

ANNUAL FINANCIAL REPORT

FOR THE YEAR ENDED
31 DECEMBER 2023

Annual Financial Report publication in accordance with the requirements of Law 3556/2007 and Regulation (EU) 2019/815 is fulfilled with the publication of the relevant zip (ESEF) and ixbrl inline viewer files, which are available on the Eurobank Holdings' website: eurobankholdings.gr

The current document, which presents the Annual Financial Report in pdf format, does not fulfil the above requirements for the publication of the Annual Financial Report of Eurobank Holdings.

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for the year ended 31 December 2023**

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for the year ended 31 December 2023**

**Statements of Members of the Board of Directors
(according to the article 4 par. 2 of the Law 3556/2007)**

We declare that to the best of our knowledge:

- the annual financial statements for the year ended 31 December 2023, which have been prepared in accordance with the applicable accounting standards, present fairly the assets, liabilities, equity and annual results of Eurobank Ergasias Services and Holdings S.A. and the companies included in the consolidation, and
- the annual report of the Board of Directors presents fairly the development, the performance and the position of the Eurobank Ergasias Services and Holdings S.A and of the companies included in the consolidation, including the description of the main risks and uncertainties they face.

Athens, 28 March 2024

Georgios P. Zanias
I.D. No AI – 414343

CHAIRMAN
OF THE BOARD OF
DIRECTORS

Fokion C. Karavias
I.D. No AI - 677962

CHIEF EXECUTIVE
OFFICER

Stavros E. Ioannou
I.D. No AH - 105785

DEPUTY
CHIEF EXECUTIVE
OFFICER

The directors present their report together with the financial statements for the year ended 31 December 2023.

General information

Eurobank Ergasias Services and Holdings S.A. (the Company or Eurobank Holdings) is a holding company listed on the Athens Exchange, owning 100% of the share capital of Eurobank S.A. (the Bank). Eurobank Holdings and its subsidiaries form a group (Group), consisting mainly of Eurobank Group, that being the Bank and its subsidiaries. The Company's operations principally relate to the strategic planning of the non-performing loans management and the provision of services to the Group entities and third parties.

Financial Results Review and Outlook¹

In 2023, on the back of a positive macroeconomic backdrop in Greece and the other countries of substantial presence, the Group enhanced its core profitability, strengthened its capital adequacy and liquidity position, and improved further its asset quality. In addition, it executed several strategic actions, which will allow it to expand its business and extend further its regional footprint.

As at 31 December 2023 total assets, including the impact from the sale of Eurobank Direktna (Serbia), decreased by €1.7bn to €79.8bn (Dec. 2022²: €81.5bn) with gross customer loans amounting to €42.8bn (Dec. 2022: €43.5bn) and investment securities reaching €14.7bn (Dec. 2022: €13.3bn). Out of the total loan portfolio, €28.1bn has been originated from Greek operations (Dec. 2022: €28.2bn), €10.3bn from international operations (Dec. 2022: €10.4bn or €8.7bn excluding Eurobank Direktna operations) and €4.5bn refer to senior and mezzanine notes of the Pillar, Cairo and Mexico securitizations (Dec. 2022: €4.9bn). Business (wholesale and small business) loans stood at €25bn (Dec. 2022: €25bn) and accounted for 58% of total Group loans, while loans to households reached €13.4bn (Dec. 2022: €13.6bn), of which 74% is the mortgage portfolio and the rest are consumer loans. Group deposits reached €57.4bn (Dec. 2022: €57.2bn) with those from Greek operations amounting to €40bn (Dec. 2022: €39.6bn), while international operations contributed with €17.5bn (Dec. 2022: €17.7bn or €16bn excluding Eurobank Direktna operations). As a result, the (net) loan-to-deposit (L/D) ratio stood at 72.3% for the Group (Dec. 2022²: 72.4%) and at 78.3% for Greek operations (Dec. 2022: 79.5%). The funding from the European Central Bank (ECB) refinancing operations reduced by €5bn to €3.8bn (Dec. 2022: €8.8bn) (note 31 of the consolidated financial statements). During the year, in the context of the implementation of its medium-term strategy to meet the Minimum Requirements for Eligible Own Funds and Eligible Liabilities (MREL), the Bank proceeded with the issuance of two preferred senior notes of €500m each, at a coupon of 7% and 5.875% and maturities in January 2029 and November 2029, respectively. More recently, in January 2024, the Company completed the issue of a €300m Subordinated Tier II debt instrument, at a coupon of 6.25% and maturity in April 2034 (notes 4 and 34 of the consolidated financial statements). The Group Liquidity Coverage ratio (LCR) maintained at high level reaching 178.6% (31 December 2022: 173%).

Pre-provision Income (PPI) amounted to €1,999m or €1,902m excluding a) the €111m gain on investment in Hellenic Bank (Cyprus) accounted for as an associate and b) the €14m contribution to restoration initiatives after natural disasters (2022²: €2,184m or €1,859m excluding the €325m gain on sale of Bank's merchant acquiring business (project "Triangle")), while core pre-provision income (Core PPI) increased by 58.6% year-on-year to €1,802m or €1,816m excluding the €14m contribution as above (2022²: €1,145m). Net interest income (NII) grew by 46.9% to €2,174m (2022²: €1,480m), mainly driven by the higher interest rates, the organic loans growth and the increased positions in investment bonds partly offset by higher debt issued and deposits cost. Net interest margin (NIM) stood at 2.75% (2022²: 1.91%) with the fourth quarter reaching 2.90%. Fees and commissions expanded by 4.2% to €544m (2022²: €522m), of which banking fees and commissions by 4.8% to €447m (2022²: €427m), mainly due to the increased fees from lending activities and despite the negative impact from merchant acquiring disposal. Fees and commission accounted for 69bps of total assets (2022²: 67bps). Operating expenses increased by 5.2% to €902m excluding the €14m contribution as above (2022²: €857m) due to higher costs from international operations, inflationary pressures and investments in IT infrastructure projects, partly offset by lower contributions to resolution and deposit guarantee funds. Costs from international operations amounted to €258m (2022²: €212m) including the effect from the acquisition of BNP Paribas Bulgaria end of May 2023, while in Greece slightly decreased by 0.1% to €644m (2022: €645m). The cost to income (C/I) ratio for the Group reached 32.2%, excluding the €111m gain on investment in Hellenic Bank and the €14m contribution as above (2022²: 31.6%, excluding the €325m gain on project "Triangle"), while the international operations C/I ratio stood at 33.1% (2022²: 42.7%). The respective cost to core income³ ratio for the Group improved at 33.2% compared to 42.8%² for 2022.

Trading and other activities recorded net income of €196m (2022²: €1,039m income) mainly including a) €86m derivatives' gains (2022²: €625m gains), b) €57m gains on sale of investment bonds at FVOCI net of hedging (2022²: €26m loss) and c) €68m net other income, including the €111m gain on investment Hellenic Bank (2022²: €323m income, including the €325m gain on project "Triangle") (notes 9 and 10 of consolidated FS).

The NPE formation was positive by €138m, out of which €119m referring to a single corporate customer, (fourth quarter 2023: €29m negative), (2022: €40m positive excluding Serbian operations). In total, the Group's NPE stock stood at €1.5bn, following the classification of the loan portfolio of project "Leon" as held for sale, the sale of Eurobank Direktna, and the write-offs during the year (31 December 2022: €2.3bn) driving the NPE ratio to 3.5% (31 December 2022⁽²⁾: 5.2%). The loan provisions (charge) reached €412m or €345m, excluding the loss

¹ Definitions of the selected financial ratios and the source of the financial data are provided in the Appendix.

² The comparative information has been adjusted due to a) the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. and b) the presentation of operations of Eurobank Direktna a.d. disposal group as discontinued.

³ Total operating expenses divided by total core income.

recorded for projects “Leon” and “Solar” and corresponded to 0.85% of average net loans (2022²: €276m which corresponded to 0.71% of average net loans), while the NPE coverage ratio stood at 86.4% (31 December 2022²: 75.5%). The NPEs after deducting the accumulated stock of loan provisions, amounted to €0.2bn (31 December 2022: €0.6bn).

Furthermore, the Group recognised in 2023 other impairments, risk provisions and related costs amounting to €96m (2022²: €103m), which are analysed in a) €49m impairment on real estate properties, out of which €23m remeasurement loss related to the subsidiary IMO Property Investments Sofia E.A.D. which was disposed of during the year, b) €17m impairment on computer hardware and software (notes 26 and 28 of consolidated FS), and €30m other impairments, litigation and conduct-related provisions and costs. Moreover, it recorded restructuring costs of €37m (2022²: €89m) including an amount of €11m related to the acquisition of BNP Paribas Personal Finance Bulgaria by Eurobank Bulgaria A.D. (note 23.2). The Group’s share of associates/JVs results amounted to €88m income, of which €58m income relates to Hellenic Bank profits for the six-month period ended 30 September 2023.

