty-five percent (25%) of the annual meetings.

The majority of Committee Members shall comprise a quorum. A majority of Committee Members shall be considered to be the next integral number of one half of the Members.

The decisions of the Committee are taken by majority voting. In the event of an equality of votes, the Chairperson of the meeting shall not have a second or casting vote and the item in discussion must be escalated to the Board of Directors.

The Company Secretariat must be closely involved in the preparation of the meeting's agenda and ensure it is distributed, including any supporting papers where relevant, at least three (3) business days in advance of the meeting. Any envisaged late material submission, deemed necessary and justified, has to be authorised by the Committee Chairperson in advance.

The material submitted should include summarising cover memos or executive summaries and/or dashboards and should highlight the risks, opportunities, costs and benefits of the various items on which the Committee is expected to make recommendations to the Board.

The Committee reports regularly to the Board. The Company Secretariat must ensure that minutes and decisions are kept for each Committee meeting, they are finalised not later than fifteen (15) business days following the meeting and are formally approved at the next scheduled meeting. The Company Secretariat ensures that the minutes are in accordance with Paragraph 12 of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus. The approved and signed minutes are subsequently circulated to all Board Members (by uploading on Diligent Board Resources).

Prior to the commencement of a Committee meeting, the Chairperson shall read all the items on the agenda and request that any Member, who has a potential interest and/or conflict of interest in any of the agenda items, to explain such conflict and not participate in the discussion of such agenda topic. Also, during a Committee meeting, a Member must declare any potential interest and/or conflict of interest as soon as it becomes apparent. For any agenda item / other specific issue with conflicts of interest by a Committee Member, he/she is asked to leave the meeting when discussing / voting for that agenda item / specific issue and the relevant material and minutes relating to that agenda item / specific issue are restricted to be viewed by that Member.

The Committee, in exercising its duties, shall take into account, to the extent possible and on an ongoing basis, the need to ensure that decision making is not dominated by one individual or by a small group of individuals in a way that it affects the interests of the Company as a whole.

The Chairperson of the Committee shall ensure that no person other than its Members is present at a meeting, including other Board Members, unless he/she is formally invited for a specific item or items on the agenda to contribute towards that specific item. Such person is present only during the discussion of the specific item and leaves the meeting immediately after without any participation in the decision-making process.

The Chairperson of the Committee is responsible for the efficient operation of the Committee and for adhering to proper governance procedures. He/She encourages and promotes open discussions with a critical spirit, ensuring that divergent views can be expressed and discussed within the decision-making process. The Chairperson of the Committee sets and prioritises the items on the agenda and ensures that Committee decisions are taken on a sound basis based on sufficient information received on time before meetings. He/She also ensures that sufficient time is provided to Committee Members for examining important issues and receiving answers to any questions or concerns they may have, without being confronted with unrealistic deadlines for decision making.

The Committee should follow the arrangements established / approved and supervised by the Board that are intended to ensure the internal operation of the Committee, for the proper flow of information, including the verification documents for the Committee's recommendations and conclusions, and the reference channels between the Committee and the Board, the Central Bank of Cyprus and other parties.

The Committee, in exercising its supervisory responsibilities, shall have adequate access to resources and information relevant to their duties. The Committee shall follow the framework and appropriate and transparent procedures for such access, and appropriate and transparent procedures in the event that it allows Committee Members to communicate individually and directly with senior management and/or members of staff, in exercising their supervisory responsibilities as Members of the Committee (abovementioned framework / procedures are established by the Board).

The Committee shall receive regular reports, ad hoc information, announcements and the opinion of the Heads of Control Functions in relation to the Company's existing risk profile, risk culture and limits as well as any significant violations that may have emerged, with detailed information and recommendations on the corrective action taken.

The Committee shall review on a periodic basis and decide on the content, form and frequency of the information to be provided regarding risk and where necessary, to ensure the necessary participation of the Control Functions and other related functions (Human Resources, Legal Services, Economic Research) within their respective fields of expertise and/or to seek advice from external advisors.

The Committee has the approval of the Board to obtain independent professional advice whenever it deems this necessary. The Committee has an annual budget of €100.000 to use for the services of independent experts / consultants. In case the annual budget needs to be exceeded, the Committee should request the approval of the Board before any additional expenditure is incurred.

4. Duties and Responsibilities of the Nominations / Internal Governance Committee

The Committee shall carry out the duties set out below:

Board Evaluation

4.1 Assess periodically and at least annually, the collective suitability (using the skills and expertise matrix found in the European Central Bank IMAS Fitness & Probity Questionnaire), structure, size, composition and performance of the Board and make recommendation regarding any changes to Board membership.

4.2 Evaluate periodically and at least annually, the skills, knowledge, experience, diversity and expertise of Members of the Board of Directors, individually and collectively, reporting accordingly to the Board.

4.3 Assign at least every three (3) years the review and evaluation of the composition, efficiency and effectiveness of the Board and its Committees to an independent external consultant to bring an objective perspective and share leading industry practices.

Board Succession Plans

4.4 Review periodically and at least annually, succession plans for the Board to ensure that on the one hand successions occur smoothly and an appropriate balance of diversity, skills and experience is maintained, and on the other hand the progressive renewal of the Board, reporting accordingly to the Board.

Policies

4.5 Define, for the approval by the Board, and periodically review policies for:

(a) Nomination, evaluation, selection, ongoing assessment and succession of Board Members, including the necessary competences, skills and academic or professional qualifications to ensure sufficient expertise and conformity with the regulatory requirements that an individual should possess in order to serve as a member of the Board of Directors; and

(b) Board diversity, including a target representation of the underrepresented gender and how to reach and maintain this target.

4.6 Review periodically and at least annually, the policy for selection, development, appointment and replacement of senior management and Heads of Control Functions and make recommendations to the Board.

4.7 Review periodically the policy for recruitment, rotation and promotion of staff, reporting accordingly to the Board.

Board and CEO Appointments

4.8 Identify, evaluate and recommend, for the approval by the Board or for election at the Shareholders' Annual General Meeting, candidates to fill vacancies in the board of directors of the Company or of any other company in which the Company has the right to appoint any member to its board of directors.

In identifying candidates, the Committee shall, with the assistance of external advisors if deemed necessary:

a) Consider candidates from a wide range of backgrounds;

b) pay due regard to the Fitness and Probity (Suitability) regulatory requirements; and

c) consider candidates on merit and against objective criteria, as defined in the Board Nomination, Evaluation, Selection, Succession and Ongoing Assessment Policy, with due regard to the benefits of diversity, taking care that appointees will have sufficient time to devote to the position.

4.9 Identify, evaluate and recommend, for the approval by the Board, candidates for the position of the CEO of the Company or of any other company in which the Bank has the right to appoint and/or recommend the Chief Executive Officer, with the assistance of external advisors if deemed necessary.

4.10 In its recommendation to the Board to appoint a candidate as Director or CEO, the Committee shall provide a full rationale of how it arrived at its decision. In addition, the relevant discussions and accompanying justification for selecting / rejecting proposed candidates will be appropriately documented in the minutes of the Committee.

4.11 Prior to the appointment of a Director, the proposed appointee shall be required by the Committee to disclose any other business interests that may result in a conflict of interest and be required to report any future business interests that could result in a conflict of interest.

4.12 The Committee is responsible for

(a) assessing whether any interests or relationships declared by Members of the Board present an actual or potential conflict of interest and

(b) approving Members of the Board's requests related to directorships with other companies or intra-Group.

Appointment of Key Function Holders

4.13 Identify, evaluate and recommend, for the approval by the Board, the appointment of Key Function Holders (other than Heads of Control Functions), following a relevant recommendation by the CEO.

Suitability

4.14 The Committee shall continuously monitor the collective and individual suitability of Board Members and Key Function Holders, on the basis of the assessment criteria included in the Directive on the Assessment of Suitability of the Members of the Management Body and Key Function Holders of Authorised Credit Institutions of 2020, as amended, of the Central Bank of Cyprus.

4.15 When events make re-assessment necessary in order to verify the ongoing suitability of the Board collectively or of the individual member / key function holder in question, and taking into account the relevant provisions of the Internal Governance of Credit Institutions Directive of 2021, as amended, such a re-assessment should be undertaken immediately and any conclusions / proposed action should be submitted to the Board for final decision and subsequent communication to the Central Bank of Cyprus.

4.16 If at any given time, persons who hold the post of an independent Director do not satisfy or seem not to satisfy any of the independence criteria due to developments, then the Committee must address the issue immediately and proceed with a relevant recommendation to the Board as to the issue and as to the necessary remedial measures, including removing the said Member from the Board or redefining his/her role in the Board and/or appointing a new independent Director. All necessary remedial measures should be implemented as soon as possible. The said Member should be released from any of his/her duties as an independent Member of the Board from the date the non-compliance with the independence criteria is identified.

Control Functions

4.17 Review periodically, and at least annually, in collaboration with the Audit and Risk Management Committees, the composition, authority and independence of the Control Functions, reporting accordingly to the Board.

Internal Governance Arrangements

4.18 Ensure effective internal governance arrangements are in place and evaluate the extent of compliance with the policies of internal governance as approved by the Board.

Environmental, Social and Governance

4.19 The Committee has the overall responsibility for the development and implementation of the Bank's Environmental, Social and Governance (ESG) strategy with the aim of a positive impact on the stakeholders, the environment and the society in general. The Committee also supports the Board in overseeing and challenging actions related to it.

4.20 The Committee reviews and recommends for approval by the Board the Annual ESG Impact Report.

Committee Governance

4.21 The Committee shall review its Terms of Reference regularly, at least annually, to ensure continuing appropriateness. The reviews must be documented and include, where necessary, recommendations to the Board on revisions.

4.22 The Committee shall conduct annually a self-assessment and report its conclusions, recommendations for improvements and changes to the Board.

Annual General Meeting

4.23 The Chairperson of the Committee shall be available for personal, telephone, electronic or written communication, which shareholders of the Company may request, regarding issues concerning the work of the Committee. He/She shall also be available to answer any questions during the Annual General Meeting or any meeting for the purposes of briefing the shareholders of the Company. Information concerning the structure and work of the Committee shall also be given in the Annual Corporate Governance Report of the Board of Directors of Hellenic Bank Public Company Limited.

Reporting to the Central Bank of Cyprus

4.24 The Annual Evaluation Reports referred to in Paragraphs 4.1 and 4.2 shall be submitted to the Central Bank of Cyprus within three (3) months of the end of every year.

Job Descriptions

4.25 The Committee shall review and approve, where this is deemed necessary, the Job Description (roles, responsibilities, main duties, powers, etc.) of the Executive Members of the Board, the Chief Executive Officer, Key Function Holders (other than Heads of Control Functions).

5. <u>Code of Corporate Governance</u>

It is understood that the Nominations / Internal Governance Committee will operate strictly within the framework of the relevant provisions of the Code of Corporate Governance, as determined in Chapter A of the Code.

(15) Part D of the Code which refers to the Relations of the Company with its Shareholders

The Board of Directors of the Company utilises the occasions of the announcements of financial results, as well as of the Annual General Meeting of the Shareholders itself for organising analytical presentations of the Financial Statements. These are usually undertaken by the Chief Financial Officer and the Company's Executive Management for the benefit of shareholders, financial analysts, members of the Stock Exchange and representatives of the media.

Regarding the Annual General Meeting, the Company takes into consideration the relevant provisions of the legislation, the Company's Articles of Association and the Code.

Mr Constantinos Pittalis, Manager Investor Relations, has been appointed as Investor Relations Officer (tel. 22500794, e-mail: ir@hellenicbank.com), responsible for the communication between shareholders and the Company. Information concerning the Group is provided to shareholders, prospective investors, analysts and brokers in a prompt and unbiased manner.

(16) Rotating Directors eligible for Re-Election

The Bank's Articles of Association provide that at each Annual General Meeting (AGM), provided they have completed three years in office from the date of their last election to the Board, one-third of the Board Members for the time being, or, if their number is not three or a multiple of three, then the number nearest to one-third, and any person appointed by the Board in accordance with the Articles of Association, shall retire from office and shall, if willing to act, be eligible for re-election.

The Board Members to retire at each AGM shall be those who have been longest in office since the date of their last election, but as between persons who were last elected on the same day those to retire shall be those Board Members longest in office since the date of their first appointment to the Board (and as between persons whose first appointment to the Board was on the same day those to retire shall (unless they otherwise agree among themselves) be determined by lot).

The Internal Governance Directive additionally provides that, in the event of a change in the ownership structure of the Bank, the provision for the completion of three years in office from the date of the Board Member's last election to the Board does not apply in determining the Non-Executive Directors to retire at each AGM. A change in the ownership structure means the acquisition of a qualifying holding (at least 10%) in the share capital of the Bank and any further increase of such qualifying holding so that the holding percentage in the share capital of the Bank reaches or exceeds 20%, 30% or 50% of its share capital, based on the provisions of section 17(1) of the Business of Credit Institutions Law of 1997 (Law 66(I)/1997), as amended.

In accordance with the provisions of the Bank's Articles of Association, the following Directors will retire and are eligible (provided they offer themselves) for re-election at the Annual General Meeting of the Shareholders (their curriculum vitaes are uploaded on the Bank's website www.hellenicbank.com (The Group / Investor Relations / Corporate Governance [Board of Directors])):

(a) Antonis Rouvas
(b) Miranda Xafa

(17) Corporate Social Responsibility (CSR)

Extensive information as to the Company's environmental, social, and corporate governance (ESG) related actions is to be found in the Sustainability Statement contained within the present Annual Financial Report. It makes reference to the Company's policy regarding CSR, presenting the objectives, strategies, and results of its actions.

This contributes to increasing corporate transparency, as well as strengthening trust on the part of the shareholders, customers, employees, and society at large, demonstrating the Company's responsible attitude towards social and environmental issues.

Nicosia, 20 March 2025

Remuneration Policy Report for the year 2024

INTRODUCTION

The Board of Directors (the "Board") of Hellenic Bank Public Company Limited (the "Company" or the "Bank"), in compliance with the provisions of the Code of Corporate Governance, published by the Cyprus Stock Exchange (6th edition - April 2024) and particularly Appendix 1 of the Code, as well as the provisions of the Encouragement of the Long-Term Active Participation of the Shareholders Law of 2021, Law 111(I)/2021, as amended (the "SRD Law"), incorporates the present Remuneration Policy Report in the Company's 2024 Annual Financial Report. The Company's 2024 Annual Financial Report is published in the Company's website.

REMUNERATION COMMITTEE

The Remuneration Committee reviews and recommends for approval by the Board of Directors the Remuneration Policy and the Remuneration Principles of the Group, as well as the Directors' Remuneration Policy, which is voted at the Annual General Meeting of the Shareholders in accordance with the provisions of the SRD Law. The Committee reviews the remuneration of Executive and Non-Executive Members of the Board, the Company Secretary, the Chief Executive Officer, Key Function Holders including the Heads of Control Functions, and the Anti-Money Laundering Compliance Officer, and it makes relevant recommendations to the Board. The aim of the Committee is to attract and retain good quality officers at Executive and Key Function Holder levels in order to better serve the interests of the Group as well as those of its Shareholders and other stakeholders. The Committee's suggestions and the Group's Remuneration Policy take into consideration the relevant responsibilities, workload, qualifications, know-how, academic background, experience, individual performance, remuneration of comparable positions in the market, especially in areas where the Group is active, remuneration at other levels in the Group as well as non-financial criteria e.g., compliance with applicable rules and procedures.

Each year, the Remuneration Committee proposes to the Board of Directors the Annual Remuneration Policy Report, as part of the Annual Financial Report of the Company, which is submitted to the Annual General Meeting of the Shareholders for approval. The Committee also reviews and approves the Disclosure of Information regarding the Annual Remuneration of the Directors, which is prepared by Human Resources for inclusion in the notes to the annual Financial Statements of the Company and the Remuneration Policy Report itself.

The composition of the Remuneration Committee during 2024 and until the date of this Report is as follows:

Chairperson:	Kenneth Howard Prince-Wright (from 18th September 2024) Petros Christodoulou (from 30th January 2024 until 18th September 2024) Andreas Persianis (until 30th January 2024)
Members:	Charalambos Constantinou (from 18th September 2024) Maria Charalambous (from 18th September 2024) Miranda Xafa Christos Themistocleous (until 30th January 2024) Marco Comastri (until 18th September 2024) Kristofer Richard Kraus (from 30th January 2024 until 20th June 2024).

The terms of reference of the Remuneration Committee are detailed below:

Terms of Reference of the Remuneration Committee (exact copy)

1. <u>Role of the Remuneration Committee</u>

The Remuneration Committee was established to ensure that Hellenic Bank Public Company Limited (the "Company") complies with the requirements of the Business of Credit Institutions Laws / other relevant Laws, the relevant Central Bank of Cyprus' Directives and the Cyprus Stock Exchange's Code of Corporate Governance and is responsible for the evaluation of proposals regarding remuneration matters, including those proposals which have an implication on the risk and risk management of the Group.

The primary role of the Committee is to define and recommend for approval by the Board of Directors of the Company (the "Board") the Group Remuneration Policy, including pensions and variable compensation, and the Remuneration Principles for the Group that are aligned to the Group's strategic objectives and values. Also, the Committee prepares proposals for the approval by the Board on the remuneration packages, including retirement and other benefits, of Executive and non-Executive Members of the Board, the Company

Secretary, as well as of the Chief Executive Officer, Key Function Holders including the Heads of the Control Functions, and the Anti-Money Laundering Compliance Officer. Furthermore, the Committee is engaged in reviewing and making proposals on the remuneration (Directors' Fees) of the Members of the Board of Directors of any company in which the Bank has the right to appoint and/or recommend Members of the Board.

2. Composition of the Remuneration Committee

The Committee is appointed by the Board and consists of three to five exclusively non-Executive Directors who shall exercise competent and independent judgment on remuneration policies and practices. The majority of the Members of the Committee must be independent non-Executive Members of the Board.

Members of the Remuneration Committee can be members of only one other Board Committee.

The Chairperson of the Committee is appointed by the Board and should be an Independent Member.

The term-in-office of the Members of the Committee is decided by the Board.

Committee Members shall not hold any other posts or positions or conduct transactions which could be considered to be in conflict with the Terms of Reference of the Committee.

3. Meetings / Decision-making Process of the Remuneration Committee

The Committee shall meet whenever necessary and at least twice a year. The Committee may convene via teleconferencing / videoconferencing. A Committee resolution in writing signed or approved by email, text message, fax or any other means of transmission (e.g., Diligent) by ALL Committee Members shall be valid and effectual as if it had been passed at a meeting of the Committee duly convened and held.

Every effort shall be made to carry out a regular meeting at least once a year with the physical presence of all Committee Members.

The arrangement for attending regular or extraordinary meetings via teleconferencing / videoconferencing shall not to be used abusively but with caution at member or committee level ensuring that, as a rule and unless there are special circumstances to justify the opposite, at least the majority of Committee Members are physically present at each regular or extraordinary meeting.

Committee Members shall not be absent from the regular and extraordinary meetings either physically or via teleconferencing / videoconferencing, for more than two (2) consecutive meetings or twenty-five percent (25%) of the annual meetings.

The majority of Committee Members shall comprise a quorum. A majority of Committee Members shall be considered to be the next integral number of one half of the Members.

The decisions of the Committee are taken by majority voting. In the event of an equality of votes, the Chairperson of the meeting shall not have a second or casting vote and the item in discussion must be escalated to the Board of Directors.

The Company Secretariat must be closely involved in the preparation of the meeting's agenda and ensures it is distributed, including any supporting papers, where relevant, at least three (3) business days in advance of the meeting. Any envisaged late material submission, deemed necessary and justified, has to be authorised by the Committee Chairperson in advance.

The material submitted should include summarising cover memos or executive summaries and/or dashboards and should highlight the risks, opportunities, costs and benefits of the various items on which the Committee is expected to make recommendations to the Board.

The Committee reports regularly to the Board. The Company Secretariat must ensure that minutes and decisions are kept for each Committee meeting, they are finalised not later than fifteen (15) business days following the meeting and are formally approved at the next scheduled meeting. The Company Secretariat ensures that the minutes are in accordance with Paragraph 12 of the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus. The approved and signed minutes are subsequently circulated to all Board Members (by uploading on Diligent Board Resources).

Prior to the commencement of a Committee meeting, the Chairperson shall read all the items on the agenda and request that any Member, who has a potential interest and/or conflict of interest in any of the agenda items, to explain such conflict and not participate in the discussion of such agenda topic. Also, during a Committee meeting, a Member must declare any potential interest and/or conflict of interest as soon as it becomes apparent. For any agenda item with conflicts of interest by a Committee Member, he/she is asked to leave the meeting when discussing that agenda item and the relevant material and minutes relating to that agenda item are restricted to be viewed by that Member.

The Committee, in exercising its duties, shall take into account, to the extent possible and on an ongoing basis, the need to ensure that decision making is not dominated by one individual or by a small group of individuals in a way that it affects the interests of the Company as a whole.

The Chairperson of the Committee shall ensure that no person other than its Members is present at a meeting, including other Board Members, unless he/she is formally invited for a specific item or items on the agenda to contribute towards that specific item. Such person is present only during the discussion of the specific item and leaves the meeting room immediately after without any participation in the decision-making process.

The Chairperson of the Committee is responsible for the efficient operation of the Committee and for adhering to proper governance procedures. He/She encourages and promotes open discussions with a critical spirit, ensuring that divergent views can be expressed and discussed within the decision-making process. The Chairperson of the Committee sets and prioritises the items on the agenda and ensures that Committee decisions are taken on a sound basis based on sufficient information received on time before meetings. He/She also ensures that sufficient time is provided to Committee Members for examining important issues and receiving answers to any questions or concerns they may have, without being confronted with unrealistic deadlines for decision making.

The Committee should follow the arrangements established / approved and supervised by the Board that are intended to ensure the internal operation of the Committee, for the proper flow of information, including the verification documents for the Committee's recommendations and conclusions, and the reference channels between the Committee and the Board, the Central Bank of Cyprus and other parties.

The Committee, in exercising its supervisory responsibilities, shall have adequate access to resources and information relevant to their duties. The Committee shall follow a framework and appropriate and transparent procedures for such access, and appropriate and transparent procedures in the event that it allows Committee Members to communicate individually and directly with senior management and/or members of staff, in exercising their supervisory responsibilities as Members of the Committee (abovementioned framework / procedures are established by the Board).

The Committee has the amount of €100.000 per year as a budget to use for obtaining independent professional advice whenever it deems this necessary. In case the annual budget is exceeded, the Committee should request the approval of the Board for any additional expenditure to be incurred.

4. Duties and Responsibilities of the Remuneration Committee

Remuneration Framework

4.1 The Committee shall submit to the Board, within its terms of reference agreed upon and without the presence of the party interested in their evaluation, proposals concerning the framework and level of remuneration (including fixed pay, performance-related pay, bonuses, pension rights and any compensation payments, share options, etc.) of Executive and non-Executive Members of the Board of the Company, the Company Secretary, the Chief Executive Officer ("CEO") of the Company, Key Function Holders including the Heads of the Control Functions, the Anti-Money Laundering Compliance Officer (AMLCO), and the CEO of any company in which the Bank has the right to appoint and/or recommend the CEO. The Committee shall also submit to the Board proposals on the remuneration (Directors' Fees) of the Members of the Board of Directors of any company in which the Bank has the right to appoint and/or recommend Members of the Board.

The Committee will take into consideration factors such as the relevant responsibilities, workload, qualifications, know-how, academic background, experience, individual performance, remuneration of comparable positions in the market, especially in areas where the Group is active, remuneration in other levels of the Group and non-financial criteria e.g., compliance with applicable rules and procedures. It will also consider the need to attract and retain the most suitable Directors (Executive and non-Executive) / Senior Executives in the Company.

4.2 During the formulation of the above-mentioned proposals, the Committee should take care so that:

(a) These proposals are consistent with the relevant legal and regulatory requirements and

(b) the performance-related systems:

- should not extend any benefits before the gains expected by the Company materialise in a satisfactory degree,

- should not include non-Executive Members of the Board among the beneficiaries,

- should specify targets and evaluation criteria so that the remuneration of the Company Executives is properly aligned with the long-term interests of the shareholders, investors, other stakeholders and the public interest, the Company's business objectives and strategies with a view of delivering sustainable value and maintaining a sound capital base, always within the risk framework of the Company.

4.3 During the preparation of its proposals, the Committee shall provide the opportunity to the Chairperson and the Chief Executive Officer to express an opinion with regard to its proposals concerning the salaries of other Executive Board Members. It should also have access to professional advice, both internal and external.

Group Remuneration Policy

4.4 The Committee shall support and advise the Board regarding the design and/or update and monitoring of the implementation of the Group Remuneration Policy and practices and compliance with them.

4.5 The Committee shall assist the Board in fulfilling its duty in ensuring that the Group Remuneration Policy and practices are consistent with the risk appetite of the Company, prevent conflicts of interest and promote sound and effective risk management.

4.6 The Committee shall ensure that staff members, who are involved in the design, review and implementation of remuneration policies and practices, have relevant expertise and are capable of forming independent judgment on the suitability of these remuneration policies and practices, including their suitability for risk management. Independent external advice may also be sought.

4.7 The Committee shall assist, through relevant studies / proposals, the Board in fulfilling its duties in approving and periodically reviewing the Principles that govern the Group Remuneration Policy and the Policy itself and in overseeing the latter's implementation.

4.8 The Committee shall ensure that Control Functions are involved in the design, review and implementation of the Group Remuneration Policy.

4.9 In addition to setting the Group Remuneration Policy, the Committee shall:

a. Determine and periodically review target and measures to be applied for variable compensation, liaising with the Risk Management Committee of the Board,

b. assess the achievement of performance targets to be applied for variable compensation and the need for ex post risk adjustment, including the application of malus and clawback arrangements,

c. review and recommend to the Board the budget for annual staff salary increases, and

d. review and recommend to the Board the signing of Collective Agreements, where applicable.

4.10 The Committee shall review a number of possible scenarios to test how the Group Remuneration Policy and practices react to external and internal events, and back-test the criteria used for determining the award and the ex-ante risk adjustment based on the actual risk outcomes.

4.11 The Committee shall be actively involved in the identification process of staff whose professional activities have a material impact on the Bank's risk profile, in line with its responsibilities for the preparation of decisions regarding remuneration. In doing so, the Remuneration Committee has delegated the preparation of the list of Identified Staff to the Risk Management Unit, with the support of Human Resources.

4.12 The Committee shall ensure that the Group Remuneration Policy and practices are subject to a central and independent review by the Internal Audit Unit at least on an annual basis.

Remuneration of Non-Executive Members of the Board

4.13 In relation to the level of remuneration of the non-Executive Members of the Board, the Committee shall take the following into consideration:

a. The available time that the Members have to prepare for attending meetings,

b. the responsibilities assumed by each Member,

c. the non-correlation of remuneration to the profitability of the Company and

d. the non-participation in any insurance or pension plan.

The proposal of the Remuneration Committee will be submitted by the Board to the Shareholders' General Meeting for approval.

Policy for the Remuneration of the Members of the Board

4.14 The Committee shall review and submit to the Board for approval the Directors' Remuneration Policy, which is voted at the Annual General Meeting of the Shareholders in accordance with the provisions of the Encouragement of the Long-Term Active Participation of the Shareholders Law of 2021, Law 111(I)/2021, as amended.

Re-adjustment of Benefits

4.15 The Committee shall submit to the Board proposals for the determination of each re-adjustment of benefits of the Members of the Board, the Chief Executive Officer and his/her direct reports, being sensitive to the terms of remuneration and conditions of employment at other levels of the Group.

External Advice

4.16 The Committee shall review the appointment of external remuneration consultants that the Board or the Remuneration Committee may decide to engage for advice or support.

4.17 The Committee shall, when using the services of a consultant to obtain information on market standards for remuneration systems, ensure that this consultant does not also give advice to the Human Resources Department or the Executive Members of the Board.

Control Functions

4.18 The Committee reviews the remuneration of the Heads of the Control Functions for submission to the Board for its approval, following the recommendations of the Committees of the Board, as per reporting lines of the Control Functions.

If deemed appropriate, the Committees of the Board, as per the reporting lines of the Control Functions, may also make recommendations to the Remuneration Committee regarding the Senior Staff of the Control Functions when the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms).

The remuneration of employees in Control Functions is predominantly fixed, to reflect the nature of their responsibilities.

In this respect, the maximum award for variable pay for members of Control Functions has been set at 50% of annual basic salary.

In addition, the remuneration of these employees is linked to the performance of their Functions and is not dependent on the performance of the units they are tasked with controlling, to avoid any conflict of interest.

4.19 The Committee reviews the remuneration of the Anti-Money Laundering Compliance Officer (AMLCO) for submission to the Board for its approval, following the recommendation of the Board Audit Committee when the circumstances warrant it (e.g., non-contractual salary increases / changes in contract terms).

Key Function Holders

4.20 Remuneration is reviewed and agreed by the Remuneration Committee for submission to the Board for its approval, following input from the Risk Management Unit (where required).

The Chief Executive Officer makes recommendations to the Remuneration Committee regarding the remuneration of Key Function Holders, other than members of the Control Functions, the Company Secretary and Executive Members of the Board.

The Committees of the Board, as per the reporting lines of the Control Functions, make recommendations to the Remuneration Committee regarding the remuneration of the Heads, and Senior Staff (if deemed appropriate) of the Control Functions as per term of reference 4.18 above.

Remuneration Reports / Statements

4.21 The Committee shall prepare, for submission to the Board, the Annual Remuneration Policy Report, which will comprise part of or be attached to the Annual Financial Report of the Company.

4.22 The Committee shall review and approve the Annual Remuneration Statement, prepared by Human Resources for inclusion in the Company's annual Financial Statements or in the notes to the annual Financial Statements, in accordance with Appendix 2 of the Code of Corporate Governance and the relevant Cyprus Central Bank's Directives / Guidelines.

4.23 The Committee shall review and approve the content of any resolutions submitted for approval at the General Meeting of the Shareholders, which will be prepared by the Company Secretariat in cooperation with the Company's Legal Advisors, in accordance with Appendix 3 of the Code of Corporate Governance, and concern possible plans for the remuneration of Executive Members of the Board in the form of shares, share warrants or share options and of any resolutions submitted for approval at the General Meeting of the shareholders, which will be prepared by the Company Secretariat in cooperation with the Company's Legal Advisors concerning possible plans for remuneration of employees of the Group in the form of shares, share warrants or share options.

Committee Governance

4.24 The Committee shall review its Terms of Reference at least annually, to ensure continuing appropriateness. The reviews must be documented and include, where necessary, recommendations to the Board on revisions.

4.25 The Committee shall conduct annually a self-assessment and report its conclusions, recommendations for improvement and changes to the Board.

Annual General Meeting

4.26 The Chairperson of the Committee shall be available for personal, telephone, electronic or written communication, which shareholders of the Company may request, regarding issues concerning the work of the Committee. He/She will also be available to answer any questions during the Annual General Meeting or any meeting for the purposes of briefing shareholders of the Company. Information concerning the structure and work of the Committee will also be given in the Annual Corporate Governance Report of the Board of Directors of Hellenic Bank Public Company Limited.

5. Code of Corporate Governance

It is understood that the Remuneration Committee will act strictly within the framework of the relevant provisions of the Code of Corporate Governance, as determined in Chapter B of the Code.

DIRECTORS' REMUNERATION POLICY

The Remuneration Policy for the Directors of the Company remains the same as it was when approved in the Annual General Meeting of the Shareholders held on 18th September 2024, as shown below. A relevant proposal will be submitted by the Board of Directors to the Annual General Meeting of the Shareholders for approval.

The remuneration of the Members of the Board of Directors for the year 2024 was fixed as follows:

(i) Chairperson: €210.000
(ii) Vice-Chairperson: €75.000
(iii) Senior Independent Director: €75.000
(iv) Board Members: €60.000.

Furthermore, the remuneration of the Members of the following Committees of the Board of Directors for the year 2024 was fixed as follows:

(i) Chairperson of the Audit Committee: €50.000
(ii) Chairperson of the Risk Management Committee: €50.000
(iii) Chairperson of the Remuneration Committee: €25.000
(iv) Chairperson of the Nominations / Internal Governance Committee: €25.000
(v) Chairperson of the Transformation Committee: €45.000
(vi) Member of the Audit Committee: €30.000
(vii) Member of the Risk Management Committee: €30.000
(viii) Member of the Remuneration Committee: €15.000
(ix) Member of the Nominations / Internal Governance Committee: €15.000
(x) Member of the Transformation Committee: €20.000.

Pursuant to Regulation 88 of the Company's Articles of Association, the Directors may also be paid all travelling, hotel and other expenses properly incurred by them in attending and returning from meetings of the Board of Directors or in connection with the business of the Company.

This Directors' Remuneration Policy recognises:

a) The significant increase in the responsibilities undertaken and the workload of the Board, as well as of its Committees, arising due to increased regulatory requirements,
b) the time commitment the Members of the Board are required to devote to the Company for Board matters and Board Committee matters,
c) the substantial risks based on the conditions prevailing in the financial environment that the Group is operating in, and
d) the desire to attract and retain Board Members with high qualifications, know-how, experience, academic background, and performance.

The Directors' Remuneration Policy, voted at the Annual General Meeting of the Shareholders held on 28th September 2022, can be found in the Company's website at www.hellenicbank.com (The Group / Investor Relations / Corporate Governance (scroll to the end) / Directors Remuneration Policy). There was no deviation from this Policy during 2024.

REMUNERATION POLICY FOR THE EXECUTIVE DIRECTOR / CHIEF EXECUTIVE OFFICER

Mr Michalis Louis was elected as an Executive Member of the Board of Directors of Hellenic Bank by the Annual General Meeting of the Shareholders on 18th September 2024 and, later that day, he was appointed by the Board of Directors as Chief Executive Officer of the Group.

Mr M. Louis is rewarded with a remuneration package based on a contract of employment, the terms of which take into account the relevant provisions of the Code of Corporate Governance published by the Cyprus Stock Exchange, the Central Bank of Cyprus' Internal Governance Directive, the European Banking Authority's Guidelines on Sound Remuneration Policies and the Group's Remuneration Policy. The remuneration package includes a non-variable annual gross salary and has an option for variable remuneration.

The non-variable annual gross salary is paid in thirteen equal monthly instalments and is inclusive of any directors' or any other fees payable to him by reason of his directorship or holding of any other office in the Company or any Group company, and takes into consideration his knowledge, extensive experience in senior managerial positions, academic background, expertise and leadership skills. In addition, it takes into consideration the services he offers, the time devoted to the Group, the scope of his responsibilities, the benefits and remuneration of officers in corresponding positions in other comparable organisations and the market at the time when his employment contract was entered into.

In addition to the salary, the remuneration package also includes fringe benefits such as private medical insurance cover or membership and participation in a medical plan (including dental care) for the Chief Executive Officer and his family, life and permanent disability insurance and accident cover for him during the employment, use of a company car and payment by the Company of all expenses in connection with such use, and use of a mobile phone, tablet, personal computer and other electronic devices.

The Company pays a 15% employer's contribution on his monthly gross salary to a selected provident fund.

The Chief Executive Officer may participate in any variable remuneration scheme that the Company may put in place subject to the Group's Remuneration Policy.

The Chief Executive Officer's employment contract has a duration until his retirement date being the date he completes 68 years of age in the year 2030. The employment contract can be renewed for a further period of up to three years if the Company, at its sole discretion, gives Mr M. Louis six months' notice before his retirement date. The employment contract will, in such a case, be renewed, on such terms as will be agreed between the two parties.

The Chief Executive Officer may terminate his employment contract by giving not less than six months' notice to the Company.

The Company reserves the right, in its sole and absolute discretion, to terminate his employment contract with immediate effect at any time by making a pay-out of two annual gross salaries (including the employer's contributions to his selected provident fund). Any pay-out will be paid less tax, national insurance contributions and any other contributions or deductions as required by law. The Company has the right, in certain circumstances, to terminate the Chief Executive Officer's employment, with immediate effect, and without payment in lieu of notice or compensation (save as otherwise provided in the Termination of Employment Law).

The Company also has the right (generally and in specific instances (as set out in the employment contract)) not to vest in or assign to the Chief Executive Officer any powers or duties or to provide any work for him to do and the Board may, in its absolute discretion, place him on Garden Leave (as defined in the employment contract) for all or part of the remainder of the employment.

Mr Oliver Gatzke was appointed as an Executive Member of the Board of Directors of Hellenic Bank and as Chief Executive Officer of the Group on 23rd July 2021.

On 27th July 2023, Mr O. Gatzke, in accordance with the terms of his employment contract, gave to the Company notice that he intends to terminate his employment contract on its expiry date, that is on 22nd July 2024.

The Company decided to place Mr O. Gatzke on Garden Leave (as defined in his employment contract) with full pay, effective as from 1st August 2023, until further notice.

Mr O. Gatzke's employment contract expired on 22nd July 2024.

Mr O. Gatzke was rewarded with a remuneration package based on a contract of employment, the terms of which took into account the relevant provisions of the Code of Corporate Governance published by the Cyprus Stock Exchange, the Central Bank of Cyprus' Internal Governance Directive, the European Banking Authority's Guidelines on Sound Remuneration Policies and the Group's Remuneration Policy. The remuneration package included a non-variable annual salary and had an option for variable remuneration.

The non-variable annual salary was paid monthly and was inclusive of any directors' or any other fees payable to him by reason of his directorship or holding of any other office in the Company or any Group company, and took into consideration his knowledge, extensive experience in senior managerial positions, academic background, expertise and leadership skills. In addition, it took into consideration the services he offered, the time devoted to the Group, the scope of his responsibilities, the benefits and remuneration of officers in corresponding positions in other comparable organisations and the market at the time when his employment contract was entered into.

In addition to the salary, the remuneration package also included fringe benefits such as private medical insurance cover or participation in a medical plan (including dental care) for the ex Chief Executive Officer and his family, life and permanent disability insurance and accident cover for him during the employment as per the Company's policy, use of a company car and payment by the Company of all expenses in connection with such use, and use of a mobile phone, tablet, personal computer and other electronic devices.

An annual housing and travelling allowance was payable monthly at the same time as the payment of his salary. A reasonable cost for services, for example tax advice in relation to his personal tax affairs and filing of tax returns might have been paid by the Company, if required.

Subject to Shareholders' approval at a General Meeting of a variable remuneration scheme and, also, approval from regulatory authorities, the Company might have offered the ex Chief Executive Officer a variable remuneration package.

The ex Chief Executive Officer's employment contract had a three-year duration and could be renewed for a further period of up to three years if the Company, at its sole discretion, gave Mr O. Gatzke six months' notice before its expiry. The employment contract would, in such a case, be renewed, on such terms as would be agreed between the two parties.

The ex Chief Executive Officer might have, at any time after 24 months from the commencement date (i.e., 23rd July 2023), terminated his employment contract by giving not less than six months' notice to the Company (see above).

The Company reserved the right, in its sole and absolute discretion, to terminate his employment with immediate effect at any time by making a pay-out of all the Company's obligations under the employment contract which the Company would have had to pay to the ex Chief Executive Officer until its expiry. Any pay-out would be paid less tax, national insurance contributions and any other contributions or deductions as required by law.

The Company might have, in its sole and absolute discretion, elected to pay the sum described above in a series of equal instalments and such instalments to be paid during the relevant notice period.

The ex Chief Executive Officer's employment contract also gave to the Company the right to terminate the employment with immediate effect, by notice in writing, without payment in lieu of notice or compensation (other than in respect of any statutory minimum notice to which the employee may be entitled, pursuant to the Termination of Employment Law, Law No. 24/1967, if any) for cause.

The Company was under no obligation to vest in or assign to the ex Chief Executive Officer any powers or duties or to provide any work for him to do and, at any time after he or the Company had given notice to terminate the employment, or if he purported to terminate the employment in breach of contract or at such times as the Company was investigating a potential breach of the termination-related provisions in the employment contract, the Board might have, in its absolute discretion, by written notice, placed him on Garden Leave (as defined in the contract) for all or part of the remainder of the employment.

REMUNERATION POLICY FOR THE EXECUTIVE DIRECTOR / CHIEF FINANCIAL OFFICER

Mr Antonis Rouvas was appointed as an Executive Member of the Board of Directors of Hellenic Bank and as Chief Financial Officer of the Group on 20th September 2021.

On 1st August 2023, Mr A. Rouvas was appointed Interim Chief Executive Officer of the Bank until 18th September 2024, when Mr. M. Louis was appointed as Chief Executive Officer of the Group. For the duration of this appointment, Mr Rouvas, in addition to the remuneration he was receiving as Chief Financial Officer, was also paid a monthly role allowance. His duties as Chief Financial Officer were temporarily undertaken by the Bank's Chief Accountant.