Finally, in 2023 following the completion of the disposal of the Bank’s 70% shareholding in Eurobank Direktna, the Group recorded €141m net loss from discontinued operations attributable to shareholders, including the recycling of € 124m cumulative losses to the income statement (mainly currency translation differences), previously recognized in other comprehensive income.

Profit or Loss

Overall, in 2023, the profit attributable to shareholders amounted to €1,140m (2022²: €1,347m profit), as set out in the consolidated income statement. The adjusted net profit, excluding the €111m gain on investment in Hellenic Bank, accounted for as an associate, € 141 million net loss from discontinued operations, €48m net loss on projects “Solar” and “Leon” related to the NPE reduction plan, €10m provision (after tax) for the Bank’s contribution to the restoration initiatives after natural disasters, and €29m restructuring costs (after tax) amounted to €1,256m (2022²: €1,178m), of which €468m profit was related to the international operations (2022²: €211m profit).

Based on the Group’s profits for 2023, the Earning per Share (EPS) reached € 0.31 (2022²: €0.36) and the Return (adjusted profit) on Tangible Book Value (RoTBV) amounted to 18.1% (2022²: 11.4%, after deducting €516m non-recurring trading gains net of tax mainly from derivative financial instruments).

Going forward, the Group, pursues its objectives set out in the business plan for the period 2024-2026, which includes targets for a) loans organic growth, b) maintaining resilient core profitability in a lower interest rates environment, c) improvement of the asset quality ratios, d) solid organic capital generation adequate to support the business growth, and e) reward of shareholders, starting from a payout ratio, in the form of cash dividends and/or share buybacks, subject to regulatory approval, of at least 25% in 2024 and gradually increasing over coming years, mainly through the following initiatives and actions:

- a) Maintain high NII mainly driven by the organic increase of Group’s performing loans, which may offset the pressures from the potential decrease in ECB rates, the change in deposits (time/sight) mix and the issuance of MREL eligible senior notes,
- b) Strengthening core markets presence and increasing earnings and volumes contribution by international activities, which will be further enhanced by the full consolidation of Hellenic Bank in Cyprus,
- c) Growth of fee and commission income in a number of fee business segments such as lending, network and assets under management activities, bancassurance, cards issuing and investment property rentals,
- d) Initiatives for pursuing further operating efficiency, cost containment of “run the bank” activities, and proceeding with further simplification and digitalization in Greece and abroad, maintaining the annual increase of the operating expenses at a low to mid-single digit %, considering the inflationary pressures and the “grow the bank” needs. In February 2024, the Group launched a new Voluntary Exit Scheme (VES) for eligible units in Greece,
- e) Maintaining low NPE ratios with high coverage levels in all core markets in which the Group has presence, which may be challenged by the higher interest rates and inflationary pressures’ impact on households’ disposable income and corporate profit margins,
- f) Major transformation initiatives introduced in the context of the Group’s transformation plan “Eurobank 2030”,
- g) Support the green transition and financial inclusion through the further implementation of the Environment, Social and Governance (ESG) criteria in all Group’s activities and processes.

The geopolitical and macroeconomic risks, including the sustained - albeit easing - inflationary pressures, set a number of challenges to the achievement of the Group’s 2024-2026 Business Plan, mainly related with growth potential, lending margins, deposit rates, asset quality and operating cost. The headwinds coming from the geopolitical upheaval and the macroeconomic environment are likely to be mitigated by:

- a) The efficient mobilization of the already approved EU funding, mainly through the Recovery and Resilience Facility (RRF),
- b) The substantial pipeline of new investments,
- c) The decrease of the unemployment rate in 2024 at single digit levels, close to historical lows,

- d) The positive developments in the tourism sector and the strong investment inflows,
 - e) The upgrade of the Greek sovereign to investment grade by four out of the five Eurosystem-approved External Credit Assessment Institutions.
- (see also further information in the section “Macroeconomic Outlook and Risks”)

Capital adequacy

As at 31 December 2023, the Group’s Total Regulatory Capital amounted to €8.4bn (31 December 2022: €8bn) and accounted for 19.4% (total CAD) of Risk Weighted Assets (RWA) (Dec. 2022: 19.2%), compared to the CAD Overall Capital Requirements (OCR) ratio of 14.68%⁴. Respectively, the Common Equity Tier 1 (CET1) stood at 16.9% of RWA (Dec. 2022: 16%) compared to the CET1 OCR ratio of 9.98%⁴ or 12.20%, including the Additional Tier 1 (AT1) and Tier 2 capital shortfall. Both total CAD and CET1 ratios for 2023 carried the effect of the ending of the 5-year transition period for the recognition of the IFRS 9 impact on the regulatory capital and the reversion to the standardized approach as of 1 March 2023. Pro-forma for the completion of the projects “Solar” and “Leon” (note 20 of the consolidated financial statements) and the issuance of €300m Subordinated Tier II debt instruments in January 2024, the total CAD and CET1 ratios would be 20.2% and 17% respectively (note 4 of the consolidated financial statements).

As at 31 December 2023, the Bank’s MREL ratio at consolidated level stands at 24.91% of RWAs (Dec. 2022: 23.07%), higher than the interim non-binding MREL target of 23.23%, which is applicable from January 2024 (note 4 of the consolidated financial statements).

In the context of the Group’s initiatives for the optimization of its regulatory capital, in December 2023, the Bank proceeded with the execution of another synthetic risk transfer transaction (project “Wave IV”) in the form of a financial guarantee, providing credit protection over the mezzanine loss of a portfolio of performing SME and Large Corporate loans amounting to € 1.5 billion, which resulted in a capital benefit of 41 bps (note 20 of the consolidated financial statements).

Pursuant to the Regulation (EU) No 575/2013 (CRR), the deferred tax assets (DTAs) that rely on future profitability and exceed certain limits shall be deducted in the calculation of the CET1 capital. This deduction should be applied gradually by 2025. The enactment of the article 27A of Law 4172/2013, as in force, provided for the Greek credit institutions that the eligible DTAs are accounted on a) the losses from the Private Sector Involvement (PSI) and the Greek State Debt Buyback Program and b) on the sum of (i) the unamortized part of the crystallized loan losses from write-offs and disposals, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015 and can be converted into directly enforceable claims (tax credits) against the Greek State, provided that the Bank’s after tax accounting result for the period is a loss. This legislative provision enabled the Greek credit institutions, including the Bank, not to deduct the eligible DTAs from CET1 capital but recognise them as a 100% weighted asset, with a positive effect on the capital position. As at 31 December 2023, the Bank’s eligible DTAs for conversion to tax credits amounted to € 3,212m (Dec.2022: €3,402m) (note 13 to the consolidated financial statements). A potential change in the regulatory treatment of eligible DTAs as tax credits may have an adverse effect in the Group’s capital position.

2023 Stress Test Results

On 28 July 2023, the Company announced that Eurobank Holdings Group successfully completed the 2023 EU-wide Stress Test (ST), which was coordinated by the European Banking Authority (EBA) in cooperation with the ECB and the European Systemic Risk Board (ESRB). Eurobank has significantly improved its results and resilience to stress under the adverse scenario compared to the ST 2021 exercise.

The starting point of the exercise was the financial and capital position of the Group as at 31 December 2022, as calculated based on the Standardised Approach (STD). On that date, the Fully Loaded (FL) CET 1 ratio (based on the full implementation of Basel III rules) amounted to 14.4%. Under the Baseline scenario, the FL CET1 ratio increases by 360bps over the 3-year ST horizon, reaching the level of 18% at the end of 2025. Under the Adverse scenario, the FL CET1 ratio decreases by 220bps at the end of 2025 and it stands at 12.2%, while at the end of the first year (2023) the Group registered its highest FL CET 1 ratio capital depletion, at 316bps.

2024 Cyber Resilience Stress Test

In 2024 the ECB will conduct a cyber resilience stress test on 109 directly supervised banks, including Eurobank. The exercise will assess how banks respond to and recover from a cyberattack, rather than their ability to prevent it. In particular, under the stress test scenario, the cyberattack succeeds in disrupting banks’ daily business operations. Banks will then test their response and recovery measures, including the activation of emergency procedures and contingency plans and the restoration of normal operations. The ECB will assess the extent to which banks can cope under such a scenario.