Mr A. Rouvas is rewarded with a remuneration package based on a contract of employment, the terms of which take into account the relevant provisions of the Code of Corporate Governance published by the Cyprus Stock Exchange, the Central Bank of Cyprus' Internal Governance Directive, the European Banking Authority's Guidelines on Sound Remuneration Policies and the Group's Remuneration Policy. The remuneration package provides for a fixed remuneration and does not include a variable remuneration element.

The Chief Financial Officer's annual salary is paid monthly and is inclusive of any directors' or any other fees payable to him by reason of his directorship or holding of any other office in the Company or any Group company and takes into consideration his knowledge, extensive experience in senior Finance-related positions, academic background, expertise and management skills. In addition, it takes into consideration the services he offers, the time devoted to the Group and the scope of his responsibilities, the benefits and remuneration of officers in corresponding positions in other comparable organisations and the market at the time when his employment contract was entered into.

In addition to the salary, the remuneration package also includes fringe benefits such as participation in a medical plan for the Chief Financial Officer and his family, life and permanent disability insurance and accident cover for him during the employment as per the Company's policy, use of a company car and payment by the Company of all expenses in connection with such use, and use of a mobile phone, tablet, personal computer and other electronic devices.

Furthermore, a contribution is made on behalf of the Company towards the Employees Investment Retirement Plan, currently at 9% of the employee's gross monthly salary.

The Chief Financial Officer's employment contract has a five-year duration and can be renewed for a further period of up to three years if the Company, at its sole discretion, gives Mr A. Rouvas six months' notice before its expiry.

The Chief Financial Officer may, at any time after 24 months from the commencement date (i.e., 20th September 2023), terminate the contract of employment by giving not less than six months' notice to the Company.

The Company reserves the right, in its absolute discretion, to terminate his employment with immediate effect for any reason prior to the expiry date of the contract, in which case he will be entitled to receive, on the date of such termination, an amount equal to (net of tax, national insurance contributions and any other contributions or deductions as required by law):

(i) The full salary he would have been entitled to for the period between the date of termination and the expiry date and
(ii) the contributions the Company would have been obliged to make to the Employees Investment Retirement Plan for the period between the date of termination and the expiry date.

The above amounts may be paid in equal instalments during the period of notice but, in any event, not later than three months after the date of giving of such notice of termination.

The Company is entitled to terminate the employment with immediate effect, by notice in writing, without payment in lieu of notice or compensation (other than in respect of any statutory minimum notice to which the employee may be entitled, pursuant to the Termination of Employment Law, Law No. 24/1967, if any) for cause.

The Company is under no obligation to vest in or assign to the Chief Financial Officer any powers or duties or to provide any work for him to do and, at any time after he or the Company has given notice to terminate the employment, or if he purports to terminate the employment in breach of contract or at such times as the Company is investigating a potential breach of the termination-related provisions in the employment contract, the Board may, in its absolute discretion, by written notice, place him on Garden Leave (as defined in the contract) for all or part of the remainder of the employment.

The changes in the cumulative retirement benefits of the Executive Directors for the year are disclosed in Note 43 to the Financial Statements contained in this Annual Financial Report.

GROUP REMUNERATION POLICY

Per the Group Remuneration Policy, for the determination of the variable remuneration of the Executive Members of the Board of Directors, as applicable, the Non-Executive Members of the Board, on the basis of the recommendations of the Remuneration Committee (which follows the proposal of the Nominations / Internal Governance Committee), consider:

(a) The Bank's consolidated results, including profitability, capital base and liquidity among other parameters, the financial conditions of the market in which these results were achieved and the risks assumed;

(b) the performance of the Executive and/or the Unit(s) under his/her responsibility and/or the consolidated performance of the Bank, bearing in mind both financial and non-financial criteria; and

(c) the long-term interests of the Group.

Although there is currently no variable remuneration plan in force for the Executive Members of the Board, the Board of Directors may approve a payment of bonus of up to €50.000 to Executive Directors in accordance with the Group Remuneration Policy.

The Group Remuneration Policy is compliant with the 6th edition of the Corporate Governance Code published by the Cyprus Stock Exchange (6th edition - April 2024), the European Banking Authority Guidelines on Sound Remuneration Policies (EBA/GL/2021/04) and the Internal Governance of Credit Institutions Directive of 2021, as amended, of the Central Bank of Cyprus.

The Group Remuneration Policy is reviewed annually by the Non-Executive Members of the Board of Directors (last review / approval on 30th January 2025) further to recommendation by the Remuneration Committee, in order to ensure compliance with the regulatory framework, as well as to ensure that it is in line with the Group's prevailing strategic targets and to prevent the introduction of incentives that lead to excessive risk assumption or conflicts of interest. The Policy is also evaluated in order to determine whether it corresponds to the prevailing conditions of the market and the Group and whether these justify the Policy's review. The review is coordinated by Human Resources and is conducted with the participation of the Risk Management Unit, the Compliance Unit and other Head Office Units. The Group Remuneration Policy is audited annually by the Internal Audit Unit.

Related to the Remuneration Policy for the Executive and Non-Executive Members of the Board and Senior Managers for 2024 is the disclosure of information in the notes to the Financial Statements (Note 43) included in this Annual Financial Report as well as the analytical Disclosure of Information regarding the Remuneration of the Directors for the year 2024 shown below.

Comparative Information on the Annual Change of Directors' and Employees' Remuneration and the Company's Performance (as required by the SRD Law) is also given below.

The Board of Directors submits this Remuneration Policy Report (as adapted in accordance with the SRD Law) to the Annual General Meeting of the Shareholders and unanimously recommends its approval.

Nicosia, 20 March 2025

DISCLOSURE OF INFORMATION REGARDING THE REMUNERATION OF DIRECTORS FOR THE YEAR 2024

	Remuneration for services	Remuneration for participation in the Board of Directors	Remuneration for participation in the Committees of the Board of Directors	**Total remuneration for services**	Remuneration and benefits from companies of the same Group of companies	Remuneration in the form of profit and/or bonus distribution	Assessment of the value of the benefits that are considered to form remuneration	**Total remuneration and benefits**	Annual increase in the total retirement benefits
	€	€	€	**€**	€	€	€	**€**	€
Executive Directors [1]									
Michalis Louis [2]	198.288	0	0	**198.288**	0	0	16.650	**214.938**	0
Antonis Rouvas [2]	386.000	0	0	**386.000**	0	0	13.238	**399.238**	0
	584.288	0	0	**584.288**	0	0	29.888	**614.176**	0
Non-Executive Directors [3]									
Petros Christodoulou	0	225.184	38.866	**264.050**	0	0	0	**264.050**	0
Robert Anastassis Kyprianou	0	23.116	22.951	**46.067**	0	0	0	**46.067**	0
Oliver Bernard Ellingham	0	23.516	22.951	**46.467**	0	0	0	**46.467**	0
Stephen John Albutt	0	66.600	68.320	**134.920**	0	0	0	**134.920**	0
Miranda Xafa	0	62.000	40.697	**102.697**	0	0	0	**102.697**	0
Kenneth Howard Prince-Wright	0	18.413	11.475	**29.888**	0	0	0	**29.888**	0
Charalambos Constantinou	0	17.333	12.910	**30.243**	0	0	0	**30.243**	0
Maria Charalambous	0	17.393	12.910	**30.303**	0	0	0	**30.303**	0
Sofronis Clerides	0	17.303	4.303	**21.606**	0	0	0	**21.606**	0
Marco Comastri	0	43.751	42.951	**86.702**	0	0	0	**86.702**	0
Demetrios Efstathiou	0	44.551	42.951	**87.502**	0	0	0	**87.502**	0
Kristofer Richard Kraus [4]	0	0	0	**0**	0	0	0	**0**	0
Marios Maratheftis	0	37.630	27.172	**64.802**	0	0	0	**64.802**	0
Christos Themistocleous	0	48.374	36.735	**85.109**	0	0	0	**85.109**	0
John Gregory Iossifidis	0	53.688	33.798	**87.486**	0	0	0	**87.486**	0
Andreas Persianis	0	43.071	36.188	**79.259**	0	0	0	**79.259**	0
Christodoulos Hadjistavris	0	43.701	35.792	**79.493**	23.000	0	0	**102.493**	0
	0	785.624	490.970	**1.276.594**	23.000	0	0	**1.299.594**	0
Total	**584.288**	**785.624**	**490.970**	**1.860.882**	**23.000**	**0**	**29.888**	**1.913.770**	**0**

Notes

1. After receiving notice from Mr Oliver Gatzke (ex Executive Director / Chief Executive Officer) that he had decided to terminate his employment contract with the Bank with effect from 22.07.2024, the expiry date of the contract, in accordance with the provisions of Mr Gatzke's employment contract, the Company decided to place him on Garden Leave with full pay, effective as from 01.08.2023, until further notice. Mr Gatzke's employment contract expired on 22.07.2024.
   Mr Gatzke's Remuneration for services for the period 01.01.2024-22.07.2024 (while he was on Garden Leave) was €422.151.
   The Assessment of the value of the benefits received that are considered to form remuneration for the period 01.01.2024-22.07.2024 was €922.
2. On 01.08.2023, Mr Antonis Rouvas was appointed Interim Chief Executive Officer of the Bank, until 18.09.2024, when Mr Michalis Louis was appointed as Chief Executive Officer of the Group. For the duration of that interim appointment, Mr Rouvas was paid a monthly role allowance of €10.000.
3. The Remuneration for participation in the Bank's Board of Directors and its Committees of the Non-Executive Directors relates to the period for which they were Members of the Board of Directors / Board Committees.
4. Mr Kristofer Richard Kraus had waived his right to receive remuneration due to his company policy.

COMPARATIVE INFORMATION ON THE ANNUAL CHANGE OF DIRECTORS' AND EMPLOYEES' REMUNERATION AND THE COMPANY'S PERFORMANCE

	Note	Percentage change 2024 - 2023	Percentage change 2023 - 2022	Percentage change 2022 - 2021	Percentage change 2021 - 2020
Directors' Remuneration – Executive Directors					
Michalis Louis	1	n/a	n/a	n/a	n/a
Oliver Gatzke	2	-100%	-42%	129%	n/a
Antonis Rouvas	3	10%	16%	263%	n/a
Lars Kramer	4	n/a	n/a	n/a	-67%
Directors' Remuneration - Non-Executive Directors					
Petros Christodoulou	5	n/a	n/a	n/a	n/a
Robert Anastassis Kyprianou	6	n/a	n/a	n/a	n/a
Oliver Bernard Ellingham	7	n/a	n/a	n/a	n/a
Kenneth Howard Prince-Wright	8	n/a	n/a	n/a	n/a
Charalambos Constantinou	9	n/a	n/a	n/a	n/a
Maria Charalambous	10	n/a	n/a	n/a	n/a
Sofronis Clerides	11	n/a	n/a	n/a	n/a
Dr. Evripides A. Polykarpou	12	-100%	-29%	2%	1%
Marco Comastri	13	-32%	21%	0%	8%
Stephen John Albutt	14	-5%	35%	0%	0%
Marianna Pantelidou Neophytou	15	-100%	-91%	0%	-4%
Demetrios Efstathiou	16	-24%	48%	-15%	15%
Kristofer Richard Kraus	17	n/a	n/a	n/a	n/a
Marios Maratheftis	18	-38%	40%	0%	0%
Christos Themistocleous	19	-55%	91%	11%	20%
John Gregory Iossifidis	20	-29%	63%	98%	n/a
Andreas Persianis	21	-31%	44%	107%	n/a
Miranda Xafa	22	-2%	62%	n/a	n/a
Christodoulos Hadjistavris	23	-19%	n/a	n/a	n/a
Andrew Charles Wynn	24	n/a	n/a	n/a	-58%
Michael Spanos	25	n/a	n/a	n/a	57%
Average Remuneration on a full-time equivalent basis of Employees					
Employees of the Company	26	6%	6%	9%	6%
Company Performance					
Profit before derecognition of financial assets measured at amortised cost and impairment losses	27	7%	226%	47%	-30%
Cost to Income Ratio (adjusted)	28	+1 p.p.	-27 p.p.	-6 p.p.	+6 p.p.

Notes

1. Elected as Executive Director and appointed as Chief Executive Officer on 18.09.2024.
2. Appointed as Executive Director on 23.07.2021 and resigned on 13.08.2023. Appointed as Chief Executive Officer on 23.07.2021 and placed on Garden Leave on 01.08.2023 until 22.07.2024 when his employment contract expired.
3. Appointed as Executive Director / Chief Financial Officer on 20.09.2021. Served as Interim Chief Executive Officer from 01.08.2023 until 18.09.2024, with payment of a monthly role allowance for the duration of this appointment.
4. Appointed as Executive Director on 10.07.2017 and resigned on 09.02.2021. Appointed as Chief Financial Officer on 03.04.2017 and resigned on 08.05.2021.
5. Appointed as Non-Executive Director / Chairman on 08.01.2024.

6. Elected as Non-Executive Director and appointed as Vice-Chairman on 18.09.2024.
7. Elected as Non-Executive Director and appointed as Senior Independent Director on 18.09.2024.
8. Elected as Non-Executive Director on 18.09.2024.
9. Elected as Non-Executive Director on 18.09.2024.
10. Elected as Non-Executive Director on 18.09.2024.
11. Elected as Non-Executive Director on 18.09.2024.
12. Elected as Non-Executive Director on 28.05.2014. Served as Senior Independent Director from 27.01.2015 to 28.08.2019. Served as Chairman from 28.08.2019 to 28.06.2023. Resigned on 28.06.2023.
13. Elected as Non-Executive Director on 28.08.2019. Served as Vice-Chairman from 16.06.2020 to 28.06.2023. Resigned on 18.09.2024.
14. Appointed as Non-Executive Director on 21.09.2016. Served as Senior Independent Director from 28.08.2019 to 28.06.2023.
15. Appointed as Non-Executive Director on 24.12.2013 and resigned on 26.01.2023.
16. Appointed as Non-Executive Director on 29.05.2017. His term of office expired on 18.09.2024.
17. Appointed as Non-Executive Director on 19.06.2019. He had waived his right to receive remuneration due to his company policy. Resigned on 20.06.2024.
18. Elected as Non-Executive Director on 28.08.2019. Resigned on 08.08.2024.
19. Served as Non-Executive Director from 06.03.2020 to 23.06.2021 and as Interim Director from 01.07.2021 to 10.02.2022. Appointed as Non-Executive Director on 10.02.2022. Appointed as Vice-Chairman on 28.06.2023. Served as Acting Chairman from 28.06.2023 to 08.01.2024. Resigned on 05.08.2024.
20. Appointed as Non-Executive Director on 18.06.2021. Appointed as Senior Independent Director on 28.06.2023. Resigned on 18.09.2024.
21. Appointed as Non-Executive Director on 30.06.2021. Resigned on 18.09.2024.
22. Appointed as Non-Executive Director on 14.02.2022.
23. Appointed as Non-Executive Director on 26.01.2023. Resigned on 18.09.2024.
24. Appointed as Non-Executive Director on 19.02.2016, served as Vice-Chairman from 28.08.2019 to 16.06.2020 and resigned on 18.06.2021.
25. Appointed as Non-Executive Director on 03.09.2020 and resigned on 23.06.2021.

26. Calculated as Staff Costs [Salaries] (excluding Executive Directors' Remuneration for services) divided by the Average Number of Staff employed by the Company (excluding Executive Directors, adjusted for the 2022 Voluntary Early Exit Scheme (VEES) leavers in November and December 2022 / January and February 2023), as per the Annual Financial Reports of the respective years.

    The 2022 Staff Costs [Salaries] also exclude the one-off payments made in relation to the re-instatement of the ex-Cooperative Credit Institutions employees' salaries to 2013 levels, effective from 1 January 2019, for the years 2019-2021, as well as the one-off accumulated unutilised annual leave payments made to the 2022 VEES leavers in November and December 2022.

    The 2023 Staff Costs [Salaries] also exclude the one-off accumulated unutilised annual leave payments made to the 2022 VEES leavers in January and February 2023.

27. The Profit before net gains / losses on derecognition of financial assets measured at amortised cost and impairment losses of the Company (i.e., Total Net Income less Total Expenses) of the Company is as per the Annual Financial Reports of the respective years.

28. Defined as Total Expenses divided by Total Net Income of the Company as per the Annual Financial Reports of the respective years.

    The Total Expenses were adjusted to exclude the Special Levy on Credit Institutions, the Deposit Guarantee Scheme contribution, the Termination Benefits and the Transformation Costs for the respective years.

1. ESRS 2 – General Disclosures

1.1 Basis for preparation

General basis for preparation of sustainability statements [BP-1]

The Consolidated Sustainability Statement for the year ended 31 December 2024 has been prepared in accordance with the European Sustainability Reporting Standards ("ESRS"), pursuant to the provisions of section 151B of the Companies Law, Cap. 113 for which non-financial disclosures including information on environmental and employee matters are required under the Non-financial Reporting Directive ("NFRD"). This is also considered as voluntary sustainability reporting under the Corporate Sustainability Reporting Directive ("CSRD") as it has not been transposed into Cypriot Law.

The Consolidated Sustainability Statement has been compiled for Hellenic Bank Public Company Limited (the "Bank") and its subsidiary companies, which together are referred to as the Group. The reporting period and the scope of the Consolidated Sustainability Statement is consistent with the Consolidated Financial Statements of the Group.

The Group did not use the option to make any omissions in this Consolidated Sustainability Statement.

The Group has conducted its first Double Materiality Assessment ("DMA") to set the basis for its Consolidated Sustainability Statement for the year end 2024. As a result of the DMA, the Group has identified its material Impacts, Risks and Opportunities ("IROs"), across its operations, as well as its upstream and downstream value chain, in accordance with ESRS 1 Section 5.1 Reporting undertaking and value chain.

The process followed by the Group is further described in section 1.4 Impact, risk and opportunity management - Description of the process to identify and assess material impacts, risks and opportunities [ESRS 2 IRO-1].

Following the recent changes in the shareholding structure, the Group is entering an integration phase with Eurobank Cyprus. The strategy, business model and material IROs identified are expected to be re-assessed considering the combined entity (i.e. Hellenic Bank Group and Eurobank Cyprus). Furthermore, any relevant policies, actions and targets regarding the IROs will be developed in alignment with the Eurobank Group.

The ESG department and the Eurobank Group Sustainability unit agreed to collaborate to ensure effective cooperation for consistent, independent, efficient, and effective sustainability related practices across the Eurobank Group, which will take place during the year 2025.

Disclosures in relation to specific circumstances [BP2]

Timeframes & Assessments Horizons

The Group has selected time horizons consistent with the definitions within ESRS, namely short (<1 year), medium (1-5 years) and long-term (>5 years). However, when assessing financial materiality, the Group has assessed these based on time horizons consistent with the Group's overall risk management framework, as further described below.

The time periods are on the basis of three pre-defined horizons as described below:

Short-term (1 – 4 years): Short-term horizon is set to 1 year and capturing a range up to 4 years to include the near-term impacts and serve as the basis for formulating the Group's annual Risk Appetite Framework ("RAF") and Risk Appetite Statement ("RAS"). The Group's overall financial planning and forecasting process is used to determine risks and opportunities that could have a material impact for that near-term period. Short-term horizon is stretched up to 4 years, to also include alignment with the Group's 3-year Strategic Plan and relevant business objectives.

Medium-term (5 - 9 years): Medium-term usually follows a 5-year forward looking approach which extends up to 9 years. During this period, the Group aims to complete most major projects and revise any portfolio requirements, if necessary, following the near-term assessment particularities. Implementation of the Paris Agreement, which aims to limit global warming to 1,5°C, outlines that greenhouse gas emissions must decline 43% by 2030, requiring economic and social transformation as a minimum. Thus, the key milestone for the medium-term horizon is the year 2030.

Long-term (10 years and beyond): Long-term is defined at 10 years and at least up to year 2050. This assessment period covers only ESG risks. It is recognized that climate change impacts occur over longer time periods, always considering any uncertainties and complexities existing in the climate changing patterns. In this respect, chronic physical risks are expected to manifest within a long-term horizon (i.e., up to 2050) and the frequency of acute risks can notably increase as well. EU's long term strategic targets aim on a climate neutral EU by 2050. In line with the timelines set with the "European Green deal" and "Paris Agreement", the Group sets its key milestone for the long-term horizon to be the year 2050. This also arises from the target set of Scope 1, Scope 2 and Scope 3 GHG emissions to be reduced to zero by 2050. In covering the longer-term particularities of climate change and environmental degradation (such as their relation to the average maturities of the current loan portfolio of the Group and the useful life of relevant assets, and any future strategic aspects giving rise or enlarging financial risks) the long-term horizon demonstrates the Group's goals on managing Climate-related & Environmental ("CE") risks in a longer term.

<u>Sources of estimation and outcome uncertainty</u>

In relation to the Banking book loans and advances, uncertainty exists across the various Network for Greening the Financial System ("NGFS") scenarios utilised, thus the Bank performs calculations across three NGFS scenarios and utilises the range of results within its materiality risk assessment. Additionally, the damages to collateral values calculated for Cyprus have been based off geolocation data of collaterals and models utilised to estimate the damages observed across the below five hazards assessed for physical risk quantification of the credit risk impact: Sea level rise, Wildfires, Flood, Landslide and Wind gust.

The collateral damages across these hazards have been based off models utilising historical relationships utilising the most recent available literature on each of the hazards. These models assume that these relationships will continue to exist in the future and do not account for any extreme events where a hazard would cause a varying damage coefficient to what has been observed in the past. The main assumptions utilised are the following:

- Sea level rise damage is dependent on the distance from the coastline and the elevation of the collateral;
- Wildfire damages are impacted based on the distance to a vegetation area with a specific tree cover density;
- Flood damages are dependent on the flood depth and distance from a river/coast
- Landslide damages are dependent on landslide susceptibility driven by slope, geology and land cover;
- Wind gust damages are dependent on the level of elevation of collaterals alongside the effect on wind wave generation and tree movement.

Furthermore, the collateral damages are then inputted into the Bank's expected credit loss models which also use estimation models to assess anticipated credit losses from each of the physical risk hazards which are then taken into account within the Material Risk Assessment process. These IFRS9 models are back tested and independently validated on an annual basis by the Model Validation team and approved for use in line with the Bank's model risk governance framework.

With respect to the Bank's holdings in debt securities, the Bank has obtained access to a specialized database to Run the Climate VaR model. This model calculates the impact of climate risks on the Bank's investment portfolio using scenarios from the NGFS and IPCC. It takes into account both Transition (Policy Risk and Technology opportunities) and Physical Risks, based on reported data from companies including emissions, revenue, and financials information. However, the accuracy of the model depends on the quality of the input data. If the reported data is unreliable or incomplete, the model's outputs may also be flawed. The quality of the modelling is only as good as the input data. Additionally, unlike past financial crises (i.e., inflation crisis, credit crisis, sovereign debt crisis, etc.), the ongoing climate crisis is unprecedented. As a result, the financial impact of climate change cannot be forecasted using past trends. As such, climate change impacts are modelled using scenarios that project potential changes to the world due to the changing climate. This leads to uncertainty in the modelling process without a probability function to represent the likelihood of different outcomes associated with that uncertainty.

Incorporation by reference

No incorporation by reference was made within the Consolidated Sustainability Statement.

1.2 Governance

The role of the administrative, management and supervisory bodies [ESRS 2 GOV-1]

Board of Directors

As at 31 December 2024, the Board of Directors ("BoD") comprises a total of eleven members, including two Executive Members (18%) and nine Non-Executive Independent Members (82%). The Executive Members are responsible for the day-to-day management and operational decisions of the Group, while the Non-Executive Members provide independent oversight and strategic guidance.

Although, there is no representation of staff members and other workers in the BoD, staff-related matters are communicated to the BoD by either the Executive Board members or Company Secretariat. Furthermore, staff-related matters are communicated to staff members through the Group's internal hub, as described in ESRS S1 section 5.9 Engaging our staff members.

Members of the Board of Directors as at 31 December 2024		
Petros Christodoulou	Non-Executive Chairman of the Board	Independent
Robert Anastassis Kyprianou	Non-Executive Vice Chairman of the Board	Independent
Oliver Bernard Ellingham	Non-Executive Member of the Board Senior Independent Director	Independent
Michalis Louis	Executive Member of the Board/Chief Executive Officer	n/a
Antonis Rouvas	Executive Member of the Board/Chief Financial Officer	n/a
Stephen John Albutt	Non-Executive Member of the Board	Independent
Miranda Xafa	Non-Executive Member of the Board	Independent
Charalambos Constantinou	Non-Executive Member of the Board	Independent
Maria Charalambous	Non-Executive Member of the Board	Independent
Sofronis Clerides	Non-Executive Member of the Board	Independent

Kenneth Howard Prince-Wright	Non-Executive Member of the Board	Independent

The members of the BoD and Board Committees possess experience relevant to the sectors, products and geographic locations of the Group. Further information regarding the expertise of the BoD can be found through their CVs, publicly available through the Group's website: Corporate Governance.

The below table presents the BoD's gender diversity:

Board Diversity as at 31 December 2024		
	Male	**Female**
Number of Board members	9	2
Percentage of total number	82%	18%
BoD gender diversity ratio	0,2:1	

Board Committees

The following four permanent committees operate within the Bank:

- Board Audit Committee;
- Board Remuneration Committee;
- Board Nominations/Internal Governance Committee;
- Board Risk Management Committee.

The terms of reference for the aforementioned Committees are derived from both the relevant provisions of the Code of Corporate Governance (the "Code"), as published by the Cyprus Stock Exchange and the guiding Directives of the Central Bank of Cyprus.

ESG and sustainability governance arrangements

The Group embeds ESG principles into its internal governance practices and within the responsibilities of the BoD and its Committees. This is also demonstrated through the establishment of a dedicated ESG department and in the assignment of ESG related responsibilities and reporting lines in all three lines of defence and other affected units. These include Transformation, Planning, ESG, Risk Management, Banking, Investors Relations, HR Governance, Corporate Communications & Branding, Economic Research, Global Markets and Wealth & Investment Services, etc.

Board Committees and Other Committees with ESG responsibilities

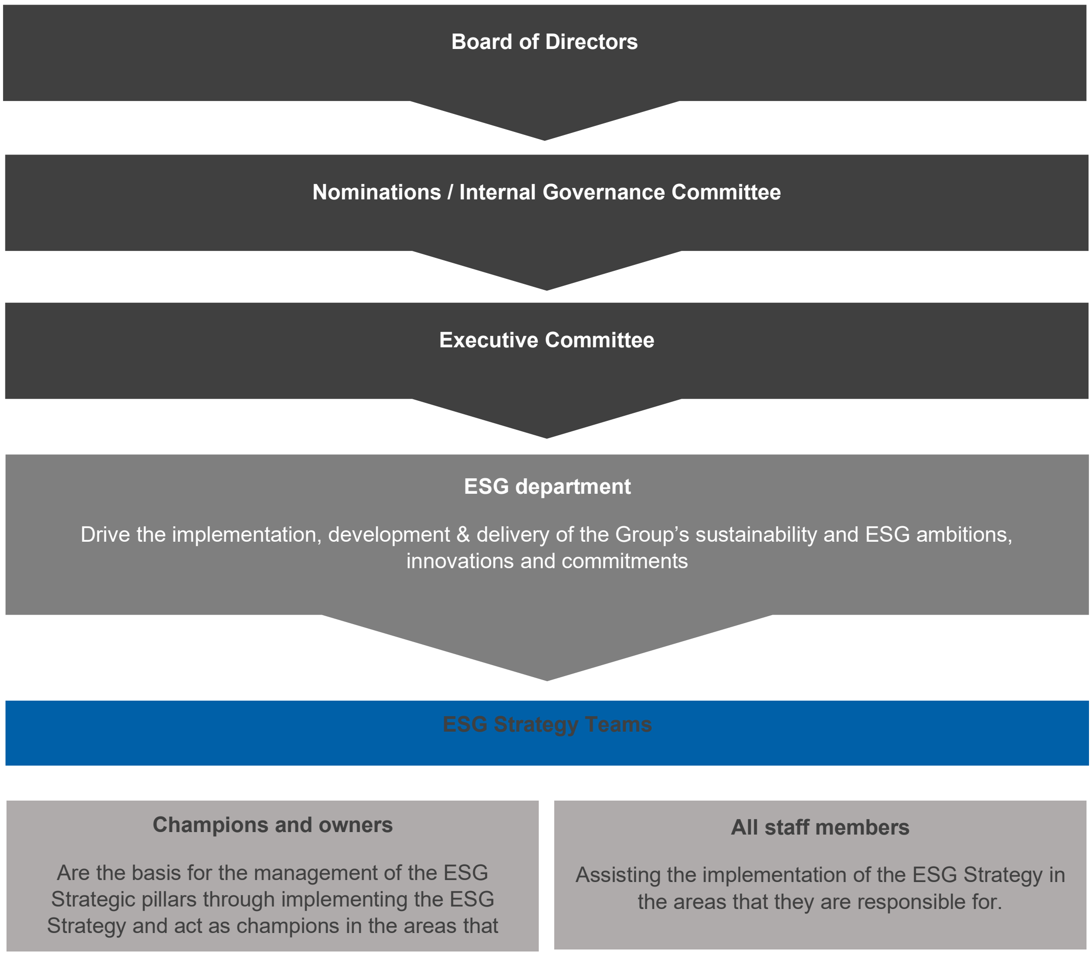
The terms of references of the relevant Board Committees mentioned above and Other Committees have been revisited and enhanced to include ESG factors. In particular, the terms of reference of these Committees include the following ESG related aspects.

Board Committees & Other Committees	Roles & Responsibilities
Board Risk Management Committee ("BRMC")	• Monitor ESG risk through the semi-annual submission and discussion of the Bank's ESG Action Plan • While reviewing relevant strategy/policies, assess whether ESG risk considerations are taken into account • Ensure ESG risk is adequately managed through the Bank's Risk Appetite Framework and through embedding ESG-related matters within the relevant risk frameworks
Board Nominations / Internal Governance Committee ("BNIGC")	• Overall responsibility for the development and implementation of the Bank's ESG Strategy with the aim of a positive impact on the stakeholders, the environment, and the society in general • Supports the BoD in overseeing and challenging actions related to the Bank's ESG Strategy • Reviews and recommends for approval by the BoD the Annual ESG Impact Report
Risk Management Committee ("RMC")	• Informed of the project status update of the ESG Action Plan on a quarterly basis or as deemed necessary • Receive an update on ESG risk related matters as deemed necessary, at least on a quarterly basis
Executive Committee ("ExCo")	• ExCo main ESG related responsibilities include the review of the ESG Strategy at the executive level, its monitoring and other ESG related initiatives/reporting (other than those addressed to the Risk Management Committee). The ESG related roles and responsibilities of each ExCo member are defined in their job description.

ESG department

The Bank established a dedicated ESG department in December 2021, which as from December 2024 reports to the Head of the CEO's office, who reports directly to the CEO. Previously the ESG department reported to the Head of Transformation, Planning & Innovation (previously Strategy & Transformation) who, under the previous structure, also reported directly to the CEO. The ESG department is responsible for the implementation of the overall strategic direction, development and delivery of the Group's sustainability and ESG ambitions, as part of the overall business model. With this setup, the Group strives to invest in sustainable development and consistently design its actions to improve its impact on environmental sustainability, social responsibility and corporate governance. The ESG department coordinates ESG efforts with Risk Management, Banking, Transformation, Planning, HR, Investors Relations, Corporate Communications & Branding and other units of the Group if need arises.

The following diagram outlines the key bodies/departments/committees within the Group, that are responsible for setting, approving, implementing and monitoring the ESG Strategy:



For the risks identified, the Group reports to the RMC and BRMC.

Currently, there are no dedicated controls and procedures in place for managing IROs, and there is no oversight regarding the setting of targets or monitoring the progress towards them. These processes will be addressed in the next planning cycle of the ESG Strategy, in alignment with Eurobank Group.

The Bank's administrative, management, and supervisory bodies ensure the availability of appropriate skills and expertise to oversee sustainability matters by allocating staff members with ESG responsibilities. These bodies possess sustainability-related expertise that is also developed via trainings and assessed during BoD evaluations, which is further strengthened through access to experts and specialised training programmes. As per the ESG Strategy, the Group has a target to provide at least one ESG training session per year to the BoD members with the content revised annually. The Group plans to align the BoD's skills and expertise related to the Group's material IROs identified as part of its integration with Eurobank Group.

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies [GOV-2]

The material IROs which result from the DMA as described in section 1.4 Impact, risk and opportunity management - Description of the process to identify and assess material impacts, risks and opportunities [ESRS 2 IRO-1], are presented to ExCo and approved by the BoD on an annual basis or when deemed necessary.

The Group does not currently conduct due diligence to assess the effectiveness of the policies, actions, metrics, and targets implemented to address the material IROs. Furthermore, it does not yet take into account the IROs when overseeing the Group's strategy, decisions on major transactions, or its risk management process. This will be evaluated in alignment with Eurobank Group.

The BRMC monitors the ESG risks through the quarterly risk monitoring and the semi-annual submission and discussion of the Bank's ESG Action Plan. It also ensures that ESG risks are effectively managed within the Bank's Risk Appetite Framework, aligning the Group's strategy.

Integration of sustainability-related performance in incentive schemes [GOV-3]

Per the Group Remuneration Policy, for the determination of the variable remuneration of the Executive Members of the Board of Directors, as applicable, the Non-Executive Members of the BoD, on the basis of the recommendations of the Board Remuneration Committee (which follows the proposal of the Board Nominations / Internal Governance Committee), consider:

(a) The Bank's consolidated results, including profitability, capital base and liquidity among other parameters, the financial conditions of the market in which these results were achieved and the risks assumed;
(b) the performance of the Executive and/or the Unit(s) under his/her responsibility and/or the consolidated performance of the Bank, bearing in mind both financial and non-financial criteria; and
(c) the long-term interests of the Group.

Although there is currently no variable remuneration plan in force for the Executive Members of the BoD, the Board of Directors may approve a payment of bonus of up to €50.000 to Executive Directors in accordance with the Group Remuneration Policy.

In addition, the Group does not factor any climate-related considerations into the remuneration of members of the BoD and its Committees.

These aspects will be evaluated in alignment with Eurobank Group.

Statement on due diligence [GOV-4]

The table below outlines how the Group implements the core elements of due diligence for people and the environment, along with their corresponding references within this Consolidated Sustainability Statement.

Core elements of Due Diligence	Paragraphs in the Consolidated Sustainability Statement
A) Embedding due diligence in governance, strategy and business model	ESRS 2 GOV-2 & SBM-3
B) Engaging with affected stakeholders in all key steps of the due diligence	ESRS 2 SBM-2 & IRO-1
C) Identifying and assessing adverse impacts	ESRS 2 SBM-3 & ESRS 2 SBM-3 disclosures under E1, E4 & E5
D) Taking actions to address those adverse impacts	E1-3 & E5-2
E) Tracking the effectiveness of these efforts and communicating	E1-5 & E1-6

Risk management and internal controls over sustainability reporting [GOV-5]

The ESG department is responsible for the preparation of the annual Consolidated Sustainability Statement.

The ESG department reviews annually the Group's IROs and performs any revisions/ amendments accordingly either through a full blown or a high-level materiality assessment following the DMA. In relation to the impact materiality, the ESG department coordinates the assessment of the impacts whereas for the financial materiality, Risk Management unit performs this assessment. Please refer to section 1.4 Impact, risk and opportunity management - Description of the process to identify and assess material impacts, risks and opportunities [IRO-1] for the DMA methodology.

Once the IROs are set, the ESG department assesses the disclosure requirements under the ESRS's and notifies the relevant stakeholders to provide their input to be included within the Consolidated Sustainability Statement. In parallel, relevant data is gathered through the Group's systems, noting that in cases where there are no systems/ automations in place, data is gathered manually by the ESG department. The ESG department reviews the input provided and drafts the Consolidated Sustainability Statement, with the support of external advisors. Once the first draft is completed, the relevant stakeholders review and provide feedback and comments. The Consolidated Sustainability Statement is also reviewed by the ESG department Manager and CSRD Steering Committee.

The CSRD Steering Committee consists of the Chief Financial Officer, Credit Risk Officer and Head of CEO's office. The approval of the final Consolidated Sustainability Statement follows the same approval process as for the Annual Financial Report of the Group, through the relevant committees: ExCo, BAC and BoD. The CSRD Steering Committee has been set up to establish direction and guidance, to make key decisions, monitor the progress of workstreams, sign-off on major deliverables and act on recommendations and assign appropriate resources

The main risks identified during the sustainability reporting process include: (a) the completeness and integrity of the data required due to the absence of system automation of all data points requested, (b) the accuracy of estimation and manual estimation of certain data points and (c) the low availability of upstream and/or downstream value chain data due to unavailability and restricted ESG data from relevant counterparties.

Mitigation actions for the above include respectively for (a) and (b) are four eyed review of data points provided and ongoing efforts to automate/ upgrade Group's systems and for (c) collection of actual ESG data from customers and vendors through relevant ESG questionnaires. In addition, regular updates of any arising issues are provided to the CSRD Steering Committee.

Limited assurance is obtained from external auditors on the Consolidated Sustainability Statement. Any issues identified as part of the limited assurance process, are communicated by the external auditors to the management and through the BAC. Specific controls are in place and include related policies and procedures in relation to the outcomes of internal and external audit reviews which include incident management and regular reporting to the Internal Audit unit of the Group.

1.3 Strategy

Strategy, business model and value chain [SBM-1]

Business model

The principal activity of the Group is the provision of a wide range of banking and financial services, which include lending, investment and insurance services, custodian and factoring services and management and disposal of properties, predominately acquired in debt satisfaction.

The Group provides its services through a large branch network and digital channels.

The Group’s primary source of capital are the funds collected in the form of deposits from the general public. These inputs are offered as outputs in the form of loans and mortgages to retail and corporate clients. The main source of revenue is the interest income from the loans and mortgages provided. Additionally, the Group earns fees and commissions from banking and insurance activities.

Value chain

The Group defines outcomes as the internal and external positive and negative consequences as a result of its business activities, products, services, and waste. It aims to use capital inputs to make a positive contribution to the development of its staff members, managing environmental impacts and contributing to society.

The upstream value chain primarily involves IT, software, and hardware providers who supply the essential technology infrastructure and equipment necessary for its operations. These providers are crucial in ensuring the availability, reliability, and security of the Group’s IT environment, which is fundamental to delivering banking services to customers and managing operational risks.

The downstream value chain is divided into two main areas: customers and investments. The customer base consists primarily of individuals and local companies , with significant exposures in the hotels and lodgings, and real estate sectors. These customers are the end-users of the Group’s financial, insurance products and services. Regarding investments, the Group holds debt securities in both listed and non-listed companies in Cyprus and abroad, primarily investing in other banks' securities and government bonds. Additionally, the Group holds equity securities in listed and non-listed companies, as well as collective investment units. The Group primarily invests in companies offering financial services, collective investment units, insurance, energy, government, and consumer industries.

These relationships with key suppliers, customers, and investment entities are integral to the Group’s value chain, ensuring the effective delivery of financial services and the management of investment portfolios.

Strategy

The Group’s strategy is to achieve sustainable growth by meeting its customers’ needs, in order to build a sustainable, low NPL bank with a minimum environmental footprint. The Group’s Strategic Plan consists of five strategic pillars: Growth, ESG, Asset Quality, Cost Optimisation and Capital & Funding.

In order to execute the Strategic Plan, the Bank is implementing a Transformation Plan with focus on driving retail sales, enhancing digital footprint and achieving efficiencies. The Bank’s transformation strategy embraces next generation technology, power of data, streamlining processes and unlocking human potential through culture change and meritocracy, with emphasis on improving the customer service.

ESG Strategy

As mentioned above, ESG is a strategic pillar of the Strategic Plan with the objective of “becoming a Net-Zero Bank and supporting customers in the transition to a low-carbon economy”. To support this strategic pillar, an ESG Strategy has been developed, which was revised and approved by the BoD in November 2023. The ESG Strategy focuses on the benefit of the Group’s stakeholders and consists of four pillars. These pillars, detailed in the following section, include specific goals and targets that demonstrate the Group’s commitment to sustainable development and the implementation of appropriate ESG practices. The ESG Strategy's implementation is supported by the ESG initiative of the Transformation Plan.

The sustainability-related goals for products and services, relate to new lending targets for the green[1] retail products and green[1] financing offered by the Bank (for more details please refer to ESRS E1 section Actions and resources in relation to climate change policies [E1-3]). Through these goals the Bank aims to support retail customers as well as legal entities, in their efforts for the green transition. The Bank assesses its significant products and/or services, as well as its key markets and customer groups, in relation to its sustainability-related goals in line with its Products & Services Policy.