This stress test exercise will not have an impact on capital through the Pillar 2 guidance (P2G), which is a bank-specific capital recommendation on top of the binding capital requirements. Rather, the ECB will discuss the findings and lessons learned with each bank as part of the 2024 Supervisory Review and Evaluation Process (SREP), which assesses a bank’s individual risk profile. The exercise’s main findings will be communicated in the summer of 2024.

⁴ The ‘Overall capital requirement (OCR)’ is the sum of the total SREP capital requirement (TSCR) and the combined capital buffer requirement.

International Operations

The Group has a significant presence in three countries apart from Greece. In Cyprus, Eurobank Cyprus Ltd (Eurobank Cyprus) operates a network of 8 banking centres in all major cities across the island, and has five main pillars of business namely, corporate banking, wealth management, international business banking, global markets and affluent banking. In Luxembourg, Eurobank Private Bank Luxembourg S.A. in parallel to its operations in Luxembourg, operates one branch in London and one in Athens, and offers products and services to private banking customers, fund management services, as well as tailored made corporate banking services. In Bulgaria, Eurobank Bulgaria AD (Postbank), is a universal bank offering a wide range of banking services to individuals and companies, through a network of 235 branches and business centres.

On 2 March 2023, the Bank announced that it signed a binding share purchase agreement with AIK Banka a.d. Beograd (AIK) for the sale of its 70% shareholding in its subsidiary in Serbia, Eurobank Direktna a.d.. On 2 November 2023, following the receipt of the approvals by all competent regulatory authorities the Bank announced that the abovementioned sale was completed for a cash consideration of €198m. The transaction was consistent with Eurobank's strategy to direct capital to opportunities with more compelling RoTBV and to further enhance its presence in its core markets, namely Greece, Bulgaria and Cyprus (note 30 to the consolidated financial statements).

On 4 April 2023 the Bank announced that, after the receipt of the relevant regulatory approvals, it completed the acquisition of an additional 13.41% holding in Hellenic Bank Public Company Limited ("Hellenic Bank"), a financial institution located in Cyprus, for a consideration of €70m. Following that, the total holding in Hellenic Bank, including the previously held participation of 15.8%, on the above date reached 29.2% and the Group is considered to have significant influence over the entity. Therefore, from the second quarter of 2023, the investment in Hellenic Bank is accounted for as a Group's associate.

Furthermore, in August 2023, the Bank announced that it has entered into share purchase agreements (SPAs) with certain shareholders of the Hellenic Bank, pursuant to which, it has agreed to acquire an additional total holding of 26.1% in the entity, for a total consideration of € 253.2 million (*announcements dated on August 23rd, 25th and 30th*). The consideration for the said transactions is subject to possible adjustments depending inter alia on the timing of the completion and the terms of the mandatory tender offer in accordance with the provisions of the Takeover Bids Law of 2007 in Cyprus. The completion of the acquisitions is subject to the receipt of all customary regulatory approvals. Following their completion, the total holding in Hellenic Bank will amount to 55.3%. More recently, following the approval of the Commission for the Protection of Competition of the Republic of Cyprus in its meeting on 2 February 2024, the acquisition of the additional total holding of 26.1% in Hellenic Bank, as per the aforementioned signed agreements with certain of its shareholders, is subject to the approvals of the Central Bank of Cyprus/European Central Bank and the Superintendent of Insurance of Cyprus (note 24 to the consolidated financial statements).

Further to the announcement of 9 December 2022, on 1 June 2023, Eurobank Holdings announced that the acquisition of BNP Paribas Personal Finance Bulgaria by Postbank was completed on 31 May 2023, following the receipt of the approvals by all competent regulatory authorities. The transaction strengthens Postbank's position in the Bulgarian retail sector, while it also provides significant opportunities for cross selling, given BNP Paribas Personal Finance Bulgaria's clientele of more than 300 thousand clients. The operational integration is being designed aiming to maximize synergies while exploiting the best practices currently employed in the Personal Finance business model (note 23.2 to the consolidated financial statements).

International operations remain a fundamental competitive advantage for the Bank, with notable contribution to the Group's results. The prospects for the performance of Group's International Operations remain positive despite the challenges in the global economic and geopolitical environment. International Operations business model and solid fundamentals allow to effectively respond to the challenges, safeguarding their profitability, promote sustainable prosperity in the local communities and create value for their clients, employees, shareholders, and the society at large.

Risk management

The Group acknowledges that taking risks is an integral part of its operations in order to achieve its business objectives. Therefore, the Group's management sets adequate mechanisms to identify those risks at an early stage and assesses their potential impact on the achievement of these objectives.

Due to the fact that economic, industry, regulatory and operating conditions will continue to change, risk management mechanisms are set in a manner that enable the Group to identify and deal with the risks associated with those changes. The Bank's structure, internal processes and existing control mechanisms ensure both the independence principle and the exercise of sufficient supervision.

The Group's Management considers effective risk management as a top priority, as well as a major competitive advantage, for the organization. As such, the Group has allocated significant resources for upgrading and maintaining its policies, methods and infrastructure up to date, in order to ensure compliance with the requirements of the European Central Bank (ECB) and of the Single Resolution Board (SRB), the guidelines of the European Banking Authority (EBA) and the Basel Committee for Banking Supervision as well as the best international banking practices. The Group implements a well-structured credit approval process, independent credit reviews and effective risk management policies for all material risks it is exposed to, both in Greece and

in each country of its international operations. The risk management policies implemented by the Group are reviewed on a regular basis.

Risk culture is a core element of the organisation. Risk management function provides the framework, procedures and guidance to enable all employees to proactively identify, manage and monitor the risks in their own areas and improve the control and co-ordination of risk taking across their business. Ongoing education, communication and awareness takes place via dedicated learning programs, monthly meetings, sharing of best practices and other initiatives. The Group has also a policy in place to address any risks associated with the introduction, significant modifications and periodic monitoring of its products and services.

The amount of risk which the Group is willing to assume in the pursuit of its strategic objectives is articulated via a set of quantitative and qualitative statements for risks assessed as material, that are described in the Group's Risk Appetite Framework. The objectives are to support the Group's business growth, balance a strong capital position with higher returns on equity and to ensure the Group's adherence to regulatory requirements. The Risk Appetite, that is clearly communicated throughout the Group determines risk culture and forms the basis on which risk policies and risk limits are established at Group and regional level. Aiming to identify relevant and material risks the Bank maintains a well-defined Risk Identification and Materiality Assessment (RIMA) Framework. The identification and the assessment of all risks is the cornerstone for the effective Risk Management. The Group aiming to ensure a collective view on the risks linked to the execution of its strategy, acknowledges the new developments at an early stage and assesses the potential impact.

The Board Risk Committee (BRC) is a committee of the Board of Directors (BoD) and its task is to advise and support the BoD regarding the monitoring of Group's overall actual and future risk appetite and strategy, 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 institution. The BRC assists the BoD in overseeing the implementation of Group's risk strategy and the corresponding limits set. It also oversees the implementation of the strategies for capital and liquidity management as well as for all other relevant risks, such as credit and market risks, non-financial risks such as operational, reputational conduct, legal, cyber, outsourcing climate and environmental, in order to assess their adequacy against the approved risk appetite limits. The BRC consists of five (5) non-executive directors, meets on a monthly basis and reports to the BoD on a quarterly basis and on ad hoc instances if it is needed.

The Management Risk Committee (MRC) is a management committee established by the Chief Executive Officer (CEO) and its main responsibility is to oversee the risk management framework of the Group. As part of its responsibilities, the MRC facilitates reporting to the BRC on the range of risk-related topics under its purview. The MRC proactively supports the Group Chief Risk Officer, Chairman of the MRC, to identify material risks, in addition to those identified independently by the Group CRO and the Group Risk Management Unit, and to promptly escalate them to the BRC and assists the Group CRO in ensuring that the necessary policies and procedures are in place to prudently manage risk and to comply with regulatory requirements.

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

As part of its overall system of internal controls, Eurobank Ergasias Services and Holdings S.A. has engaged in a Service Level Agreement (SLA) with Eurobank S.A. (the banking subsidiary of the Group) in order to receive supporting and advisory services in all areas of risk management undertaken by the Group.

The most important types of risk that are addressed by the risk management functions of the Group are:

Credit Risk

Credit risk is the risk that a counterparty will be unable to fulfil its payment obligations in full when due. Credit risk is also related with country risk and settlement risk. Credit risk arises principally from the wholesale and retail lending activities of the Group, as well as from credit enhancements provided, such as financial guarantees and letters of credit. The Group is also exposed to credit risk arising from other activities such as investments in debt securities, trading, capital markets and settlement activities. Taking into account that credit risk is the primary risk the Group is exposed to, it is very closely managed and monitored by specialised risk units, reporting to the GCRO.

The credit review and approval processes are centralized both in Greece and in the International operations following the "four-eyes" principle and specific guidelines stipulated in the Credit Policy Manual and the Risk Appetite Framework. The segregation of duties ensures independence among executives responsible for the customer relationship, the approval process and the loan disbursement, as well as monitoring of the loan during its lifecycle. The credit approval process in Corporate Banking is centralized through the establishment of Credit Committees with escalating Credit Approval Levels, which assess and limit to the extent possible the corporate credit risk. Rating models are used in order to calculate the credit rating of corporate customers, reflecting the underlying credit risk. The most significant ones are the MRA (Moody's Risk Analyst) applied for companies -

mostly- with industrial and commercial activity and the slotting rating models, used for specialised lending portfolios (shipping, real estate and project finance) with ring fenced transactions. Credit risk assessment is performed by Group Credit (GC), which assesses the credit requests submitted by the Business Units, a procedure including the evaluation of the operational and financial profile of the customer, the validation of the borrower's rating and the identification of potential risk factors for the Bank.

The credit review and approval processes for loans to Small Businesses (turnover up to €5m) are also centralised following specific guidelines and applying the 'four-eyes' principle. The assessment is primarily based on the analysis of the borrower's operational characteristics and financial position. The same applies for Individual Banking (consumer and mortgage loans), where the credit risk assessment is based on criteria related to the characteristics of the retail portfolio, such as the financial position of the borrower, the payment behaviour, the existence of real estate property and the type and quality of securities.

The ongoing monitoring of the portfolio quality and of any deviations that may arise, lead to an immediate adjustment of the credit policy and procedures, when deemed necessary. The quality of the Group's loan portfolios (business, consumer and mortgage in Greece and abroad) is monitored and assessed by the Group Credit Control (GCC) via field, desktop and thematic reviews in order to timely identify emerging risks, vulnerabilities, compliance to credit policies and consistency in underwriting. Furthermore, the GCC assumes oversight and supervisory responsibilities for proper operation of corporate rating and impairment models. Moreover, GCC regularly reviews the adequacy of provisions of all loan portfolios. The sector also formulates Group's credit policies, reviews policies developed by other units and participates in the development of new loan products. Finally, it monitors regulatory developments, emerging trends and best practices proposing relevant policy updates or product enhancements when necessary. GCC operates independently from all the business units of the Bank and reports directly to the GCRO.

The measurement, monitoring and periodic reporting of the Group's exposure to counterparty risk (issuer risk and market driven counterparty risk), which is the risk of loss due to the customer's failure to meet its contractual obligations in the context of treasury positions, such as debt securities, derivatives, repos, reverse repos, interbank placings, etc. are performed by the Group Market and Counterparty Risk (GMCR). The Group sets limits on the level of counterparty risk that are based mainly on the counterparty's credit rating, as provided by international rating agencies, the product type and the maturity of the transaction (e.g. control limits on net open derivative positions by both amount and term, sovereign bonds exposure, corporate securities, asset backed securities, etc.). GMCR maintains and updates the limits' monitoring systems and ensures the correctness and compliance of all financial institutions limits with the Bank's policies as approved by the Group's relevant bodies. The utilization of the abovementioned limits, any excess of them, as well as the aggregate exposure per Group's entity, counterparty and product type are monitored by GMCR on a daily basis. The Group from 2021 applies the new regulatory framework for the counterparty risk from derivatives Standardised Approach for measuring counterparty credit risk (SA-CCR).

Market Risk

The Group has exposure to market risk, which is the risk of potential financial loss due to an adverse change in market variables. Changes in interest rates, foreign exchange rates, credit spreads, equity prices and other relevant factors, such as the implied volatilities, can affect the Group's income or the fair value of its financial instruments. The market risks, the Group is exposed to, are monitored, controlled and estimated by GMCR. GMCR is responsible for the measurement, monitoring, control and reporting of the exposure on market risks including the Interest Rate Risk and the Credit Spread Risk in the Banking Book (IRRBB/CSRBB) of the Group. The GMCR reports to the GCRO. The exposures and the utilisation of the limits are reported to the Board Risk Committee and to the BoD.

Market risk in Greece and International Subsidiaries is managed and monitored mainly using Value at Risk (VaR) methodology, sensitivity and stress test analysis. VaR is a methodology used in measuring financial risk by estimating the potential negative change in the market value of a portfolio at a given confidence level and over a specified time horizon. The VaR that the Group measures is an estimate based upon a 99% confidence level and a holding period of 1 day and the methodology used for the calculation is Monte Carlo simulation (full re-pricing of the positions is performed). Since VaR constitutes an integral part of the Group's market risk control regime, VaR limits have been established for all portfolios (trading and investment) measured at fair value and actual exposure is monitored daily by management. However, the use of this approach does not prevent losses outside of these limits in the event of extraordinary market movements. For that reason the Group uses additional monitoring metrics such as: Stressed VaR, Expected Shortfall and Stress Tests. Finally, the Group already monitors the impact from the new regulatory framework for market risk (Fundamental Review of the Trading Book-FRTB) and monitors the evolution of the relevant capital charges until its official application (2025) based on a set of established systems and procedures.

Interest Rate Risk in the Banking Book (IRRBB)

The IRRBB is defined as the current and the prospective risk of a negative impact to the institution's economic value of equity, or to the institution's net interest income, taking market value changes into account as appropriate, which arise from adverse movements in interest rates affecting interest rate sensitive instruments, including gap risk, basis risk and option risk.

GMCR is the unit responsible for the monitoring, control, reporting and estimation of IRRBB on a group level. Both the Economic Value of Equity (EVE) and NII sensitivity to a number of stresses on interest rates are estimated on a periodic basis and are compared with the approved BoD Risk Appetite Statements (RAS) thresholds. The Group is now using the established Asset and Liability Management (ALM) tool for a significant part of the analysis on a solo level. The plan is to further increase the use of the ALM tool for any analysis related to IRRBB on a group level. Furthermore, the Group already applies a set of extra stress test analysis for specific parts of its Banking Book for the assessment to the exposure on Mark-to-Market (MTM) volatility and for the assessment of the CSRBB (Credit Spread Risk in the Banking Book). The policy for the management of IRRBB as approved by BRC and BoD provides a clear description of the methodologies, the governance, the limits that are used for the management of IRRBB & CSRBB.

Liquidity Risk

The Group is exposed on a daily basis to liquidity risk due to deposits withdrawals, maturity of medium or long term notes, maturity of secured or unsecured funding (interbank repos and money market takings), collateral revaluation as a result of market movements, loan draw-downs and forfeiture of guarantees. The Board Risk Committee and the BoD sets in the RAS Framework the liquidity risk thresholds to ensure that sufficient funds are available to meet all of these contingencies under any scenario. The Group monitors on a continuous basis the level of liquidity risk using regulatory and internal metrics and methodologies (Liquidity Coverage Ratio/LCR, Net Stable Funding Ratio/NSFR, Liquidity Buffer analysis, cash flow analysis, short-term and medium-term stress test etc.).

BRC role is to approve all strategic liquidity risk management decisions and monitor the quantitative and qualitative aspects of liquidity risk. Group Assets and Liabilities Committee (G-ALCO) has the mandate to form and implement the liquidity policies and guidelines in conformity with Group's risk appetite, and to review at least monthly the overall liquidity position of the Group. Group Treasury is responsible for the implementation of the Group's liquidity strategy, the daily management of the Group's liquidity and for the preparation and monitoring of the Group's liquidity budget, while GMCR is responsible for measuring, control, monitoring and reporting the liquidity of the Group to the G-ALCO, BRC, BoD and to the regulatory bodies.

Operational & Non-Financial Risks (NFRs)

Aiming to strengthen further the existing Operational Risk Framework in alignment with increased regulatory expectations as defined in the: i) EBA Guidelines on Internal Governance (2021) under Directive 2013/36/EU, (ii) BCBS Revisions to the Principles for the Sound Management of Operational Risk (2021), (iii) BCBS Principles for Operational Resilience, and (iv) EBA Guidelines on ICT and security risk management EBA/GL/2019/04, the Group had decided to move towards managing Non-Financial Risks (NFRs) holistically.

NFR is defined by exclusion, that is, any risk other than the financial risks such as credit, market, and liquidity. It includes operational risk and reputational risk as well as specific aspects of other risks, such as business and strategic risk. Operational risk is defined as the risk of loss resulting from inadequate or failed internal processes, people, and systems or from external events (definition includes legal risk but excludes business, strategic and reputational risk).