Becoming a Net-Zero Bank includes both the decarbonisation of own operations as well as the decarbonisation of the Bank's portfolio. The main challenges around the implementation of the Net-Zero objective are the following:

- Decarbonisation of own operations: The Action Plan for decarbonisation of own operations has been formulated based on information and assumptions which may change. The main external factors, affecting the timely implementation of the Action Plan for decarbonisation of own operations include external temperature deviation from the Paris agreement 1,5°C temperature goal as well as delays in obtaining approvals from local authorities for the implementation of works, the connection of photovoltaics systems to the grid and reaping the respective benefits.
- Decarbonisation of portfolio: supporting customers to meet their sustainability goals is a challenging task for the Bank. This is because it involves addressing different levels of maturity within the market in combination with limited data availability and quality, as well as adhering to the demanding regulatory requirements.

The Bank aims to develop decarbonization strategies/transition pathways for specific sectors of its credit portfolio. For this purpose, the Bank will align with Eurobank Group with regards to the sectors and KPIs to be developed. The Eurobank Group has identified its priority, carbon intensive sectors, representing a significant proportion of its financed emissions, and is developing its 2030 emission reduction targets, which will also cover the Bank's portfolio. The targets will be finalised within 2025, including phased target setting up to 2050, and operationalization of its net-zero 2030 targets.

The sustainability-related goals in terms of relationships with stakeholders, relate to the Group's workforce[2] and contribution to the community. Workforce related goals include diversity targets, raising ESG awareness and enhancing employee wellbeing. Community contribution includes volunteering and charitable activities.

The sustainability related goals described above, are demonstrated in the ESG Strategy diagram below.

[1] As per the Bank's internal green lending definition, which is not EU Taxonomy aligned.

[2] As of December 31, 2024, all staff members, based on headcount, are located in Cyprus (refer to ESRS S1 section Characteristics of employees [S1-6]).

<table>
<tr><th colspan="9">ESG STRATEGY</th></tr>
<tr><td>STRATEGIC PILLARS</td><td>Pillar 1: Net-Zero Bank</td><td colspan="3">Pillar 2: Workforce of the Future</td><td colspan="2">Pillar 3: Resilience and Performance</td><td colspan="2">Pillar 4: Sustainable Ecosystem</td></tr>
<tr><td>GOALS</td><td>Become a net-zero Bank by 2050</td><td>ESG awareness</td><td>Employee wellbeing</td><td>Diversity & inclusion</td><td>Enhance frameworks and disclosures</td><td>Improve ESG performance</td><td>Support customers in their green transition and sustainable goals</td><td>Positive impact on community & environment</td></tr>
<tr><td>KPIs</td><td>Reduction of Greenhouse Gas (“GHG”) emissions in line with the Paris Agreement and EU Green Deal</td><td>ESG training</td><td>Employee wellbeing initiatives</td><td>Increase participation of diverse groups in BoD, Key function holders & direct reports to CEO and to Board Committees</td><td>Implementation of Climate and Environmental (‘CE’) risks action plan</td><td>Improve ESG rating</td><td>Increase green[3] lending</td><td>Increase charitable activities, focusing on impactful actions
Contribution of staff members in the Bank’s voluntary initiatives</td></tr>
<tr><td>KPI TARGETS</td><td>Become a net-zero Bank by 2050:
▪ 45% reduction of total scope 1 and scope 2 GHG emissions by 2030
▪ Develop decarbonisaton plan for scope 3 financed emission by 2025</td><td colspan="3">ESG awareness:
▪ 2 specialised ESG trainings in 2024
▪ 1 ESG training per year to BoD.

Employee wellbeing initiatives:
▪ Implement at least 3 employee wellbeing initiatives, related for example to mental health, physical health, work life balance until the end of 2025

Increase participation of diverse groups
▪ The Bank has set an aspirational target to have members of the under-represented gender make up 30% of the KFH of the Group, by the end of June 2026[4]
▪ Under-represented gender to represent 50% of direct reports to CEO and to Board Committees, by the end of June 2026[4]
▪ The Bank has set an aspirational target to have members of the under-represented gender make up 33% of the BoD’s non-executive members by the end of 2026[5]</td><td colspan="2">Implementation of CE risks action plan:
▪ Completion by December 2025 as per approved extension from ECB

Improve ESG rating:
▪ Obtain an improved ESG rating by 2025</td><td colspan="2">Increase green[3] lending:
▪ Green car lending at least 15% of new car lending p.a.
▪ Green mortgage at least 55% of new mortgage lending p.a.
▪ Renewable Energy lending at least €20 million in 2024

Increase charitable activities:
▪ At least 9% of the overall marketing budget p.a. is allocated to projects that contribute to society and the environment.

Contribution of staff members in voluntary initiatives:
▪ Increase in contribution of staff members in the Bank’s voluntary initiatives</td></tr>
</table>

[3] As per the Bank’s internal green lending definition, which is not EU Taxonomy aligned.
[4] Ensuring at the same time that all appointments are assessed objectively and that the best person for the position is appointed, based on individual merit, qualifications and experience.
[5] Always ensuring that all appointments are assessed on merit.

Interests and views of stakeholders [SBM-2]

The Group maintains ongoing dialogue with a broad spectrum of stakeholders, each representing diverse priorities and interests. By engaging in regular communication with them, it aims to enhance its corporate objectives, products, and services.

The Group's effort to improve and understand stakeholders, their interests and expectations is ongoing. This enables the Group to better understand its performance and track its progress against the material sustainability aspects and ESG Strategy. Overall, the stakeholders are a valuable part of the Group's supply chain and the aim is to establish long lasting relations with them.

The Group's ESG Strategy is revised annually taking into account the interests of relevant stakeholders. The ExCo and BoD are informed on the views and interest on the stakeholders through the presentation of the Double Materiality Assessment results. Please refer to section Description of the process to identify and assess material impacts, risks and opportunities [ESRS 2 IRO-1]. The Group involves the various internal stakeholders to specify the strategy, agree the targets and ensure alignment. The DMA results will be taken into account for the revision of the ESG Strategy in the context of alignment with Eurobank Group during 2025.

Stakeholder group	Form of communication/ Engagement Channels	Stakeholders' interests
Customers (Corporate & Retail)	Surveys, meetings, complaints management, media tracking, customer service	Customer data protection
		Responsible Marketing
		Quality of products and services
		Digital transformation
Shareholders / Investors	Shareholders meetings, roadshows, regulatory and non-regulatory announcements, Financial Disclosures, Non-Financial Disclosures	Financial and non-financial performance
		Corporate governance
		Risk management & transparency
Staff members	Workshops, surveys, trainings, oral and written communication, Trade Union negotiations, Internal hub, appraisals, exit interviews, meetings	Fair performance reward
		Ongoing, transparent & interactive feedback
		Safe working environment
		Professional development and education
		Equal opportunities for career development
		Freedom of association and collective bargaining

Standard setters	Supervisory dialogues (On & Off-site Meetings), Video & Teleconferences, regulations, directives, circulars	Corporate governance
		Risk management & transparency
		Financial and non-financial performance
		Compliance
Suppliers	Contracts, meetings, assessments	Corporate governance
		Risk management & transparency
		Financial and non-financial performance
		Compliance
Industry Associations	Meetings, surveys, seminars, workshops, BoD and Committees participation	Risk management & transparency
		Financial and non-financial performance
Rating Agencies	Reports, meetings, press releases	Financial and non-financial performance
Media	Media monitoring, press meetings, online and offline meetings	Announcements
		Advertising campaigns
		Social Media
Communities	Social media, press releases, press conferences, conferences, social events	Donations and sponsorships
		Volunteering
Government Agencies / Regulators	Surveys, meetings, monitoring regulations	Corporate governance
		Risk management & transparency
		Financial and non-financial performance
		Compliance
		Anti-corruption
Non-governmental organizations	Surveys, meetings, complaints management, ongoing feedback	Corporate governance
		Risk management & transparency
		Financial and non-financial performance
Nature	Surveys	Volunteering
		Donations and sponsorships

Material impacts, risks and opportunities and their interaction with strategy and business model [SBM-3]

In accordance with AR 16 ESRS 1 Appendix A, the Group has identified the following material topics to address its IROs. The Group aims to integrate these IROs in its business model and strategy.

E1 - Climate Change					
Type of Impact or Risk/Opportunity	**Value chain**	**Description**	**Short term**	**Medium term**	**Long term**
Energy					
Energy consumption					
Actual negative impact	Own Operations	Negative impacts from the Group's energy consumption related to its own operations, including the fuel consumption from fossil fuel sources and consumption of purchased electricity, heating and cooling from fossil fuels.	✓	✓	✓
Climate change mitigation					
GHG emissions (Scope 1 & 2)					
Actual negative impact	Own Operations	Impact on climate change from the Group's Scope 1 emissions generated from stationary fuel combustion, mobile fuel combustion, and fugitive emissions from the release of GHGs in anthropogenic systems and the Group's Scope 2 emissions generated from the purchased electricity.		✓	✓
GHG emissions (Scope 3 including financed emissions)					
Actual negative impact	Own Operations, Downstream & Upstream	Impact on climate change from the Bank's Scope 3 emissions relating to the activities within its value chain. These cover the categories of purchased goods and services, capital goods, fuel and energy-related activities, waste generated in operations, and employee commuting. In addition, the impact from the Bank's Scope 3 financed emissions relating to its lending portfolio is also accounted for.		✓	✓
Climate-related transition risks					

Risk	Own Operations, Upstream & Downstream	The Bank is potentially vulnerable to the event of policy changes, technological changes and/or changes in market sentiment and customer preferences, which are arising though the need of green transitioning and alignment. Transition risk drivers are mainly affecting credit risk, operational risk, market risk and investment risk of the Bank in different time horizons.	✓	✓	✓
Sustainable financing					
Opportunity	Downstream value chain	Increase of the Bank's net revenue is expected from the offering of low-carbon products/adaptation solutions and specifically from its Sustainable Financing. This includes the green loan categories: (a) renewable energy, (b) green building financing and energy efficient improvement, (c) clean transportation.	✓	✓	✓
Climate change adaptation					
Climate-related physical risks					
Risk	Own Operations, Downstream	The Bank is potentially vulnerable to the event of wildfires within the Cyprus region, while at the same time, drought, earthquakes, tsunamis, and extreme heat events are also materially affecting principal risk categories as follows: • wildfires impacting credit and operational risk • drought impacting credit risk • precipitation (changing patterns and variation) impacting credit risk • earthquake/tsunami impacting operational risk • extreme heat (temperature rise) impacting investment risk	✓	✓	✓

E4 - Biodiversity and ecosystems

Type of Impact or Risk/Opportunity	Value chain	Description	Short term	Medium term	Long term
Direct impact drivers of biodiversity loss					
Land-use change, fresh water-use change and sea-use change					
Potential negative impact	Downstream	Impacts on biodiversity from land-use change within the Bank's downstream value chain in its lending and investment portfolio based on their industry		✓	✓

E5 - Circular economy					
Type of Impact or Risk/Opportunity	**Value chain**	**Description**	**Short term**	**Medium term**	**Long term**
Waste					
Actual negative impact	Own Operations, Downstream & Upstream	Impacts on the environment from the waste mainly generated from the operations/activities of the industries in the Group's upstream value chain (including IT hardware manufacturing) and downstream value chain entities (industries in both its lending and investment portfolio). Waste is also generated from the Group's own operations (offices and branches).	✓	✓	✓

S1 - Own workforce					
Type of Impact or Risk/Opportunity	**Value chain**	**Description**	**Short term**	**Medium term**	**Long term**
Working conditions					
Adequate wages					
Actual positive impact	Own Operations	The social impacts of adequate wages on the Group's own workforce can include improved quality of life, reduced financial stress, and enhanced staff member well-being. Adequate wages can lead to improved living standards, providing staff members with the means to meet their basic needs, access healthcare, and afford education for themselves and their families.	✓	✓	
Freedom of association, the existence of works councils and the information, consultation and participation rights of workers					

Actual positive impact	Own Operations	The social impact on the Group's own workforce from the provision of freedom of associations, the existence of works councils and the information, consultation and participations rights of workers. The lack of freedom of association can restrict staff members from collectively addressing social issues within the workplace, potentially impacting staff member morale and social responsibility initiatives.	✓	✓	✓
Collective bargaining, including rate of workers covered by collective agreements					
Actual positive impact	Own Operations	The social impact on the Group's own workforce from having the ability for collective bargaining through the negotiation of fair wages, benefits, and working conditions. Collective bargaining can contribute to a more equitable and supportive work environment, positively impacting staff member well-being and overall social responsibility within the Group.	✓	✓	✓
Work-life balance					
Actual positive impact	Own Operations	The social impacts of work-life balance on the Group's own workforce can include improved mental well-being, reduced stress, and enhanced job satisfaction. A better work-life balance can lead to reduced stress and burnout among staff members, contributing to improved mental health and overall well-being.	✓		
Working time					
Actual positive impact	Own Operations	The social impacts of working time on the Group's own workforce can include significant positive effects on staff member well-being, work-life balance, and mental health. Staff members with a balanced work schedule are likely to	✓		

		experience reduced stress levels, improved mental health, and greater overall well-being. This balance allows staff members to spend quality time with their families and engage in personal interests, which can enhance their quality of life.			
Other work-related rights					
Privacy					
Risk	Own Operations	Data privacy is a key work related right that might pose key risks to the Group. These relate to breaches of personal data and may have financial (i.e. fines and other costs from legal actions against the Group), operational (disruption of operations), regulatory and reputational impacts.	✓	✓	✓
Equal treatment and opportunities for all					
Gender equality and equal pay for work of equal value					
Actual positive impact	Own Operations	The Group's impact on gender equality and equal pay for work of equal value as this can lead to a more inclusive and equitable work environment, fostering a sense of fairness, respect, and empowerment among staff members.	✓	✓	✓
Diversity					
Actual positive impact	Own Operations	The social impacts of the Group on diversity within it's own workforce as this can contribute to a more inclusive and supportive workplace culture, promoting a sense of belonging and respect among staff members. Furthermore, a diverse workforce can lead to increased collaboration and understanding, fostering a more cohesive and harmonious work environment.	✓	✓	✓

S4 - Consumers and end-users					
Type of Impact or Risk/Opportunity	**Value chain**	**Description**	**Short term**	**Medium term**	**Long term**
Information-related impacts for consumers and/or end-users					
Access to (quality) information					

Actual positive impact	Own Operations	The social impact of access to quality information is significant as it promotes transparency and fosters informed decision-making. Quality information enables individuals to make well-informed choices about their health, education, finances, and civic engagement, leading to improved well-being and empowerment.	✓	✓	✓
Privacy					
Risk	Own Operations & Value Chain	Privacy is a key information related impact for Consumers and end- is that can pose a material risk for the Bank. This risk relates to breaches of personal data and may have financial (i.e. fines and other costs from legal actions against the Bank), operational (disruption of operations), regulatory and reputational impacts	✓	✓	
Social inclusion of consumers and/or end-users					
Access to products and services					
Actual positive impact	Own Operations	The social impact of the Bank by providing access to products and services is significant as it contributes to improved quality of life, economic opportunities, and social inclusion. Access to a diverse range of products and services can lead to improved standards of living, providing individuals and communities with essential goods and resources.	✓	✓	
Responsible marketing practices					
Actual positive impact	Own Operations	Responsible marketing practices can have a positive social impact by promoting transparency, trust, and ethical consumer behavior. By providing accurate and honest information about products and services, responsible marketing practices can foster trust between businesses and consumers, leading to more informed	✓	✓	✓

		and empowered purchasing decisions.			

G1 - Business Conduct					
Type of Impact or Risk/Opportunity	**Value chain**	**Description**	**Short term**	**Medium term**	**Long term**
Corporate Culture					
Actual positive impact	Own Operations	Positive business conduct and a healthy corporate culture can contribute to staff member well-being, encourage community engagement and ethical business practices that benefit local communities. Furthermore, they can support the uphold of high ethical standards, transparency, and accountability in business operations		✓	✓
Protection of whistleblowers					
Actual positive impact	Own Operations	The protection of whistle-blowers can have an important impact by fostering a culture of transparency, accountability, and ethical conduct within organizations and society at large. It encourages individuals to come forward with information about misconduct, fraud, or unethical behavior, leading to improved corporate governance and ethical business practices. This can contribute to the creation of a more trustworthy and responsible business environment, promoting public trust and confidence in institutions.	✓	✓	✓

A number of the above IROs have been previously identified by the Group as important sustainability matters that had an effect on the Group. These were considered and included in the ESG Strategy, which is a pillar of the Group strategy which defines the key direction towards decision making and enhancement of the Group's business model. These IROs include sustainability matters such as diversity, GHG emissions, climate related risks and sustainable financing that impact both own operations as well as elements of the value chain. Certain other sustainability matters that deal with Consumers, Governance and Staff Members such as matters around information related impacts, corporate culture and working conditions affect the

Group and are considered within the overall strategy and decision making. For other sustainability matters that relate to IROs identified through the DMA exercise and which were not previously considered part of the ESG and overall strategy, such as Biodiversity and Waste, the Group will look to align with Eurobank Group and assess the anticipated effect on the strategy and incorporation into the Group's business model.

As of 31 December 2024, in relation to material risks the Bank has assessed the potential impact of CE risks on its credit risk and Expected Credit Losses ("ECL") models. After evaluation, the Bank has determined that the current impact of these risks on the Bank's credit exposures is not significant enough to warrant adjustments to ECL calculations. This decision is based on the following considerations:

- Current Exposure Assessment: The current lending portfolio is predominantly local portfolio in sectors where CE risks are assessed to be minimal in the short to medium term. Regular reviews and stress testing of the credit portfolio have shown limited sensitivity to CE risks factors under current market conditions.
- Risk Management Practices: The Bank continues to monitor CE risks as part of its broader Risk Management Framework. Any emerging risks that may affect the Bank's portfolio will be evaluated and integrated into its models as necessary.
- Rationale for Exclusion: Based on existing data and available projections, the financial impact of CE risks does not materially affect the Bank's credit risk profile or ECL estimates at this time. The Bank is committed to incorporating CE risks into the ECL models should the risk landscape change or if new regulatory guidance emerges.
- Future Considerations: The Bank remains vigilant and prepared to adapt its approach as more reliable data and methodologies for assessing CE risks become available.

In relation to opportunities, as of 31 December 2024 the Group considers that the current financial effects from Sustainable Financing are not significant.

1.4 Impact, risk and opportunity management

Description of the process to identify and assess material impacts, risks and opportunities [ESRS 2 IRO-1]

DMA methodology

The Group has developed its methodology based on the principles of ESRS per the Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023. The main objective was to identify and prioritise key topics for the Group and its stakeholders. The outcome of the DMA is to identify the material IROs of the Group.

This year, the Group prepared its Consolidated Sustainability Statement as per the NFRD requirements and in accordance with the ESRS standards. This represented a significant alteration in the reporting process compared to the previous period, which the Group compiled its sustainability report as per the NFRD requirements and in accordance with the GRI Standards. The primary distinction includes broader scope and coverage, its emphasis on double materiality, and its integration with financial reporting. Double materiality requires consideration of both the impact of the Group on the environment and society, as well as the risks and opportunities that might arise through ESG factors. These changes underscore the commitment in complying with evolving regulatory standards and enhancing the transparency and comprehensiveness of the Group's sustainability reporting.

The Group performed a double materiality assessment following the requirements of the ESRSs for the first time in July 2024. The results of the DMA exercise and the disclosure requirements of material IROs under the ESRS, highlighted areas of enhancement in terms of policies, target setting, monitoring and governance.

The double materiality process was conducted in the following stages:

1. Identification of Key Stakeholders

The Group identified all relevant affected stakeholders who's views and interests should be considered as part of the DMA exercise. For each external stakeholder group, the Group identified the relevant internal proxies that can be in a better position to assess the views and interests of such stakeholders. Internal stakeholders represented the key functional areas of the Group, in alignment with the organisational structure. In addition, the Group contacted directly a number of external stakeholders to corroborate the assessment of the material IROs. The Group will further look to enhance external stakeholders' direct input in future reporting periods.

External Stakeholder Group	Internal Proxies
Suppliers	Central Procurement Dep. | Technology & Digital | Information Security Dep.
Customers (corporate)	Banking Dep. (Corporate) | Information Security Dep.
Customers (retail)	Quality and Research dep. | Wealth Services | Data Protection Dep. | Information Security Dep. | Customer Contact Centre | Product Development | Wealth Services
Communities	ESG Dep. | Corporate, communication & Branding | Treasury & Global Markets
Staff members	HR Unit | Health & Safety Dep. | Physical Security
Nature	ESG Dep. | Technical Services | Risk Management unit | Treasury & Global Markets
Shareholders / Investors	Investor Relations Dep. | Finance Dep.
Industry Associations	CEOs office
Media	Corporate Communications & Branding
Non-governmental organizations	ESG Unit | Corporate Communications & Branding | HR Dep.
Raters & Rankers	Investor Relations | ESG Dep.
Standard setters	ESG Dep.
Government Agencies / Regulators	Compliance Dep. (Regulatory compliance) | Legal Services Dep. | Information Security Dep.

2. Identification of the IROs

To support the identification of IROs, the Group employed a list of sustainability matters provided by AR 16 within ESRS 1. Each sustainability matter was evaluated against several resources, including relevant regulations (such as Pillar-III and SFDR), SASB's industry-specific standards, international reporting standards (ISSB), the Group's ESG Impact Report of 2023 as well as against additional sources (UN Impact Radar 2022, World Economic Forum: Global Risks Report 2024, and SYNESGY Certification) and peer practices.

Impact Identification: Across each one of the sustainability matters, the Group performed an exercise to identify actual or potential, negative or positive, social or environmental impacts it might have, either directly through its own operations and/or indirectly through its value chain (either upstream or downstream) across the different time horizons as prescribed by ESRS 1.

Risk Identification: The Bank's Risk Management unit through its BAU activities has identified a number of ESG risks that the Bank might face. These have been complemented by additional risks identified that may relate to identified impacts and may pose mostly reputational risks for the Bank.

Opportunity Identification: Across the different sustainability matters, an opportunity has also been identified by the Group. This arises mainly through the changing regulatory environment as well as the green transition of the economy.

3. IRO Assessment

Across each of the Impacts, Risks and Opportunities identified, the Group has performed an assessment of the significance of each IRO. The exercise differed between Impacts and Risks & Opportunities as follows:

Impact assessment

The Group has considered the requirements of ESRS 1 on Impact Materiality and has created an impact scoring framework to assess their severity based on the following factors:

- Scale: how grave the negative impact is or how beneficial the positive impact is for people or the environment;
- Scope: how widespread the negative or positive impacts are; and
- Irremediable character: whether and to what extent the negative impacts could be remediated.

Severity was calculated as an average of scope, scale and irremediability and, where the identified impact also had a human rights impact, the severity was further multiplied by an additional factor.

In addition, for any potential impacts the Group also considered the likelihood of occurrence for such impacts with the final assessment of impacts being the product of severity and likelihood.

This framework was used by a number of internal stakeholders who acted as proxies to external stakeholders and who provided their assessment of the significance of each relevant impact.

In addition, the Group has identified a number of key external stakeholder groups for which it decided to engage directly to support validation of the internal impact assessment results. It was decided that such an external engagement required to be at a higher level (sustainability matter instead of at each impact) to ensure adequate engagement with each stakeholder through a simplified questionnaire.

Risk & Opportunity assessment

With respect to Risks and Opportunities, the Bank's Risk and ESG team were engaged to provide their assessment on the Risks and Opportunities respectively. For these assessment the Bank's existing risk management framework for magnitude and likelihood was utilized.

The ESG Risk Taxonomy, which is part of the overall Bank's Risk Taxonomy that forms the basis of the Materiality Risk Assessment ("MRA"), categorizes CE risks into physical and transition risk drivers, as well as social and governance risks. This taxonomy was aligned with the sustainability matters listed in ESRS 1 AR16 and additional matters. During this process, potential risks and opportunities associated with various sustainability matters were evaluated using the same scoring framework as the ESG Risk Taxonomy. The scoring results reflect the internal risk team's assessment of how these matters could impact the Bank' s financial performance and strategic objectives.

Similarly to the impact assessment, the Group had identified a number of key external stakeholder groups for which it decided to engage directly to support validation of the internal risk and opportunity assessment. This was also decided to be performed at a sustainability matter to ensure adequate engagement with each stakeholder through a simplified questionnaire.

DMA thresholds

The ESG department has set the materiality thresholds that indicate which sustainability matters are immaterial, impact material, financially material, or both impact and financially material.

Sustainability-related risk-assessment

The identification and assessment process of sustainability related risk drivers follows the principles embedded in the overall Bank's Risk Management Framework. Sustainability-related risks are identified and assessed based on the Bank's materiality matrix parameter dimensions and based on their materiality components are accordingly prioritized to receive appropriate management attention and handling.

Risks related to climate change and environmental degradation are identified with the support of literature on the climate-related and environmental risks that are affecting the Mediterranean region and Cyprus, as well as the expert analysis of risk owners and leading market practices. All sustainability-risks are taxonomized in the Bank's risk Library and based on their materiality are then further managed through the setting of RAS limits in accordance. In this respect, material sustainability risks are built into the RAS limit setting methodology through qualitative and/or quantitative RAS limits and statements. The evolution of Sustainability-related Risk Appetite metrics, as well as the Key Risk Indicators ("KRIs") relevant to sustainability risk drivers, is in line with the Bank's capital planning and Strategic Plan, forming the Bank's strategic targets. The Bank assesses the inherent and residual materiality of sustainability risks, following same parameters as with other risk categories. Specific controls in place are identified including related policies and procedures, incident management, stress testing and regular reporting to the management body and senior management accordingly.

Decision making process

The Planning unit leads the planning process which results in the preparation of Strategic Plan under the direction of the CEO. The planning cycle which includes the development of the ESG Strategy, takes into consideration the identified material sustainability risks. The regular planning cycle takes place annually. The previous year's approved Strategic Plan is the basis of the current year's plan and, in order to able to revise it, the Planning unit takes into account, amongst others, the revised RAS, the YTD financial performance, any internal and market developments and the Transformation Plan progress update. The Planning unit involves the various stakeholders to specify the strategy, agree the targets and ensure alignment, in order to prepare financial projections of 3-5 years.

In relation to the opportunity identified (sustainable financing), the Group has in place a Sustainable Lending Policy for the classification of loans into green and social. This policy will be revised to ensure alignment with Eurobank Group and will facilitate the reporting, monitoring and potential target setting of sustainable financing. The green[6] loan categories include renewable energy, green building financing and energy efficient improvement, and clean transportation. The social loan categories include healthcare and SME financing.

The Group considers Climate and Environmental risks, in the broader context of its ESG agenda, to be a key strategic objective.

[6] As per the Bank's internal green lending definition, which is not EU Taxonomy aligned.

For the Operational Risk, the CE risks assessment conducted covers physical risk drivers that have been identified to have an impact on the Bank's premises and operations through loss impact, continuity or reputational factors and a separate assessment on transition risks across the three pre-defined horizons. For the physical risk assessment, a quantitative assessment was performed on specific climate related physical risks based on assumptions also used for the assessment conducted for Credit Risk and a qualitative assessment for environmental related physical risks. For the transition risks assessment, a qualitative assessment was performed on 7 transition risk drivers that might give rise to operational risks and impact the operations of the Bank.

In terms of Assets & Liability Risks, the Bank assessed how CE risks affect the following risks under the ALM spectrum:

- Investment risks as these stem from the Bank's investment portfolios.
- Market risks mainly examined through Interest Rate Risk in the Banking Book (IRRBB).
- Liquidity and funding risks.

The analysis and assessment of the impact of CE risks on ALM risk categories is performed both for Transition Risk and for Physical Risk, as well as for short-term, medium-term and long-term horizons. Under ALM risks, the Bank monitors its Market risks (including Interest Rate Risk in the Banking Book), risks emanating from the Bank's investment portfolios and Liquidity and Funding risks. Within this context, the Bank leverages on CE risk related data retrieved from third parties (Moody's, Bloomberg and MSCI), which include Green House Gas Emission data, ESG assessment scores, Climate risk scores, Climate Value at Risk calculations from MSCI, etc. Furthermore, the Bank analyses its portfolio as per the Notre Dame Global Adaptation Initiative Country Index (NDG index), while also performing scenario analysis by applying the NGFS Climate scenarios and through performing additional sensitivity Analysis.

2.1 Disclosures pursuant to Taxonomy Regulation

Disclosure pursuant to Article 8 of Taxonomy regulation (Regulation 2020/852 Article 8)

The EU Taxonomy Regulation (EU) 2020/852 of the European Parliament and of the Council) was adopted in 2020 by the European Parliament and represents an important step for the EU to achieve the Paris Agreement climate neutrality goals. It sets out the criteria to establish a common classification system for sustainable economic activities. The EU Taxonomy Regulation determines whether an economic activity is environmentally sustainable and requires financial and non-financial entities subject to the Non-Financial Reporting Directive (NFRD) to disclose the alignment of their activities.

Article 8 of the Taxonomy Regulation prescribes that undertakings subject to the Non-Financial Reporting Directive (NFRD), including financial undertakings, publish to what extent their activities are associated with economic activities that qualify as environmentally sustainable under EU Taxonomy Regulation. Separate disclosures requirements and extensive criteria are in place for financial and non-financial undertakings under Article 8 of EU Taxonomy Regulation Delegated Act (Commission Delegated Regulation (EU) 2021/2178.

For the years 2021 and 2022, financial undertakings subject to NFRD were required to disclose the proportion of taxonomy-eligible and taxonomy non-eligible activities related to the environmental objectives of climate change adaptation and climate change mitigation.

In 2023, two new Delegated Acts issued by the European Commission were adopted:

- The Delegated Regulation 2023/2485, which extends the number of eligible activities in the climate change adaptation and mitigation objectives;
- The Delegated Regulation 2023/2486, which establishes the technical screening criteria for the economic activities of the remaining four environmental objectives.

For the current year, in accordance with the requirements of the EU Taxonomy Regulation and related Delegated Acts, this report includes the alignment of the Bank's activities with all six environmental objectives. However, it should be noted that the alignment data for the four additional environmental objectives presented below, rely on alignment KPIs that non-financial undertakings have chosen to report on a voluntary basis: (a) sustainable use and protection of water and marine resources, (b) transition to a circular economy, (c) pollution control and prevention and (d) protection and restoration of biodiversity and ecosystems.

This is due to the fact that non-financial undertakings, whose prior-year data forms the basis for Group's alignment calculations, are required to report alignment for these objectives starting only from their 2024 disclosures, available in 2025.

With the gradual adoption of the new CSRD by large companies, small and medium listed companies and large companies outside the EU with significant activity in the EU, the Group's KPIs are expected to improve as the number of companies subject to this new directive will increase.

Credit institutions publish the Green Asset Ratio ("GAR"), which determines the extent to which the Group's assets, lending or investments relate to taxonomy-aligned economic activities. It is the ratio of the Group's taxonomy-aligned assets to covered assets (total assets excluding exposure to sovereigns, central banks and the trading portfolio). Moreover, as required by the EU Taxonomy Regulation, to be taxonomy-aligned, activities must meet the specific taxonomy criteria and ensure that they cause no significant harm to any of the other environmental objectives ("DNSH") and meet minimum social safeguards ("MSS"). Additional KPIs are required regarding the off-balance sheet exposures and specifically for financial guarantees to financial and non-financial undertakings (FinGuar KPI) and assets under management (AuM KPI).

Integration of Taxonomy in the Group's business strategy, operating model, products and customers

The Group developed a Sustainable Lending Policy, that forms an integral part of the Credit Policy Manual and the credit assessment process. Refer to ESRS E1 section Transition plan for climate change mitigation [E1-1] for further details on this policy.

Approach for the preparation of disclosures relating to Article 8 of the Taxonomy Regulation

The preparation of mandatory disclosure in taxonomy eligibility and alignment is based on the prudential consolidation for the Group. The consolidation is in accordance with the supervisory reporting of institutions according to the Commission Implementing Regulation (EU) 2021/451 (FINREP).

The Group, upon reviewing its business activities to map Taxonomy reporting requirements with its core activities, provides the key performance indicators (KPIs) and other disclosure requirements, as laid down in the EU Taxonomy Regulation and the EU Taxonomy Regulation Delegated Act.

For 2024, credit institutions shall disclose:

- The aggregate GAR for covered on-balance sheet assets and the breakdown by environmental objective and by type of counterparty.
- The percentage of their total assets that are excluded from the numerator and the denominator of the GAR.
- A complementary ratio on the level of association with Taxonomy-aligned economic activities of off-balance sheet exposures. These exposures include financial guarantees granted by the financial institution and assets under management. As per EU Taxonomy Regulation Delegated Act, the calculation of KPIs for off-balance sheet exposures shall consider financial guarantees granted by the credit institution and assets under management for guarantee and investee non-financial undertakings. Other off-balance sheet exposures such as commitments shall be excluded from that calculation.

The application of the EU Taxonomy differs for general purpose financing and specific purpose financing (i.e. ‘known use of proceeds’).

General purpose financing

For general purpose financing, the Group uses counterparties’ reported eligibility and alignment information from the latest published taxonomy information. Specifically for corporate counterparties, the Group uses actual information that has been disclosed and collected by its counterparties reporting under NFRD.

In order to determine which companies are subject to NFRD, an assessment is carried out to determine that all of the following criteria are met: a) if the country of incorporation of the counterparty is in the EU, and b) whether the counterparty’s is either a listed company, a credit institution, or an insurance company, and c) whether the entity’s net revenue exceeds €40m or its total assets exceed €20m and d) the counterparty has over 500 employees.

The identification of counterparties subject to NFRD and counterparties not subject to NFRD has been carried based on the core banking systems as well as external information.

The Taxonomy-aligned assets present the reported alignment for exposures to non-financial companies subject to NFRD, based on the Turnover and capital expenditure (“CapEx”) KPI published by the counterparties. The Taxonomy KPI operating expenses (“OpEx”) is not used for assessing Taxonomy-aligned activities, in accordance with EU Taxonomy Regulation Delegated Act. For financial undertakings subject to NFRD, the Group’s exposures have been weighted to the counterparty’s proportion of Taxonomy-aligned assets.

Financial and non-financial undertakings that do not meet the aforementioned requirements are identified as non-subject to NFRD. Undertakings that are not required to report under the EU Taxonomy regulation (non-NFRD) are not included in the calculation of eligible and aligned assets since estimations are not allowed in mandatory reporting. Therefore, assets on the Group’s balance sheet to non-NFRD undertakings are not assessed for taxonomy eligibility.

Specific purpose financing

For specific purpose financing where the use of proceeds is known, project-specific KPIs are used in the assessment of Taxonomy-eligibility. It is noted that no sufficient information data was in place for the performance of taxonomy alignment assessment. It is noted that obtaining reliable ESG data required in order to perform the taxonomy alignment assessment is a challenging task (i.e. to perform the Technical Screening Criteria, Minimum Social Safeguard, Do No Significant Harm assessments). The Group is working towards improving the collection of ESG data from its customers and obtaining access to governmental available sources.

Other matters

The following categories were considered for taxonomy-eligibility: households, loans collateralised by residential real estate, loans granted for renovation purposes and loans granted with purpose to finance the purchase of vehicles. It is noted that no sufficient information data was in place for the performance of taxonomy alignment assessment. The Bank is also reporting its exposure to economic activities related to fossil gas and nuclear energy according to Commission Delegated Regulation (EU) 2022/1214, which amended the EU Taxonomy Delegated Act. Hence, the taxonomy-non-eligible nuclear energy related activities are included in the denominator of Bank’s key performance indicators. The Bank also uses the relevant templates included in the Delegated Act to disclose information for nuclear and fossil gas related activities.

The Bank continues its work on implementing the EU taxonomy requirements and further enhancing its reporting methodology to ensure transparency and completeness of the information disclosed as further robust information becomes available from counterparties.

Results

The Bank's total GAR based on turnover and total GAR based on CapEx, as at year-end 2024, cover the six climate-related EU environmental objectives and are presented in the summary below:

<table>
<tr><th colspan="6">Summary EU Taxonomy KPIs</th></tr>
<tr><th>€m</th><th>Gross carrying amount</th><th colspan="2">Turnover KPIs</th><th colspan="2">Capex KPIs</th></tr>
<tr><td>GAR - Covered assets in both numerator and denominator</td><td>4.379</td><td colspan="2" rowspan="2">0,2%</td><td colspan="2" rowspan="2">0,3%</td></tr>
<tr><td>Assets excluded from the numerator for GAR calculation (covered in the denominator)</td><td>6.739</td></tr>
<tr><td>Taxonomy-eligible assets</td><td></td><td>3.054</td><td>27%</td><td>3.073</td><td>28%</td></tr>
<tr><td>Taxonomy-aligned assets</td><td></td><td>25</td><td>0,2%</td><td>32</td><td>0,3%</td></tr>
<tr><td>Total GAR assets</td><td>11.118</td><td colspan="4" rowspan="2"></td></tr>
<tr><td>Total assets</td><td>18.704</td></tr>
</table>

The reported main and additional KPIs calculated on 31 December 2024 for the Group, including the reporting templates as set out in the EU Taxonomy Regulation, EU Taxonomy Regulation Delegated Act and the European Commission FAQs, are presented in Appendix C.

2.2 ESRS E1 - Climate change

2.2.1 Governance

Integration of sustainability-related performance in incentive schemes [ESRS 2 GOV-3]

Refer to ESRS 2 section Integration of sustainability-related performance in incentive schemes [GOV-3] for the relevant disclosures.

2.2.2 Strategy

Transition plan for climate change mitigation [E1-1]

ESG Strategy: Net-Zero Bank

Under Pillar 1 **"Net-Zero Bank"** of its ESG Strategy, the Group has set the goal to become net-zero by 2050 with the related KPI being the reduction of its GHG emissions in line with the Paris Agreement and EU Green Deal. The specific targets which have been set are:

- 45% reduction of total Scope 1 and Scope 2 GHG emissions by 2030;
- Development of a decarbonisation plan and pathways for Scope 3 financed emissions by 2025 refer to ESRS 2 section Strategy, business model and value chain [SBM-1]).

Action Plan for decarbonisation of own operations (Scopes 1 and 2)

During 2024 the Group underwent an exercise for the development of an Action Plan for decarbonisation of own operations (scopes 1 and 2 emissions), which resulted in a more prudent target of 45% (prior year: 55%) for 2030. The revision of target was made as the Group enhanced its action plan to reflect strategic priorities, including the acquisition of CNP Cyprus Insurance Holdings Limited. This action plan took into consideration the Group's buildings and the potential locked-in emissions of the building infrastructure. The Group did not perform a holistic qualitative or quantitative assessment of its locked-in emissions for its own operations and value chain.

For the Group's Scope 1 and Scope 2 emissions, two primary decarbonisation levers have been identified up to 2030 which is the near-term target year: energy efficiency and consumption reduction and increased use of renewable energy. Several key actions have been planned based on these levers and in alignment with the Group's emission hotspots and the scope of its GHG emission reduction target, provided under section Actions and resources in relation to climate change policies [E1-3]. Another decarbonisation lever is associated with the adoption of low Global Warming Potential ("GWP") Fluorinated greenhouse gases ("F-gases"), representing an indirect GHG emissions reduction effect. This reduction arises from the upgrade of equipment that utilize F-gases, specifically through the substitution of high-GWP F-gases with alternatives that have a significantly lower global warming potential.

For the long-term target year of 2050, additional actions have been identified under the decarbonisation levers of electrification and fuel switching. Further details on the decarbonisation levers and the related key actions are provided under section Actions and resources in relation to climate change policies [E1-3].

Sustainable Lending Policy

The Group, which reported under the provisions of Commission Delegated Regulation (EU) 2021/2139 for FY2023, developed a Sustainable Lending Policy, that forms an integral part of the Credit Policy Manual and the credit assessment process. The Bank's Sustainable Lending Policy sets out a framework for the assessment of sustainable lending and classification of credit facilities into Green and/or Social Loans. Green Loans aim to support clients for their green transition. In addition, the Bank aims to increase its green lending within targets set within ESG Strategy. The Bank also aims to improve the ESG data collection from its customers, which in turn enables better classification under the Taxonomy Regulation. It is noted that Sustainable Lending Policy will be revised to ensure alignment with Eurobank Group.

Other parameters on transition planning

Furthermore, it is stated that the Group is not excluded from EU-Paris agreement benchmarks.

As mentioned in ESRS 2 sections 1.3 Strategy and 1.4 Impact, risk and opportunity management, the Group's strategic approach towards sustainability and ESG, includes ESG integration across the Group. In this respect, ESG and the net-zero commitment, is one of the strategic pillars of the Group's Strategic Plan. In addition, the latest MRA of the Bank in regard to the ESG risks is taken into consideration during the strategic planning cycle of the Group.

Becoming a net-zero Bank is one of the pillars of the Group's ESG Strategy, and which includes specific goals and targets (refer to the Strategy section above) that reflect the Group's net-zero commitment. The Group's strategic pillar to become a net-zero Bank and the related targets that have been set are also aligned with the Group's financial planning. The Group develops an annual budget which includes activities towards achieving its strategic targets. The Group's transition planning does not currently include Scope 3 emissions. The Group aims to develop a decarbonisation plan and pathways for Scope 3 financed emissions by 2025 (refer to ESRS 2 section Strategy, business model and value chain [SBM-1]).

The ExCo has approved the Action Plan for decarbonisation of own operations which falls under the ESG Strategy Pillar 1: "Net-Zero Bank".

Actions demonstrating the Group's ongoing progress towards the implementation of its transition plan to becoming a net-zero by 2050 include:

- Implementation of its Environmental and Energy Management Policy since 2014, through which it has managed to reduce its annual electricity consumption and its Scope 2 emissions.
- Implementation of a number of green initiatives by the Group, such as thermal insulation and thermal glazing for certain buildings, installation of photovoltaics in certain buildings, and sourcing of electricity from third party vendors that produce green energy.
- Implementation of its Energy Management System("EnMS"), since the beginning of 2015, which is certified and based on the international standard ISO 50001 Energy Management, as well as the successful transition to the new requirements of the ISO 50001 standard in October 2020. The ISO 50001 EnMS is implemented throughout the Group and across all services and related buildings and provides a systematic approach towards the continuous improvement of energy performance, including efficient energy use and consumption as well as the minimization of CO_2 emissions.

Material impacts, risks and opportunities and their interaction with strategy and business model [ESRS 2 SBM-3]

The CE risks identification and assessment exercise performed by the Bank, acknowledged relevant granularity in terms of climate-related risks whereas physical risks (both acute and chronic) as well as transition risks have been identified and assessed accordingly.
In terms of physical risks, the Bank is potentially vulnerable to the event of wildfires within the Cyprus region, while at the same time, earthquakes, tsunamis and extreme heat events are also materially affecting principal risk categories through relevant transmission channels.

In terms of transition risks, the Bank is potentially vulnerable to the event of policy changes, technological changes and/or changes in market sentiment and customer preferences, which are arising though the need of green transitioning and alignment. Transition risk drivers are mainly affecting credit risk, operational risk, market risk and investment risk of the Bank in different time horizons through relevant transmission channels.

Leveraging on the work to set-out the transmission channels and causal chain analysis emanating from the CE risk map, the Bank has established the linkage with its internal projection of macro-economic drivers and has accordingly adjusted the short-term path of the key macroeconomic variables used as integral input for planning purposes. Through this process, the Bank evaluates the impact on projections for GDP, property price evolution, inflation and unemployment. In this respect, the Bank is in a position to determine a quantitative impact on IFRS9 credit loss provisions and its planned projections, incorporating CE risks, both of which are outlined as part of the Bank's strategic MRA.

Integration of CE risks with strategic planning

The Planning department initiates the annual planning process by reviewing the previous Strategic Plan and Transformation Plan, the year-to-date financial performance through the management accounts, the predetermined RAS which includes ESG limits and the Transformation Plan progress update which includes ESG initiatives.

MRA included physical and transition risks analysis for the Bank's portfolio (downstream) and own operations. The time periods considered in the Bank's CE risks identification and assessment exercises are on the basis of three pre-defined horizons: short term (1 - 4 years), medium term (5 – 9 years) and long term (10 – 27 years) as described in ESRS 2 section Disclosures in relation to specific circumstances [BP2]. Following the materiality assessment of physical and transition risks, the Bank's stress testing framework was applied, whereas any material risks had been further stressed (e.g. Internal Capital Adequacy Assessment Process ("ICAAP")/ Internal Liquidity Adequacy Assessment Process ("ILAAP")).

The Bank has performed a thorough analysis in terms of identifying and assessing possible climate-related risks. The detailed analysis performed, has demonstrated the impacts of climate change to the economy and the financial environment related to the Bank and its risk profile, while it has also provided relevant outcomes that are useful in constructing effective follow-up actions to ensure the Bank's resilience in the dynamic business environment it is operating.

This assessment has been conducted taking into consideration the fact that natural disasters considered and analysed in this assessment, may lead to an immediate contraction in economic output, a worsening of the country's balance of trade, a deterioration of fiscal balances, and an increase in poverty or income disparities. Analysis has clearly shown that climate-related risks are of a significant importance.

Following the assessment results and in order to further enhance the Bank's resilience status in terms of climate-related risks, the overall risk management process has been updated accordingly to accommodate any capital impact from climate-related risks, collateral valuations and due diligence within lending policies among others. Risk appetite is continuously enhanced to cater for relevant limits related to sustainability lending, renewable energy and carbon footprint in order to establish a clear long-term vision of pivoting the portfolio of climate risk profile away from high-risk client segments, mainly through incentivization methods, promoting and financing green transition and elevating client awareness.

Please refer to section Description of the processes to identify and assess material climate-related impacts, risks and opportunities [IRO-1] for the results of the MRA analysis.

Limitations & Uncertainties

In terms of granularity, in some assessed areas, there are some data availability limitations, preventing at some degree a definite assessment both for physical risk (e.g., exact locations of exposures) and transition risk.

Climate change is unprecedented and rather fast-moving, and there is a quite little reliance that can be placed on historical experience to assess the relevant risks' magnitude or to identify specific patterns that lead to financial impacts at the current state. For example, there are cases where the non-linearities and the probability of distribution cannot be inferred from historical data, nor proxied. In addition, most traditional pricing models neglect tail risk and incomplete markets being affected by climate change and/or environmental degradation.

The forward-looking nature of CE risks, considering their velocity of occurrence, shows that relevant impacts are expected in the medium to long term while, on the other hand, the time horizon of finance is shorter (e.g., average loan book maturities are expected in a rather shorter term than CE risks' impacts).

Moreover, when looking at CE risks' transmission channels and mechanisms, a noteworthy number of variabilities is presented as it is, for example, the geographical or sectoral heterogeneity, both exacerbating uncertainty aspects. Complexities and interrelations within transmission mechanisms provide high levels of uncertainties and/or difficulties in identification and assessment.

Nevertheless, despite of any uncertainties in place, the analysis performed has been grounded in robust data and utilizes scenario planning to evaluate potential outcomes. Through the integration of ESG risk aspects into the overall Risk Management Framework, ESG risk analysis results are cascaded to business activities through the risk appetite setting methodologies and thus business and Strategic Plan of the Bank.

2.2.3 Impact, risk and opportunity management

Description of the process to identify and assess material climate-related impacts, risks and opportunities [ESRS 2 IRO-1]

The Group has identified impact and risk and opportunity drivers on climate change (refer to ESRS 2 section Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]), as presented in the table below.

Type of Impact or Risk/Opportunity	Value chain	Time Horizon	Description
Energy			
Energy consumption			
Actual negative impact	Own operations	Short- / Medium - / Long-term	Negative impacts from the Group's energy consumption related to its own operations, including the fuel consumption from fossil fuel sources and consumption of purchased electricity, heating and cooling from fossil fuels.
Climate change mitigation			
GHG emissions (Scope 1 & 2)			
Actual negative impact	Own operations	Medium - / Long-term	Impact on climate change from the Group's Scope 1 emissions generated from stationary fuel combustion, mobile fuel combustion, and fugitive emissions from the release of GHGs in anthropogenic systems and the Group's Scope 2 emissions generated from the purchased electricity.
GHG emission (Scope 3 including financed emissions)			
Actual negative impact	Own operations Down- / Upstream value chain	Medium - / Long-term	Impact on climate change from the Bank's Scope 3 emissions relating to the activities within its value chain. Thes cover the categories of purchased goods and services, capital goods, fuel and energy-related activities, waste generated in operations, and employee commuting. In addition, the impact from the Bank's Scope 3 financed emissions relating to its lending portfolio is also accounted for.
Climate-related transition risks			
Risk	Own operations, Down- / Upstream value chain	Short- / Medium - / Long-term	The Bank is potentially vulnerable to the event of policy changes, technological changes and/or changes in market sentiment and customer preferences, which are arising though the need of green transitioning and alignment. Transition risk drivers are mainly affecting credit risk, operational risk, market risk and investment risk of the Bank in different time horizons
Sustainable financing			
Opportunity	Downstream value chain	Short- / Medium - / Long-term	Increase of the Bank's net revenue is expected from the offering of low-carbon products/adaptation solutions and specifically from its Sustainable Financing. This includes the green loan categories: (a) renewable energy, (b) green building financing and energy efficient improvement, (c) clean transportation.
Climate change adaptation			
Climate-related physical risks			
Risk	Own operations,	Short- / Medium	The Bank is potentially vulnerable to the event of wildfires within the Cyprus region, while at the

	Downstream value chain	- / Long-term	same time, drought, earthquakes, tsunamis, and extreme heat events are also materially affecting principal risk categories as follows: • wildfires impacting credit and operational risk • drought impacting credit risk • precipitation (changing patterns and variation) impacting credit risk • earthquake/tsunami impacting operational risk • extreme heat (temperature rise) impacting investment risk

Scope 1, 2 and 3 (non-financed) GHG emissions

The Group has been calculating and monitoring its greenhouse gas emissions since 2021. For all reporting years between 2021 and 2024, the Group has quantified emissions for Scopes 1, 2, and 3 (non-financed).

The Scopes 1, 2, and 3 (non-financed) GHG inventories were prepared in accordance with the requirements of ISO 14064-1:2018 Part 1: Specification with guidance at the organisation level for quantification and reporting of greenhouse gas emissions and removals.

The Group defined its organisational boundaries based on the operational control approach, considering all GHG emissions from installations and activities under its operational control. This approach was chosen so as to streamline the emission accounting process while ensuring the inclusion of emissions from all the Group's activities.

The identification of GHG emission sources associated with the organisation's operations is closely linked to the reporting boundary, developed in accordance with ISO 14064-1. Under this framework, Category 1 ("Direct GHG emissions and removals," equivalent to Scope 1 in the GHG Protocol) and Category 2 ("Indirect GHG emissions from imported energy," equivalent to Scope 2 in the GHG Protocol) are mandatory. The screening of the organisation's GHG sources for these categories identified the following sources:

- Fuel stationary combustion: Diesel for generators and boilers;
- Fuel mobile combustion: Gasoline and diesel for passenger and commercial vehicles;
- F-Gas losses: From air-conditioning systems in facilities;
- Imported electricity consumption: For buildings.

For other indirect GHG emissions, a process has been developed based on the significance criteria outlined in ISO 14064-1:2018 and explained in section Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6] below.

Financed emissions

Regarding its financed impact-related Scope 3 emissions, the Eurobank Group calculates and discloses its financed emissions (category 15) following the PCAF methodology, which is based on a revenue-based approach, with emission factors estimated for each sector and country through a multiregional input-output analysis framework, which covers the Bank's lending and investment activities (i.e. excluding Group's insurance activities). Please refer to section 2.2.4 Metrics and targets for the financed emission calculations.

Process to identify and assess climate-related risks

The time periods considered in the Bank's CE risks identification and assessment exercises are on the basis of three pre-defined horizons, short-, medium- and long-term. The definitions of these three pre-defined horizons are disclosed in ESRS 2 section Disclosures in relation to specific requirements [BP-2].

The information to follow describes the process to identify, measure and monitor activities and exposures.

(i) Risk identification

CE risks are considered as drivers of prudential risks, in particular credit risk, operational risk, market risk, liquidity risk and strategic risk and as such, they are incorporated into the overall Risk Management Framework. Following the latest performed identification and assessment exercise, the Bank has identified the physical and transition risks to which can potentially be exposed within the pre-defined time horizons. The following table shows an overview of the identified CE risk drivers, categorized in physical and transition risks.

Physical Risks	Transition Risks
Climate Risks (related to climate change) **Chronic Physical Risks** • **Sea Level Rise and Coastal Erosion** • **Temperature change (Extreme Temperatures/ Temperature variability)** • **Water Stress / Water Scarcity** • **Precipitation (Changing patterns and variability)** • **Ocean Acidity** • Atmospheric CO2 at sea surface) • **Changing Wind Patterns** **Acute Physical Risks** • Wildfire • Landslide • Heatwave • Coldwave • Drought • Heavy Rain • Wind Gust • Flood (river, urban, flash) • Heat Stress • Cyclones **Environmental Risks** (beyond climate change) **Acute Physical Risks** • Earthquake & Tsunami • Water / Marine Pollution • Biodiversity Loss	Risks are arising from measures taken towards the transition to a more sustainable, net-zero economy, which could impose increased taxes and fees for example. Key measures (related policies, regulations) that could materially impact the Bank are the below: **Climate-related Transition Risks** (related to climate change) • Zero emissions policies in construction • Waste reduction policies • Aviation Emissions reduction • Regulations to reduce Global Shipping Emissions • Regulations to reduce Emissions of Cars and Road Transport • More sustainable consumption and production patterns imposed (Manufacturing and Agriculture) **Environmental Transition Risks** (beyond climate change) • Policies on Global Biodiversity and Circular Economy • Improving Water Quality managing Marine Pollution • Sustainable management of agricultural areas and food services relevant regulations • EU targets on reducing environmental degradation from Transportation • Changes in Manufacturing parameters

Identified CE risk drivers have been further assessed to provide insights on whether the Bank can potentially be affected by the impacts of changing patterns of the climate as well as by the degradation of the environment. In terms of transition risks, it is acknowledged that those are categorised in environmental and climate-related risk drivers and are stemming from policy changes, technological changes and changes in market sentiment, which are interconnected. The table above shows the key upcoming policy changes in relation to climate and the environment, which may potentially directly or indirectly affect the economy and therefore the Bank in its operations and overall strategic planning. The impact may arise through either change imposed to emission levels, waste reduction penalties and zero emission policies in construction sector, or sustainable production rules imposed in manufacturing and agriculture, leading to the need for technological enhancements thus additional cost for companies operating in related sectors, among others.

(ii) Materiality Assessment

In line with the Bank's Risk Identification and Assessment Policy, as well as the CE risks Identification and Assessment Methodology, the identified CE risk drivers have been assessed in terms of their materiality showing that they are driving the Bank's overall business strategy and Risk Management Framework especially when considering its long-term financial interest. The results of the Material Risk Assessment are approved by the Bank's BoD, following review by the highest executive committee in the Bank, and Board-level committee, the BRMC.

Following the outcome of the Climate-related and Environmental risks assessment exercise, it is shown that the Bank can potentially be impacted by global warming which related to changing patterns of the climate as well as by the degradation of the environment through various acute and chronic hazards, together with the risks arising from the green transitioning path as below:

Material CE risk Drivers

A. Physical risks impact

In terms of physical risks, the Bank is potentially vulnerable to the event of wildfires within the Cyprus region, while at the same time, drought, earthquakes, tsunamis, and extreme heat events are also materially affecting principal risk categories through relevant transmission channels. In specific, and after assessing various physical risks, the assessment resulted to the below material physical risks:

- **Wildfire** as an acute physical risk caused by climate-change effects, is materially affecting the Bank mostly in the medium to long-term horizon (i.e., 5years and beyond) impacting credit risk and operational risk. Impact on credit risk is mostly concentrated in the Nicosia region, further showing more sensitivity in the “Wholesale and retail trade; repair of motor vehicles and motorcycles” sector. In terms of operational risk, a wildfire event can cause material damages to the Bank’s premises in Nicosia and Limassol, mainly in the long term. It is further noted that wildfire probability of occurrence and its resulted impacts can also be affected by other climate-change related physical hazards and vice-versa, such as the change in precipitation patterns (lower amounts of wet elements) and drought events which may worsen the parameters causing a wildfire.
- **Flood** as an acute physical risk caused by climate-change effects, is materially affecting the Credit Risk of the Bank in the long-term horizon (i.e. 10 years and beyond) with the greatest impact coming from collaterals in the impacting mainly collaterals concentrated in Nicosia region and more sensitivity shown in “Manufacturing” sector.
- **Earthquake/Tsunami** as acute physical risks driven by both climate change and environmental degradation are mainly impacting the operational risk of the Bank at material levels in all three term horizons. While earthquake can potentially occur across Cyprus, since Cyprus as an island is positioned on active seismogenic layer, tsunamis for which main source are the earthquakes, can mostly affect the coastal regions of Cyprus and impact the relevant Bank’s premises accordingly.
- **Extreme Heat (Temperature rise)** as an acute (and chronic) physical, climate-related, and environmental risk is mainly impacting the investment portfolio, therefore affecting the investment risk of the Bank, in the long term (i.e., 10 years and beyond). Considering its investment risk, the Bank assessed its portfolio exposures per country and industry, showing that the Bank’s portfolio is highly invested in western developed countries with a very high readiness to leverage private and public sector investment for adaptive actions and with low vulnerability to climate disruptions. In this respect, the analysis has shown that the investment portfolios’ exposures to the manufacturing sector is highly impacted in the United States and Spain, while the “Human health and social work activities” sector is mostly impacted through the Bank’s exposures in France.

B. Transition Risks Impact

In terms of transition risks, the Bank is potentially vulnerable to the event of policy changes, technological changes and/or changes in market sentiment and customer preferences, which are arising though the need of green transitioning and alignment. Transition risk drivers are mainly affecting credit risk, operational risk, market risk and investment risk of the Bank in different time horizons through relevant transmission channels as below:

- **Policy changes** (e.g., new or updated Regulations on GHG emission prices) are impacting credit risk mostly in the long-term showing high sensitivities in sectors of Manufacturing, Agriculture and Power Generation, while they present material impact on operational risk aspects in all three horizons.
- **Other technological changes** such as enhancements related to renewable energy and better insulation and/or energy conservation are materially impacting operational risk in all three term horizons assessed, while the potential changes in customer preferences and changes in the market sentiment are also affecting operational risk in all pre-defined horizons, while impacting credit risk mainly in the long term and market risk mostly in the medium term.

It is noted that at the same time, there is no negative impact shown from the current assessment in the long term for market risk (IRRBB), but there is a potential material impact in the long term for investment risk, especially driven from the manufacturing sector and geographically from the United States, France and Great Britain.

The regional impact analysis for credit risk and operational risk of the Bank has considered Cyprus as one region in terms of transition risks impacts, given that transition risk drivers are ought to be applied across EU without regional selection. Even though the transition risk assessment shows a very low impact on liquidity risk, it is noted that more sensitivity is resulting from activities of households.

(i) Material Risk Assessment ("MRA") Surveys

In line with the Risk Identification & Materiality Assessment Policy those CE risk categories which are assessed as being material within the ESG Risk Taxonomy, are ranked through relevant MRA Surveys, on the basis of pre-defined horizons of short, medium and long terms.

MRA Surveys are used to define the ranking of material risks, based on scoring derived from "Likelihood" and "Impact", among other parameters and are distributed along different groups and clusters in the Bank, covering all three lines of defence as well as executive members.

(ii) Risk Appetite Statement ("RAS")

In considering its Risk Appetite, the BoD sets limits within the Bank's Risk Capacity, expressed quantitatively through certain RAS Limits, as well as via qualitative risk appetite statements.

As part of the ESG risk monitoring, relevant environmental KRIs have been defined and the corresponding limits were set under RAS. ESG risks are captured in RAS with qualitative as well as quantitative statements limits where applicable. In case of a limit breach, escalation process to the BRMC is followed, and mitigation actions are defined.

In respect to ESG risks, the Bank has updated its RAS Dashboard during the 2024/2025 RAS Cycle, which includes the following key RAS metrics, among others:

- Collaterals with a High Wildfire impact in the short-term and no insurance
- Collaterals with a High Flood impact in the short-term and no insurance
- Green Mortgage
- Green Car Lending (Retail)
- Sectoral Financed Emissions
- Renewable Energy (New Lending)
- Number of overdue High Risk Internal Audit Findings existed at quarter-end
- Number of CE Risks Action Plan initiatives delayed (year-end)
- Number of CE Risks related actions based on ECB feedback letter (quarter-end)
- Carbon footprint - direct emissions (Scope 1 – due to heating, bank owned vehicles, air conditioning)
- Carbon footprint - indirect emissions (Scope 2 – due to electricity consumption)
- Electricity consumption (per annum)

Further to the above, qualitative analysis in the RAS was enhanced to include relevant qualitative statements for operational risks, credit risks, liquidity/funding risks, investment and market risks.

(iii) ESG risks analysis within the Bank's business environment

As part of its ongoing assessment of climate-related economic (CE) effects on the Cyprus economy, the Bank has evaluated the impact of climate scenarios within its IFRS 9 modeling framework. The ongoing work in this area aims to refine methodologies and macroeconomic scenarios, further enhancing the analysis of CE risks and their implications for the local economy in the medium and long term.

(iv) Scenario Analysis & Stress Testing

As part of the overall risk management of the Bank, scenario analysis and stress testing are both essential tools for an effective risk management, enhancing the understanding of the vulnerabilities and viability of the Bank. Stress testing as a key risk management tool, drives and informs a number of key decision-making processes across the Bank such as the Bank's RAS, ICAAP, ILAAP and Recovery Planning.

Through the latest Risk identification and assessment exercise, the Bank has identified specific CE risks as having the potential to affect the sustainability of its business model, safety and soundness, as well as specific social and governance risks. In terms of the environment, certain CE risks have been assessed as able to materially impact the Bank's overall business performance, in the short-, medium- and long-term horizons. Those risks that have been assessed as material CE risks have been stressed accordingly through independent physical and transition risk scenarios. As part of the latest risks identification and assessment, the Bank put special focus on CE physical and transition risks which are considered and accordingly addressed within the ICAAP under both Normative and Economic Perspectives, with emphasis on credit risk which represents one of the Bank's most material risk exposures, as well as other prudential risk categories accordingly.

The scenarios assessed for each risk category are outlined below:

(a) CE risks driving credit risk
During the latest CE risks identification and assessment exercise performed by the Bank utilizing June 2024 information, CE risks have been assessed based on the credit risk exposures to the loan book portfolio across the short, medium and long-term for both climate-related physical risks and transition risks. The assessment was performed the following NGFS Phase IV (published in November 2023) paths calibrated for Cyprus:

- **Orderly transition – Net-Zero 2050:** assume that climate policies are introduced early and gradually become more stringent. Physical and transition risks are relatively small. The Phase IV update of the scenarios assumes the same climate goal is reached in a shortening window of time, thus requires more and intense emission reductions going forward.
- **Disorderly transition – Delayed Transition:** explore higher transition risk due to delayed or divergent policies across countries and sectors. Assumes annual emissions do not decrease until 2030. Strong policies are needed to limit warming to below 2°C. Negative emissions are limited.
- **Hot House World – Current Policies:** assume that some climate policies are being implemented in some jurisdictions, but that globally efforts are insufficient to halt significant global warming. These scenarios pose serious physical risks.

It is noted that both the Disorderly transition and the Hot House World scenarios are high emission climate scenarios.

The assessment performed was across exposures secured by immovable property and unsecured exposures for legal entities utilising an exposure concentration or detailed bottom-up assessment of collateral based on property level addresses or customer level addresses. The assessment utilised geospatial information, considering the likelihood, magnitude and duration of hazards leveraging historical climatic databases and the three NGFS climate scenarios described above. The overall assessment was performed on 20 physical risk drivers, including a separate assessment on transition risks across the three different horizons. Out of the 20 physical risk drivers assessed, 16 relate to climate risks and 4 relate to risks beyond climate change i.e., environmental risks which were assessed through a qualitative approach utilizing quantitative inputs. The assessment results showed that Wildfire and Flood events can materially affect credit Risk of the Bank. The key impact of physical risks (which were assessed utilising geolocation information and models that utilised NASA climatologies produced by the Goddard Institute for Space Studies ("GISS") model) is a drop in collateral value of properties leading to an increase in provisions.

Additionally, for transition risk the main impact is driven by increased customer expenses or higher transition costs resulting in changes in collateral values, both of which lead to lower repayment ability and therefore increased provisions. Thus, transition risks were assessed across both non-financial corporates within the loan book, residential real estate exposures that would be impacted by transition costs. Through this assessment, it was identified that transition risks are material in the long run for non-financial corporates, whilst the credit risk impact to residential real estate exposures is immaterial.

The physical and transition risks scenario analysis was performed on the following risk drivers:

Risk Type	Risk Driver	Material
Physical - Climate	Sea Level rise/ Erosion	
	Extreme temperatures/ Heat Stress	
	Changing Temperature	
	Temperature Variability	
	Water Scarcity/ Stress	
	Changing precipitation patterns	
	Precipitation variability	
	Changing wind patterns	
	Wildfire	✓
	Flood (River, Urban, Flash)	✓
	Drought	
	Landslide	
	Heavy Rain	
	Coldwave	
	Heatwave	
	Wind gust	
Physical - Climate	Atmospheric C02 at surface	
	Ocean acidity	
	Water/ Marine pollution	
	Biodiversity	
Physical - Climate	**Policy**	✓
	Technology	
	Market Sentiment	

Under the Economic Perspective assessed within the Bank's 2025 ICAAP exercise (with a 3-year horizon), quantifiable financial impacts across physical and transition risks were utilised within the bank's capital needs utilising the Q4 2024 MRA results assuming varying results from the 3 NGFS scenarios over the long-term horizon (20-year) across Baseline and Adverse scenarios.

(b) CE risks driving operational risk

During the latest CE risks identification and assessment exercise performed by the Bank, CE risks have been assessed in terms of operational risks expected to manifest via physical damage to the Bank's properties affecting the Bank's operations through continuity, additional operational costs/losses or reputational factors. The below five scenarios have been compiled for the 2024 ICAAP exercise to address the CE risks (physical and transitional risks) identified as material during the latest MRA process. The following risk drivers examined were chosen as the ones most likely to have an impact on the Bank's operations:

ESG Operational Risk Stress Testing		
Drivers of Operational risk	**Main Stressed Scenarios**	**Key Impact**
Physical risks *(Due to acute, event driven phenomena)*	• Wildfire • Earthquake/Tsunami	• Damage to the Bank's premises (reduction of Bank properties values) • Possible Business Disruption
Transition risks	• Policy changes • Technological Changes • Changes in Market and Consumer Behavior	• Damage to Bank's reputation and creditability • Increased operational costs/losses

Climate-related and environmental risks have been assessed based on the operational risk exposure on the Bank's operations through damage to its premises for physical risks and additional operational costs/losses or reputational factors for transition risks. The relevant risks and transmission channels were identified, with each risk driver being described in detail in terms of exposure, operational risk impact and materiality. An impact assessment was performed over three-time horizons (short-, medium-, and long-term horizons) for both physical and transition risks.

Materiality assessment results for physical risks were based on a quantitative and a qualitative forward-looking assessment based on criteria described in the Bank's Materiality Matrix manual.

The quantitative assessment was based on customized models, whereby mapping of physical risk drivers with the Bank premises' locations was performed, identifying certain climate related physical risks as having an impact on tangible assets of the Bank. The impact assessment takes into consideration the likelihood of occurrence for these physical events based on Bank premises locations. The Bank further assessed the economic impact of these physical risk drivers on the Bank's owned premises affected via potential damages caused.

The qualitative assessment was based on the method used for the Risk & Control Self-Assessment ("RCSA") process, where operational risks are identified and assessed in cooperation with the relevant unit and risk champion. This assessment refers to the likelihood of the risk driver impacting the operations of the bank in the specified time horizon and not the likelihood of the risk driver hazard based on the Bank premises locations.

In this respect, physical risks stemming from "Wildfire" have been identified as material over the long-term horizon, while physical risks stemming from "Earthquake/Tsunami" have been identified as material over all time horizons (short, medium- and long-term horizons), impacting the operational risks of the Bank.

Materiality assessment results for transition risks were based on a qualitative assessment. Same approach has been followed for the physical risks' qualitative assessment. In this respect, transitions risks stemming from policy changes (e.g., new or updated regulations on GHG emission prices), technological changes and changes in customer preferences and changes in the market sentiment have been identified as materially impacting operational risk in all three term horizons assessed.

(c) CE risks driving liquidity risk

Liquidity risk from climate-related and environmental factors is expected to affect the Bank's liquidity position as a result of relevant drivers (physical and transition risks). The Bank's qualitative assessment of climate risk transmission channels for physical and transition risks, resulted in the conclusion that various risk drivers would have an impact on the Bank's liquidity position.

The below drivers examined were chosen as the ones most likely to have an impact on the Bank’s portfolio:

ESG Liquidity Risk Stress Testing		
Drivers of Liquidity Risk	**Main Stressed Scenarios**	**Key Impact**
Physical risks *(Chronic: Due to longer-term shifts in climate patterns)*	1. Extreme temperatures	• Deposit Outflows
Physical risks *(Due to acute, event driven phenomena)*	2. Floods 3. Drought and heat 4. Earthquake 5. Wildfires	
Transition risks	6. Policy changes 7. Technological changes	• Impact through exposures in Corporate Bonds

(d) CE risks driving market & investment risk

As part of the latest CE risk identification, CE risks have been assessed in relation to Investment portfolio risks. The analysis and assessment of the impact of CE risks on the Investment Portfolio are performed both for transition risk and for physical risk, as well as for short-term, medium-term and long-term horizons.

More importantly, the Bank leverages on CE risk related data retrieved from third parties (Moody’s, Bloomberg and MSCI), which include green-house gas emission data, ESG assessment scores, climate risk scores, climate Value-at-Risk (“VaR”) calculations from MSCI, etc. Furthermore, the Bank analyses its portfolio as per the Notre Dame Global Adaptation Initiative Country Index (NDG index), while also performing scenario analysis by applying the NGFS Climate scenarios and through performing additional sensitivity analysis.

More specifically, the Bank assesses the impact and materiality of CE risks on the Bank’s investment portfolios, analysing the shocks and impact on exposures without taking into consideration any diversification benefits. The Bank’s investment portfolios include Treasury’s portfolios, the Asset Managers’ portfolios of BB EUR corporate bonds and the International Syndicated Lending portfolio of EUR Leveraged Loans.

The CE risk drivers for physical and transition risks as affecting the risks stemming from the Bank’s Investment portfolio are summarised in the table below and are assessed for short-term, medium-term and long-term horizons.

Analysis of CE Risk for the Bank's Investment portfolios		
CE risks	**CE Risk drivers**	
Physical risks	**Chronic physical risks**	Extreme Cold
		Extreme Heat
		Wind Gusts
		Heavy Snowfall
		Heavy Precipitation
	Acute physical risks	Tropical Cyclones
		Coastal Flooding
		Fluvial Flooding
		River Low Flow
		Wildfires
Transition risks	**Policy risk**	Emissions Reduction costs (Scope 1)

		Electricity pass-through cost (Scope 2)
		Value-chain Impact (Scope 3)
	Technology opportunities	Clean-tech revenues
		Patents deliver deep insights into R&D investments

The qualitative assessment was based on the Climate VaR model, which provides forward-looking analysis on how climate change could affect company valuations. The assessment results indicated that only the long-term transition risk could materially impact the unrealized loss of the Bank's investment portfolio under the Materiality Matrix portfolio approach.

Under the Economic Perspective assessed within the Bank's 2024 ICAAP exercise, the Bank calculates CE risks for its investment portfolios using a Climate VaR analysis. This analysis evaluates the impact from the NGFS and IPCC scenarios on the Bank's investment portfolios for transition (policy risk and technology opportunities) and physical risks. Taking into consideration the 3-year period of the ICAAP and the remaining maturity of the Bank's investment portfolios, Capital needs for CE risks are assessed using the Medium-Term Climate VaR which extends to 2030.

In terms of the Consolidated Financial Statements, it is noted that these do not include any climate-related assumptions in connection with the aforementioned climate change scenarios.

Policies related to climate change mitigation and adaptation [E1-2]

Policy to address impacts related to climate change mitigation

The Group maintains the "Environmental and Energy Management Policy Statement" according to the provisions of the ISO 50001 standard. By strategically optimizing energy consumption across its operations, the Group mitigates its adverse contribution to the global GHG emissions. Its scope covers all the Group's activities and premises and is based on the following basic principles:

- To incorporate in its strategies, policies and practices, measures aiming at the improvement and energy performance, by applying this policy in its daily operation and the choices made.
- To abide, to all relevant and other legislation which relates to energy management.
- To demonstrate leadership and commitment in energy management matters.
- To achieve continuous improvement in its energy performance via providing a framework for setting and reviewing objectives and energy targets.
- To set and review objectives and goals, through a documented and holistic approach, and secure the resources and data required to achieve them.

In addition, to ensure that its EnMS is effectively implemented, the Group has established an Energy Management Strategy based on specific energy management strategic priorities, guided by the Group's EnMS governance:

- Reduce the electricity consumption;
- Reduce GHG emissions from its operations (Scope 1 and Scope 2);
- Improve staff members' awareness and culture in relation to energy consumption and contribute to the Group's commitment to sustainability.

This framework provides a structured approach to optimising energy management practices across the Group's operations. By focusing on these priorities and adhering to EnMS governance, the Group aims to achieve significant improvements in energy efficiency and manage its energy consumption effectively. Each year, the Group undertakes a thorough analysis of the internal and external environmental factors concerning the EnMS. This commitment aligns with the Group's ambition to achieve net-zero emissions by 2050 and reduce GHG emissions in line with the Paris Agreement and the EU Green Deal.

Within the framework of the Group's EnMS, the areas of energy efficiency and renewable energy deployment respectively, are addressed through a number of actions detailed under section Actions and resources in relation to climate change policies [E1-3]. The energy consumption is monitored and reported during the ESG Strategy monitoring process, and through the EnMS processes.

The Bank has in place the following ESG risk policies that cover transition and physical CE risks which relate to climate change mitigation and climate change adaptation risks respectively:

- ESG Risks policy sets out the framework for the effective management and monitoring of the Group's ESG risks, including the relevant governance arrangements and control mechanisms, as well as the key parameters of Climate-related and Environmental risks
- Credit Policy manual considers CE risks in all relevant stages of the credit-granting processes, with CE risks affecting the borrower's credit profile
- Property valuations policy includes a section on ESG assessment, setting the ESG considerations and their potential impact on property value which include CE risks (such as EPC, use of renewable energy)
- Hellenic Bank Investment Framework ("HBIF") includes a section on ESG Guidelines which covers environmental/ CE risks, which specify prohibited sectors and activities of counterparties, essentially imposing zero limits/ tolerances that need to be adhered to for the Bank's investment portfolios. Furthermore, it includes a guidance for monitoring CE risks for investment activities through set CE KRIs, noting that these are regularly monitored.

Policy to address risks related to climate change adaptation (physical risks)

The Bank considers ESG matters to be of material importance and inherent in its activities, especially in regard to its regulatory obligations, its conduct, the reputational consequences and legal liabilities. To this end, the Bank is committed to set the appropriate culture, governance and processes to manage ESG associated risks in an effective way, in line with the Bank's RAF and its strategic objectives.

The Bank implemented an ESG Risk Policy that provides relevant principles and applicable requirements for ensuring that the Bank uses environmentally sustainable and socially responsible practices across its operations, including implementing appropriate governance and culture. Per the principles of the ESG Risk Policy, the Bank provides CE risks awareness training to members of the BoD to ensure BoD commitment and aspirations are aligned with the Bank's CE risks culture and to ensure Board knowledge on CE risks related issues is up to date and also provides ESG related trainings to staff members. Additionally, the ESG induction training and the ESG eLearning course launched in 2023, are available to all new hires.

CE risks have been embedded into the Bank's overall Risk Management Framework accommodating any updates towards the climate change adaptation and green transitioning. In this respect all relevant documentation has been aligned incorporating CE risks identification, assessment and management. The RAS/RAF, ERMF, MRA, and Stress Testing Policy among others, include CE risks identification, materiality assessment and overall risk management provisions in the Bank.

Please refer to ESG risks policies above which cover climate change adaptation as well.

Actions and resources in relation to climate change policies [E1-3]

Actions relating to climate change mitigation

In alignment with its ESG strategic pillar "Net-Zero Bank", the Group has set a target for a 45% reduction of Scopes 1 and 2 GHG emissions by 2030. The Bank also aims to develop decarbonization strategies/transition pathways for specific sectors of its credit portfolio (refer to ESRS 2 section 1.3 Strategy).

Within this context, a number of actions/initiatives are being implemented by the Group in relation to climate change mitigation:

- Implementation of its Environmental and Energy Management Policy since 2014, through which it has managed to reduce its annual electricity consumption and its Scope 2 GHG emissions.
- Implementation of the ISO 50001 standard since 2015 with a transition to the new standard requirements in 2020. The Group's Energy Management System which is based on the ISO 50001 standard, is implemented throughout all services and related buildings of the Group and provides a systematic approach towards the continuous improvement of energy performance, including efficient energy use and consumption as well as the minimization of GHG emissions.
- Establishment of an energy management team across the Group.
- Completion and updating of Energy audits for buildings and vehicles of the Group.
- Design of all new and/or renovated branches and offices with energy saving specifications established by the Group. Examples are energy efficient equipment, facility energy upgrades (e.g. double glazing, insulated walls) and replacement of existing lighting with new energy efficient lighting.
- Use of parameters and selection criteria such as energy efficiency considerations to evaluate the proposals regarding the offered services/equipment/machinery.
- Implementation of training programs which include modules in energy management.
- An induction training course on energy matters, is also available to all staff members, on the Group's internal portal.
- Installation of photovoltaics on roof tops of the Group's buildings.
- Sourcing of electricity from third party vendors that produce green energy.
- Implementation of a procedure for the assessment and identification of the energy uses. Through these procedures the following areas have been identified as the most significant in reference to energy usage: (a) lighting, (b) heating/cooling/fresh air and ventilation, (c) servers/ data-rooms, (d) personal computers and other electrical appliances.
- Identification of opportunities to enhance energy efficiency through the rigorous monitoring, analysis, and adaptation and continuous pursuit of smarter energy usage across all activities.

In relation to its energy management, the Group has allocated internal resources to support the implementation of its action plans and objectives. All EnMS-related actions are integrated into the Technical Services ("TS") Unit's budgets, ensuring a cohesive approach to achieving energy management goals. The following energy management governance structure is implemented across the Group:

- The management representative of the Group has the overall responsibility for the EnMS;
- The energy manager has the operational and technical responsibility for the implementation of the EnMS;
- The Group Energy Committee approves the Energy Management Strategy of the Group, sets the energy targets, provides the necessary resources to meet energy targets, and oversees the effective implementation of the EnMS;
- The District Energy Committees assist in the effective implementation of the EnMS, communicate the policies across the Group and promote energy culture.

The key climate mitigation actions for the near term (2030) are categorized into two primary decarbonisation levers: energy efficiency and consumption reduction and increased use of renewable energy. These initiatives align with the organisation's emission hotspots and the scope of its target (Scope 1 and Scope 2).

Actions under the "use of renewable energy" lever involve the installation of photovoltaic systems on rooftops and parking areas. The Group has installed photovoltaics in several buildings during the reporting period, in addition to those referenced in the previous year's report. Specifically:

- Installation of photovoltaics in 2 buildings with expected capacity of 220.000 kWh/year was connected to the grid (end of April 2024);
- Installation of photovoltaics in 5 buildings with expected capacity of 242.000 kWh/year (expected connection to the grid by the second quarter of 2025).

Meanwhile, the "energy efficiency and consumption reduction" lever encompasses a wider range of initiatives, including:

- Enhancing insulation (e.g., walls, roofs, etc.);
- Replacing windows with more energy-efficient alternatives;
- Upgrading air conditioning systems;
- Installing energy management systems;
- Replacing old chillers with more efficient models;
- Installing advanced heat pumps;
- Automated Lighting Systems.

A secondary decarbonisation lever is associated with the adoption of low-GWP F-gases, representing an indirect GHG emissions reduction effect. This reduction arises from the upgrade of equipment that utilizes F-gases, specifically through the substitution of high GWP F-gases with alternatives that have a significantly lower global warming potential.

For the long-term target year of 2050, additional actions have been identified under the decarbonisation levers of electrification and fuel switching. These actions include:

- Replacing boilers to eliminate the use of conventional fuels for heating purposes;
- Upgrading the fleet by transitioning from conventional vehicles to electric alternatives, including Battery Electric Vehicles and/or Fuel Cell Electric Vehicles.

The Group achieved the following in 2024:

- Reduction of total electricity energy consumption approximately 21% (total kWh) against the baseline (year 2021).
- Year-on-year reduction of 55% for Scope 1 and 13% for Scope 2 emissions
- Generation of 208,44 MWh of renewable energy in 2024 (from the photovoltaics installed on roof tops of 6 buildings), which corresponds to 2,4% of total electricity consumption consumed by the Group. The Group is in process of installing additional photovoltaic systems in 2 buildings, with 60.000 kWh capacity and expected completion by the end of 2025.
- Sourcing of electricity from third party vendors that produce green energy: 39,8% of the Group’s total electricity consumption is sourced from suppliers with higher renewable energy mix.
- Completion and update of Energy audits for buildings and vehicles of the Group in 2022. New energy audits are scheduled for 2026.
- The Group is in process to install photovoltaic systems on the rooftop of parking places in 2 buildings.

<u>Expected GHG emission reductions</u>

The expected GHG emission reductions are a 45% reduction of the total GHG emissions by 2030.