Eurobank is gradually implementing the Risk Appetite Framework to cover NFRs, which sets out the mechanisms through which the Group establishes its risk appetite and ensures that its risk profile remains within that appetite to bear risk in relation to the internal and external events as well as other constraints.

Governance responsibility for Non-Financial Risks management stems from the Board of Directors (BoD), through the Executive Board and Senior Management, and passes down to the Heads and staff of every business unit. The BoD establishes the mechanisms used by the Group to manage NFRs, sets the tone and expectations, and delegates relevant responsibilities. The Board Risk Committee and the Audit Committee monitor the NFR levels and profile, including relevant events.

NFR management comprises risk identification, assessment, and mitigation while employing independent oversight and an effective risk culture to ensure that business objectives are met within the NFR appetite that is reflected in the Group's Policies and Guidelines.

The Heads of each Business Unit (the risk owners) are primarily responsible for the day-to-day management of NFRs and the adherence to relevant controls. Each Business Unit has appointed an Operational Risk Partner (OpRisk Partner) or an Operational Risk Management Unit (ORMU) depending on the size of the business unit, which are responsible for coordinating the internal risk management efforts of the business unit while forming the link between Line 1 and Line 2.

Eurobank has adopted a Themes-based risk taxonomy, developed along the lines of the industry reference taxonomies, for risk management and reporting purposes. Each Risk Themes is overseen by Theme Coordinators (Second Line of Defense). The risk themes which fall within the scope of NFR are the following:

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Internal Fraud	Regulatory compliance	Information Security	Model	People
External Fraud	Conduct	Technology	Reputational	Third Party
Transaction Processing & Execution	Financial Crime	Physical Security, Safety & Business Disruption	ESG	Business & Strategic

Group Operational and Non-Financial Risks Unit (GONFR) has been positioned as an overlaying framework coordinator for all Non-Financial Risks (NFRs). GONFR's overlaying responsibilities aim to harmonize the Second Line of Defense activities across the Group and to holistically ensure the effective, consistent application of the Risk Appetite Framework. The 2LoD Units maintain their responsibilities for specific Risk Theme(s) owned.

Climate related and environmental risks

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

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

Climate-related and environmental risks include the following:

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

The Group is adopting a strategic approach towards sustainability, climate change risk identification and risk management, signifying the great importance that is given in the risks and opportunities arising from the transitioning to a low-carbon and more circular economy. In this context, the Bank has approved and implements its Financed Impact Strategy, which focuses on:

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

In line with good practices identified by the ECB, the Financed Impact Strategy of the Bank will focus on sustainable financing targets / commitments. In particular, the Bank identified total portfolio and sectoral targets with regards to financing the green transition of its clients.

The Bank has set the following targets for sustainable disbursements in the following years:

- New disbursements: €2bn new green disbursements to businesses until 2025 or 20% of the annual new corporate disbursements to be classified as green/ environmentally sustainable,
- Renewable energy: 35% of new disbursements in the energy sector will be directed to Renewable Energy Sector (RES) financing,
- Green buildings: 80% of disbursements related to the construction of new buildings will be allocated to green buildings,
- RRF: €2.25bn total green contribution through RRF funds in the Greek economy by 2026,
- Green stock / exposure evolution: 20% stock of green exposures for the corporate portfolio by 2027 (up from 11% in 2022), and
- Double retail green gross disbursements within 2023 compared to 2022.

To facilitate the classification of sustainable/green financing opportunities in a structural manner, the Bank has developed its Sustainable Finance Framework (SFF). Through its SFF, the Bank is able to classify sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing (eligible green and social assets). Furthermore, the Group has updated its governance structure by introducing and defining the roles and responsibilities in relation to ESG and climate related and environmental (CR&E) risks, embedding regulatory guidelines and market practices involving various key stakeholders (i.e. Business functions, Units, and Committees). The Group applies a model of defined roles and responsibilities regarding the management of CR&E risks across the 3 Lines of Defense.

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

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

The Group participates in the European Central Bank’s (ECB) supervisory One-off Fit-for-55 climate risk scenario analysis, which was launched in December 2023. The climate risk scenario analysis – with the participation of 110 significant banks – aims to gain insights into the capacity of the financial system to support the transition to a lower carbon economy under conditions of stress. The Group is in the process of successfully completing this exercise, and continues to work in order to implement its climate risk action plan, to further integrate climate risks into its business strategy and risk management practices, and to support its clients towards climate transition and sustainable business growth.

The Group applies the elements of the Three Lines of Defense model for the management of all types of risk. The Three Lines of Defense Model enhances risk management and control by clarifying roles and responsibilities within the organization. Under the oversight and direction of the Management Body, the responsibilities of each of these lines of defense are:

- Line 1 - Own and manage risk and controls. The front line business and operations are accountable for this responsibility as they own the rewards and are the primary risk generators,
- Line 2 - Monitor risk and controls in support of Executive Management, providing oversight, challenge, advice and group-wide direction. These mainly include the Risk and Compliance Units,
- Line 3 - Provide independent assurance to the Board and Executive Management concerning the effectiveness of risk and control management. This refers to Internal Audit.

Further information on the Group’s financial risk management objectives and policies, including the policy for hedging each major type of transaction for which hedge accounting is used is set out in the notes 2, 5 and 19 to the consolidated financial statements for the year ended 31 December 2023.

Non Performing Exposures (NPE) management

The Group realizes the NPE Strategy Plan through its implementation by doValue Greece for the assigned portfolio and the securitization transactions.

Troubled Assets Committee

The Troubled Assets Committee (TAC) is established according to the regulatory provisions and its main purpose is to act as an independent body, closely monitoring the Bank’s troubled assets portfolio and the execution of its NPE Management Strategy.

Remedial and Servicing Strategy (RSS)

Remedial Servicing & Strategy Sector (RSS) has the mandate to inter alia devise the NPE reduction plan and closely monitor the overall performance of the NPE portfolio as well as the relationship of the Bank with doValue Greece. Furthermore, following Eurobank’s commitments against the significant risk transfer (SRT) monitoring regulatory requirements pertaining to Bank’s concluded transactions, RSS has a pivotal role in ensuring that relevant process is performed smoothly and in a timely manner and that any shortcomings are appropriately resolved, while providing any required clarifications or additional material required by the regulatory authorities. The Head of RSS reports to the General Manager of Group Strategy.

In this context, RSS has been assigned inter alia with the following responsibilities:

- a) Develop and actively monitor the NPE targets and reduction plan,
- b) Set the strategic principles, priorities, policy framework and KPIs under which doValue Greece is servicing the portfolio,
- c) Closely monitor the execution of the approved strategies, as well as all contractual provisions under the relevant contractual agreements for Eurobank’s portfolio assigned to doValue Greece including the securitized portfolio of ERB Recovery DAC,
- d) Monitoring of the performance of the senior notes of the securitizations in collaboration with Group Risk so as to ensure compliance to significant risk transfer (SRT) and to the Hellenic Asset Protection Scheme (HAPS),
- e) Budget and monitor the Bank’s expenses and revenues associated with the assigned portfolio,

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- f) Cooperate closely with doValue Greece on a daily basis in achieving the Group's objectives,
- g) Maintain supervisory dialogue.

NPE Management Strategy and Operational targets

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

Project "Solar"

In the context of its NPE management strategy, the Group has structured another NPE securitization transaction (project 'Solar'), as part of a joint initiative with the other Greek systemic banks, in order to decrease further its NPE ratio and strengthen its balance sheet de-risking. In addition, the Group targets to the prudential and accounting derecognition of the underlying corporate loan portfolio from its balance sheet by achieving a Significant Risk Transfer (SRT) and including 'Solar' securitization under the Hellenic Asset Protection Scheme (HAPS), thus the senior note of the securitization to become entitled to the Greek State's guarantee.

On 2 November 2023, the Bank announced the execution of a binding agreement between the four Greek systemic banks (the Banks) and Waterwheel Capital Management, L.P., with respect to the sale to the latter of 95% of the Mezzanine notes and of 95% of the Junior notes to be issued in the context of "Solar" securitization. The Banks will hold 100% of the Senior notes as well as 5% of the Mezzanine and of the Junior notes. The completion of the transaction is subject to the fulfillment of customary conditions for such transactions, including, among others, the HAPs guarantee and SRT approval mentioned above (note 20 to the consolidated financial statements).