The CapEx and OpEx monetary amounts required for the implementation of the Group’s current and planned climate change mitigation actions (including energy efficiency and renewable energy deployment actions) have been assessed as not significant and are therefore, not disclosed.

Actions relating to climate change adaptation

In alignment with its ESG Strategic Pillar "Sustainable Ecosystem" aiming at the support of its customers and investors in their green transition, the Bank has been offering the following green lending[7] products:

- "Green Home" loan for the purchase, construction of energy- efficient homes, including the renovation/ energy upgrade of existing homes.
- "Green Car" for the purchase of new electric or hybrid cars.
- Green Loan for Home Improvement: a loan designed for anyone planning to upgrade and improve their home's energy efficiency by investing in energy-efficient appliances, solar panels and more.
- Business Green Loan covering financing for renewable energy deployment, and implementation of energy efficiency upgrades.

In addition, the Group has in place a Sustainable Lending Policy for the classification of loans into green and social. This policy will be revised to ensure alignment with Eurobank Group and will facilitate the reporting, monitoring and potential target setting of sustainable financing. The green[7] loan categories include renewable energy, green building financing and energy efficient improvement, and clean transportation.

2.2.4 Metrics and targets

Targets related to climate change mitigation and adaptation [E1-4]

Group tracks the effectiveness of its ESG Strategy and related policies through a number of KPI targets which cover its ESG Strategic Pillars. These include targets related to climate change mitigation and adaptation. During 2024 the Group underwent an exercise for the development of an Action Plan for decarbonisation of own operations (scopes 1 and 2 emissions), which resulted in a more prudent target of 45% (prior year: 55%) for 2030. The Bank also aims to develop decarbonization strategies/transition pathways for specific sectors of its credit portfolio. Refer to ESRS 2 section Strategy, business model and value chain [SBM-1] and E1 section Transition plan for climate change mitigation [E1-1] for further information.

GHG Emission Reduction Targets 2030

The specific reduction targets that have been set for Scope 1 and 2 GHG emissions (own operations) are as follows:

	GHG Emission target 2030	Amount - Absolute value of total greenhouse GHG emissions reduction (in tonnes of carbon dioxide equivalent ("CO_2e")	Percentage of total GHG emissions reduction (as of emissions of base year)	Intensity value of GHG Emissions reduction (where relevant)
Scope 1	918	183	4%	n/a
Scope 2	4.109	3.932	96%	n/a

For the setting of the targets, the Group defined its organisational boundaries based on the operational control approach, considering all GHG emissions from installations and activities under its operational control. This approach was chosen so as to streamline the emission accounting process while ensuring the inclusion of emissions from all the Group's activities.

All sources from Scope 1 and Scope 2 that the Group has operational control over, are included in the target boundary. As a result, the targets set are combined for Scope 1 and Scope 2

[7] As per the Bank's internal green lending definition, which is not EU Taxonomy aligned.

emissions. The target boundary diverges from the GHG emissions reporting boundary as Scope 3 emissions are excluded.

The GHG emission reduction targets are gross, meaning that no GHG removals, carbon credits, or avoided emissions are included as a means of achieving the GHG emission reduction target.

The emissions included in the targets for Scope 1 and Scope 2 emissions cover the following categories:

- Fuel combustion (diesel) in generators (stationary combustion);
- Fuel combustion (diesel) for heating purposes (stationary combustion);
- Fuel combustion (gasoline/diesel) in passenger and commercial vehicles (mobile combustion) owned or controlled by the Group;
- Fugitive emissions from air-conditioning systems in facilities;
- Imported electricity consumption.

The Scope 2 GHG emissions included in the target have been calculated using the location-based method.
The GHGs covered are: CO_2 (carbon dioxide), CH_4 (methane), N_2O (nitrous oxide), and the hydrofluorocarbon ("HFC") group.

Regarding the short-term target, the base year selected for the Group's Action Plan for decarbonisation of own operations for the goal period 2024-2030, is 2021 with 9.142 tn CO_2e for Scope 1 and Scope 2. To foster comparability, the base year selected does not precede the first reporting year of the target period by longer than three years.

The Group's commitment to reducing greenhouse gas emissions for Scope 1 and Scope 2 is aligned with the Science Based Targets initiative ("SBTi") recommended Absolute Contraction approach. The near-term reduction target of 42,29% by 2030, based on 2021 levels, matches SBTi's guidance for achieving the 1,5°C target. This results into allowable emissions for the year 2030 equal to 5.276 tn CO_2e.

The Group, through careful assessment of future developments, engagement of the relevant internal stakeholders and available mitigation measures has set a 2030 reduction target equal to 45% compared to 2021 levels for Scope 1 and Scope 2. The Group's decision to adopt a more ambitious target of 45% by 2030, resulting in allowable emissions of 5.027 tn CO_2e, underscores its dedication to exceeding baseline requirements.

In relation to external factors that may influence GHG emission levels, the maximum and minimum temperatures for the years 2021, 2022, and 2023 have been analysed. Based on official data provided by the Department of Meteorology, Ministry of Agriculture, Rural Development and Environment, there are no significant temperature anomalies in the selected baseline year that could affect the representativeness of the baseline value used to measure progress towards the target. For the period 2030-2050, the base year its updated after every 5-year period thereafter (2030, 2035, etc).

The Group integrates a forward-looking approach in its target-setting process and determination of its decarbonisation levers to ensure alignment with the climate scenario compatible with limiting global warming to 1,5°C. This approach encompasses operational, structural, and national energy considerations (environmental and policy-related developments) to establish realistic and robust emissions reduction pathways:

- Operational Changes: The Group focuses on facility management optimisations to reduce direct Scope 1 and indirect Scope 2 emissions. These adjustments are not only cost-effective but also align with short-term decarbonisation requirements and near-term milestones of a 1,5°C pathway.
- Strategic Acquisitions: The inclusion of emissions from strategic acquisitions, such as CNP Cyprus Insurance Holdings Limited starting in 2025, reflects the Group's anticipation of future structural and organisational impacts on its carbon footprint. This ensures that its targets are comprehensive, accounting for the complexities of growth and integration within a dynamic economic and regulatory environment. The forward-looking integration

of acquisition impacts ensures the Group remains within the carbon budgets consistent with such scenarios.

- National Energy Mix: The Group considers the projections outlined in Cyprus's updated National Energy and Climate Plan (NECP) for 2021–2030. The plan includes anticipated shifts in the national energy landscape, such as increased renewable energy adoption and the implementation of decarbonisation policies. By aligning its targets with these national strategies, the Group ensures its scenario planning reflects realistic trajectories in energy production and consumption. The integration of these systemic changes into its modelling demonstrates the Group's readiness to adapt to climate scenarios that prioritize renewable energy transitions and policy-driven emissions reductions.

The overall contribution to the achievement of the Group's GHG emission reduction targets per decarbonisation lever, is provided in the table below.

	Base Year 2021	**2030 target**	**Scope 1**	**Scope 2**
GHG Emissions (tn CO_2e)	9.142	5.027	918	4.109
Energy efficiency/consumption reduction		(2.197)		(2.197)
Use of renewable energy		(1.734)		(1.734)
Low GWP F-Gases		(183)	(183)	

For the long-term science-based target compatible with the limiting of global warming to 1,5°C, the minimum reduction is 90% by 2050 compared to 2021 levels in accordance with SBTi for Scope 1 and Scope 2 emissions, calculated using operational control boundaries. Scope 3 emissions are not included in the current assessment or target framework. The reduction target has been translated into four interim targets for the years 2035, 2040, 2045 and 2050 with different base years – 2030, 2035, 2040 and 2045, respectively. However, these targets have not been externally assured or validated by the SBTi.

After achieving approximately 90% reduction in Scope 1 and Scope 2 emissions, the remaining residual emissions could be neutralized through the following mechanisms:

- Renewable Energy Investments: Further enhancements in renewable energy procurement to ensure 100% clean energy usage and additional grid decarbonisation support.
- High-Quality Carbon Credits: Use of certified removal-based carbon credits.

Recognizing the uncertainties inherent in such an ambitious long-term plan, the Group will conduct a more detailed design phase before the end of the near-term goal period (2024–2030). This plan will be reviewed and updated every five years to ensure alignment with evolving best practices, technologies, and regulatory developments.

The Action Plan for decarbonisation of own operations will be monitored on quarterly basis as part of the ESG Strategy monitoring process. The actual scopes 1 and 2 emissions are reported under the section Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6].

In relation to climate change adaptation, it is stated that specific strategic targets have been set by the Bank for the increase of green lending under the ESG Strategy. Refer to the ESG Strategy under ESRS 2 section Strategy, business model and value chain [SBM-1] for the specific targets.

Energy consumption and mix [E1-5]

In 2023, the Group introduced sourcing of electricity from third party vendors that produce green energy: 39,8% of the Group's 2024 consumption is through such vendors out of which 16,97% is sourced through renewable energy. As a result, the share of renewable sources is 16,6% of the total energy consumption (fossil fuels and electricity). The consumption of purchased electricity from renewable sources for 2024 was 1.449 MWh.

The renewable energy generated was 208,44 MWh in 2024 (from the photovoltaics installed on roof tops of 6 buildings), which corresponds to 2,4% of total electricity consumption consumed by the Group.

The Group's energy consumption and mix from January to December 2024 is as follows:

Energy Consumption and Mix	2024
Fuel consumption from coal and coal products (MWh)	n/a
Fuel consumption from crude oil and petroleum products (MWh)	1.230
Fuel consumption from natural gas (MWh)	n/a
Fuel consumption from other fossil sources (MWh)	n/a
Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	7.091
Total fossil energy consumption (MWh)	**8.321**
Share of fossil sources in total energy consumption (%)	**83,4%**
Consumption from nuclear sources (MWh)	n/a
Share of consumption from nuclear sources in total energy consumption (%)	**n/a**
Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)	n/a
Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	1.449
The consumption of self-generated non-fuel renewable energy (MWh)	208
Total renewable energy consumption (MWh)	**1.657**
Share of renewable sources in total energy consumption (%)	**16,6%**
Total energy consumption (MWh)	**9.978**

Gross Scopes 1, 2, 3 and Total GHG emissions [E1-6]

Scope 1, 2 and 3 GHG emissions

The emissions disclosed below concern the emissions of the Group:

	Actual		Milestones and target years		
	Base year[8]: 2021	**2024**	**2025**	**2030**	**2050**
Scope 1 GHG Emissions					
Gross Scope 1 GHG emissions (tCO_2e)	**1.521**	**491**	**1.093**	**918**	**0**
Scope 2 GHG Emissions					
Gross location-based Scope 2 GHG emissions (tCO_2e)	**7.622**	**5.387**	**5.718**	**4.109**	**914**
Scope 3 GHG Emissions					
Total Gross indirect (Scope 3) GHG emissions (tCO_2e)	**n/a**	**2.355.211**	**n/a**	**n/a**	**n/a**
Purchased goods and services	n/a	22.312	n/a	n/a	n/a
Capital goods	n/a	5.603	n/a	n/a	n/a
Fuel and energy-related	n/a	1.481	n/a	n/a	n/a
Waste generated in operations	n/a	7	n/a	n/a	n/a
Employee commuting	n/a	1.795	n/a	n/a	n/a
Investments (Bank's financed emissions excl. insurance activities)	n/a	2.324.013	n/a	n/a	n/a
Total GHG Emissions					
Total GHG emissions (location-based) (tCO_2e)	**9.143**	**2.361.089**	**6.811**	**5.027**	**914**

The following gases and source types were accounted for each scope, as per the data provided above:

	GHG Category (CO_2, CH_4, N_2O, HFCs, PFCs, SF_6, NF_3, and other GHG considered)	**Source type stationary combustion, mobile combustion, process emissions and fugitive emissions)**
Scope 1	CO_2, CH_4, N_2O, HFCs	• Stationary combustion • Mobile combustion • Fugitive emissions from the release of GHGs in anthropogenic systems
Scope 2	CO_2, CH_4, N_2O	• Imported electricity

[8] Base year and targets set for Scopes 1 and 2 of own operations.

Scope 3	CO_2e	• Purchased goods and services • Capital goods • Fuel and energy-related activities • Waste generated in operations • Employee commuting
Total	**CO_2e**	

In the sections to follow, the methodology applied for the calculation of each GHG emissions scope category, is provided.

<u>Scope 1 GHG emissions</u>

The amount of each GHG calculated based on the equation below is multiplied by the GWP of each GHG to convert them all to carbon dioxide equivalent.

$$\text{Emissions}_{GHG} = \text{Activity Data} \times \text{Emission Factor}_{GHG}$$

The quantification approaches chosen are either defined in the National Inventory Report of Cyprus or are recognised international practices.

Stationary Combustion

- Methodology from National Inventory Report of Cyprus
- Activity Based Method
- Emissions $_{GHG}$ = Activity Data (fuel consumption) x Lower Calorific Value x Emission Factor $_{GHG}$ x Oxidation Factor
- Emissions CO_2e = Σ_{GHG} (Emissions $_{GHG}$ x GWP $_{GHG}$)
- Emission factors from: National Inventory Report

Mobile Combustion

- Methodology from National Inventory Report of Cyprus
- Activity Based Method
- Emissions $_{GHG}$ = Activity Data (fuel consumption) x Lower Calorific Value x Emission Factor $_{GHG}$ x Oxidation Factor
- Emissions CO_2e = Σ_{GHG} (Emissions $_{GHG}$ x GWP_{GHG})
- Emission factors from: National Inventory Report

F-Gases

- Fugitive emissions of GHGs, particularly fluorinated gases (F-gases) from air conditioning and refrigeration systems, are tracked using reports from maintenance companies detailing any leakages identified during the annual service cycle.
- Emissions CO_2e = $\Sigma_{f\text{-}gas}$ (Emissions $_{f\text{-}gas}$ x GWP_{GHG})

Fuel	**Emission Factor (t GHG / TJ)**		
	CO_2	**CH_4**	**N_2O**
Diesel (Stationary)	74,1	0,0100	0,0006
Diesel (Mobile)	74,6	0,0001	0,0029
Gasoline (Mobile)	72,3	0,0061	0,0006

The calculations are performed in a custom-made excel spreadsheet.

The GWPs used to calculate CO_2e emissions of non-CO_2 gases are as follows:

GHG	GWP Value	Time period	Source
CO_2	1	100-years	IPCC AR6
CH_4	27,9	100-years	IPCC AR6
N_2O	273	100-years	IPCC AR6
R-422A	3.359	100-years	IPCC AR6
R-407C	1.908	100-years	IPCC AR6
R-410A	2.256	100-years	IPCC AR6
R-32	771	100-years	IPCC AR6

Scope 2 GHG emissions

It is stated that the Group calculates its Scope 2 GHG emissions using the location-based accounting method only. The Group does not calculate market-based Scope 2 GHG emissions, as no electricity has been purchased with instruments such as Guarantees of Origin or Renewable Energy Certificates to date.

Scope 3 GHG emissions

While primary data is used for Scope 3 emissions, sector-average emission factors dominate calculations with the exemption "Emissions from employee commuting". Based on this approach, approximately 6% of Scope 3 emissions are calculated using primary data. More specifically:

Upstream emissions

- **Emissions from employee commuting:**
  - Activity Data: Primary data from the Group - number of staff members and their work-home district categorization.
  - Emission Factors: National Inventory Report (country-specific).
  - Specific Activity Input: Inputs are activity-specific to employee commuting.

- **Emissions from purchased goods:**
  - Activity Data: Primary data from the Group - amount spent.
  - Emission Factors: Sector-average emission factors.
  - Specific Activity Input: Partially - activity data exists (spending), but emissions are not specific to suppliers' activities.

- **Emissions from capital goods:**
  - Activity Data: Primary data from the Group - amount spent.
  - Emission Factors: Sector-average emission factors
  - Specific Activity Input: Partially - activity data exists (spending), but emissions are not specific to suppliers' activities.

- **Emissions from use of services not described above (Fuels and Energy):**
  - Activity Data: Primary data from the Group - energy and fuel usage.
  - Emission Factors: Sector-average emission factors.
  - Specific Activity Input: Partially - activity data exists, but emissions are not specific to suppliers' activities.

- **Emissions from disposal of solid and liquid waste:**
  - Activity Data: Primary data from the Group - amount of paper waste.
  - Emission Factors: Sector-average emission factors.
  - Specific Activity Input: Partially - activity data exists, but emissions are not specific to suppliers' activities.

The reporting boundaries considered and the calculation methods for estimating the GHG emissions for each significant Scope 3 GHG category, are as follows:

Category 3.3 Emissions from employee commuting

- Reporting Boundaries: Includes emissions from employee commuting (between home and work) using private vehicles powered by diesel and gasoline
- Activity Based Method
- Emissions CO_2e = Activity Data (kilometres travelled) x Emission Factor CO_2e
- Emission factors from: National Inventory Report

Category 4.1 Emissions from purchased goods & 4.2 Emissions from capital goods

- Reporting Boundaries: Includes emissions from the following categories - Financial transactions processing, Sprays, Cleaning, Cleaning/sanitary items, Water, Stationery, Security, Paper products, Computer services, Cards, Advertising and public relations, Insurances, Market research, Legal services, Professional and technical services, Office administrative/office support, Accounting/Auditing services, Other Maintenance, Lifts, Generators, Electrical installations, Structured cabling, Mechanical installations, Auxiliary services, Fire extinguishers, Signs, Security Systems, Machinery, Premises repairs, Premises professional services, Office equipment repairs, Buildings maintenance and repairs, Building materials, Other equipment, Courier, Trading platforms, Business Subscriptions, Software, Machinery, Computers, Hardware, Land and Buildings, Furniture & Equipment, Vehicles
- Spend Based Method
- Emissions CO_2e = Activity Data (amount spent) x Emission Factor CO_2e
- Emission factors from: BEIS/DEFRA in the official report on UK and England's carbon footprint to 2019 and 2021, Exiobase 3.8.2, EPA 2018: USEEIO model 1.0.1, EPA: Supply Chain Factors Dataset v1.3, Market Economics Limited 2023

Category 4.3 Emissions from disposal of solid and liquid waste

- Reporting Boundaries: Includes emissions from the treatment of waste generated by the organisation’s operations and more specifically paper.
- Activity Based Method
- Emissions CO_2e = Activity Data (waste generated) x Emission Factor CO_2e
- Emission factors from: Ecoinvent 3.9.1

Category 4.4 Emissions from the use of services not descripted above

- Reporting Boundaries: Includes emissions from the upstream extraction, production, and transportation of fuels (diesel and gasoline) and energy (electricity) purchased and consumed, excluding emissions already accounted for in Scope 1 or 2.
- Activity Based Method
- Emissions CO_2e = Activity Data (fuel/energy consumed) x Emission Factor CO_2e
- Emission factors from: DEFRA, 2022 European Residual Mix Report, CERA

For indirect GHG emissions, a process has been developed based on the significance criteria outlined in ISO 14064-1:2018, including factors such as magnitude, level of influence, risk or opportunity, sector-specific guidance, outsourcing, and staff member engagement. Each category of indirect GHG emissions is assessed separately. If identified as significant, further criticality analysis is conducted for relevant subcategories. Criteria are evaluated on a scale from 1 to 10 to determine a total "weight" of importance. The significance of a source is determined by factoring in reporting obligations, criticality, and relevance.

The evaluation of significance identified the following sources of indirect emissions:

- Fuel mobile combustion from employee commuting: Gasoline and diesel for passenger vehicles (Category 3.3)

- Purchased goods and services (Category 4.2)
- Waste management (Category 4.3)
- Fuel and energy not included in Scope 1 and Scope 2 (Category 4.4)

Category	Included?	Key criterion
Category 3: Indirect GHG emissions from transport		
3.1 Emissions from upstream transport and distribution for goods	No	Magnitude
3.2 Emissions from downstream transport and distribution for goods	No	Relevance
3.3 Emissions from employee commuting	Yes	Magnitude/staff member engagement
3.4 Emissions from client and visitor transport	No	Level of influence
3.5 Emissions from business travels	No	Level of influence
Category 4: Indirect GHG from products used by the company		
4.1 Emissions from purchased goods	Yes	Magnitude
4.2 Emissions from capital goods	Yes	Magnitude
4.3 Emissions from disposal of solid and liquid waste	Yes	Opportunity
4.4 Emissions from the use of services not descripted above	Yes	Magnitude
Category 5: Indirect GHG associated with the use of products from the organisation	No	Sector-specific guidance (PCAF) (refer to the section Scope 3 Financed GHG Emissions below)

Scope 3 Financed GHG Emissions

The financed emissions (investments) are calculated and disclosed following the PCAF methodology, which is based on a revenue-based approach, with emission factors estimated for each sector and country through a multiregional input-output analysis framework, which covers the Bank's lending and investment activities. Note that reported emissions from Bank's counterparties have been used where available across Scope 1, 2 and 3. Where one or more reported scope categories were not disclosed/complete, estimated emissions have been incorporated according to internal methodology, in line with the PCAF standard.

More specifically, a waterfall approach was utilized for the calculation of the financed emissions:

- To the extent possible, published (reported) emissions of the counterparties are used. (Option 1 – Reported emissions)
- In all other cases the scope 1, 2 and 3 emissions are calculated based on the economic activity data of the counterparty (i.e., EUR of revenue) and appropriate emission factors expressed per economic activity (e.g., tCO_2e/million EUR output of the corresponding sector), (Option 3 – Economic activity-based emissions.)

The table below presents the a breakdown of the Bank's total financed emissions between lending and investment activities:

	Emission covered exposure (€m)	Scopes 1 & 2 ($ktCO_2e$)	Scope 3 ($ktCO_2e$)	Total emissions ($ktCO_2e$)
Lending				
Corporate	5.746	558	955	1.513
Retail[9]	1.120	109	76	185
Investments[10]	1.232	240	387	626
Total	8.098	907	1.417	2.324

The majority of the Bank's financed emissions come from its corporate portfolio lending, accounting for 65% of the total, while Scope 3 financed emissions account for 61% of the total.

Corporate financed emissions

	Emission covered exposure (€m)	Scopes 1 & 2 (ktCO2e)	Scope 3 (ktCO2e)	Total emissions (ktCO2e)
A - Agriculture	37	48	21	69
B - Mining	8	1	0	1
C - Manufacturing	360	152	281	433
D - Electricity	1	0	0	0
E - Water supply	51	36	10	46
F – Construction	127	10	117	127
G - Wholesale and retail trade	356	127	112	239
H - Transportation and storage	281	38	183	221
I – Accommodation	260	17	27	43
K – Financial & Insurance Services	3.037	2	109	111
L – Real Estate	176	1	4	4
Exposures to other sectors	1.053	127	91	218
Total	**5.746**	**558**	**955**	**1.513**

Regarding the corporate portfolio, lending to the Manufacturing sector has the biggest contribution, 29%, followed by Wholesale and retail trade, 16%, and Transportation and storage, 15%.

Total GHG Emissions

ESRS Quantitative data/metric	Unit	2024
Total GHG emissions (location-based)	tCO_2e	2.361.088

[9] Covering Mortgage and Motor Vehicles Loans
[10] Covering Debt Securities, Equity Instruments, Sovereign Debt and Commercial Real Estate

ESRS Quantitative data/metric	Unit	2024
Total net revenue	€m	718

Total GHG emission intensity

ESRS Quantitative data/metric	Unit	2024
Total net income	€m	718
GHG intensity per net revenue (location-based)	tCO_2e/€m	3.287

Reconciliation of net income

Net Income reconciliation	Unit	2024
Net income used to calculate GHG intensity	€m	718
Net income relating to insurance activities of the Group	€m	10
Total Net Income as per the Consolidated Financial Statements for the year-ended 31 December 2024	€m	728

3. ESRS E4 - Biodiversity and ecosystems

3.1 Strategy

Transition plan and consideration of biodiversity and ecosystems in strategy and business model [E4-1]

The Group will develop a strategy on Biodiversity and Ecosystems in alignment with Eurobank Group.

Material impacts, risks and opportunities and their interaction with strategy and business model [ESRS 2 SBM-3]

The Group has not recognized any impacts, risks and opportunities from its own operations.

3.2 Impact, risk and opportunity management

Description of the process to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities [ESRS 2 IRO-1]

The Group has identified as direct impact drivers of biodiversity loss the: land use change as a significant material topic (refer to ESRS 2 section Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]). As presented in the table below, this includes potential negative impact on biodiversity from land-use change within the Bank's downstream value chain in its lending and investment portfolio based on their industry.

Type of Impact or Risk/Opportunity	Value chain	Time Horizon	Description
Direct impact-drivers of biodiversity loss			
Land-use change, fresh water-use change and sea-use change			
Potential negative impact	Downstream value chain	Medium- / Long-term	Impacts on biodiversity from land-use change within the Bank's downstream value chain in its lending and investment portfolio based on their industry.

Policies, actions and resources related to biodiversity and ecosystems [E4-2, E4-3]

The Group does not currently have policies and/or actions with reference to Biodiversity and Ecosystems. Any relevant policies, actions and resources related to Biodiversity and Ecosystems will be developed in alignment with the Eurobank Group.

The Bank has the following exclusion list which prohibit exposures within its credit and investment portfolio as follows:

- Exclusion List within credit policy that excludes from financing activities that are prohibited by the laws of the host country or international conventions relating to the protection of biodiversity.
- The HBIF includes prohibited sectors and activities of counterparties that includes financing to: activities which give rise to environmental impacts that are not largely mitigated and/or compensated, any product or activity deemed illegal under host country laws or regulations or international conventions and agreements or subject to international phase-outs or bans, activities that contribute to the destruction of high conservation value areas.

3.3 Metrics and targets

Targets related to biodiversity and ecosystems [E4-4]

Currently, the Group has not set specific, measurable targets related to Biodiversity and Ecosystems. Such targets will be developed in alignment with the Eurobank Group.

4. ESRS E5 - Resource use and circular economy

4.1 Impact, risk and opportunity management

Description of the process to identify and assess material resource use and circular economy-related impacts, risks and opportunities [ESRS 2 IRO-1]

The Group has identified Waste as a significant material topic (refer to ESRS 2 section Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]). As presented in the table below, this relates to waste generated from the Group's own operations (offices and branches) as well as waste generated from the operations/activities of the industries in the Group's upstream value chain (including IT hardware manufacturing), and waste from downstream value chain entities (industries in both its lending and investment portfolio).

Type of Impact or Risk/Opportunity	Value chain	Time Horizon	Description
Waste			
Actual negative impact	Own operations, Down- / Upstream value chain	Short- / Medium- / Long-term	Impacts on the environment from the waste mainly generated from the operations/activities of the industries in the Group's upstream value chain (including IT hardware manufacturing) and downstream value chain entities (industries in both its lending and investment portfolio). Waste is also generated from the Group's own operations (offices and branches).

While the Group did not conduct formal consultations with affected communities regarding waste, this aspect is under consideration for future development.

Policies related to resource use and circular economy [E5-1]

The Group does not have a waste management policy in place for its own operations or its value chain, however, it is in the process of implementing an Environmental Management System for its own operations in accordance with ISO 14001. The Environmental Management System will be fully finalized and implemented during 2025, and relevant policies will be adopted and aligned with the Eurobank Group during 2025.

During 2024, as part of the implementation of ISO 14001, the Group conducted an environmental review of its operations to identify environmental aspects and determine the aspects that are significant and should be prioritized within the Environmental Management System. The environmental review process considers the inputs and outputs associated with the Group's activities. Additionally, as part of this exercise, the Group is determining risks and opportunities to ensure the Environmental Management System can achieve its intended outcomes effectively. Furthermore, the prioritization of waste management for the Group, involves the identification, minimization, and proper management of waste generated by the Group’s operations.

Actions and resources related to resource use and circular economy [E5-2]

The following actions were embedded during 2024 in the day-to-day operations of the Group, facilitating the reduction of waste in all branches and offices:

- Recycling of Plastic, Metal, and Drink cartons, paper and batteries so that all staff members and customers can easily dispose of their recyclable waste.
- Electronic waste management (“e-waste”) by prioritizing the repair and reuse of electronic devices before considering recycling or donating. This approach aims to extend the lifecycle of equipment, reduce environmental impact, and promote responsible resource management.
- Reuse, refurbishment and donations of furniture.
- The construction waste from the renovations of the Group’s offices and branches is recycled by the construction companies per the legal requirement and contractual agreements.

Furthermore, during 2025 the Group will finalize and implement the Environmental Management System for its own operations and identify/assess additional actions.

No significant operational expenditures (OpEx) and/or capital expenditures (CapEx) were estimated for these actions.

Other than aforementioned, the Group did not implement or plan any other actions for its own operations or value chain. This will be further assessed in the context of alignment with Eurobank Group.

4.2 Metrics and targets

Targets related to resource use and circular economy & Resource outflows [E5-3, E5-5]

Currently, the Group has not set specific, measurable targets related to resource use and circular economy. Such targets will be developed in alignment with the Eurobank Group. The Group did not keep records for its waste streams (including non-recycled waste) during 2024. Furthermore, it does not track the effectiveness of the aforementioned actions. During 2025, the reporting/monitoring process will be enhanced and further structured through the implementation of the Environmental Management System, and also in the context of alignment with Eurobank Group.

5. ESRS S1 - Own workforce

5.1 Strategy

<u>Interests and view of stakeholders & Material IROs and their interaction with strategy and business model [ESRS 2 SBM-2, ESRS 2 SBM-3]</u>

The implementation and achievement of the Strategic Plan is dependent on its staff members and how the Group impacts them. Through the policies and actions described in the sections below, the Group aims to have a positive impact on its workforce. A key enabler is the feedback received from the staff members through various engagement actions (refer to section 5.9 Engaging our staff members).

The material IROs identified under its own workforce, are connected to the Group's Strategic Plan and business model, however, do not inform and contribute to their adaptation.

The Group's Strategic Plan and the business model are expected to be re-assessed following the integration with Eurobank Cyprus.

Actual positive impacts on own workforce, identified through own operations

As part of the materiality analysis, actual positive impacts that arise from the Group's own operations have been identified, as presented in the table below:

Working conditions				
Impacts	**Time Horizon**	**Description of impact**	**Brief description of the activities that result in the positive impacts**	**Types of employees and non-employees in the Group's own workforce that are affected by its operations**
Work-life balance	Short-term	The social impacts of work-life balance on the Group's own workforce can include improved mental well-being, reduced stress, and enhanced job satisfaction. A better work-life balance can lead to reduced stress and burnout among staff members, contributing to improved mental health and overall well-being.	Work-life balance is promoted through the Group's Remote Working policy, leave benefits, the wellbeing wonder movement and the skills development lab.	All staff members (permanent and temporary)
Freedom of association, the existence of works councils and the information, consultation and participation rights of workers	Short- / Medium- / Long-term	The social impact on the Group's own workforce from the provision of freedom of associations, the existence of works councils and the information, consultation and participations rights of workers. The lack of freedom of association can restrict staff members from	The Group engages with Trade Unions representing its staff members as part of its ongoing stakeholder engagement activities and negotiates for the settlement of disputes arising from Collective	All staff members (permanent and temporary)

		collectively addressing social issues within the workplace, potentially impacting staff member morale and social responsibility initiatives.	Agreement negotiations.	
Collective bargaining, including rate of workers covered by collective agreements	Short- / Medium- / Long-term	The social impact on the Group's own workforce from having the ability for collective bargaining through the negotiation of fair wages, benefits, and working conditions. Collective bargaining can contribute to a more equitable and supportive work environment, positively impacting staff member well-being and overall social responsibility within the Group.		
Working time	Short-term	The social impacts of working time on the Group's own workforce can include significant positive effects on staff member well-being, work-life balance, and mental health. Staff members with a balanced work schedule are likely to experience reduced stress levels, improved mental health, and greater overall well-being. This balance allows staff members to spend quality time with their families and engage in personal interests, which can enhance their quality of life.	The working time of the Group's staff members, including special working hours and shift work for certain units or teams in the Group, is governed by the provisions of the Collective Bargaining Agreement, and it is aligned with the national Law.	
Adequate wages	Short- / Medium-term	The social impacts of adequate wages on the Group's own workforce can include improved quality of life, reduced financial stress, and enhanced staff member well-being. Adequate wages can lead to improved living standards, providing staff members with the means to meet their	All staff members are paid an adequate wage, in line with applicable legal requirements, which are covered in the Group Remuneration policy.	All staff members (permanent and temporary)

		basic needs, access healthcare, and afford education for themselves and their families.		

Equal treatment and opportunities for all				
Impacts	**Time Horizon**	**Description of impact**	**Brief description of the activities that result in the positive impacts**	**Types of employees and non-employees in the Group’s own workforce that are affected by its operations**
Gender equality and equal pay for work of equal value	Short- / Medium- / Long-term	The Group’s impact on gender equality and equal pay for work of equal value as this can lead to a more inclusive and equitable work environment, fostering a sense of fairness, respect, and empowerment among staff members.	Through the provisions of the Key Function Holders (“KFH”) Diversity policy, Succession Planning of KFH policy, Recruitment policy, Group Remuneration policy, Statement on Human Rights, Whistleblowing policy, Code of Business Conduct and Ethics, Code for Dealing with Harassment in the Workplace, Disciplinary Code	All staff members (permanent and temporary)
Diversity	Short- / Medium- / Long-term	The social impacts of the Group on diversity within it’s own workforce as this can contribute to a more inclusive and supportive workplace culture, promoting a sense of belonging and respect among staff members. Furthermore, a diverse workforce can lead to increased collaboration and understanding, fostering a more cohesive and harmonious work environment.		

Risk arising from own workforce, identified through own operations

As part of the double materiality analysis, the risk that arises from the Group's own operations has been identified, as presented in the table below:

Other work-related rights				
Risk	**Time Horizon**	**Description of risk**	**Brief description of the activities that result in the risk**	**Types of employees and non-employees in the Group's own workforce that are affected by its operations**
Privacy	Short- / Medium- / Long-term	Data privacy is a key work related right that might pose key risks to the Group. These relate to breaches of personal data and may have financial (i.e. fines and other costs from legal actions against the Group), operational (disruption of operations), regulatory and reputational impacts.	Risk arises from personal data of workforce held by the Group	All staff members (permanent and temporary)

The Group has not identified any material impact on its own workforce that may arise from transition plans for reducing negative impacts on the environment and achieving greener and climate-neutral operations.

The risk of forced labour, compulsory labour, or child labour is not relevant for the Group.

5.2 Work-life balance

Impact, risk and opportunity management

Policy related to own workforce [S1-1]

Remote Working policy: To promote work-life balance, the Group has developed a Remote Working policy. The policy aims to provide flexible work arrangements that best fit the personal needs of the Group's staff members, while at the same time providing a mutual benefit for the Group and its staff members, in terms of productivity, business continuity and staff member engagement. The policy covers the eligible staff members for working remotely, remote working approval process, main principles, remote working required resources and information security and safety matters and is in line with the National Computer Security Incident Response Team for Cyprus requirements for remote work policy. In accordance with the Group's governance framework for all policies, the policy has been reviewed by Compliance, Risk Management, Data Protection, O&M, Legal Services, Company Secretariat, Information Security & Fraud, Technology & Digital, and Health & Safety. The BoD is the most senior level in the Group that is accountable for the implementation of the policy. The Policy is available to all Staff Members via the Group's internal portal.

Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]

Apart from the afore-mentioned policy, the Group during 2024 implemented the below actions to promote work-life balance:

Leave donation:

For staff members with difficulties or with serious health or other personal issues (either themselves or members of their immediate family), the Group runs the “Leave Donation Program”. The leaves that are donated within the year are being communicated to the staff members on a yearly basis.

Wellbeing Wonder Movement:

The Wellbeing Wonder Movement, which was launched in October 2024, encourages staff members to identify their personal needs and provides direction and opportunities to enhance their self-wellbeing through a holistic, multi-dimensional, and proactive approach. The initiative’s pillars include physical, intellectual, emotional, and financial wellbeing, as well as mental health. A dedicated page on the internal portal offers relevant information and guides on the Group's initiatives for each pillar.

Skills Development Lab/Empowerment Talks:

The Skill Development Lab offers courses and workshops to all staff members including subjects related to work-life balance and specifically Mental Resilience and Wellbeing and Mental Health. The courses are designed and delivered by the Group’s internal instructors or external experts and aim to provide staff members with the tools and knowledge, to further develop their interpersonal skills and supporting their personal and professional growth. Additionally, the Empowerment Talks provide monthly 1-hour online inspirational/motivational speeches to all staff members, focusing on the personal development, interpersonal skills, and wellbeing of staff members.

No significant operational expenditures (OpEx) and/or capital expenditures (CapEx) were estimated for these actions.

Further actions will be assessed in the context of alignment with Eurobank Group.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities, and Work-life balance metrics [S1-5 & S1-15)]

The Group has not set specific, measurable targets on work-life balance and does not track the effectiveness of its policies and actions on the work-life balance of its staff members. The targets will be assessed in the context of alignment with Eurobank Group.

The Human Resources unit keeps track of how each leave was utilized for internal purposes, however the numbers and percentages of which are considered personal information and will not be disclosed.

5.3 Freedom of association and collective bargaining

Impact, risk and opportunity management

Policies related to own workforce [S1-1]

The Group has more than one Collective Bargaining Agreement and engages with the Trade Unions as part of its ongoing stakeholder engagement activities and negotiates for the settlement of disputes arising from collective agreement negotiations. The Group does not have a separate policy in place as it safeguards this right as part of its legal obligations. Collective bargaining is governed by the Industrial Relations Code, which lays out in detail the procedures to be followed for conflict resolution in labour disputes. The code also sets specific fundamental rights/principles including The Right to Organise, The Right to Collective Bargaining, Collective Agreements and Joint Consultation which are respected by participating parties.

Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]

The Group does not implement any actions as it safeguards this right as part of its legal obligations.

Metrics and targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5 & S1-8]

At the end of 2024, 93,02%[11] of the Group's staff members, all of which were employed in Cyprus, are represented by the Trade Union and 97,22%[12], are covered by Collective Bargaining Agreements.

Specific targets have not been set as the Group safeguards this right as part of its legal obligations.

5.4 Adequate wages

Impact, risk and opportunity management

Policies related to own workforce [S1-1]

Group Remuneration policy: A Group Remuneration policy is in place, whose objective is to establish the framework for the remuneration of all staff members of the Group. The policy describes the criteria for determining among others fixed non-contractual and contractual (emanated from the Collective Agreement) remuneration, sets the conditions for payment of variable remuneration, the criteria for identifying material risk takers, and is directly linked with the Group's structured Performance Appraisal Systems.

As per the Central Bank of Cyprus Directive of Internal Governance of Credit Institutions of 2021 issued on 15 October 2021, the Group has implemented a gender-neutral Group Remuneration Policy. Per the Group Remuneration policy:

- Staff Members, independent of their gender, should be equally remunerated for equal work or work of equal value, in line with point 65 of Article 3(1) of Directive 2013/36/EU;
- All aspects of the Remuneration policy are gender neutral, including the award and pay-out conditions for remuneration;
- The gender-neutral Fixed Remuneration of Identified Staff should reflect their professional experience and organisational responsibility, taking into account the degree of seniority, the level of expertise and skills and job experience.

As a result, the Group applies a gender-neutral Group Remuneration policy by:

- Making the Group Remuneration policy transparent to all staff members, where it is clearly communicated on how remuneration is determined;
- Conducting a gender gap analysis;
- Documenting job descriptions;
- Defining grading and salary structure as stipulated in the last signed Collective Agreement.

The Group's policy ensures fair treatment and provision of equal opportunities. In addition to gender, as explained above, the criteria used for determining remuneration are irrespective of race, religion, origin, marital status and political beliefs. Furthermore, staff members involved in the determination of remuneration must do so objectively, fairly, and aim to avoid, disclose and/or manage any actual or potential conflict of interest which may arise while doing so.

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[11] Calculated as the percentage of the number of employees represented by the Trade Union over the total number of employees.
[12] Calculated as the percentage of the number of employees covered by Collective Bargaining Agreements over the total number of employees.

The Group Remuneration policy is compliant with the Corporate Governance Code published by the Cyprus Stock Exchange, the European Banking Authority Guidelines on Sound Remuneration Policies and the Internal Governance of Credit Institutions Directives of 2021 of the Central Bank of Cyprus.

The BoD is the most senior level in the Group that is accountable for the implementation of the policy. The policy was revised during 2025 for alignment with Eurobank Group's respective policy.

The policy is available to all staff members via the Group's internal portal. Information regarding the policy is also communicated in a concise and comprehensible manner, to external stakeholders (e.g. the regulators/competent authorities and, also to investors as the Bank is a listed company), as appropriate.

Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]

Apart from ensuring the adherence of the Group Remuneration policy the below actions were taken during 2024 and applicable to all staff members:

- Salary increments are paid to staff members who have signed employment contracts linked to/incorporating the provisions of the Collective Agreement (between the Trade Union and the employer), based on the current grading and salary structure, as stipulated in the last signed Collective Agreement. In the cases of non-contractual salary increases, as well as in the cases of new appointments, factors such as the scope of duties, work complexity, seniority, required skills, job experience, professional expertise, academic qualifications, evaluation of capabilities, and both internal and external benchmarks, social, economic, cultural, or other relevant factors, including the place of employment and its cost of living, are considered. During recruitment, structured interviews are being developed to overcome unconscious bias and candidates are not asked about their salary history.
- The Remuneration Benchmarking Exercise of the European Banking Authority is completed, bearing in mind the relevant EBA Guidelines.
- The Group has also internally developed a customised job mapping tool based on best practises, which analyses real data as extracted from the HR system, evaluates job roles and groups all active unique positions, to ultimately link them to a range of Union's salary scales.

Detailed information relating to the remuneration practices is disclosed according to the applicable regulatory requirements and is re-adjusted by the Management Body and its Committees, in order to ensure proper evaluation and informed decision making.

No significant operational expenditures (OpEx) and/or capital expenditures (CapEx) were estimated for these actions.

Further actions will be assessed in the context of alignment with Eurobank Group.

Metrics and targets

<u>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5, S1-10, S1-11, S1-16]</u>

No specific target is currently set in terms of wages as the Group ensures that wages are based on the applicable labour legislation in Cyprus and any relevant employment-related agreements (including employment contracts), as per the Group Remuneration policy. This will be further assessed in the context of alignment with Eurobank Group.

To track the effectiveness of its policy and actions, the Group pays particular attention in internal feedback processes, utilizing both daily communication and exit interviews as tools to gather feedback, assess staff member experience and challenges, and identify opportunities and risks to improve retention and engagement. The following metrics are relevant.

Adequate wages

All staff members are paid an adequate wage, in line with the Minimum Wage Law, Cap. 183 and EBA Guidelines on Sound Remuneration Policies.

Social protection

The Group offers all staff members social protection benefits as per individual employment contracts and/or Group's policies/procedures and/or Collective Agreements (if, and to the extend, applicable) and/or legal obligations. These include social insurance, health & life insurance coverage (General Health System (GESY), Medical funds & Group Life Insurance Programme), permanent disability insurance and accident covers, as well as staff credit facilities with favourable terms (where applicable).

The Group also has a provision for paid sick leave days, which provide a level of stability in cases of sickness or injury among its staff members. Furthermore, the Group contributes to the staff members' provident fund which can act as a monetary cushion during retirement. Additionally, staff members are provided with parental and paternity leaves in line with relevant legislation in Cyprus.

Remuneration metrics (pay gap and total remuneration)

The gender pay gap, defined as the difference of average pay levels between female and male staff members, expressed as a percentage of the average pay level of male staff members is presented below. In the calculation, the average gross hourly pay level of women staff members was subtracted from the average gross hourly pay level of male staff members. The difference is then divided by the average gross hourly pay level of male staff members and multiplied by 100 to get the percentage difference.

Average gross hourly pay of male as at 31 December 2024	Average gross hourly pay of female as at 31 December 2024	Gender pay gap at 31 December 2024
€25,78	€20,34	21%

The table below presents the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all staff members (excluding the highest-paid individual):

Fixed remuneration of the highest paid individual	€426.238
Variable remuneration for the highest paid individual	€0
Annual total remuneration for the highest paid individual	€426.238
Median staff member annual total remuneration (excluding the highest paid individual)	€45.052
Annual total remuneration ratio	9:1

5.5 Working time

Impact, risk and opportunity management

<u>Policies related to own workforce [S1-1]</u>

The Group does not currently have a specific policy in place on this matter, since the working time of its staff members, including special working hours and shift work for certain units or teams in the Group, is governed by the provisions of the Collective Bargaining Agreement between the Group and the respective representative of the staff members and it is aligned with the national Law.

<u>Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions [S1-4]</u>

The Group does not implement any actions as it safeguards this as part of its legal obligations and Trade Union agreements.

Metrics and targets

<u>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5]</u>

The Group has not set targets and does not track the effectiveness of its actions, with regard to working time. Any amendments to the terms should be firstly discussed and agreed with the Trade Union before putting them into effect.

5.6 Diversity, gender equality and equal pay for work of equal value

Impact, risk and opportunity management

<u>Policies related to own workforce [S1-1]</u>

To promote **diversity and gender equality**, the Key Function Holders ("KFH[13]") Diversity policy was established and specific provisions were included in the Succession Planning of KFH policy, Recruitment policy, Group Remuneration policy, and Code of Business Conduct & Ethics.

KFH[13] Diversity policy: The aim of this policy is to establish the principles governing diversity and inclusion for KFH positions at the Group and has been prepared to outline the fundamental principles and rules governing the recruitment, selection, and ongoing assessment of KFH in adherence to the applicable regulatory framework such as the "CBC Suitability Directive" and "the Law on equal treatment and equal opportunities of men and women in matters of employment and occupation of 2002, as amended" and best practice. The Group through the relevant policy and the fundamental principles/rules governing the process of new members for KFH positions and Executive Members of the Management Body, ensures at the same time that all appointments are assessed objectively and that the best person for the position is appointed, based on individual merit, qualifications and experience, with the absence of discrimination of any kind, i.e. irrespective of gender, sexual orientation, marital status, age, social background, disability, colour, race, ethnic or national origin, religion and beliefs, nationality. The provisions and guidelines of the policy are applicable to external recruitments and internal selection for KFH positions and Executive Members of the Management Body. The ultimate accountability for the implementation of the policy lies with the BoD and the policy is available on the Group's internal portal.

The **Group's Succession Planning of KFH policy** sets the guidelines and principles on which the Group develops the activities for proactively identifying and developing the "best-fit"

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[13] KFH include the members of the Bank's Executive Committee, the Heads of Internal Control Functions, the Company Secretary/General Manager Chairman's Office & Company Secretariat and the Outsourcing Officer.

individuals for future succession needs in critical roles, with the absence of discrimination of any kind, i.e. irrespective of gender, sexual orientation, marital status, age, social background, disability, colour, race, ethnic or national origin, religion and beliefs, nationality. The ultimate accountability for the implementation of the policy lies with the BoD and the policy is available on the Group's internal portal.

Recruitment policy: The policy has been prepared based on best practices in recruiting human resources and its objective is to ensure that the principles of transparency, objectivity, equal opportunities, absence of discrimination of any kind and meritocracy are applied throughout the selection and recruitment process. By implementing the policy, the Group selects the most suitable person for the position, based on their relevant abilities and no candidate is unfairly treated on the grounds of race, colour, gender, ethnic or national origins, religion and beliefs, nationality, sexual orientation, marital status, age, social background or disability. The policy covers all the Group's staff members, and it is available on the Group's internal portal. The BoD is the most senior level that is accountable for the implementation of the policy. The policy is monitored through the documentation of sufficient information in relation to the remuneration levels and salary ranges for each position to ensure that all aspects of the remuneration policy are gender neutral.

Group Remuneration policy: Gender-neutrality is also specifically addressed in the Group Remuneration policy (refer to section 5.4 Adequate wages).

The Group ensures adherence to the afore-mentioned policies and communication to all relevant stakeholders.

Human rights:

Although the policies disclosed in ESRS S1 do not include a reference to the UN Guiding Principles on Business and Human Rights, the Group issued and published on its website a Statement on Human Rights and based its principles on the International Bill of Human Rights (refer to ESRS S4). Furthermore, the Group took into account the "Protect, Respect and Remedy" framework of the UN Guiding Principles on Business and Human Rights ("UNGP") which defines the responsibilities of States and business enterprises for protecting and respecting human rights. The Group's staff members were identified as a key stakeholder and according to its Statement on Human Rights:

- The Group strives to create a respectful, rewarding, diverse, positive, productive working environment and supportive workplace which enables staff members to thrive, values diversity and provides equal opportunities for all. The Group aims to treat staff members fairly and consistently.
- Harassment in the workplace, of any kind, either direct/indirect/implied, is considered unacceptable and unjustified and all necessary actions are taken to ensure that such behaviour or form of misconduct does not take place.
- The Group applies the highest health and safety standards across all its operations and offices and is constantly taking measures to promote and improve health and safety conditions.
- Under the freedom of collective bargaining, the right of workers and the Group to form and join organisations of their own choosing is an integral part of a free and open society to collectively express, promote, pursue and defend common interests and is of great importance to the Group.

Furthermore, the Group has developed mechanisms to prevent and mitigate discrimination and act upon once detected, as well as to advance diversity and inclusion in general. The following mechanisms and measures to provide and/or enable remedy for human rights impacts are relevant, together with the Code of Business Conduct and Ethics and the Whistleblowing policy which are covered in section ESRS G1 – Business Conduct:

- **Code for dealing with harassment in the workplace:** The Group acknowledges the seriousness of harassment in the workplace and confirms, through the code, that such conduct is a punishable offence and is considered unacceptable and unjustified. The code specifically addresses all possible forms of workplace harassment including sexual harassment, bullying, intimidation and coercion and covers incidents of harassment which occur in the workplace and/or during work-related events, such as business trips, training events or social functions.

- **Disciplinary Code:** The code is designed to be non-discriminatory, and it provides clear guidelines as to the disciplinary process and measures that may be applied in cases of non-adherence to the Group's standards of business conduct and ethics as stipulated in the relevant code.
- **Personal Grievance Committee:** The committee has been formed based on Collective Agreement (consisting of members of the Group and the Trade Union) and its purpose is to deal with situations concerning labour relations between a staff member and the Group, that affect or may affect the working conditions of the staff member. The staff member may raise in writing the complaint to the committee and following investigation, a recommendation/report is provided to the Group, suggesting specific measures/course of actions. The Group assess the report and proceeds with further actions. Based on the seriousness and nature of the complaint, the Group may closely monitor the relationship of the staff members involved and request periodic feedback on their behaviour/working conditions. Depending on the feedback, it may proceed to activate/consider possible referral of the incident to disciplinary proceedings.

The Group engages through a number of channels with its staff members as part of the day-to-day operations (refer to section 5.9 Engaging our staff members below).

The Group does not explicitly state in its own workforce policies whether it addresses trafficking in human beings, forced or compulsory labour, or child labour. This will be addressed in alignment with the Eurobank Group.

Metrics and targets

<u>Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S1-5, S1-9]</u>

The Group has set the following targets in its ESG Strategy:

- Under-represented gender (females) to represent 50% of staff members that report directly to the CEO and to the Board Committees, by the end of June 2026.
- Members of the under-represented gender (females) to make up 30% of the KFH[14] of the Group, by the end of June 2026.

The objective of the above targets was defined taking into consideration the statistics of the Group at the time, as well as the EBA Report on the Benchmarking and Diversity Practices and the Gender Pay Gap (EBA/REP/2023/07). The targets are closely monitored on an annual basis through the preparation of relevant statistics and communicated to the CEO for consecutive actions and on a bi-annual basis through the ESG Strategy monitoring. Following the Group's reorganisation in December 2024, the percentage of the under-represented gender (females) that reports directly to the CEO and to the Board Committees is 35,29% and the members of the under-represented gender (female) make up 16,67% of the KFH of the Group. The targets will be re-assessed in the context of alignment with Eurobank Group and integration with Eurobank Cyprus.

The Group did not engage with its workforce or workers' representatives to set or track the Group's performance against the targets and no interim targets were set.

[14] KFH include the members of the Bank's Executive Committee, the Heads of Internal Control Functions, the Company Secretary/General Manager Chairman's Office & Company Secretariat and the Outsourcing Officer.

The following table presents the gender distribution in number and percentage at top management level as at 31 December 2024:

Gender distribution in top management as at 31 December 2024		
Gender	**Number of staff members**	**Percentage of total number**
Male	9	82%
Female	2	18%
Other *(Gender as specified by the staff members themselves.)*	-	-

“Top management” is defined as “The natural Persons who exercise executive functions within the Group and who are responsible and accountable to the BoD for the day-to-day management of the Group”.

The following table presents the distribution of staff members by age group as at 31 December 2024:

Distribution of staff members by age group as at 31 December 2024		
< 30	**30 ≤ X ≤ 50**	**> 50**
75	1.640	550

Incidents, complaints and severe human rights impacts [S1-17]

The following table presents the work-related incidents reporting during the period and affecting the Group’s own workforce.

Incidents, complaints, and severe human rights impacts	Unit	2024
Total number of incidents of discrimination, including harassment, reported in the reporting period	Number	2
Number of complaints filed through channels for people in the organisation's own workforce to raise concerns (including grievance mechanisms)	Number	16[15]
Total amount of fines, penalties, and compensation for damages as a result of the incidents and complaints disclosed above	Monetary terms	n/a
Number of severe human rights incidents	Number	0

5.7 Privacy

Please refer to ESRS S4 for further information regarding the Group’s policies, actions and targets on data privacy.

During 2024, there were no personal data breaches concerning staff members.

5.8 Health and Safety

The Group has established Health & Safety and Physical Security units with designated officers and Health, Safety, and Security Policies for the Bank and its subsidiaries approved by the BoD is in place.

[15] Including the 2 incidents of discrimination/harassment reported above.

5.9 Engaging our staff members

Processes for engaging with own workforce and workers' representatives about impacts [S1-2]

The Human Resources unit gathers staff member feedback through various channels of engagement, as outlined below:

Engagement channel	Description	Stage at which engagement occurs	Type of engagement	Stakeholder engaged	Frequency of engagement
Trainings and workshops	Employees provide feedback at the end of each training/workshop where they have the opportunity to suggest additional topics for consideration based on their needs.	Throughout/ Impact identification and management	Consultation	Directly with own staff members	Ad-hoc
Trade Union negotiations	The Group engages with the Trade Union that represents the staff members' interests and can act as the formal mode of communication for Collective Bargaining Agreements.	Throughout/ Impact identification and management	Participation through representatives	Through workers' representatives	Ad-hoc
Performance appraisal process	During the annual performance appraisal process, the Group encourages open discussion and constructive feedback.	Throughout/ Impact identification and management	Consultation	Directly with own staff members	On an annual basis
Internal Hub	The Group shares announcements, new activities and other updates with its staff members. Also acts as the central hub for sharing information about the Group's well-being initiatives. Staff members can also share their feedback through this channel	Throughout/ Impact identification and management	Information	Directly with own staff members	Daily
Oral and written communication	The Group engages with its staff members through email communication and meetings.	Throughout/ Impact identification and management	Information	Directly with own staff members	Ad-hoc
Exit interviews	The Group conducts exit interviews with the leavers and gathers feedback.	Throughout/ Impact identification and management	Consultation	Directly with own staff members	Ad-hoc
Meeting with new staff members	The Group conducts meetings with new staff members upon completion of 6 months of employment to understand their	Throughout/ Impact identification and management	Consultation	Directly with own staff members	Ad-hoc

	views and gather feedback.				

The function with operational responsibility for ensuring that this engagement happens and that the results inform the undertaking's approach is the Human Resources unit.

Furthermore, during the 2024 DMA, the Group actively engaged with staff members who acted as proxies for the Group's workforce to identify its material IRO's related to own workforce. The Group ensured that the staff members that were selected to participate were the most suitable members to act as proxies, based on their day-to-day responsibilities and engagement with the staff members.

Effectiveness of the engagement

The feedback gathered from the above engagement channels is assessed by the Human Resources unit and, if required, escalated to the appropriate stakeholders (e.g. BoD, Executive Committee, CEO). In the cases where the feedback indicates the need to amend policies, the ultimate responsibility lies with the responsible Board committee for the formulation and implementation of the Group's policies. Additionally, the dialogue with the Trade Union on topics such as adequate wages and Collective Bargaining Agreements allow the timely resolution and management of impacts in a way that takes into consideration the needs, interests, and perspective of the Group's staff members and supports the Group in assessing the general effectiveness of its staff member related efforts. The effectiveness of the engagement channels is also assessed through the formal reporting mechanisms of the Group such as grievance, workplace harassment committee and whistleblower mechanisms, through the evaluation of the complaints which are reported. Where changes are implemented, these are communicated to the staff members, as appropriate.

5.10 Characteristics of employees [S1-6]

The table below illustrate the headcount, broken down by gender and the number of permanent and temporary staff members as at the end of year 2024. There is no part-time employment in the Group therefore full-time equivalent was not calculated. As at the reporting date the Group employed personnel only in Cyprus.

Total in Head Count	As at 31 December 2024				
	Male	Female	Other	Not reported	Total
Total number of permanent staff members	782	1.443	-	-	**2.225**
Total number of temporary staff members	10	30	-	-	**40**
Total of non-guaranteed hours staff members	-	-	-	-	**-**
Total number of staff members	**792**	**1.473**	**-**	**-**	**2.265**[16]

During the reporting period, a total of 70 staff members (30 males and 40 females) left the Group. The Group's staff member turnover was 3**%.**

[16] For the most representative number in the Financial Statements, refer to note 12.

5.11 Characteristics of non-employee workers in the undertaking's own workforce [S1-7]

The Bank also engages in employment activities with dedicated personnel employed by third parties, providing Technology & Digital and Operations divisions, implementation, and project management services. As recorded on 31 December 2024, 110 members were engaged to provide such services. The number is reported in headcount.

Furthermore, the insurance subsidiary as at 31 December 2024 engaged in employment activities with 1 dedicated personnel employed by a third party, providing accounting services.

Throughout the year, no significant fluctuations were recorded concerning the number of these non-staff members.

6. ESRS S4 – Consumers and end-users

6.1 Strategy

Material IROs and their interaction with strategy and business model [ESRS 2 SBM-3]

The identified material IROs related to consumers and end-users are fully integrated into the Group's customer-centric strategy and directly support its vision: *"To be the customers' primary bank in Cyprus, recognized as the safest, most reliable partner, always supporting customers' aspirations."*

These IROs inform strategic decision-making and contribute to the adaptation of the Group's business model, ensuring that its services, products, and customer engagement practices align with evolving sustainability standards and stakeholder expectations. The Group recognises that enhancing access to quality financial information, ensuring responsible marketing, and broadening access to financial products and services are key drivers of long-term value creation and trust-building with consumers.

To further strengthen its ESG Strategy, the Group is committed to developing specific objectives and measurable targets related to these material consumer and end-user impacts. This enhancement will be conducted in alignment with Eurobank Group's sustainability framework and will be fully integrated into the Group's strategic planning by 2025.

The Group's assessment of material IROs related to consumers and end-users includes all those who are likely to be materially impacted by the Group's operations and value chain, including impacts arising from its products, services, and business relationships. The Group did not identify different types of consumers. However, specific groups that were included are people with disabilities, pensioners and vulnerable individuals[17].

As part of the ongoing efforts to promote inclusion and accessibility, certain activities of the Group have a positive impact in relation to access to products and services, such as service and product accessibility for people with disabilities and reduced transaction fees for pensioners. For more details refer to section 6.6 Access to products and services.

The material risk of privacy is inherently linked to the Group's business model, as the provision of financial products and services necessitates the collection and processing of personal customer information, creating an inherent risk of data and privacy breaches. Widespread and systemic risks arise from the increasing reliance on digital banking, online transactions, and

[17] For minimum guaranteed income beneficiaries ("EEE") as well as customers falling under the provisions of law 64(I)/2017 (Asylum Seekers, Political Refugees, Holders of Complementary Protection, Victims of Trafficking and / or Exploitation of Persons).

data-driven services, which heightens exposure to cybersecurity threats, data leaks, and unauthorised access. Furthermore, external threats, including state-sponsored cyber activities, industry-wide cyber vulnerabilities, and large-scale data breaches, contribute to systemic risks that can significantly impact the banking sector as a whole. This identified material risk does not affect specific groups, as all consumers and end-users are affected.

The impacts and risks associated with Consumers and end-users related matters are shown in the table below:

Type of Impact or Risk/ Opportunity	Value chain	Time Horizon	Description
Information-related impacts for consumers and/or end-users			
Access to (quality) information			
Actual positive impact	Own operations	Short- / Medium- / Long-term	The social impact of access to quality information is significant as it promotes transparency and fosters informed decision-making. Quality information enables individuals to make well-informed choices about their health, education, finances, and civic engagement, leading to improved well-being and empowerment.
Privacy			
Risk	Own operations, Down- / upstream value chain	Snort- / Medium-term	Privacy is a key information related impact for Consumers that can pose a material risk for the Bank. This risk relates to breaches of personal data and may have financial (i.e. fines and other costs from legal actions against the Bank), operational (disruption of operations), regulatory and reputational impacts
Social inclusion of consumers and/or end-users			
Access to products and services			
Actual positive impact	Own operations	Short- / Medium-term	The social impact of the Bank by providing access to products and services is significant as it contributes to improved quality of life, economic opportunities, and social inclusion. Access to a diverse range of products and services can lead to improved standards of living, providing individuals and communities with essential goods and resources.
Responsible marketing practices			
Actual positive impact	Own operations	Short- / Medium- / Long-term	Responsible marketing practices can have a positive social impact by promoting transparency, trust, and ethical consumer behaviour. By providing accurate and honest information about products and services, responsible marketing practices can foster trust between businesses and consumers, leading to more informed and empowered purchasing decisions.

6.2 Human Rights

Policies related to consumers and end-users [S4-1]

The Group issued its Human Rights Statement to state its commitment to respect and promote human rights. The Human Rights statement can be found in the Group's website.

The Group bases its human rights principles on the Universal Declaration of Human Rights ("UDHR"), the International Covenant on Economic, Social and Cultural Rights ("ICESCR"), and the International Covenant on Civil and Political Rights ("ICCPR"). Additionally, the Bank takes into account the "Protect, Respect and Remedy" framework of the UN Guiding Principles on Business and Human Rights ("UNGP") in forming its Statement of Human Rights.

Policy commitments in relation to human rights are in place to identify, prevent, and mitigate human rights impact through the below provisions included in the relevant policies:

- In line with its Credit Policy, the Bank maintains a clear lending strategy which includes the maintenance of a prohibited lending list that excludes certain activities which might directly or indirectly be linked to human rights violations. Prohibited activities include activities involving exploitative labour and discriminatory practices, activities prohibited in relation to the protection of cultural heritage, activities in violation of health and safety laws, activities in relation to animal testing, and others considered ethically or morally controversial. In addition, through its Credit Policy, the Bank assesses environmental, social, governance ('ESG') factors as part of certain customer's credit risk assessments (legal entities and self-employed individuals) which include parameters in relation with their customer relations, human capital management, health and safety practices, community engagement and responsible production practices.
- As per Products & Services Management Policy in the assessment and approval of new products there are considerations of ESG matters to ensure alignment with ESG Strategy;
- The Group through its Data Protection Policy sets high standards of information security practices in order to protect customer's data. Also, during the assessment of new products/services/communication, special characteristics of groups of customers are taken into consideration so as to avoid discrimination and safeguard their personal data protection due to specific characteristics.

As a result, the Group will not engage in business activities where substantiated evidence of adverse human rights cannot be avoided or mitigated.

The policies disclosed above do not include a reference to the UN Guiding Principles on Business and Human Rights.

The Group encourage its stakeholders to bring to its attention instances where products and services have potential or real human rights impacts, using existing channels which are described in the following section 6.3 Engaging with consumers and end-users. In case of any human rights violation connected to consumers and/or end-users, these are communicated through the Group's available channels, and any remedy is assessed and provided on a case-by-case basis. No severe human rights issues and incidents connected to consumers and/or end-users have been reported in 2024.

6.3 Engaging with consumers and end-users

Processes for engaging with consumers and end-users about impacts [S4-2]

As part of its customer centric strategy, the Group is in regular dialogue with its customers. The engagement with consumers and/or end users occurs directly with them at multiple stages of the customer journey and the Group utilizes the following forms of communication: surveys, meetings, complaints management, ongoing feedback, media tracking and customer service.

The CEO is the most senior role responsible for customer-related activities and products.

Engagement is ongoing and ensured through the frontline staff members of the Group as well as through the various customer relationship channels such as:

- through visiting a branch;
- through mobile or internet banking;

- by phone to the Customer Contact Centre at 8000 9999 or +357 22500500 (if calling from abroad);
- by email at contact@hellenicbank.com;
- by email if it concerns suggestion or complaint at suggestionsandcomplaints@hellenicbank.com;
- through the Centre of alternative dispute resolution, in case of a complaint;
- through any subsidiary and any other third-party entity with which the Bank maintains a relevant agreement for managing, the recovery of NPL portfolio and repossessed assets;
- in writing by completing the Customers' Feedback Form available at any Customer Service Unit;
- by mail to the Bank registered address.

In order to assess the effectiveness of its engagement with customers, the Bank is undertaking various customer satisfaction surveys. Based on the surveys' results, the Bank sets certain metrics to measure channel usage and satisfaction and take appropriate corrective actions. Market research surveys are conducted frequently, with the majority being tracker studies and mystery customer surveys. These surveys focus on monitoring key constructs such as customer satisfaction, loyalty, retention, and overall customer experience. Indices such as Net Promoter Score, Overall Customer Satisfaction, Intention to maintain cooperation, Secure Customer Index, Customer Effort Score, Customer Engagement Index, ESG Index, Bank Reliability Index, are monitored and assessed. Retail customers' satisfaction is also monitored through the mystery customer surveys for the branch network and the Customer Contact Centre (CCC). All above mentioned surveys and indices are conducted by market research agencies, associates of the Bank, which are members of ESOMAR, WAPOR, MSPA. Moreover, raw data of the surveys are delivered to the Bank for additional analysis (if needed) by Quality & Research and Data & Analytics.

The CCC is one of the key channels of the Bank, promptly addressing customer inquiries and effectively resolving issues. All customers can raise their enquiries by contacting the CCC. Customers can receive information and assistance with queries related to products and services without needing to visit a branch. CCC often acts as the liaison with the customer when the Bank needs to communicate any process, information, or the result of an investigation of a technical issue/complaint/inquiry.

All research findings are reported on a quarterly basis to ExCo for information and initiation of targeted actions. Subsequently, these insights are reported to the BRMC. Research findings are also communicated monthly to specific bank units for more informed decisions and actions. These bank units include CEO's Office, Transformation Planning & Innovation, Operational Risk Management, Corporate Communication & Branding, Internal Audit, Retail Banking / Distribution Channels, Data & Analytics and Human Resources".

During 2024, the Bank has prepared an action plan with specific tasks assigned to relevant departments, aiming to improve customer relationship and higher customer engagement. Quality & Research department has produced a report incorporating improvement action plans and monitoring mechanisms from the major customer contact bank units. Each unit submits improvement tasks, sets deadlines, and monitors on a quarterly basis the progress made, taking corrective actions when needed. Key action plans include the strengthening of the customer contact centre with permanent and temporary staff, the use of alternative electronic channels at lower costs for customer service, the streamlining/centralisation/automation of processes and procedures, redesign of lending process, improved performance of ATMs, enhancement of staff morale, adoption of a quality culture, and more focused staff training. These bank wide actions will assist in implementing the bank's digital roadmap, increased customer engagement and better service quality. They are ongoing actions with a time horizon the next two years 2025-2026.

The Group has not yet established a formal process to engage with consumers and end-users who may be particularly vulnerable to impacts or marginalized, such as people with disabilities, children, or financially vulnerable individuals. A timeframe for this initiative will be determined as part of the Group's alignment with Eurobank Group.

6.4 Privacy

Impact, risk and opportunity management

Policies related to consumers and end-users [S4-1]

The Group has adopted a Data Protection Policy (DPP) to prevent unlawful processing of personal data and ensure compliance with national and European regulatory frameworks. The DPP outlines the basis for collecting and processing personal data and the measures to ensure the privacy and security of personal information throughout the organisation. Processing personal data of natural persons must adhere to the data protection principles set out in the GDPR. The Group's Data Protection Policy is designed and monitored to ensure compliance with such principles: lawfulness, fairness, and transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality, and accountability.

The DPP covers all customers and applies regulatory requirements for special categories of data (health data, sex orientation data, political beliefs, union data or ethnic data) and special category of customers (minors). The BoD is accountable for the implementation of the DPP.

Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]

The Group has developed and continuously enhances a culture of GDPR compliance to increase public trust. The Group also implements appropriate technical and organisational measures to meet the regulatory requirements for protecting personal data, including those set by the GDPR and the Cyprus law (Law).

The Group has established and continues to develop a Data Protection Programme to:

- Implement and maintain effective and transparent policies and procedures for personal data processing;
- Ensure it can respond to requests from both the supervisory authority and data subjects;
- Continuously enhance its organisational and technical measures to ensure compliance with the GDPR and the Law;
- Monitor its activities involving personal data of natural persons and effectively manage relevant risks.

In accordance with GDPR provisions, the Group has appointed a Data Protection Officer ("DPO"), whose appointment is communicated to the Commissioner for Personal Data Protection. The DPO is supported by the Data Protection Office.

The DPO must be involved in all issues relating to personal data protection, ensuring compliance, and promoting a privacy-by-design approach. Changes to the processing of personal data (procedures, systems, vendors) are assessed accordingly to ensure any processing is compliant to GDPR.

In line with the DPP objectives, during root cause analysis of any personal data breach incident/near miss, for any possible enhancements identified, the DPO promotes ideas for implementation and engages in guiding such implementation.

Additionally, the Group publishes its Privacy Notice, obtains customer consent where required, and provides opt-out options to ensure transparency and compliance with data protection regulations, e.g. in promotional communication, responding to access rights or other rights exercised by personal customers. By applying Personal Data Policy/procedures (internally), DPO is assessing new/revised processing activities of the Group at design level, to ensure both personal data protection and compliance with GDPR principles. The Privacy notice serves as communication tool. It provides full transparency on what information the Group collects and how it is used, from where or where it may be received or sent and the legal basis on which it relies. Also, it is required to be provided to each onboarded customer and it is publicly available on the Group's website.

The Group allocates the necessary resources for the management of its material risk of data privacy, including financial resources, dedicated human resources and specialised systems.

No significant operational expenditures (OpEx) and/or capital expenditures (CapEx) were estimated for these actions.

Metrics and Targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

Regarding privacy risk (i.e., data protection), the Bank's has in place Risk Appetite Statement ("RAS") metrics and KRIs with set tolerance levels covering the data protection of natural persons. These metrics are set taking into account trends of historic data and based on the Risk Appetite of the Bank. They are monitored by ORM and escalated to Senior Management in case of any breaches of the tolerance levels. In 2024, these metrics were within tolerance levels. Specifically, in 2024:

- The RAS metric "Number of Personal Data actual breach incidents with DPO involvement" was 27 which is within the tolerance level (less than 80 per annum). Note that DPO 'involvement' refers to incidents investigated by DPO. These incidents were handled with due care, ensuring compliance with the requirements of the GDPR, informing the Commissioner and/or the data subjects involved where such notification was required and taking immediate corrective action for the avoidance of similar incidents in the future. There were no decisions against the Bank from the reported breaches.
- The KRI "Number of GDPR incidents with decision against the Bank by Personal Data Protection Commissioner" was 0 which is within the tolerance level (less than 3 per annum).

When tracking the effectiveness of the Data Protection Programme, any enhancement required which results from the assessment of personal data incidents is initiated by the DPO and monitored until completion. In case there is any residual risk, or an open risk the appropriate management body is informed for additional measures, in line with the Data Protection Policy ("DPP").

No targets have been set yet but they will be taken into consideration in alignment with the Eurobank Group.

6.5 Access to (quality) information

Impact, risk and opportunity management

Policies and actions for material impacts on consumers and end users [S4-1, S4-4]

The Group does not currently have policies and/or actions with reference to access to quality information. Any relevant policies, actions and resources related to access to quality information will be developed in alignment with the Eurobank Group.

Metrics and Targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

Currently, the Group has not set specific, measurable targets related to access to quality information. Such targets will be developed in alignment with the Eurobank Group.

6.6 Access to products and services

Impact, risk and opportunity management

The Bank's ongoing effort is to maintain an appropriate range of products and services, which empower it to align its strategy with the interests, objectives, characteristics and needs of its customers. The Bank ensures that the introduction of new products/services and amendments to existing ones align with the Group's overall strategy, including its ESG Strategy, and risk appetite.

Policies related to consumers and end-users [S4-1]

The Bank's Products & Services Management Policy aims to maintain a portfolio that meets customer needs while managing risks effectively and it is approved by the BoD upon the recommendation of the BRMC. This Policy is in accordance with the CBC Internal Governance of Credit Institutions Directive of 2021 (R.A.A. 426/2021) and considers the applicable regulatory framework at any given time.

This Policy provides, the principles, provisions, best practices, controls for the identification, assessment, management, mitigation of the corresponding risks related to the launch of new products/services, entry into new markets, new business launches, investment for own account in asset classes, as well as amendments to existing products/services aiming to appropriately address and satisfy the interests, objectives, characteristics and needs of the customers.

The Products & Services Management Policy stakeholder consultation involves consultation with relevant stakeholders and internal control functions for risk assessment and approval before launching or amending products/services. The interests, objectives, and unique characteristics of customers are assessed by the respective product owners in order to be preserved and continuously enhanced through products and services. This process involves a thorough analysis of customer feedback, market trends, and regulatory requirements, to ensure that products and services remain competitive and aligned with customer needs.

Additionally, the Policy mandates the testing of products/services before launch in order to assess their impact on customers, while it ensures that the Bank has adequate resources to understand and manage associated risks before introducing new products/services or making significant amendments to existing ones. Such provisions, help the Bank align its offerings with its strategic goals and customer needs while maintaining effective oversight & governance.

During the assessment of new products/services/communication, special characteristics of groups of customers are taken into consideration so as to avoid discrimination and safeguard their personal data protection due to specific characteristics.

Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]

In relation to access to products and services, the Bank implements the following actions, as part of its ongoing efforts to promote inclusion and accessibility:

- Touch Credit and Debit Cards designed to make payments more accessible to visually impaired customers;
- ATM/Branch accessibility for people with disabilities;

- “Meet and Greet” responsible individual in each branch to assist people with disabilities;
- Free over-the-counter transactions for people with disabilities;
- Free Basic Account for vulnerable individuals (For minimum guaranteed income beneficiaries (“EEE”) as well as customers falling under the provisions of law 64(I)/2017 (Asylum Seekers, Political Refugees, Holders of Complementary Protection, Victims of Trafficking and / or Exploitation of Persons));
- Reduced fees on transactions made in Branches for pensioners;
- Car loan with special pricing for the purchase of disability vehicle.

In addition the Bank has announced additional fee relaxations and measures to support society, which will be implemented in 2025. These measures include:

- Free over-the-counter cash withdrawals and deposits for pensioners;
- Free issuance of cheque books for pensioners;
- Free account and debit card for young customers aged 18 to 25 years.

The Group allocates the necessary resources for the management of its material impact access to products and services, including financial resources, dedicated human resources and specialised systems.

No significant operational expenditures (OpEx) and/or capital expenditures (CapEx) were estimated for these actions.

Metrics and Targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

Currently the Group does not have in place any metrics to track the effectiveness of its actions to manage the impact of access to products and services, hence no targets have been established in relation to this impact. The Group will consider developing a monitoring framework for the impact of access to products and services and specifically to financial inclusion as well as enhancing its product related policy accordingly, in the context of the alignment with Eurobank Group within 2025.

6.7 Responsible marketing practices

Impact, risk and opportunity management

Policies related to consumers and end-users [S4-1]

The Group recognises the positive impact of responsible marketing practices but has not implemented a dedicated policy to manage it. This will be aligned with the Eurobank Group during 2025.

Relevant activities are carried out in accordance with existing internal procedures, as detailed below. The Group ensures full compliance with advertising laws and regulations, and that all marketing communications are legal, honest, and truthful, enabling customers to obtain accurate information about its products and services and make well-informed decisions.

Specifically, there is an internal procedure that ensures that marketing activities are reviewed and approved by Compliance, Legal and Data Protection departments to make sure that they are aligned with all respective laws in order to:

- be transparent and honest (ensure that all advertising is truthful, avoid misleading or deceptive marketing practices and provide clear, understandable information about products and services);
- ensure consumer privacy protection (respect customers privacy by safeguarding their personal data and complying with relevant privacy laws i.e. GDPR, clearly communicate how customer data will be used);
- adhere to industry regulations and standards (stay up to date with legal regulations and advertising codes in the local market, implement internal checks to ensure all marketing activities comply with relevant laws and industry standards).

The Head of the Corporate Communications and Branding unit is accountable for the implementation of this procedure.

Taking action on material impacts on consumers and end- users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions [S4-4]

Although the Group does not currently have any actions with reference to responsible marketing practices, it implements certain initiatives to educate the public. As part of its responsible marketing practices the Bank collaborates with a local portal to create and feature financial literacy videos. These videos, along with other instructional content, are shared through the Bank's social media platforms, empowering customers to make informed financial decisions about its products and services.

Any actions related to responsible marketing practices will be developed in alignment with the Eurobank Group.

The effectiveness of the Group's marketing campaigns/material is closely monitored by advertising agencies and communications experts (third-party agencies). All actions are thoroughly evaluated by tracking customer reach, leads and engagement.

Metrics and Targets

Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities [S4-5]

Currently, the Group has not set specific, measurable targets related to responsible marketing practices. Such targets will be developed in alignment with the Eurobank Group.

7. ESRS G1 – Business Conduct

7.1 Governance

The role of the administrative, management and supervisory bodies [ESRS 2 GOV-1]

The Bank is governed and controlled by the BoD, which operates on the basis of the Code of Corporate Governance (the "Code"), as published by the CSE, the relevant Companies, CSE and Business of Credit Institutions Laws and the Company's Articles of Association.

The BoD establishes the Group's strategic goals and ensures that the necessary financial and human resources are available to achieve the Group's strategic and operational objectives.

The BoD has the overall responsibility for:

- Setting and overseeing the values and standards of the Group;
- Setting and overseeing the business model of the Group;
- Maintaining effective systems and controls to ensure effective operation of the Group and compliance with the applicable legal and regulatory framework;
- Setting the framework and policy for effective governance and oversight of the Group;
- Monitoring business performance against the strategic objectives, risk appetite and expected standards.

The BoD is responsible for ensuring that the composition and organisation of the Board of Directors and its Committees are appropriate.

The Bank's Corporate Governance Framework encompasses a list of matters reserved for the BoD, including, among others, establishing the Group's overall strategy and targets, approving the annual budget, endorsing capital and funding plans, making decisions regarding the Bank's capital structure, addressing significant issues and material transactions, handling transactions with Board Members, Senior Executives, or major shareholders, appointing or removing the Chief Executive Officer, and addressing matters related to the composition and organisation of the BoD and its Committees, as well as governance issues.

The Bank follows a predetermined procedure for the nomination, evaluation, selection, succession, and ongoing assessment of the Members of its BoD. Specifically, all Board Members must be of good repute, adhere to the highest ethical standards, and act with integrity and honesty. All BoD Members must have the necessary qualifications, education, skills, knowledge, experience / expertise, diversity, and independence in order to conduct all their duties. The Nominations / Internal Governance Committee of the Board of Directors identifies, evaluates and recommends for approval by the Board candidates to be appointed as Directors.

In identifying candidates, the Board Nominations / Internal Governance Committee:

(a) Considers candidates from a wide range of backgrounds,

(b) pays due regard to the Fitness and Probity (Suitability) regulatory requirements and

(c) considers candidates on merit and against objective criteria, as defined in the relevant policy, with due regard to the benefits of diversity, taking care that appointees will have sufficient time to devote to the position.

The Bank has a Recruitment Policy in relation to the nomination, evaluation, selection, succession, and ongoing assessment of the Members of the BoD, reviewed by the Board Nominations / Internal Governance Committee and approved by the BoD, with the view of promoting diversity of skills and competencies within the BoD.

All newly appointed Board Members receive an induction and training. They receive an induction information pack, participate in an induction programme and have the opportunity to meet with senior officers of the Bank, be briefed by them and participate in introductory presentations.

In addition, the Chairperson of the BoD, with the assistance of the Company Secretary, must ensure that the Members of the BoD possess at all times sufficient knowledge and skills to perform their duties and that their education and development needs are addressed on a continuing basis. For this purpose, a Board annual training schedule is prepared, which includes specialised programmes covering technical matters and matters for the development of business and personal skills. In addition, they are given the opportunity to participate in specialised induction programmes and seminars that relate to their responsibilities as Members of Board Committees.

More information on the composition of the BoD and its Committees is provided in ESRS 2 – General Disclosures section 1.2 Governance.

7.2 Impact, risk and opportunity management

Description of the process to identify and assess material impacts, risks and opportunities [ESRS 2 IRO-1]

The Group has identified Corporate Culture and Protection of Whistleblowers as material sustainability topics related to Business Conduct (refer to ESRS 2 section Description of the process to identify and assess material impacts, risks and opportunities [IRO-1]). The actual positive impacts associated with Business conduct matters are shown in the table below:

Type of Impact or Risk/ Opportunity	Value chain	Time Horizon	Description
Corporate culture			
Actual positive impact	Own operations	Medium- / Long-term	Business conduct and a healthy corporate culture can contribute to staff member well-being, encourage community engagement and ethical business practices that benefit local communities. Furthermore, they can support the uphold of high ethical standards, transparency, and accountability in business operations
Protection of whistleblowers			
Actual positive impact	Own operations	Short- / Medium- / Long-term	The protection of whistle-blowers can have an important impact by fostering a culture of transparency, accountability, and ethical conduct within organizations and society at large. It encourages individuals to come forward with information about misconduct, fraud, or unethical behaviour, leading to improved corporate governance and ethical business practices. This can contribute to the creation of a more trustworthy and responsible business environment, promoting public trust and confidence in institutions

Business conduct policies and corporate culture [G1-1]

The Group's policies that are in place to promote corporate culture are the following:

- Code of Business Conduct & Ethics
- Whistleblowing Policy
- Anti-Bribery and Corruption Policy[18]
- Conflict of Interest Policy
- Market Abuse Policy
- Compliance Policy

In the following sections more details are provided on the Code of Business Conduct & Ethics and Whistleblowing Policy, as these are the material impacts identified under Corporate Culture, through the DMA process.

Code of Business Conduct & Ethics [19]

According to the CBC Directive on the Internal Governance in Credit Institutions of 2021, as amended from time to time, the Group must develop, approve, and promote, throughout the organisation, a Code of Business Conduct, ethics, and corporate values on the basis of generally acceptable principles. The Code of Business Conduct & Ethics (the "Code") does not allow behaviour that could result in the Group engaging in any improper, inappropriate, corrupted, unethical, or illegal activity.

In compliance with the applicable regulatory framework, the Group adopts this Code that encapsulates the principles, values, standards and rules of conduct / behaviour and general professional attitude that guide the decisions, procedures, and systems of the Group.

This Code includes principles and standards related to the following areas:

- Corporate Values;
- Social and Environmental Responsibility;
- Conduct towards Customers and Associated Third Parties;
- Market Conduct;
- Conduct towards Colleagues;
- Data Protection;
- Information Security;
- Anti-Bribery and Corruption;
- Financial Crime;
- Fraud;
- Communication;
- Lobbying Activities.

This Code is approved by the BoD based on recommendations of the BAC and is reviewed annually or whenever required because of changes of circumstances. The roles and responsibilities of the BoD and the BAC in relation to this Code are incorporated in the BoD and BAC Terms of Reference respectively.

Scope & Applicability

This Code defines the standards, principles, values, and rules of conduct / behaviour by which all activities of the Group are governed in all dealings. It applies to all staff members, Senior Management, and all Members of the BoD of the Group; and any others associated with the Group such as agents, brokers, introducers, suppliers/vendors, contractors, consultants, business partners and other third-party representatives of the Group when they are working for or on behalf of the Group (Associated Third Parties). With regard to Associated Third Parties

[18] The Anti-Bribery and Corruption Policy is consistent with the United Nations Convention against Corruption.
[19] The Code of Business Conduct & Ethics is currently under review to be aligned with Eurobank Group relevant code.

the principles of the said code should be reflected through relevant clauses stated in the bilateral agreements between associates and the Group.

Monitoring

Instances of non-compliance with this Code are fully investigated and may result in a disciplinary action in accordance with the Group's Disciplinary Code. All staff members and other relevant stakeholders (as described in the following section) subject to this Code must report immediately any actual or suspected breaches of this Code.

Highest accountable level

The BoD is the highest accountable level for the implementation of the Code of Business Conduct & Ethics. Senior Management is responsible for adopting this Code which is also embedded in the staff members' performance appraisal.

Stakeholder interest consideration

The interests of key stakeholders', as mentioned above, are captured in the setting up of the code through the following areas/topics:

- Conduct towards Customers
- Market Conduct
- Conduct towards staff members
- Data protection
- Information Security & Fraud
- Anti-Bribery & Corruption
- Financial Crime
- Communication

Policy availability

The Code is accessible by all staff members via the Group's internal portal. Additionally, in line with the applicable regulatory framework, the Group is required to disclose the said Code on its website in a clear and visible manner and ensure that it is updated accordingly in case of any material changes. Furthermore, the Group's responsibility to respect human rights is outlined in its Human Rights Statement which is available through the Bank's website.

Corporate Culture

The Group's corporate culture is established / developed via this Code through the Group's corporate values, which underpin the way the Group does business with its clients/customers, counterparties, and associated third parties, guide its decision-making and the manner in which all persons subject to this code are expected to behave, operate, and work. All persons subject to this code must understand and comply with these values and through their behaviour actively help to embed them within the Group's culture.

Misconduct considerations

Any instances of misconduct are investigated and may result in a disciplinary action in accordance with the Group's Disciplinary Code. Persons subject to this code are able, in line with the Whistleblowing Policy, to report, in good faith, serious irregularities and omissions, unethical or questionable practices and actual or potential breaches of laws, regulations, policies, standards and procedures.

Additionally, customers are informed of the Group's complaints procedure so they understand how and where they can raise their concerns, complaints or suggestions and get assurance that these are investigated and addressed accordingly.

Training

All Senior Management and staff members are obliged to attend regular trainings in all of the following areas, ensuring their timely completion:

- Code of Business Conduct and Ethics in order to become appropriately acquainted with the said Code
- Information Security & Fraud to be able to safeguard the Group's information assets and services, using them appropriately in accordance with the Information Security and Fraud Policy
- Financial Crime & Sanction to ensure that they understand the Group's defined limits and risk appetite.

To monitor and track the effectiveness of training on such matters, upon completion of each training course an internal evaluation is completed by each participant and also relevant records of participation are maintained. Human Resources is responsible to ensure, in cooperation with the Compliance Unit, that regular training arrangements are in place in order to cover all principles defined in the said Code.

Whistleblowing Policy [20]

The Group has developed and implements a policy for Reporting Illegal or Unethical Conduct Violations of EU Law (Whistleblowing Policy). The Whistleblowing Policy is developed in line with the CBC Directive on the Internal Governance of Credit Institutions of 2021, the Directive (EU) 2019/1937 on the protection of persons who report breaches of the European Union law and the respective Cyprus Law [N.6(I)/2022], as amended from time to time. The Whistleblowing Policy defines the guidelines and principles for the reporting and effective management of named or anonymous Reports, on matters of concern or suspicion relating to:

- serious irregularities and omissions;
- unethical or questionable practices;
- potential or actual Breaches of the applicable regulatory framework;
- potential or actual Breaches of internal policies, standards, and procedures.

The purpose of the Whistleblowing Policy is to encourage and facilitate the staff members of Group, as well as any concerned third party to submit reports on wrongdoings, while setting out measures for their protection. The Group encourages the reporting of any actual, attempted, or suspected illegal or unethical conduct. In compliance with the applicable regulatory framework, the BoD adopts this policy for the named or anonymous reporting and management of wrongdoings. This policy covers the basic principles for the reporting of wrongdoings, the reporting channels, the protection rights of reporting persons, the report handling principles, the record keeping obligations and the roles and responsibilities of all involved stakeholders.

The Whistleblowing Policy and any subsequent updates / amendments are approved by the BoD, based on the recommendations of the BAC, and is available to all staff members via the Group's internal portal. The policy is reviewed and updated on the earliest of:

- Every year by the CU;
- Following applicable amendments to the legal and regulatory framework (when required);
- Where significant deficiencies are identified in the reporting framework; or
- When changes to the Group's business require additional or different measures or whenever required because of changes of circumstances.

The roles and responsibilities of the BoD and the BAC, in relation to the Whistleblowing Policy, are defined in the BoD and BAC Terms of Reference respectively. In cases where there are references in any other internal policies and procedures in relation to issues covered by this policy, which were approved prior to the approval of this policy, the provisions of this policy will prevail. The implementation process of this policy is described in the Whistleblowing procedure.

[20] Whistleblowing Policy was revised to be aligned with Eurobank Group relevant policy and was approved by the BoD in January 2025.

Scope/Applicability

The Whistleblowing Policy sets out the regulatory requirements relating to the communication and / or submission of whistleblowing reports and ensures that all necessary steps are taken for the timely and effective handling, management and recording of such reports. The aim is to provide for the overall protection of persons reporting breaches or concerns, including Person Concerned and Third Persons who are connected with the Reporting Persons, from retaliation, for the mutual benefit of staff members or other involved persons and the Group.

The said policy applies to reports relating to the Group. Specifically, the policy applies for reports submitted by persons engaged by the Group permanently or temporarily, with any form of employment including persons working remotely, as well as paid or unpaid trainees. Moreover, it applies to reports from ex-employees, volunteers and job applicants that have acquired information on breaches during the recruitment process or other pre-contractual negotiations, persons having self-employed status, or consultants, any persons working under the supervision and direction of contractors, subcontractors and suppliers. It also applies to reports from shareholders, board members, executive or non-executive, and members of supervisory bodies. The policy also applies to reports submitted by third parties, apart from those mentioned above, to the extent that the current legislation requires their handling by the Group. The policy also refers to the Associated Third Parties (including servicers) performing services for the Group or on their behalf.

Monitoring

The CU prepares, on an annual basis, reports on the performance of the reporting system, taking into account quantitative as well as qualitative criteria. The CU also monitors and evaluates the operational effectiveness of the policy and relevant procedure, in line with its annual action plan. In addition, Internal Audit, through its deliverables to the BAC, informs on a regular basis on all misconduct reports that fall under the provisions of this policy. Moreover, the ORM reports to the BRMC any whistleblowing related issue comes to its attention and is of adequate materiality.

Highest accountable level

The BoD is responsible for:

- Ensuring the existence of a robust framework for reporting illegal or unethical conduct;
- The investigation of Reports under terms of legality, objectivity, impartiality, and transparency;
- Promoting continuous improvement of the policy;
- Committing to, promoting, and practicing a speak-up/listen-up culture;
- Ensuring, to the extent possible, that Reporting Persons and others involved will not suffer detriment with relation to the reporting.

Stakeholder interest consideration

Key stakeholders' interests are captured through the basic principles of this policy, which are:

- All staff members and Associated Third Parties are encouraged to communicate their concerns by submitting a report;
- The Group shall not hinder reporting, retaliate against reporting persons, victimise or discourage them in any way;
- There are a number of channels that can be used for submitting a report;
- The handling of reports is subject to strict confidentiality and personal data protection rules;
- Reporting persons can choose to submit a report anonymously;
- Reports of wrongdoing are dealt with in a proper and timely manner;
- Persons who report wrongdoing and have reasonable grounds to believe that the information they provide is true at the time of reporting, are protected against any form of retaliation, including threats and attempts of retaliation.

Policy availability

Staff members are given the Whistleblowing Policy as part of the Bank's induction pack by Human Resources. They also have access to this policy as well as the relevant procedure through the Group's internal portal. Via the Group's website, information and advice is provided regarding the submission of Reports by persons falling under the definition of Reporting Persons as well as the remedies available to protect against retaliation and their rights.

Corporate Culture

Through the Whistleblowing Policy the Group promotes a speak up culture in order to identify breaches at an early stage and address them before they develop and be proactive in detecting misconducts soon enough before they occur. As the Group is dedicated and committed to operate within a culture of integrity, honesty, respect, trust, professionalism and within the corporate values, the Group aims to judgement and discretion and constructively raise alerts in good faith on issues which call for immediate attention. This culture is reflected in the Group's practices, as well as Senior Management's behaviour, communication and guidance.

Details of reporting channels

Reporting Persons may submit reports through:

- the internal reporting channels (via email, letter, or phone);
- external reporting channels (i.e., the relevant competent authority) either after reporting first through internal reporting channels or by directly reporting through external reporting channels;
- public disclosure.

The Group encourages reporting through internal reporting channels before reporting through external reporting channels, where the potential or actual Breach can be addressed effectively internally and where the Reporting Person considers that there is no risk of Retaliation.

Reports can be named and anonymous, in writing and verbally, via telephone or through other voice messaging system. Also, upon request by the Reporting Person, reports can be submitted by means of a physical meeting within a reasonable timeframe.

Specifically, the Group encourage the submission of internal reporting, in written form, line with the provisions of the Whistleblowing procedure. The Reports need to be as specific, descriptive and comprehensive as possible to allow the initiation of the investigation and assist Senior Management in understanding and better addressing the issue. Reports remitted to the Group are mailed in a sealed envelope, to the P.O. Box 25513, 1394 Nicosia, Cyprus, addressed to "Hellenic Bank Public Co Limited, for the "Chairman of the Board Audit Committee".

The actual Reports can also be communicated directly to the Central Bank of Cyprus, addressed to the Head of Supervision, or any other relevant Competent Authority, if deemed necessary. In case of breaches/infringements relating to Market Abuse, such infringements may also be reported to the Cyprus Securities and Exchange Commission, in line with DV15 directive.

Channels for receiving the Reports are designed, established, and operated in a secure manner that ensures that the confidentiality of the identity of the persons involved is protected and prevents access thereto by unauthorised staff members. The reports should be as specific as possible, and violations should be described in sufficient detail to facilitate an investigation.

The actions to be taken depend on the nature and gravity of the concern. In any case, the actions shall be taken in an independent, lawful, impartial, transparent as well as timely manner and shall be documented. When an investigation takes place, it shall aim to establish facts and evaluate them objectively in order to determine if the wrongdoing is occurring, has occurred or is likely to occur, as well as its extent. Internal Audit is responsible for the investigations, unless decided differently.

Safeguards for reporting irregularities

Persons Concerned may fully exercise the right to an effective remedy and to a fair trial, as well as the presumption of innocence and the right of defence, including the right to be heard and the right to access their record / file, provided that such access does not infringe any law and is in line with EU Regulation 2016/679 and the respective Cyprus Law [N.125(I)/2018]. The identity of persons concerned is protected for as long as investigations triggered by the Report, or the public disclosure are ongoing. The principles of the Duty of Confidentiality, the Processing of Personal Data and the not-disclosure of information that may identify any person involved / referred to in the Report, mentioned above, also apply to the protection of the identity of Persons Concerned.

Reporting Persons qualify for protection provided that:

- they have reasonable ground to believe that the information on breaches reported was true at the time of reporting and that such information fell within the scope of Directive (EU) 2019/1937 and the respective Law [N.6(I)/2022];
- they report either internally or externally or make a public disclosure;
- they report in good faith and not vindictively or for purposes of own benefit. Persons who report or publicly disclose information on breaches anonymously, but who are subsequently identified and suffer Retaliation, nonetheless qualify for the protection provided for under Directive (EU) 2019/1937 and Law N.6(I)/2022 provided they meet the above-mentioned conditions.

The Group take all reasonable measures (to the extent possible in the capacity, capability and competence of the organisation) to protect the Reporting Person as well as the Person Concerned and any third person who is connected with the Reporting Person, from any form of retaliation, whether direct or indirect, discrimination or other types of unfair treatment or generally against any adverse consequence, as a result of the report submitted, provided that reporting is done in good faith and in compliance with the provisions of this policy. Any affected staff member / involved person who believes that they have been the victim of abuse, retaliation or reasonably believe they are exposed to a risk of abuse or retaliation or have suffered any adverse consequence as a result of a report submitted, has the right to report the case to any of the appropriate channels mentioned in the Whistleblowing Policy and relevant procedure.

Training

The Group provides information and training on the Whistleblowing Policy and the reporting system to all its staff members. Specifically, Human Resources provides relevant and regular training to staff members that are responsible for handling Reports on whistleblowing handling related requirements, to ensure they understand the regulatory requirements and the relevant restrictions provided within this Policy, in coordination with relevant Units (e.g. Compliance and Internal Audit).

To monitor and track the effectiveness of training on such matters, upon completion of each training course an internal evaluation is completed by each participant and also relevant records of participation are maintained.

Measures for protection against retaliation:

Reporting Persons qualify for protection against Retaliation, as follows:

- Where persons report information on breaches or make a public disclosure, they shall not be considered to have breached any restriction on disclosure of information and shall not incur liability of any kind in respect of such report or public disclosure provided that they had reasonable grounds to believe that the reporting or public disclosure of such information was necessary for revealing a breach.
- Reporting Persons shall not incur liability in respect of the acquisition of or access to the information, which is reported or publicly disclosed, provided that such acquisition or access did not constitute a self-standing criminal offence. In the event of the acquisition or access constituting a self-standing criminal offence, criminal liability shall continue to be governed by the applicable law.
- In proceedings before a court or other process relating to a detriment suffered by the Reporting Person, and subject to that person establishing that he/she reported or made a public disclosure and suffered a detriment, it shall be presumed that the detriment was made in retaliation for the report or the public disclosure. In such cases, it shall be for the person who has taken the detrimental measure to prove that that measure was based on duly justified grounds.

- Reporting Persons shall have access to remedial measures against Retaliation as appropriate, including interim relief pending the resolution of legal proceedings, in accordance with the applicable law.
- In legal proceedings, including for defamation, breach of copyright, breach of secrecy, breach of data protection rules, disclosure of trade secrets, or for compensation claims, Reporting Persons shall not incur liability of any kind as a result of reports or public disclosures. Reporting Persons shall have the right to rely on that reporting or public disclosure to seek dismissal of the case, if they had reasonable grounds to believe that the reporting or public disclosure was necessary for revealing a breach.
- Remedies and full compensation shall be provided for damage suffered by Reporting Persons in accordance with the relevant Law [N.6(I)/2022].

Evaluation of Corporate Culture

Corporate culture is evaluated through the incidents of breaching the code of business conduct and ethics, whistleblowing incidents, customers' complaints and whether all staff members have completed the related trainings. Corporate culture is also evaluated through the BoD and Board Committees' evaluation conducted in accordance with the provisions of the Internal Governance Directive of the Central Bank of Cyprus and best practices on Corporate Governance, at least on an annual basis.

Functions that are most at risk in respect of corruption and bribery

The Group does not define functions that are most at risk in respect of corruption and bribery, but instead specific activities at risk are defined as part of the annual risk assessment. These activities are performed by Marketing, Procurement, Credit Lending Committees and Banking Units.

Consolidated Sustainability Statement Appendices

A. Disclosure Requirements in ESRS covered by the Group's Consolidated Sustainability Statement [ESRS 2 IRO-2]

ESRS 2 General disclosures		Section
BP-1	General basis for preparation of the sustainability statement	1.1
BP-2	Disclosures in relation to specific circumstances	1.1
GOV-1	The role of the administrative, management and supervisory bodies	1.2
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.2
GOV-3	Integration of sustainability-related performance in incentive schemes	1.2
GOV-4	Statement on sustainability due diligence	1.2
GOV-5	Risk management and internal controls over sustainability reporting	1.2
SBM-1	Strategy, business model and value chain	1.3
SBM-2	Interests and views of stakeholders	1.3
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	1.3, Omission of anticipated financial effects for the first year of preparation
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	1.4
IRO-2	Disclosure Requirements in ESRS covered by the undertaking's sustainability statement	1.4
MDR-P	Policies adopted to manage material sustainability matters	Policies analysed per respective topic
MDR-A	Actions and resources in relation to material sustainability matters	Actions analysed per respective topic
MDR-M	Metrics in relation to material sustainability matters	Metrics analysed per respective topic
MDR-T	Tracking effectiveness of policies and actions through targets	Targets analysed per respective topic

E1 Climate change		Section
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	2.2.1
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.2

ESRS 2 IRO-1	**Description of the processes to identify and assess material climate-related impacts, risks and opportunities**	**2.2.3**
E1-1	**Transition plan for climate change mitigation**	**2.2.2**
E1-2	**Policies related to climate change mitigation and adaptation**	**2.2.3**
E1-3	**Actions and resources in relation to climate change policies Metrics and targets**	**2.2.3**
E1-4	**Targets related to climate change mitigation and adaptation**	**2.2.4**
E1-5	**Energy consumption and mix**	**2.2.4**
E1-6	**Gross Scopes 1, 2, 3 and Total GHG emissions**	**2.2.4**
E1-7	**GHG removals and GHG mitigation projects financed through carbon credits**	**2.2.4**
E1-8	**Internal carbon pricing**	**Not applicable**
E1-9	**Anticipated financial effects from material physical and transition risks and potential climate-related opportunities**	**Phased-in Disclosure Requirement**

E4 Biodiversity and ecosystems		**Section**
ESRS 2 SBM-3	**Material impacts, risks and opportunities and their interaction with strategy and business model**	**3.1**
ESRS 2 IRO-1	**Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities**	**3.2**
E4-1	**Transition plan and consideration of biodiversity and ecosystems in strategy and business model**	**3.1**
E4-2	**Policies related to biodiversity and ecosystem**	**3.2**
E4-3	**Actions and resources related to biodiversity and ecosystems**	**3.2**
E4-4	**Targets related to biodiversity and ecosystems**	**3.3**
E4-5	**Impact metrics related to biodiversity and ecosystems change**	**Non-material**
E4-6	**Anticipated financial effects from biodiversity and ecosystems-related risks and opportunities**	**Phased-in Disclosure Requirement**

E5 Resource use and circular economy		**Section**
E5.IRO-1	**Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities**	**4.1**
E5-1	**Policies related to resource use and circular economy**	**4.1**
E5-2	**Actions and resources related to resource use and circular economy**	**4.1**

E5-3	**Targets related to resource use and circular economy**	**4.2**
E5-4	**Resource inflows**	**Non-material**
E5-5	**Resource outflows**	**4.2**
E5-6	**Anticipated financial effects from material resource use and circular economy-related risks and opportunities**	**Phased-in Disclosure Requirement**

S1 Own workforce		**Section**
ESRS 2 SBM-2	**Interests and views of stakeholders**	**5.1**
ESRS 2 SBM-3	**Material impacts, risks and opportunities and their interaction with strategy and business model**	**5.1**
S1-1	**Policies related to own workforce**	**5.2-5.7**
S1-2	**Processes for engaging with own workers and workers' representatives about impacts**	**5.9**
S1-3	**Processes to remediate negative impacts and channels for own workers to raise concerns**	**5.6, Disclosure Requirement S1-3 32 (a) is Non-material**
S1-4	**Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions**	**5.2-5.7**
S1-5	**Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities**	**5.2-5.7**
S1-6	**Characteristics of the undertaking's employees**	**5.10**
S1-7	**Characteristics of non-employee workers in the undertaking's own workforce**	**5.11**
S1-8	**Collective bargaining coverage and social dialogue**	**5.3**
S1-9	**Diversity metrics**	**5.6**
S1-10	**Adequate wages**	**5.4**
S1-11	**Social protection**	**5.4**
S1-12	**Persons with disabilities**	**Non-material**
S1-13	**Training and skills development metrics**	**Non-material**
S1-14	**Health and safety metrics**	**Non-material**
S1-15	**Work-life balance metrics**	**5.2**

S1-16	Compensation metrics (pay gap and total compensation)	5.4
S1-17	Incidents, complaints and severe human rights impacts	5.6

S4 Consumers and end-users		Section
ESRS 2 SBM-2	Interests and views of stakeholders	6.1
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	6.1
S4-1	Policies related to consumers and end-users	6.2,6.4-6.7
S4-2	Processes for engaging with consumers and end-users about impacts	6.3
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	Non-material
S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end- users, and effectiveness of those actions	6.4-6.7
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	6.4-6.7

G1 Business conduct		Section
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	7.1
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	7.2
G1-1	Corporate culture and business conduct policies and corporate culture	7.2
G1-2	Management of relationships with suppliers	Non-Material
G1-3	Prevention and detection of corruption and bribery	Non-Material
G1-4	Confirmed incidents of corruption or bribery	Non-Material
G1-5	Political influence and lobbying activities	Non-Material
G1-6	Payment practices	Non-Material

B. List of datapoints that derive from other EU legislation

The following table indicates all the data points that derive from other EU legislation as listed in ESRS 2 appendix B, indicating where the data points can be found in the Consolidated Sustainability Statement and which data points are assessed as "Not material", "Not applicable", "Phased-in Disclosure requirement".

Datapoints that derive from other EU legislation							
Disclosure requirement	**Data point**	**Consolidated Sustainability Statement**	**SFDR reference**	**Pillar 3 reference**	**Benchmark regulation reference**	**EU Climate Law reference**	**Section**
ESRS 2 GOV-1	21(d)	Board's gender diversity	x		x		**1.2**
ESRS 2 GOV-1	21(e)	Percentage of board members who are independent			x		**1.2**
ESRS 2 GOV-4	30	Statement on due diligence	x				**1.2**
ESRS 2 SBM-1	40 (d) i	Involvement in activities related to fossil fuel activities	x	x	x		**Not applicable**
ESRS 2 SBM-1	41 (d) ii	Involvement in activities related to chemical production	x		x		**Not applicable**
ESRS 2 SBM-1	41 (d) iii	Involvement in activities related to controversial weapons	x		x		**Not applicable**
ESRS 2 SBM-1	42 (d) iv	Involvement in activities related to cultivation and production of tobacco			x		**Not applicable**
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				x	**2.2.2**
ESRS E1-1	16 (g)	Undertakings excluded from Paris-aligned Benchmarks		x	x		**2.2.2**
ESRS E1-4	34	GHG emission reduction targets	x	x	x		**2.2.4**
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x				**2.2.4**
ESRS E1-5	37	Energy consumption and mix	x				**2.2.4**
ESRS E1-5	40 to 43	Energy intensity associated with activities in high climate impact sectors	x				**Not applicable**
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	x	x	x		**2.2.4**
ESRS E1-6	53 to 55	Gross GHG emissions intensity	x	x	x		**2.2.4**
ESRS E1-7	56	GHG removals and carbon credits				x	**Not applicable**
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			x		**Phased-in Disclosure requirement**
ESRS E1-9	66 (a)	Disaggregation of monetary amounts by		x			**Phased-in Disclosure requirement**

		acute and chronic physical risk					
ESRS E1-9	66 (c)	Location of significant assets at material physical risk		x			**Phased-in Disclosure requirement**
ESRS E1-9	66 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		x			**Phased-in Disclosure requirement**
ESRS E1-9	69	Degree of exposure of the portfolio to climate- related opportunities			x		**Phased-in Disclosure requirement**
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	x				**Non-Material**
ESRS E3-1	9	Water and marine resources	x				**Non-Material**
ESRS E3-1	13	Dedicated policy	x				**Non-Material**
ESRS E3-1	14	Sustainable oceans and seas	x				**Non-Material**
ESRS E3-4	28 (c)	Total water recycled and reused	x				**Non-Material**
ESRS E3-4	29	Total water consumption in m^3 per net revenue on own operations	x				**Non-Material**
ESRS 2- IRO 1 - E4	16 (a) i		x				**Non-Material**
ESRS 2- IRO 1 - E4	16 (b)		x				**3.2**
ESRS 2- IRO 1 - E4	16 (c)		x				**3.2**
ESRS E4-2	24 (b)	Sustainable land / agriculture practices or policies	x				**Non-Material**
ESRS E4-2	24 (c)	Sustainable oceans / seas practices or policies	x				**Non-Material**
ESRS E4-2	24 (d)	Policies to address deforestation	x				**Non-Material**
ESRS E5-5	37 (d)	Non-recycled waste	x				**4.2**
ESRS E5-5	39	Hazardous waste and radioactive waste	x				**4.2**
ESRS 2- SBM3 - S1	14 (f)	Risk of incidents of forced labour	x				**5.1**
ESRS 2- SBM3 - S1	14 (g)	Risk of incidents of child labour	x				**5.1**
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions	x				**5.6**
ESRS S1-1	20	Human rights policy commitments			x		**5.6**
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x				**5.6**

ESRS S1-1	23	Workplace accident prevention policy or management system	x				**5.8**
ESRS S1-3	32 (c)	Grievance/complaints handling mechanisms	x				**5.6**
ESRS S1-14	88 (b) & (c)	Number of fatalities and number and rate of work- related accidents	x		x		**Non-Material**
ESRS S1-14	88 (e)	Number of days lost to injuries, accidents, fatalities or illness	x				**Non-Material**
ESRS S1-16	97 (a)	Unadjusted gender pay gap	x		x		**5.6**
ESRS S1-16	97 (b)	Excessive CEO pay ratio	x				**5.6**
ESRS S1-17	103 (a)	Incidents of discrimination	x				**5.6**
ESRS S1-17	104 (a)	Non-respect of UNGPs on Business and Human Rights and OECD	x		x		**5.6**
ESRS 2- SBM3 – S2	11 (b)	Significant risk of child labour or forced labour in the value chain	x				**Non-Material**
ESRS S2-1	17	Human rights policy commitments	x				**Non-Material**
ESRS S2-1	18	Policies related to value chain workers	x				**Non-Material**
ESRS S2-1	19	Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	x		x		**Non-Material**
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8			x		**Non-Material**
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				**Non-Material**
ESRS S3-1	16	Human rights policy commitments	x				**Non-Material**
ESRS S3-1	17	Non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines	x		x		**Non-Material**
ESRS S3-4	36	Human rights issues and incidents	x				**Non-Material**
ESRS S4-1	16	Policies related to consumers and end-users	x				**6.2**
ESRS S4-1	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	x		x		**6.2**
ESRS S4-4	35	Human rights issues and incidents	x				**6.2**
ESRS G1-1	10 (b)	United Nations Convention against Corruption	x				**7.2**

ESRS G1-1	10 (d)	Protection of whistle-blowers	x				**7.2**
ESRS G1-4	24 (a)	Fines for violation of anti- corruption and anti-bribery laws	x		x		**Non-Material**
ESRS G1-4	24 (b)	Standards of anti-corruption and anti-bribery	x				**Non-Material**

FY 2024
0. Summary of KPIs

		Total environmentally sustainable assets	KPI[4] (T)	KPI[5] (C)	% coverage (over total assets)[3]	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	25,0	0,2%	0,3%	59%	36%	41%

		Total environmentally sustainable activities	KPI[4] (T)	KPI[5] (C)	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	*GAR (flow)*	21,5	0,9%	0,0%	100%	69%	0%
	Trading book[1]	n/a	n/a	n/a			
	Financial guarantees	-	0%	0%			
	Assets under management	0,1	0%	0%			
	Fees and commissions income[2]	n/a	n/a	n/a			

Notes:
1. For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR
2. Fees and commissions income from services other than lending and Assets under Management
3. % of assets covered by the KPI over banks´ total assets
4. based on the Turnover KPI of the counterparty
5. based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

FY 2024

1.Assets for the calculation of GAR, Turnover

	Million EUR	a	b	c	d	e	f	g	h	i	j
		Total [gross] carrying amount	**Climate Change Mitigation (CCM)**					**Climate Change Adaptation (CCA)**			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	4.304	3.020	25	7	4	4	6	0	-	0
2	**Financial undertakings**	**810**	**186**	**18**	**7**	**2**	**1**	**1**	**0**	**-**	**-**
3	Credit institutions	803	186	18	7	2	1	1	0	-	-
4	Loans and advances	307	57	7	7	-	0	1	0	-	-
5	Debt securities, including UoP	497	129	11	-	2	0	-	-	-	-
6	Equity instruments	-	-	-		-	-	-	-		-
7	Other financial corporations	7	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-		-	-	-	-		-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-		-	-	-	-		-
20	**Non-financial undertakings**	**93**	18	7	-	3	3	5	0	-	0
21	Loans and advances	28	1	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	64	17	7	-	3	3	5	0	-	0
23	Equity instruments	0	-	-		-	-	-	-		-
24	**Households**	**3.401**	2.816	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	2.489	2.489	-	-	-	-	-	-	-	-
26	of which building renovation loans	214	214	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	113	113	-	-	-	-	-	-	-	-
28	**Local governments financing**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
29	Housing financing	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	**75**	**34**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**

		a	b	c	d	e	f	g	h	i	j
	Million EUR	Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	**6.739**									
33	**Financial and Non-financial undertakings**	**5.701**									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	**3.521**									
35	Loans and advances	2.086									
36	of which loans collateralised by commercial immovable property	1.426									
37	of which building renovation loans	33									
38	Debt securities	1.421									
39	Equity instruments	15									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	**2.179**									
41	Loans and advances	434									
42	Debt securities	1.745									
43	Equity instruments	-									
44	**Derivatives**	**22**									
45	**On demand interbank loans**	**227**									
46	**Cash and cash-related assets**	**101**									
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	**689**									
48	**Total GAR assets**	**11.118**									
49	**Assets not covered for GAR calculation**	7.587									
50	**Central governments and Supranational issuers**	1.930									
51	**Central banks exposure**	5.627									
52	**Trading book**	30									
53	**Total assets**	**18.704**									
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations										
54	Financial guarantees	8	-	-	-	-	-	-	-	-	-
55	Assets under management	4	1	0	-	-	-	0	-	-	-
56	Of which debt securities	1	0	0				0			
57	Of which equity instruments	3	1	0				0			

	Million EUR	k	l	m	n	o	p	q	r	s	t	u	v
		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	0	-	-	-	-	-	-	-
2	**Financial undertakings**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-		-	-	-		-	-	-		-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-		-	-	-		-	-	-		-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-		-	-	-		-	-	-		-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-		-	-	-		-
20	**Non-financial undertakings**	-	-	-	-	0	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	0	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-		-	-	-		-	-	-		-
24	**Households**					-	-	-	-				
25	of which loans collateralised by residential immovable property					-	-	-	-				
26	of which building renovation loans					-	-	-	-				
27	of which motor vehicle loans												
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-

		k	l	m	n	o	p	q	r	s	t	u	v
	Million EUR	Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**												
33	**Financial and Non-financial undertakings**												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations												
35	Loans and advances												
36	of which loans collateralised by commercial immovable property												
37	of which building renovation loans												
38	Debt securities												
39	Equity instruments												
40	Non-EU country counterparties not subject to NFRD disclosure obligations												
41	Loans and advances												
42	Debt securities												
43	Equity instruments												
44	**Derivatives**												
45	**On demand interbank loans**												
46	**Cash and cash-related assets**												
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**												
48	**Total GAR assets**												
49	**Assets not covered for GAR calculation**												
50	**Central governments and Supranational issuers**												
51	**Central banks exposure**												
52	**Trading book**												
53	**Total assets**												
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligati												
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities												
57	Of which equity instruments												

		w	x	z	aa	ab	ac	ad	ae	af
	Million EUR	Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	3.026	25	7	4	4
2	**Financial undertakings**	**-**	**-**	**-**	**-**	**187**	**18**	**7**	**2**	**1**
3	Credit institutions	-	-	-	-	187	18	7	2	1
4	Loans and advances	-	-	-	-	58	7	7	-	0
5	Debt securities, including UoP	-	-	-	-	129	11	-	2	0
6	Equity instruments	-	-		-	-	-		-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-		-	-	-		-	-
12	of which management companies	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-		-	-	-		-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-		-	-
20	**Non-financial undertakings**	-	-	-	-	23	7	-	3	3
21	Loans and advances	-	-	-	-	1	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	22	7	-	3	3
23	Equity instruments	-	-		-	-	-		-	-
24	**Households**					2.816	-	-	-	-
25	of which loans collateralised by residential immovable property					2.489	-	-	-	-
26	of which building renovation loans					214	-	-	-	-
27	of which motor vehicle loans					113	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	34	-	-	-	-

	Million EUR	w	x	z	aa	ab	ac	ad	ae	af
		Biodiversity and Ecosystems (BIO)				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**									
33	**Financial and Non-financial undertakings**									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations									
35	Loans and advances									
36	of which loans collateralised by commercial immovable property									
37	of which building renovation loans									
38	Debt securities									
39	Equity instruments									
40	Non-EU country counterparties not subject to NFRD disclosure obligations									
41	Loans and advances									
42	Debt securities									
43	Equity instruments									
44	**Derivatives**									
45	**On demand interbank loans**									
46	**Cash and cash-related assets**									
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**									
48	**Total GAR assets**									
49	**Assets not covered for GAR calculation**									
50	**Central governments and Supranational issuers**									
51	**Central banks exposure**									
52	**Trading book**									
53	**Total assets**									
	Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligati									
54	Financial guarantees	-	-	-	-	-	-		-	-
55	Assets under management	-	-	-	-	1	0		-	-
56	Of which debt securities					0	0		-	-
57	Of which equity instruments					1	0		-	-

FY 2024

1.Assets for the calculation of GAR, Capex

		a	b	c	d	e	f	g	h	i	j
	Million EUR	Total [gross] carrying amount	**Climate Change Mitigation (CCM)**					**Climate Change Adaptation (CCA)**			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	4.304	3.039	32	7	4	6	2	0	-	0
2	**Financial undertakings**	810	195	22	7	2	1	2	0	-	-
3	Credit institutions	803	195	22	7	2	1	2	0	-	-
4	Loans and advances	307	66	10	7	-	0	2	0	-	-
5	Debt securities, including UoP	497	130	12	-	2	1	-	-	-	-
6	Equity instruments	-	-	-		-	-	-	-		-
7	Other financial corporations	7	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-		-	-	-	-		-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-		-	-	-	-		-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-		-	-	-	-		-
20	**Non-financial undertakings**	93	28	10	-	3	5	0	-	-	0
21	Loans and advances	28	5	0	-	-	-	-	-	-	-
22	Debt securities, including UoP	64	24	9	-	3	5	0	-	-	0
23	Equity instruments	0	-	-		-	-	-	-		-
24	**Households**	3.401	2.816	-	-	-	-				
25	of which loans collateralised by residential immovable property	2.489	2.489	-	-	-	-				
26	of which building renovation loans	214	214	-	-	-	-				
27	of which motor vehicle loans	113	113	-	-	-	-				
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	75	34	-	-	-	-	-	-	-	-

		a	b	c	d	e	f	g	h	i	j
	Million EUR	Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)		
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	6.739									
33	**Financial and Non-financial undertakings**	5.701									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	3.521									
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36	of which loans collateralised by commercial immovable property	1.426									
37	of which building renovation loans	33									
38	Debt securities	1.421									
39	Equity instruments	15									
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2.179									
41	Loans and advances	434									
42	Debt securities	1.745									
43	Equity instruments	-									
44	**Derivatives**	22									
45	**On demand interbank loans**	227									
46	**Cash and cash-related assets**	101									
47	**Other categories of assets (e.g. Goodwill, commodities etc.**	689									
48	**Total GAR assets**	11.118									
49	**Assets not covered for GAR calculation**	7.587									
50	**Central governments and Supranational issuers**	1.930									
51	**Central banks exposure**	5.627									
52	**Trading book**	30									
53	**Total assets**	**18.704**									
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations											
54	Financial guarantees	8	-	-	-	-	-	-	-	-	-
55	Assets under management	4	1	0	-	-	0	0	-	-	-
56	Of which debt securities	1	0	0			0	0			
57	Of which equity instruments	3	1	0			0	0			

	Million EUR	k	l	m	n	o	p	q	r	s	t	u	v
		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	0	-	-	-	-	-	-	-
2	**Financial undertakings**	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-		-	-	-		-	-	-		-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-		-	-	-		-	-	-		-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-		-	-	-		-	-	-		-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-		-	-	-		-
20	**Non-financial undertakings**	-	-	-	-	0	-	-	-	-	-	-	-
21	Loans and advances	-	-	-	-	0	-	-	-	-	-	-	-
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-
23	Equity instruments	-	-		-	-	-		-	-	-		-
24	**Households**					-	-	-	-				
25	of which loans collateralised by residential immovable property					-	-	-	-				
26	of which building renovation loans					-	-	-	-				
27	of which motor vehicle loans												
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-

		k	l	m	n	o	p	q	r	s	t	u	v
	Million EUR	**Water and marine resources (WTR)**				**Circular economy (CE)**				**Pollution (PPC)**			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**												
33	**Financial and Non-financial undertakings**												
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations												
35	Loans and advances												
36	of which loans collateralised by commercial immovable property												
37	of which building renovation loans												
38	Debt securities												
39	Equity instruments												
40	Non-EU country counterparties not subject to NFRD disclosure obligations												
41	Loans and advances												
42	Debt securities												
43	Equity instruments												
44	**Derivatives**												
45	**On demand interbank loans**												
46	**Cash and cash-related assets**												
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**												
48	**Total GAR assets**												
49	**Assets not covered for GAR calculation**												
50	**Central governments and Supranational issuers**												
51	**Central banks exposure**												
52	**Trading book**												
53	**Total assets**												
Off-balance sheet exposures - Undertakings subject to NFRD disclosure oblig													
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities												
57	Of which equity instruments												

		w	x	z	aa	ab	ac	ad	ae	af
Million EUR		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	-	-	-	-	3.041	32	7	4	6
2	**Financial undertakings**	-	-	-	-	197	22	7	2	1
3	Credit institutions	-	-	-	-	197	22	7	2	1
4	Loans and advances	-	-	-	-	67	10	7	-	0
5	Debt securities, including UoP	-	-	-	-	130	12	-	2	1
6	Equity instruments	-	-		-	-	-		-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-		-	-	-		-	-
12	of which management companies	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-		-	-	-		-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-		-	-
20	**Non-financial undertakings**	-	-	-	-	29	10	-	3	5
21	Loans and advances	-	-	-	-	5	0	-	-	-
22	Debt securities, including UoP	-	-	-	-	24	9	-	3	5
23	Equity instruments	-	-		-	-	-		-	-
24	**Households**					2.816	-	-	-	-
25	of which loans collateralised by residential immovable property					2.489	-	-	-	-
26	of which building renovation loans					214	-	-	-	-
27	of which motor vehicle loans					113	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	34	-	-	-	-

		w	x	z	aa	ab	ac	ad	ae	af
Million EUR		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
			Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**									
33	**Financial and Non-financial undertakings**									
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations									
35	Loans and advances									
36	of which loans collateralised by commercial immovable property									
37	of which building renovation loans									
38	Debt securities									
39	Equity instruments									
40	Non-EU country counterparties not subject to NFRD disclosure obligations									
41	Loans and advances									
42	Debt securities									
43	Equity instruments									
44	**Derivatives**									
45	**On demand interbank loans**									
46	**Cash and cash-related assets**									
47	**Other categories of assets (e.g. Goodwill, commodities etc.**									
48	**Total GAR assets**									
49	**Assets not covered for GAR calculation**									
50	**Central governments and Supranational issuers**									
51	**Central banks exposure**									
52	**Trading book**									
53	**Total assets**									
Off-balance sheet exposures - Undertakings subject to NFRD disclosure oblig										
54	Financial guarantees	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	1	0	-	-	0
56	Of which debt securities					0	0	-	-	0
57	Of which equity instruments					1	0	-	-	0