Project "Leon"

In December 2023, the Bank, aiming to accelerate further its NPE reduction plan, initiated the sale process of a mixed NPE portfolio of total gross book value ca. €400m, engaging in parallel in negotiations with potential investors. The transaction is expected to be completed by the end of 2024. Accordingly, as at 31 December 2023, the Bank classified the above loan portfolio as held for sale (note 20 to the consolidated financial statement).

Macroeconomic Outlook and Risks

Despite the fragile international environment, the economies of Greece, Bulgaria and Cyprus remained in expansionary territory in 2023, overperforming their European Union (EU) peers. More specifically, according to provisional data by the Hellenic Statistical Authority (ELSTAT), the Greek economy expanded by 2% on an annual basis in 2023 (2022:5.6%), driven by increases in exports of goods and services, household consumption and fixed investment. According to its Winter Economic Forecast (February 2024), the European Commission (EC) expects a GDP growth rate of 2.3% in 2024 and 2025. Amid strong base effects and easing energy prices, the inflation rate as measured by the annual change in the Harmonized Index of Consumer Prices (HICP) decelerated to 4.2% in 2023 from 9.3% in 2022 according to ELSTAT, with the Commission forecasting further de-escalation to 2.7% in 2024, and 2% in 2025. The average quarterly unemployment rate decreased to 11.1% in 2023 from 12.4% in 2022, with the International Monetary Fund forecasts for 2024 and 2025 standing at 9.2% and 8.5% in 2024 and 2025 respectively, according to its January 2024 Art. IV Country Report.

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

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

On the fiscal front, according to the 2024 State Budget, the general government is expected to post primary surpluses of 1.1% and 2.1% of GDP in 2023 and 2024 respectively, up from 0.1% of GDP in 2022. The gross public debt-to-GDP ratio, having declined significantly to 172.6% in 2022 (from 195% in 2021) due to the strong economic recovery and the effect of the high inflation on nominal GDP, is expected to decline further to 160.3% in 2023 and 152.3% in 2024. In 2023, the Greek government issued or re-opened twelve bonds of various maturities (from 5 to 19 years) through the Public Debt Management Agency (PDMA), raising a total of € 11.45 billion from the international financial markets. In February 2024, the PDMA issued a new 10-year bond, raising €4bn at a yield of 3.478%, and reopened two bonds with remaining maturities of 4.25 and 9.25 years for €200m each, with their yields closing at 2.58% and 3.32% respectively.

Regarding sovereign rating changes, Scope Ratings upgraded the credit rating of Greece to investment-grade status in August 2023, followed by DBRS Morningstar in September 2023, Standard & Poor's (S&P) in October 2023, and Fitch in December 2023. As of March 2024, Greek government's long-term debt securities were considered investment grade by four out of the five Eurosystem-approved External Credit Assessment

Institutions (Fitch, Scope, S&P: BBB-, stable outlook; DBRS: BBB(low), stable outlook), and one notch below investment grade by the fifth one, Moody's (Ba1, stable outlook, upgraded from Ba3 in September 2023).

According to Bank of Greece (BoG) data, the stock of credit to the non-financial private sector amounted to €109.1bn at the end of 2023, up from €107.1bn at the end of 2022, marking a gross annual increase of 1.8%. Adjusted for write-offs, reclassifications and foreign exchange fluctuations, the annual growth rate of domestic credit to the non-financial sector stood at 2.7%. On the other side of the ledger, domestic non-financial private sector deposits had increased to €190.7bn at the end of 2023 from €185.1bn at the end of 2022 (+3%). According to provisional BoG data, residential real estate prices recorded an average annual increase of 13.4% in 2023, and commercial real estate prices an average annual increase of 6.9% in the first half of 2023.

The Bulgarian economy is rendered as an outperformer among regional economies as it expanded by 2% in 2023 compared to 3.9% in 2022. Private consumption remained the key growth driver, underpinned by strong labour market conditions which in turn improved consumer confidence despite the abating, still high, inflation throughout 2023. Annual HICP inflation decelerated from 14.3% in December 2022 to 8.6% in December 2023 with potential of further decrease in 2024. According to EC's Winter Economic Forecast (February 2024), real GDP is expected to grow by 1.9% and 2.5% in 2024 and 2025 respectively, with private consumption continuing to be considered the key growth driver, while the HICP is forecast to decrease to 3.4% in 2024 and 2.9% in 2025. The revival of investments spotted in third quarter of 2023 was not sustained in fourth quarter of 2023 yet prospects for 2024 regarding this GDP component remain positive, mostly on the back of higher absorption of EU funds, as outlined in the country's Recovery and Resilience Plan. A possible delay in the euro adoption could materialise given the slow convergence on prices, resulting in Bulgaria entering the euro area later than January 2025. The entry into the Schengen area from March 2024 is embraced positively. Still, the limitations of the access only to air and sea cut down respectively the benefits only for tourism.

According to the GDP flash estimate for fourth quarter 2023, the economy of Cyprus grew by 2.5% in 2023, down from 5.1% in 2022. The deceleration in 2023 is mainly due to the milder increase in household consumption, under persisting inflationary pressures (average HICP inflation of 3.9% in 2023 after 8.1% in 2022, according to Eurostat), despite higher partial indexation of wages since June 2023 (66.7% instead of 50% in previous years). Nonetheless, based on the European Commission's winter economic forecasts (February 2024), the growth performance in 2023 is among the top-3 in the Euro area and the real GDP in Cyprus is expected to grow by 2.8% and 3% in 2024 and 2025 respectively, while the HICP is estimated at 2.4% in 2024 and 2.1% in 2025 (2023: 3.9%). Disinflation along with a tight labour market, as unemployment is projected to de-escalate to 6.1% in 2024 and 5.9% in 2025, against 6.4% in 2023, will support consumption spending expansion in these two years. On the other hand, slower GDP growth in 2024-2025 relative to 2022 will stem from the deterioration of the external balance, mainly of the goods component, due to the weakened growth momentum in Cyprus' trading partners, while exports of services are more resilient, although a protracted war in the Middle East will weigh on the tourism outlook given the vital role of tourists from Israel to the spike in tourism revenue in the first nine months of 2023 (+25% Year on Year). On the investment side, after the freezing of the RRF financing in 2023 pending the implementation of Recovery and Resilience Plan (RRP) milestones (reforms etc.), the restart of capital inflows in 2024 will boost green and digital infrastructure in 2024-2025. Particularly, strong demand for real estate in 2023, with sales at a 16-year high, will support construction activity, however, the market outlook is linked to developments in the Middle East war due to the Israeli's significant market share last year.

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

Materialization of the above risks would have potentially adverse effects on the fiscal planning of the Greek government, as it could decelerate the pace of expected growth and on the liquidity, asset quality, solvency and profitability of the Greek banking sector. In this context, the Group Management and Board, also mindful of the recent banking turmoil across some markets, are continuously monitoring the developments on the macroeconomic, financial and geopolitical fronts as well as the evolution of the Group's asset quality and liquidity KPIs and have increased their level of readiness, so as to accommodate decisions, initiatives and policies to protect the Group's capital, asset quality and liquidity standing as well as the fulfilment, to the maximum possible degree, of its strategic and business goals in accordance with the business plan for 2024 – 2026.

Share Capital

As at 31 December 2023:

- a) The total share capital of Eurobank Holdings amounted to € 817,625,550.94 divided into 3,716,479,777 common voting shares of nominal value of €0.22 each. All shares are registered, listed on the Athens Stock Exchange and incorporate all the rights and obligations set by the Greek legislation,
- b) The number of Eurobank Holdings shares held by the Group's subsidiaries in the ordinary course of their business was 4,346,566 (31 December 2022: 260,036) (note 37 to the consolidated financial statements),
- c) The number of own shares held by Eurobank Holdings was 52,080,673.

Own shares

The BoD decided on 27 June 2023 to propose at the Annual General Meeting (AGM) to approve to purchase the Company's shares held by the HFSF, via a pre-agreed transaction ("Repurchase"). The Repurchase is provided for in the HFSF's Divestment Strategy and has been approved by the Single Supervisory Mechanism (SSM). Following the above, the AGM held on 20 July 2023 approved the acquisition of own shares in accordance with article 49 of Law 4548/2018, and in particular the acquisition of all of the Company's shares which the HFSF owns, under the following conditions:

- a) Maximum number of shares to be acquired: According to article 49 of Law 4548/2018, the maximum number of shares that the Company may acquire, added together with the shares belonging to the Company from time to time, cannot exceed 10% of the Company's paid share capital. Specifically, in this transaction, the number of shares to be purchased will be the total of its issued shares held by the HFSF, i.e. 52,080,673 shares, which correspond to approximately 1.40% of its share capital,
- b) The duration for which the approval is granted is set at 6 months from the day of the General Meeting,
- c) The maximum purchase price is set at €1.90 per share and the minimum purchase price is set at €1.10 per share,
- d) To authorize the Board of Directors to determine the specific conditions and relevant details for the acquisition, taking into account the supervisory approvals.

The transaction was completed on 9 October 2023 at a price of €1.80 per share and a total consideration of €93,745,211.40.

The Company intends to proceed to the cancellation of the aforementioned treasury shares, subject to the approval of the Annual General Meeting and regulatory authorities.

Share options

Under the five-year shares award plan approved in 2020 and started in 2021, the executives and personnel of Eurobank Holdings and its affiliated companies are granted share options rights, which are exercised in portions annually during the term of the plan by issuing new shares with a corresponding share capital increase. Each portion may be exercised wholly or partly and converted into shares at the employees' option, provided that they remain employed by the Group until the first available exercise date. The maximum number of rights that can be approved was set at 55,637,000 rights, each of which would correspond to one new share and the exercise price of each new share would be equal to € 0.23.

In July 2023, the Group awarded to its executives 12,101,092 new share options, exercisable in annual portions up to 2028. From the share options exercisable in 2023, a number of 5,802,269 options were exercised during the year, resulting in the issue of an equal number of new common voting shares. Further information is provided in note 39 to consolidated financial statements.

Dividends/Distribution of Profits

In December 2023, the Bank proceeded with the distribution of non-mandatory reserves totalling €410 million to its sole shareholder, Eurobank Holdings, in order to enable the latter to distribute dividend out of the profits of the financial year 2023 to its shareholders in accordance with the provisions of article 159 of Company Law 4548/2018.

Based on the Group's financial performance for the financial year 2023, Eurobank Holdings aims to distribute to its shareholders a cash dividend equivalent to at least 25% of the Group's adjusted net profit for financial year 2023, subject to the approval of the Annual General Meeting of its shareholders and the regulatory authorities.

In addition, Eurobank Holdings intends to proceed also with the distribution of profits to the employees in accordance with its remuneration policy, subject to the approval of the Annual General Meeting of its shareholders.

Major Shareholders

Based on the most recent notifications that Eurobank Holdings has received from shareholders controlling 5 per cent or more of Eurobank Holdings' voting rights, such significant shareholders are the following:

- a) "Fairfax Financial Holdings Limited", controlling 32.93% of Eurobank Holdings' total number of voting rights, corresponding to 1,224,002,259 voting rights of Eurobank Holdings' ordinary shares (the reporting date for the aforementioned is on 14 July 2021, while the percentage calculation is based on the new total Company's listed shares that are tradeable on the Athens Stock Exchange, following the last share capital increase due to the exercise of stock option rights),
- b) "The Capital Group Companies, Inc", controlling 5.05% of Eurobank Holdings' total number of voting rights, corresponding to 187,812,291 voting rights of Eurobank Holdings' ordinary shares. (the reporting date for the

aforementioned is on 1 December 2020, while the percentage calculation is based on the new total Company's listed shares that are tradeable on the Athens Stock Exchange, following the last share capital increase due to the exercise of stock option rights),

- c) The "Helikon Investments Limited", controlling 5,00% of Eurobank Holdings' total number of voting rights, corresponding to 185,957,220 voting rights of Eurobank Holdings' ordinary shares. (the reporting date for the aforementioned is on 25 January 2023, while the percentage calculation is based on the new total Company's listed shares that are tradeable on the Athens Stock Exchange, following the last share capital increase due to the exercise of stock option rights).

Sundry information required under Law 3556/2007 (article 4, par.7)

According to the Articles of Association:

- a) there are no restrictions on the transfer of the Eurobank Holdings' shares,
- b) there are no shares with special controlling or voting rights,
- c) there are no restrictions on voting rights,
- d) the rules related to the appointment and replacement of directors as well as to the amendment of the Articles of Association are in accordance with the provisions of company law.

Eurobank Holdings is not aware of any shareholders' agreements resulting in restrictions in the transfer of its shares or in the exercise of the shares' voting rights. There are no significant agreements that enter into force, are amended or expire if there is change in the control of Eurobank Holdings following a public offer. There are no agreements between Eurobank Holdings and the Directors or the staff for compensation in the event of departure as a result of a public offer.

Board of Directors

The Board of Directors (BoD) was elected by the Annual General Meeting (AGM) of the Shareholders held on 23 July 2021 for a three-year term of office that will expire on 23 July 2024, prolonged until the end of the period the AGM for the year 2024 will take place.

Further to that:

- The AGM of the Shareholders held on 20 July 2023 approved the appointment of Mr. Burkhard Eckes and Mr. John Arthur Hollows as new independent non-executive members of Eurobank Holdings BoD, whose term of office will expire concurrently with the term of office of the other members of the BoD (comprising of fifteen members from now onwards). On the same day the BoD decided on its constitution.
- On 9 October 2023, Eurobank Holdings announced the acquisition of all of its issued shares held by the HFSF, namely 52,080,673 common registered shares. On the same day, the HFSF notified Eurobank Holdings that effective as of 11 October 2023, the HFSF will no longer have the special rights provided in law 3864/2010, including the right to appoint a representative in the Board of Directors and the Board Committees. In this framework, the HFSF representative Mrs. Efthymia Deli, member of the Boards of Directors and of the Committees of the Boards of Eurobank Holdings and Eurobank, submitted on 26.10.2023 her resignation from the abovementioned positions, effective as of 7 November 2023. Accordingly, on 10 November 2023, the BoD decided, in accordance with the provisions of article 82 par. 2 of L. 4548/2018 and article 7 par. 2 of the Company's Articles of Association, on the continuation of the Company's management and representation by the BoD, comprising of its remaining fourteen (14) members, as well as on its constitution.
- Mr. Andreas Athanasopoulos, Deputy CEO and Executive Member of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 31 October 2023 his resignation from the abovementioned positions, effective as of 31 December 2023. Accordingly, on 8 January 2024, the BoD decided, in accordance with the provisions of article 82 par. 2 of L. 4548/2018 and article 7 par. 2 of the Company's Articles of Association, on the continuation of the Company's management and representation by the BoD, comprising of its remaining thirteen (13) members, as well as on its constitution.

The BoD of Eurobank Holdings is set out in note 47 to the consolidated financial statements. Personal details of the Directors are available on the website of Eurobank Holdings (www.eurobankholdings.gr).

Information required under Law 4548/2018 (article 97, par.1 (b))

According to article 97 par. 1 (b) of Law 4548/2018 the BoD members owe to disclose in a timely and adequate manner to the other members of the BoD their own interests, which may arise from the company's transactions, which fall within their duties, as well as any conflict of their interests with those of the company or its related companies. In such case and in line with the provisions of article 97 par 3 of the same law, the member of the BoD is not entitled to vote on issues in which there is a conflict of interest with his own company or persons with whom he is a related party. In these cases, decisions are taken by the other BoD members.

For 2023, the following issues were noted in which there was a conflict of interest with Eurobank Holdings:

For the purposes of decisions related to the acknowledgement of the expiration of the deadline of par. 3 of art. 100 of Law 4548/2018 concerning the conclusion of a Share Purchase Agreement (SPA), which pertains to the Eurobank's participation in the company "Grivalia Hospitality S.A." (Grivalia Hospitality or GH) between Eurobank and "Eurolife FFH Life Insurance Single Member Société Anonyme" (Eurolife), which is a related party of the parent company of Eurobank, Eurobank Holdings, within the meaning of paragraph 2 (a) of article 99 of Greek Law 4548/2018, according to IAS 24, the BoD member Mr. Martin also Vice Chairman of Strategic

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Investments at Fairfax, which holds 32.93% of the shares of the parent company of Eurobank, Eurobank Holdings, and also controls Eurolife's parent company, "Eurolife FFH Insurance Group Holdings Société Anonyme", and indirectly Eurolife itself, was not entitled to vote according to the provisions of par. 3 of Art. 97 of the Company Law 4548/2018 due to conflict of interest.

For the purposes of decisions related to the Hellenic Financial Stability Fund (HFSF) share buy-back and decisions in the context of this buy-back related to a) the issuance of a common bond loan and b) instructions of voting for the Extraordinary General Meeting of Eurobank, the BoD member and HFSF representative Ms. Deli was not entitled to vote according to the provisions of par. 3 of Art. 97 of the Company Law 4548/2018 due to conflict of interest.