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2. GAR sector information - Turnover

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)
1	11.0 Manufacture of beverages	1,0	-			1,0	-		
2	21.1 Manufacture of basic pharmaceutical products	1,1	-			1,1	-		
3	22.2 Manufacture of plastics products	2,0	-			2,0	-		
4	23.1 Manufacture of glass and glass products	0,8	-			0,8	-		
5	23.3 Manufacture of clay building materials	1,0	0,5			1,0	-		
6	26.3 Manufacture of communication equipment	2,5	-			2,5	-		
7	27.3 Manufacture of wiring and wiring devices	1,7	0,4			1,7	-		
8	28.3 Manufacture of agricultural and forestry machinery	1,3	-			1,3	-		
9	28.9 Manufacture of other special-purpose machinery	18,4				18,4	-		
10	29.1 Manufacture of motor vehicles	9,8	0,5			9,8	-		
11	29.2 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers	2,1	0,0			2,1	-		
12	29.3 Manufacture of parts and accessories for motor vehicles	7,0	0,9			7,0	-		
13	35.1 Electric power generation, transmission and distribution	3,2	2,5			3,2	-		
14	38.3 Materials recovery	1,1	0,9			1,1	-		
15	42.1 Construction of roads and railways	0,5	0,2			0,5	-		
16	42.2 Construction of utility projects	1,9	0,0			1,9	-		
17	46.4 Wholesale of household goods	1,0	-			1,0	-		
18	46.6 Wholesale of other machinery, equipment and supplies	2,2	-			2,2	-		
19	47.2 Retail sale of food, beverages and tobacco in specialised stores	3,7	-			3,7	-		
20	47.4 Retail sale of information and communication equipment in specialised stores	0,3	0,0			0,3	-		
21	51.1 Passenger air transport	4,3	-			4,3	-		
22	52.2 Support activities for transportation	1,2	-			1,2	-		
23	55.1 Hotels and similar accommodation	2,5	-			2,5	-		
24	62.0 Computer programming, consultancy and related activities	0,5	-			0,5	-		
25	70.1 Activities of head offices	4,4	0,2			4,4	-		
26	71.1 Architectural and engineering activities and related technical consultancy	1,2	0,6			1,2	-		
27	82.9 Business support service activities n.e.c.	3,4	-			3,4	-		
28	86.1 Hospital activities	9,6				9,6	-		
29	92.0 Gambling and betting activities	2,7	-			2,7	-		

		i	j	k	l	m	n	o	p	q	r	s	t
		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
	Breakdown by sector - NACE 4 digits level (code and label)	[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)
1	11.0 Manufacture of beverages	1,0	-			1,0	-			1,0	-		
2	21.1 Manufacture of basic pharmaceutical products	1,1	-			1,1	-			1,1	-		
3	22.2 Manufacture of plastics products	2,0	-			2,0	-			2,0	-		
4	23.1 Manufacture of glass and glass products	0,8	-			0,8	-			0,8	-		
5	23.3 Manufacture of clay building materials	1,0	-			1,0	-			1,0	-		
6	26.3 Manufacture of communication equipment	2,5	-			2,5	-			2,5	-		
7	27.3 Manufacture of wiring and wiring devices	1,7	-			1,7	-			1,7	-		
8	28.3 Manufacture of agricultural and forestry machinery	1,3	-			1,3	-			1,3	-		
9	28.9 Manufacture of other special-purpose machinery	18,4	-			18,4	-			18,4	-		
10	29.1 Manufacture of motor vehicles	9,8	-			9,8	-			9,8	-		
11	29.2 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers	2,1	-			2,1	-			2,1	-		
12	29.3 Manufacture of parts and accessories for motor vehicles	7,0	-			7,0	-			7,0	-		
13	35.1 Electric power generation, transmission and distribution	3,2	-			3,2	-			3,2	-		
14	38.3 Materials recovery	1,1	-			1,1	-			1,1	-		
15	42.1 Construction of roads and railways	0,5	-			0,5	-			0,5	-		
16	42.2 Construction of utility projects	1,9	-			1,9	-			1,9	-		
17	46.4 Wholesale of household goods	1,0	-			1,0	-			1,0	-		
18	46.6 Wholesale of other machinery, equipment and supplies	2,2	-			2,2	-			2,2	-		
19	47.2 Retail sale of food, beverages and tobacco in specialised stores	3,7	-			3,7	-			3,7	-		
20	47.4 Retail sale of information and communication equipment in specialised stores	0,3	-			0,3	-			0,3	-		
21	51.1 Passenger air transport	4,3	-			4,3	-			4,3	-		
22	52.2 Support activities for transportation	1,2	-			1,2	-			1,2	-		
23	55.1 Hotels and similar accommodation	2,5	-			2,5	-			2,5	-		
24	62.0 Computer programming, consultancy and related activities	0,5	-			0,5	-			0,5	-		
25	70.1 Activities of head offices	4,4	-			4,4	-			4,4	-		
26	71.1 Architectural and engineering activities and related technical consultancy	1,2	-			1,2	-			1,2	-		
27	82.9 Business support service activities n.e.c.	3,4	-			3,4	-			3,4	-		
28	86.1 Hospital activities	9,6	-			9,6	-			9,6	-		
29	92.0 Gambling and betting activities	2,7	-			2,7	-			2,7	-		

	Breakdown by sector - NACE 4 digits level (code and label)	u	v	w	x	y	z	aa	ab
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	11.0 Manufacture of beverages	1,0	-			1,0	-		
2	21.1 Manufacture of basic pharmaceutical products	1,1	-			1,1	-		
3	22.2 Manufacture of plastics products	2,0	-			2,0	-		
4	23.1 Manufacture of glass and glass products	0,8	-			0,8	-		
5	23.3 Manufacture of clay building materials	1,0	-			1,0	0,5		
6	26.3 Manufacture of communication equipment	2,5	-			2,5	-		
7	27.3 Manufacture of wiring and wiring devices	1,7	-			1,7	0,4		
8	28.3 Manufacture of agricultural and forestry machinery	1,3	-			1,3	-		
9	28.9 Manufacture of other special-purpose machinery	18,4	-			18,4	-		
10	29.1 Manufacture of motor vehicles	9,8	-			9,8	0,5		
11	29.2 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers	2,1	-			2,1	0,0		
12	29.3 Manufacture of parts and accessories for motor vehicles	7,0	-			7,0	0,9		
13	35.1 Electric power generation, transmission and distribution	3,2	-			3,2	2,5		
14	38.3 Materials recovery	1,1	-			1,1	0,9		
15	42.1 Construction of roads and railways	0,5	-			0,5	0,2		
16	42.2 Construction of utility projects	1,9	-			1,9	0,0		
17	46.4 Wholesale of household goods	1,0	-			1,0	-		
18	46.6 Wholesale of other machinery, equipment and supplies	2,2	-			2,2	-		
19	47.2 Retail sale of food, beverages and tobacco in specialised stores	3,7	-			3,7	-		
20	47.4 Retail sale of information and communication equipment in specialised stores	0,3	-			0,3	0,0		
21	51.1 Passenger air transport	4,3	-			4,3	-		
22	52.2 Support activities for transportation	1,2	-			1,2	-		
23	55.1 Hotels and similar accommodation	2,5	-			2,5	-		
24	62.0 Computer programming, consultancy and related activities	0,5	-			0,5	-		
25	70.1 Activities of head offices	4,4	-			4,4	0,2		
26	71.1 Architectural and engineering activities and related technical consultancy	1,2	-			1,2	0,6		
27	82.9 Business support service activities n.e.c.	3,4	-			3,4	-		
28	86.1 Hospital activities	9,6	-			9,6	-		
29	92.0 Gambling and betting activities	2,7	-			2,7	-		

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2. GAR sector information - Capex

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)
1	11.0 Manufacture of beverages	1,0	0,0			1,0	-		
2	21.1 Manufacture of basic pharmaceutical products	1,1	-			1,1	-		
3	22.2 Manufacture of plastics products	2,0	-			2,0	-		
4	23.1 Manufacture of glass and glass products	0,8	0,2			0,8	-		
5	23.3 Manufacture of clay building materials	1,0	0,5			1,0	-		
6	26.3 Manufacture of communication equipment	2,5	-			2,5	-		
7	27.3 Manufacture of wiring and wiring devices	1,7	1,0			1,7	-		
8	28.3 Manufacture of agricultural and forestry machinery	1,3	-			1,3	-		
9	28.9 Manufacture of other special-purpose machinery	18,4	-			18,4	-		
10	29.1 Manufacture of motor vehicles	9,8	1,7			9,8	-		
11	29.2 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers	2,1	-			2,1	-		
12	29.3 Manufacture of parts and accessories for motor vehicles	7,0	0,9			7,0	-		
13	35.1 Electric power generation, transmission and distribution	3,2	2,5			3,2	-		
14	38.3 Materials recovery	1,1	0,9			1,1	-		
15	42.1 Construction of roads and railways	0,5	0,2			0,5	-		
16	42.2 Construction of utility projects	1,9	0,0			1,9	-		
17	46.4 Wholesale of household goods	1,0	-			1,0	-		
18	46.6 Wholesale of other machinery, equipment and supplies	2,2	0,1			2,2	-		
19	47.2 Retail sale of food, beverages and tobacco in specialised stores	3,7	0,3			3,7	-		
20	47.4 Retail sale of information and communication equipment in specialised stores	0,3	0,0			0,3	-		
21	51.1 Passenger air transport	4,3	0,0			4,3	-		
22	52.2 Support activities for transportation	1,2	-			1,2	-		
23	55.1 Hotels and similar accommodation	2,5	-			2,5	-		
24	62.0 Computer programming, consultancy and related activities	0,5	0,0			0,5	-		
25	70.1 Activities of head offices	4,4	0,6			4,4	-		
26	71.1 Architectural and engineering activities and related technical consultancy	1,2	0,3			1,2	-		
27	82.9 Business support service activities n.e.c.	3,4	0,0			3,4	-		
28	86.1 Hospital activities	9,6	-			9,6	-		
29	92.0 Gambling and betting activities	2,7	-			2,7	-		

		i	j	k	l	m	n	o	p	q	r	s	t
	Breakdown by sector - NACE 4 digits level (code and label)	Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentall y sustainable (CE)	Mn EUR	Of which environmenta ll y sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmenta ll y sustainable (PPC)
1	11.0 Manufacture of beverages	1,0	-			1,0	-			1,0	-		
2	21.1 Manufacture of basic pharmaceutical products	1,1	-			1,1	-			1,1	-		
3	22.2 Manufacture of plastics products	2,0	-			2,0	-			2,0	-		
4	23.1 Manufacture of glass and glass products	0,8	-			0,8	-			0,8	-		
5	23.3 Manufacture of clay building materials	1,0	-			1,0	-			1,0	-		
6	26.3 Manufacture of communication equipment	2,5	-			2,5	-			2,5	-		
7	27.3 Manufacture of wiring and wiring devices	1,7	-			1,7	-			1,7	-		
8	28.3 Manufacture of agricultural and forestry machinery	1,3	-			1,3	-			1,3	-		
9	28.9 Manufacture of other special-purpose machinery	18,4	-			18,4	-			18,4	-		
10	29.1 Manufacture of motor vehicles	9,8	-			9,8	-			9,8	-		
11	29.2 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers	2,1	-			2,1	-			2,1	-		
12	29.3 Manufacture of parts and accessories for motor vehicles	7,0	-			7,0	-			7,0	-		
13	35.1 Electric power generation, transmission and distribution	3,2	-			3,2	-			3,2	-		
14	38.3 Materials recovery	1,1	-			1,1	-			1,1	-		
15	42.1 Construction of roads and railways	0,5	-			0,5	-			0,5	-		
16	42.2 Construction of utility projects	1,9	-			1,9	-			1,9	-		
17	46.4 Wholesale of household goods	1,0	-			1,0	-			1,0	-		
18	46.6 Wholesale of other machinery, equipment and supplies	2,2	-			2,2	-			2,2	-		
19	47.2 Retail sale of food, beverages and tobacco in specialised stores	3,7	-			3,7	-			3,7	-		
20	47.4 Retail sale of information and communication equipment in specialised stores	0,3	-			0,3	-			0,3	-		
21	51.1 Passenger air transport	4,3	-			4,3	-			4,3	-		
22	52.2 Support activities for transportation	1,2	-			1,2	-			1,2	-		
23	55.1 Hotels and similar accommodation	2,5	-			2,5	-			2,5	-		
24	62.0 Computer programming, consultancy and related activities	0,5	-			0,5	-			0,5	-		
25	70.1 Activities of head offices	4,4	-			4,4	-			4,4	-		
26	71.1 Architectural and engineering activities and related technical consultancy	1,2	-			1,2	-			1,2	-		
27	82.9 Business support service activities n.e.c.	3,4	-			3,4	-			3,4	-		
28	86.1 Hospital activities	9,6	-			9,6	-			9,6	-		
29	92.0 Gambling and betting activities	2,7	-			2,7	-			2,7	-		

		u	v	w	x	y	z	aa	ab
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Breakdown by sector - NACE 4 digits level (code and label)	Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
		Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	11.0 Manufacture of beverages	1,0	-			1,0	0,0		
2	21.1 Manufacture of basic pharmaceutical products	1,1	-			1,1	-		
3	22.2 Manufacture of plastics products	2,0	-			2,0	-		
4	23.1 Manufacture of glass and glass products	0,8	-			0,8	0,2		
5	23.3 Manufacture of clay building materials	1,0	-			1,0	0,5		
6	26.3 Manufacture of communication equipment	2,5	-			2,5	-		
7	27.3 Manufacture of wiring and wiring devices	1,7	-			1,7	1,0		
8	28.3 Manufacture of agricultural and forestry machinery	1,3	-			1,3	-		
9	28.9 Manufacture of other special-purpose machinery	18,4	-			18,4	-		
10	29.1 Manufacture of motor vehicles	9,8	-			9,8	1,7		
11	29.2 Manufacture of bodies (coachwork) for motor vehicles; manufacture of trailers	2,1	-			2,1	-		
12	29.3 Manufacture of parts and accessories for motor vehicles	7,0	-			7,0	0,9		
13	35.1 Electric power generation, transmission and distribution	3,2	-			3,2	2,5		
14	38.3 Materials recovery	1,1	-			1,1	0,9		
15	42.1 Construction of roads and railways	0,5	-			0,5	0,2		
16	42.2 Construction of utility projects	1,9	-			1,9	0,0		
17	46.4 Wholesale of household goods	1,0	-			1,0	-		
18	46.6 Wholesale of other machinery, equipment and supplies	2,2	-			2,2	0,1		
19	47.2 Retail sale of food, beverages and tobacco in specialised stores	3,7	-			3,7	0,3		
20	47.4 Retail sale of information and communication equipment in specialised stores	0,3	-			0,3	0,0		
21	51.1 Passenger air transport	4,3	-			4,3	0,0		
22	52.2 Support activities for transportation	1,2	-			1,2	-		
23	55.1 Hotels and similar accommodation	2,5	-			2,5	-		
24	62.0 Computer programming, consultancy and related activities	0,5	-			0,5	0,0		
25	70.1 Activities of head offices	4,4	-			4,4	0,6		
26	71.1 Architectural and engineering activities and related technical consultancy	1,2	-			1,2	0,3		
27	82.9 Business support service activities n.e.c.	3,4	-			3,4	0,0		
28	86.1 Hospital activities	9,6	-			9,6	-		
29	92.0 Gambling and betting activities	2,7	-			2,7	-		

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3. GAR KPI Stock - Turnover

	% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	27,2%	0,2%	0,1%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
2	**Financial undertakings**	1,7%	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	1,7%	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	0,5%	0,1%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	1,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	25,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	22,4%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	1,9%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	1,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	**27,5%**	**0,2%**	**0,1%**	**0,0%**	**0,0%**	**0,1%**	**0,0%**	**0,0%**	**0,0%**

		j	k	l	m	n	o	p	q	r	s	t	u
% (compared to total covered assets in the denominator)		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)taxonomy relevant sectors (Taxonomy- eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**

		v	w	x	z	aa	ab	ac	ad	ae	af
	% (compared to total covered assets in the denominator)	Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	27,2%	0,2%	0,1%	0,0%	0,0%	23,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	1,7%	0,2%	0,1%	0,0%	1,7%	4,3%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	1,7%	0,2%	0,1%	0,0%	1,7%	4,3%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,5%	0,1%	0,1%	0,0%	0,5%	1,6%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	1,2%	0,1%	0,0%	0,0%	1,2%	2,7%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,2%	0,1%	0,0%	0,0%	0,2%	0,5%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,2%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,2%	0,1%	0,0%	0,0%	0,2%	0,3%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	25,3%	0,0%	0,0%	0,0%	25,3%	18,2%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	22,4%	0,0%	0,0%	0,0%	22,4%	13,3%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	1,9%	0,0%	0,0%	0,0%	1,9%	1,1%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	1,0%	0,0%	0,0%	0,0%	1,0%	0,6%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,3%	0,0%	0,0%	0,0%	0,3%	0,4%
32	**Total GAR assets**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**27,5%**	**0,2%**	**0,1%**	**0,0%**	**27,6%**	**23,0%**

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3. GAR KPI Stock – Capex

		a	b	c	d	e	f	g	h	i
	% (compared to total covered assets in the denominator)	**Climate Change Mitigation (CCM)**					**Climate Change Adaptation (CCA)**			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	27,3%	0,3%	0,1%	0,0%	0,1%	0,0%	0,0%	0,0%	0,0%
2	**Financial undertakings**	1,8%	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	1,8%	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	0,6%	0,1%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	1,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,3%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,2%	0,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	25,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	22,4%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	1,9%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	1,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	27,6%	0,3%	0,1%	0,0%	0,1%	0,0%	0,0%	0,0%	0,0%

	% (compared to total covered assets in the denominator)	j	k	l	m	n	o	p	q	r	s	t	u
		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%

	% (compared to total covered assets in the denominator)	v	w	x	z	aa	ab	ac	ad	ae	af
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	27,4%	0,3%	0,1%	0,0%	27,4%	23,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	1,8%	0,2%	0,1%	0,0%	1,8%	4,3%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	1,8%	0,2%	0,1%	0,0%	1,8%	4,3%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,6%	0,1%	0,1%	0,0%	0,6%	1,6%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	1,2%	0,1%	0,0%	0,0%	1,2%	2,7%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,3%	0,1%	0,0%	0,0%	0,3%	0,5%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,2%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,2%	0,1%	0,0%	0,0%	0,3%	0,3%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	25,3%	0,0%	0,0%	0,0%	25,3%	18,2%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	22,4%	0,0%	0,0%	0,0%	22,4%	13,3%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	1,9%	0,0%	0,0%	0,0%	1,9%	1,1%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	1,0%	0,0%	0,0%	0,0%	1,0%	0,6%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,3%	0,0%	0,0%	0,0%	0,3%	0,4%
32	**Total GAR assets**	0,0%	0,0%	0,0%	0,0%	27,7%	0,3%	0,1%	0,0%	27,7%	59,4%

FY 2024
3. GAR KPI Flow - Turnover

		a	b	c	d	e	f	g	h	i
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**			
% (compared to total covered assets in the denominator)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	12,4%	0,9%	0,8%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
2	**Financial undertakings**	2,8%	0,9%	0,8%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
3	Credit institutions	2,8%	0,9%	0,8%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
4	Loans and advances	1,7%	0,9%	0,8%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	1,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,1%	0,0%	0,0%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,1%	0,0%	0,0%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	9,5%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	7,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	0,5%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	1,7%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	12,5%	0,9%	0,8%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%

	% (compared to total covered assets in the denominator)	j	k	l	m	n	o	p	q	r	s	t	u
		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%

		v	w	x	z	aa	ab	ac	ad	ae	af
% (compared to total covered assets in the denominator)		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	12,5%	0,9%	0,8%	0,0%	0,0%	31,1%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	2,9%	0,9%	0,8%	0,0%	2,9%	17,9%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	2,9%	0,9%	0,8%	0,0%	2,9%	17,9%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	1,8%	0,9%	0,8%	0,0%	1,8%	13,1%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	1,1%	0,0%	0,0%	0,0%	1,1%	4,7%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,2%	0,0%	0,0%	0,0%	0,2%	1,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,4%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,2%	0,0%	0,0%	0,0%	0,2%	0,5%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	9,5%	0,0%	0,0%	0,0%	9,5%	12,3%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	7,3%	0,0%	0,0%	0,0%	7,3%	7,3%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	0,5%	0,0%	0,0%	0,0%	0,5%	0,5%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	1,7%	0,0%	0,0%	0,0%	1,7%	1,7%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,2%
32	**Total GAR assets**	0,0%	0,0%	0,0%	0,0%	12,6%	0,9%	0,8%	0,0%	12,7%	31,2%

FY 2024
3. GAR KPI Flow - Capex

		a	b	c	d	e	f	g	h	i
	% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator									
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	9,6%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	2,7%	1,4%	0,8%	0,0%	0,0%	0,1%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	1,1%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,2%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,2%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	9,5%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	7,3%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	0,5%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	1,7%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	9,6%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%

	% (compared to total covered assets in the denominator)	j	k	l	m	n	o	p	q	r	s	t	u
		Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
	GAR - Covered assets in both numerator and denominator												
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
32	**Total GAR assets**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%

	% (compared to total covered assets in the denominator)	v	w	x	z	aa	ab	ac	ad	ae	af
		Biodiversity and Ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator										
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0,0%	0,0%	0,0%	0,0%	9,7%	0,0%	0,0%	0,0%	0,0%	31,1%
2	**Financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	17,9%
3	Credit institutions	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	17,9%
4	Loans and advances	0,0%	0,0%	0,0%	0,0%	2,8%	1,4%	0,8%	0,0%	0,0%	13,1%
5	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	1,1%	0,0%	0,0%	0,0%	0,0%	4,7%
6	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
7	Other financial corporations	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
8	of which investment firms	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,6%
9	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
10	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
11	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,6%
12	of which management companies	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,2%
13	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,2%
14	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
15	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
16	of which insurance undertakings	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
17	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
18	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
19	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
20	**Non-financial undertakings**	0,0%	0,0%	0,0%	0,0%	0,2%	0,0%	0,0%	0,0%	0,0%	1,0%
21	Loans and advances	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,4%
22	Debt securities, including UoP	0,0%	0,0%	0,0%	0,0%	0,2%	0,0%	0,0%	0,0%	0,0%	0,5%
23	Equity instruments	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
24	**Households**	0,0%	0,0%	0,0%	0,0%	9,5%	0,0%	0,0%	0,0%	0,0%	12,3%
25	of which loans collateralised by residential immovable property	0,0%	0,0%	0,0%	0,0%	7,3%	0,0%	0,0%	0,0%	0,0%	7,3%
26	of which building renovation loans	0,0%	0,0%	0,0%	0,0%	0,5%	0,0%	0,0%	0,0%	0,0%	0,5%
27	of which motor vehicle loans	0,0%	0,0%	0,0%	0,0%	1,7%	0,0%	0,0%	0,0%	0,0%	1,7%
28	**Local governments financing**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
29	Housing financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
30	Other local government financing	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,0%	0,2%
32	**Total GAR assets**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**9,7%**	**0,0%**	**0,0%**	**0,0%**	**0,0%**	**31,2%**

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5. KPI off-balance sheet exposures, Turnover- Stock

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	8	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	1	0	-	-	-	0	-	-	-	-	-	-	-

% (compared to total eligible off-balance sheet assets)		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		Circular economy (CE)				**Pollution (PPC)**				**Biodiversity and Ecosystems (BIO)**				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	8	-		-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	1	0		-	-

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5. KPI off-balance sheet exposures, Turnover- Capex

		a	b	c	d	e	f	g	h	i	j	k	l	m
	% (compared to total eligible off-balance sheet assets)	**Climate Change Mitigation (CCM)**					**Climate Change Adaptation (CCA)**				**Water and marine resources (WTR)**			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	8	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	1	0	-	-	0	0	-	-	-	-	-	-	-

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5. KPI off-balance sheet exposures, Turnover- Capex

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		Circular economy (CE)				**Pollution (PPC)**				**Biodiversity and Ecosystems (BIO)**				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**				
	% (compared to total eligible off-balance sheet assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which enabling	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)	Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	8	-		-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	1	0		-	0

FY 2024
5. KPI off-balance sheet exposures, Turnover- Flow

% (compared to total eligible off-balance sheet assets)		a	b	c	d	e	f	g	h	i	j	k	l	m
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**				**Water and marine resources (WTR)**			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		**Circular economy (CE)**				**Pollution (PPC)**				**Biodiversity and Ecosystems (BIO)**				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**				
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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5. KPI off-balance sheet exposures, Capex- Flow

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		**Climate Change Mitigation (CCM)**					**Climate Change Adaptation (CCA)**				**Water and marine resources (WTR)**			
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
		Circular economy (CE)				**Pollution (PPC)**				**Biodiversity and Ecosystems (BIO)**				**TOTAL (CCM + CCA + WTR + CE + PPC + BIO)**				
	% (compared to total eligible off-balance sheet assets)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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Template 1 Nuclear Energy and Fossil gas-related activities		
Row	**Nuclear energy related activities**	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels	YES
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels	YES

Template 2 Taxonomy-aligned economic activities (denominator) - Turnover							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
3.	Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	25	0,2%	25	0,2%	0	0,0%
8.	Total amount and propotion of taxonomy-aligned economic activity in the denominator of the applicable KPI	25	0,2%	25	0,2%	0	0,0%

Template 3 Taxonomy-aligned economic activities (numerator) - Turnover							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	25	100,0%	25	99,9%	0	0,1%
8.	Total amount and propotion of taxonomy-aligned economic activity in the numerator of the applicable KPI	25	100,0%	25	99,9%	0	0,1%

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0,0%	0	0,0%	0	0,0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	12	0,1%	0	0,0%	0	0,0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	32	0,3%	0	0,0%	0	0,0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	2.986	26,9%	3.029	27,2%	6	0,1%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	3.035	27,3%	3.029	27,2%	6	0,1%

Template 5 Taxonomy non-eligible economic activities - Turnover							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	0	0,0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	8.058	72,5%				
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	8.058	72,5%				

Template 2 Taxonomy-aligned economic activities (denominator) - Capex							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	-	0,0%	-	0,0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	-	0,0%
3.	Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	0	0,0%	-	0,0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	-	0,0%	-	0,0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	-	0,0%	-	0,0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the denominator of the applicable KPI	0	0,0%	-	0,0%	-	0,0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	32	0,3%	32	0,3%	0	0,0%
8.	Total amount and propotion of taxonomy-aligned economic activity in the denominator of the applicable KPI	32	0,3%	32	0,3%	0	0,0%

Template 3 Taxonomy-aligned economic activities (numerator) - Capex							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0,00	0,0%	0	0,0%	-	0,0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0,00	0,0%	0	0,0%	-	0,0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the numerator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
7.	Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI	31,70	100,0%	32	100,0%	0	0,0%
8.	Total amount and propotion of taxonomy-aligned economic activity in the numerator of the applicable KPI	31,70	100,0%	32	100,0%	0	0,0%

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities - Capex							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	0	0,0%	-	0,0%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	0	0,0%	-	0,0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
7.	Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	3.075,01	27,7%	3.073	27,6%	2	0,0%
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	3.075,01	27,7%	3.073	27,6%	2	0,0%

Template 5 Taxonomy non-eligible economic activities - Capex							
Row	Economic Activities	CCM+CCA		CCM		CCA	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	0	0,0%	-	0,0%
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	0,00	0,0%	-	0,0%	-	0,0%
7.	Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	8.010,79	72,1%				
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	8.010,79	72,1%				

FY23 - Restatement

1.Assets for the calculation of GAR, Turnover

		a	b	c	d	e	f	g	h	i	j	i	j	i	j	i
Million EUR			FY2023													
		Total [gross] carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	5.049	2.864	2	-	0	1	0	0	-	0	2.864	2	-	0	1
2	**Financial undertakings**	**1.447**	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	1.187	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	1.187	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-		-	-	-	-		-	-	-		-	-
7	Other financial corporations	260	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms			-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances			-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP			-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments			-		-	-	-	-		-	-	-		-	-
12	of which management companies			-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances			-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP			-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments			-		-	-	-	-		-	-	-		-	-
16	of which insurance undertakings			-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances			-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP			-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments			-		-	-	-	-		-	-	-		-	-
20	**Non-financial undertakings**	**112**	2	2	-	0	1	0	0	-	0	3	2	-	0	1
21	Loans and advances	54	0	-	-	-	-	-	-	-	-	0	-	-	-	-
22	Debt securities, including UoP	57	2	2	-	0	1	0	0	-	0	2	2	-	0	1
23	Equity instruments	-	-	-		-	-	-	-		-	-	-		-	-
24	**Households**	**3.490**	2.861	-	-	-	-					2.861	-	-	-	-
25	of which loans collateralised by residential immovable property	2.525	2.525	-	-	-	-					2.525	-	-	-	-
26	of which building renovation loans	230	230	-	-	-	-					230	-	-	-	-
27	of which motor vehicle loans	107	107	-	-	-	-					107	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	99	41	-	-	-	-	-	-	-	-	41	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	i	j	i	j	i
			FY2023													
	Million EUR	Total [gross] carrying amount	**Climate Change Mitigation (CCM)**					**Climate Change Adaptation (CCA)**				**TOTAL (CCM + CCA)**				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	**5.868**														
33	**Financial and Non-financial undertakings**	4.744														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	2.686														
35	Loans and advances	2.323														
36	of which loans collateralised by commercial immovable property	-														
37	of which building renovation loans	42														
38	Debt securities	349														
39	Equity instruments	14														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2.058														
41	Loans and advances	372														
42	Debt securities	1.685														
43	Equity instruments	-														
44	**Derivatives**	0														
45	**On demand interbank loans**	192														
46	**Cash and cash-related assets**	95														
47	**Other categories of assets (e.g. Goodwill, commodities e**	837														
48	**Total GAR assets**	**11.016**														
49	**Assets not covered for GAR calculation**	9.597														
50	**Central governments and Supranational issuers**	1.448														
51	**Central banks exposure**	8.128														
52	**Trading book**	22														
53	**Total assets**	**20.613**														
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

FY23 - Restatement

1.Assets for the calculation of GAR, Capex

		a	b	c	d	e	f	g	h	i	j	i	j	i	j	i
		FY 2023														
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
	Million EUR	Total [gross] carrying amount	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	**5.049**	2.864	-	-	-	-	-	-	-	-	2.864	-	-	-	-
2	**Financial undertakings**	1.447	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	1.187	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	1.187	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	-	-	-		-	-	-	-		-	-	-		-	-
7	Other financial corporations	260	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	of which investment firms			-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances			-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP			-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments			-		-	-	-	-		-	-	-		-	-
12	of which management companies			-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances			-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP			-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments			-		-	-	-	-		-	-	-		-	-
16	of which insurance undertakings			-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances			-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP			-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments			-		-	-	-	-		-	-	-		-	-
20	**Non-financial undertakings**	112	3	-	-	-	-	-	-	-	-	3	-	-	-	-
21	Loans and advances	54	-	-	-	-	-	-	-	-	-	-	-	-	-	-
22	Debt securities, including UoP	57	3,07	3,07	-	-	1	-	-	-	-	3	3	-	-	1
23	Equity instruments	-	-	-		-	-	-	-		-	-	-		-	-
24	**Households**	3.490	2.861	-	-	-	-					2.861	-	-	-	-
25	of which loans collateralised by residential immovable property	2.525	2.525	-	-	-	-					2.525	-	-	-	-
26	of which building renovation loans	230	230	-	-	-	-					230	-	-	-	-
27	of which motor vehicle loans	107	107	-	-	-	-					107	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	**99**	41	-	-	-	-	-	-	-	-	41	-	-	-	-

		a	b	c	d	e	f	g	h	i	j	i	j	i	j	i
	Million EUR	Total [gross] carrying amount	FY 2023													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
				Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
					Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	**5.868**														
33	**Financial and Non-financial undertakings**	4.744														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	2.686														
35	Loans and advances	2.323														
36	of which loans collateralised by commercial immovable property	-														
37	of which building renovation loans	42														
38	Debt securities	349														
39	Equity instruments	14														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2.058														
41	Loans and advances	372														
42	Debt securities	1.685														
43	Equity instruments	-														
44	**Derivatives**	0														
45	**On demand interbank loans**	192														
46	**Cash and cash-related assets**	95														
47	**Other categories of assets (e.g. Goodwill, commodities e**	837														
48	**Total GAR assets**	**11.016**														
49	**Assets not covered for GAR calculation**	9.597														
50	**Central governments and Supranational issuers**	1.448														
51	**Central banks exposure**	8.128														
52	**Trading book**	22														
53	**Total assets**	**20.613**														
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	8	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

FY23 - Restatement
3. GAR KPI - Tunover, Stock

		a	b	c	d	e	f	g	h	i	g	h	i	g	h	i
		FY 2023														
		Climate Change Mitigation (CCM)					**Climate Change Adaptation (CCA)**				**TOTAL (CCM + CCA)**					
	% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	26,0%	0%	0%	0%	0%	0%	0%	0%	0%	26%	0%	0%	0%	0%	24%
2	Financial undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	7%
3	Credit institutions	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%
4	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%
6	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	Other financial corporations	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
8	of which investment firms	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	of which management companies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
13	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	of which insurance undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
17	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	Non-financial undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
21	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
22	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
23	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
24	Households	26%	0%	0%	0%	0%	0%	0%	0%	0%	26%	0%	0%	0%	0%	17%
25	of which loans collateralised by residential immovable property	23%	0%	0%	0%	0%	0%	0%	0%	0%	23%	0%	0%	0%	0%	12%
26	of which building renovation loans	2%	0%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	0%	0%	1%
27	of which motor vehicle loans	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	1%
28	Local governments financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	Housing financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	**Total GAR assets**	**26,4%**	**0,02%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**26%**	**0%**	**0%**	**0%**	**0%**	**25%**

FY23 - Restatement

3. GAR KPI Capex - Stock

	% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	a	b	c	d	e	af
		FY 2023														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	26%	0%	0%	0%	0%	0%	0%	0%	0%	26%	0%	0%	0%	0%	24%
2	Financial undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	7%
3	Credit institutions	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%
4	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
5	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	6%
6	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
7	Other financial corporations	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
8	of which investment firms	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
9	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
10	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
11	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
12	of which management companies	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
13	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
14	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
15	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
16	of which insurance undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
17	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
18	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
19	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
20	Non-financial undertakings	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	1%
21	Loans and advances	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
22	Debt securities, including UoP	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
23	Equity instruments	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
24	Households	26%	0%	0%	0%	0%	0%	0%	0%	0%	26%	0%	0%	0%	0%	17%
25	of which loans collateralised by residential immovable property	23%	0%	0%	0%	0%	0%	0%	0%	0%	23%	0%	0%	0%	0%	12%
26	of which building renovation loans	2%	0%	0%	0%	0%	0%	0%	0%	0%	2%	0%	0%	0%	0%	1%
27	of which motor vehicle loans	1%	0%	0%	0%	0%	0%	0%	0%	0%	1%	0%	0%	0%	0%	1%
28	Local governments financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
29	Housing financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
30	Other local government financing	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%
32	**Total GAR assets**	**26%**	**0,00%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**0%**	**26%**	**0%**	**0%**	**0%**	**0%**	**25%**

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Independent practitioner's limited assurance report on Hellenic Bank Public Company Limited Consolidated Sustainability Statement

To the Board of Directors of Hellenic Bank Public Company Limited

Scope
We have been engaged by Hellenic Bank Public Company Limited to perform a "limited assurance engagement", as defined by International Standards on Assurance Engagements, hereafter referred to as the "Engagement", to report on the Consolidated Sustainability Statement of Hellenic Bank Public Company Limited (the "Bank") and its subsidiaries (together with the Bank, the "Group") included within a section of the Management Report on pages 288 to 440 of the Annual Financial Report 2024 (the "Subject Matter" or the "Consolidated Sustainability Statement") of the Group, as at 31 December 2024 and for the year then ended.

Hellenic Bank Public Company Limited responsibilities
The Bank's Management is responsible for preparing and presenting the Subject Matter in accordance with the European Sustainability Reporting Standards (hereafter "ESRS"), as adopted by the EU (the "Criteria"), in all material respects. Management of the Bank is further responsible for preparing the disclosures in section "Disclosures pursuant to Taxonomy Regulation" of the Consolidated Sustainability Statement, in compliance with Article 8 of EU Taxonomy Regulation 2020/852 (the "EU Taxonomy Regulation"). These responsibilities include establishing and maintaining internal controls, maintaining adequate records and making estimates that are relevant to the preparation of the Subject Matter, such that it is free from material misstatement, whether due to fraud or error.

EY's responsibilities
Our responsibility is to express a conclusion on the presentation of the Subject Matter based on the evidence we have obtained.

We conducted our engagement in accordance with the International Standard for Assurance Engagements Other Than Audits or Reviews of Historical Financial Information ("ISAE 3000 (Revised)"), and the terms of reference for this engagement as agreed with Hellenic Bank Public Company Limited. This standard requires that we plan and perform our engagement to express a conclusion on whether we are aware of any material modifications that need to be made to the Subject Matter in order for it to be in accordance with the Criteria, and to issue a report. The nature, timing, and extent of the procedures selected depend on our judgment, including an assessment of the risk of material misstatement, whether due to fraud or error.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.

Our independence and quality management
We have maintained our independence and confirm that we have met the requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) issued by the International Ethics Standards Board for Accountants and have the required competencies and experience to conduct this assurance engagement.

EY also applies International Standard on Quality Management 1, Quality Management for Firms that Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services engagements, which requires that we design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Description of procedures performed
Procedures performed in a limited assurance engagement vary in nature and timing from and are less in extent than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.
Although we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls or performing procedures relating to checking aggregation or calculation of data within IT systems.

A limited assurance engagement consists of making enquiries, primarily of persons responsible for preparing the Consolidated Sustainability Statement and related information and applying analytical and other appropriate procedures.

Our limited assurance procedures included amongst others:

- Obtaining an understanding of the Group's reporting processes relevant to the preparation of its Consolidated Sustainability Statement including the consolidation processes by obtaining an understanding of the Group's control environment, processes and information systems relevant to the preparation of the Consolidated Sustainability Statement, but not evaluating the design of specific controls, obtaining evidence about their implementation or testing their operating effectiveness;
- Evaluating whether material information identified by the process followed by the Group is included in the Consolidated Sustainability Statement
- Evaluating whether the structure and the presentation of the Consolidated Sustainability Statement is in accordance with the ESRS, including the reporting requirements under the EU Taxonomy Regulation;
- Performing inquiries of relevant personnel and analytical procedures on selected information in the Consolidated Sustainability Statement;
- Analysing, on a sample basis, relevant internal and external documentation available to the Group (including publicly available information or information throughout its value chain) for selected disclosures;
- Obtaining an understanding of the process to identify EU Taxonomy Regulation eligible and aligned economic activities for turnover, capital expenditure and operating expenditure and the corresponding disclosures in the Consolidated Sustainability Statement.

We also performed such other procedures as we considered necessary in the circumstances.

Shape the future
with confidence

Conclusion

Based on the procedures we have performed, and the evidence obtained, nothing has come to our attention that causes us to believe that:

- the Consolidated Sustainability Statement as at 31 December 2024 and for year then ended, is not prepared, in all material respects, in accordance with the ESRS as adopted by the EU;
- the information of section “Disclosures pursuant to Taxonomy Regulation” of the Consolidated Sustainability Statement does not comply with Article 8 of the EU Taxonomy Regulation.

Savvas Pentaris
Certified Public Accountant and Registered Auditor

for and on behalf of
Ernst & Young Cyprus Limited
Certified Public Accountants and Registered Auditors

20 March 2025
Nicosia