For the purposes of decisions relating to a) the Stock Options plan (2nd and 3rd series implementation) approved by the Annual General Meeting of Shareholders in July 2021, b) variable remuneration awarded in instruments and c) executives' Remuneration, the CEO Mr. F. Karavias and the Deputy CEOs Messrs. Ioannou, Vassiliou and Athanasopoulos were not entitled to vote, according to the provisions of par. 3 of art. 97 of the Law 4548/2018, due to conflict of interests.

Related party transactions

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

As at 31 December 2023, the Group's outstanding balances of the transactions and the relating net income / expense for 2023 with (a) the key management personnel (KMP) and the entities controlled or jointly controlled by KMP are: compensation €9.7m, receivables €5.8m, liabilities €20.2m, net expense €18.1m, of which €4m expense relating with equity settled share based payments, (b) the Fairfax group (excluding Eurolife FFH Insurance Group Holdings S.A., which is also a Group's associate) are: receivables €132.5m, liabilities €129.4m, guarantees issued €2.5m, net income €6.4m, (c) the associates and joint ventures are: receivables €171.7m, liabilities €201.9m, net expense €76.2m (d) the Fund are: liabilities €1m.

At the same date, the Company's outstanding balances of the transactions and the relating net income / expense for 2023 with (a) KMP are: compensation €0.2m that is referring mainly to KMP services provided by Eurobank S.A. in accordance with the relevant agreement, (b) the Fairfax group refer to receivables and operating income of €0.3m related to financial consulting services, (c) the subsidiaries are: receivables €1,677m, liabilities €31.13m and net income €505.3m, including €410m dividend income and (d) the Group's associate Eurolife FFH Insurance Group Holdings S.A. are: operating expense of €0.1m.

All transactions with related parties are entered into the normal course of business and are conducted on an arm's length basis. Further information is provided in the note 45 to the consolidated financial statements and note 19 to the financial statements of the Company.

External Auditors

The Eurobank Holdings' Shareholders Annual General Meeting held on 20 July 2023 approved the appointment of KPMG, as statutory auditor for the financial statements (separate and consolidated) for the year ending 31 December 2023.

During 2023, the Audit Committee reviewed KPMG's independence and effectiveness, along with its annual audit plan. In addition, the Audit Committee ensured on a quarterly basis that a) the non-audit services assigned to KPMG, have been reviewed and approved as required and b) there is a proper balance between the audit and non-audit fees paid to KPMG, in accordance with the relevant provisions of the Group's Policy on External Auditors' Independence (note 46 of the consolidated financial statements).

NON-FINANCIAL INFORMATION**Business model**

The Eurobank Holdings Group (the Group) offers a wide range of financial products and services in retail and business banking and has a significant international presence in three countries outside Greece (see further information in the section "International Operations"). It is among the leading providers of banking services and credit to large corporates, SMEs, small businesses, professionals and households, concentrating its efforts on financing the growth cycle of the Greek economy and the other countries of presence, including an instrumental participation in Recovery and Resilience Facility (RRF) funds. In addition, the Group has a strategic focus in fee-generating activities, such as asset management, private banking, equity brokerage, treasury sales, investment banking, factoring, real estate, trade finance and bancassurance.

The Group has a diversified (through business line, geography and customer) and resilient business model, which is based on three revenue streams i.e. the Greek banking operations, the international activities and the real estate business. Its strategy aims at optimizing its financial performance, maintaining a strong capital and liquidity base, rewarding its shareholders as well as contributing to the economy and society in a holistic manner.

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The Group continues to implement the Transformation Program “Eurobank 2030”, which is a material enabler in achieving the bank’s strategic objectives and enhancing its competitive position, as it focuses on business growth, sustained operational resilience, constantly improving operational efficiencies and, ultimately, ensuring increased customer value and satisfaction. In tandem, the Group is investing in the People – Technology – Sustainability three-fold, by combining cutting edge technology and the expertise of its highly trained staff, using best practices to contribute to the effort for sustainable development for all. The Group implements a holistic sustainability strategy which is based on: a) the Operational Impact Strategy, which concerns the Bank’s own operations and activities and includes Environmental Impact, Social and Business Impact and Employer Impact and b) the Financed Impact Strategy, which involves the Bank’s investment choices and actions related to extending customer financing and working with them in meeting environmental goals and addressing climate change.

Its operating model evolves around the following key pillars:

- a) Financing landmark projects and investments of large and medium size businesses, mainly through investments based on ESG criteria,
- b) Fully supporting SMEs, in combination with the major funding potential available through European and/or Greek programmes for small businesses, aiming to boost their competitiveness, gain access to international markets, create jobs and thus distribute the benefits of growth across society,
- c) Sustaining a leading position in Retail Banking by offering high quality services and innovative products to distinct client segments leveraging on advanced multi-channel strategies and tailored to customer evolving needs,
- d) Developing a people-centred ‘phygital’ model, a hybrid of physical and digital, that combines state-of-the-art technological infrastructure with the Group’s human resources, offering simple, fast, personalised, and secure services.

In conducting its business activities, the Group considers the particular and diverse needs of its stakeholders and focuses on creating value for them. In this context, the Group:

- a) designs and offers savings and investment products to its depositors and investors; makes appropriate use of available funds for supporting households and businesses to realise their plans, financing the economies in which it operates,
- b) deploys a client-centric orientation with segmental approach and relationship-based management,
- c) relies on the skills and expertise of its human resources for the implementation of its business strategy including the improvements of products and services to customers; for this purpose, it enhances staff engagement by strengthening the knowledge and experience of its employees through training and development programmes and providing a safe and productive work environment, where diversity, equity and inclusion are strongly promoted,
- d) invests in IT infrastructures and digital transformation to systemically address the evolving technological developments and continuously improve its business and operational model,
- e) has established a system of internal controls that is based on international good practice and aims to minimize the possibility of error or financial loss, to protect the interest of shareholders and depositors, as well as to ensure that the requirements of the relevant regulatory authorities are complied with at all times,
- f) uses natural resources for its operation, while being committed to minimizing its environmental footprint by adopting environmentally friendly practices and promoting a green economy. Green procurement practices are applied, embedding environmental specifications and guidance for selection of products and suppliers,
- g) develops an ongoing dialogue with stakeholders and supports society and local communities. The Group monitors and reviews information related to its stakeholders and their requirements, shaping a specific framework of cooperation and approach to communication in each case.

The corporate governance principles of transparency, credibility, social responsibility and accountability define the framework for the achievement of the Group’s objectives, govern the organization, operations and activities and reflect its values, safeguarding the interests of shareholders and of all other stakeholders. The corporate values of empathy, drive, cooperation, innovation and trust support a strong yet adaptive business culture, which enables the Group to provide top quality services to every client, household or business, to support inclusive growth and to create sustainable prosperity for all the communities it serves.

Materiality Assessment

Materiality assessment is the key process used to define the content of the Annual Report - Business & Sustainability and is largely informed and influenced by stakeholder engagement. For the first time, the Bank proactively adopts a Double Materiality approach, incorporating a financial materiality assessment, in addition to the impact materiality assessment already adopted from previous years, in order to identify the material impacts, risks and opportunities to be reported.

The double materiality approach will define the materiality perspectives of the Bank by combining the impact materiality perspective (inside-out) and the financial materiality perspective (outside-in).

A sustainability matter is material from an impact perspective when it pertains to the Bank’s material actual or potential, positive or negative impacts on people or the environment (environmental, social and governance matters) over the short, medium and long term time horizons. It includes impacts connected to the Bank’s own operations and value chain, including through its products and services, as well as through its business relationships.

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A sustainability matter is material from a financial perspective if it generates risks or opportunities that affect (or could reasonably be expected to affect) the Bank's financial position, financial performance, cash flows, or cost of capital over the short, medium or long term.

An integral part of the Bank's approach towards Sustainable Development is the fostering of strong relationships, cooperation and mutual benefit with all stakeholders affected, positively or negatively, directly or indirectly by its activities. In this context, the Bank promotes two-way communication and develops an ongoing dialogue with stakeholders.

The overall Bank's Materiality Assessment methodology, the validated Material Topics, Sustainability Indicators per the GRI Standards and information regarding initiatives across the ESG spectrum along with ESG data submitted by the Group's subsidiaries are included in the Annual Report – Business & Sustainability, which is published on www.eurobankholdings.gr.

Group's approach towards sustainable development

The Group supports the sustainable transition of the economy and considers sustainability and climate change as an opportunity. A key strategic objective is to adapt its business and operation in a way that addresses climate change challenges, accommodate social needs within its banking business model, and safeguard prudent governance for itself and its counterparties, in accordance with supervisory initiatives and following international standards / best practices.

Committed to actively contributing to the achievement of the United Nations Sustainable Development Goals (SDGs) and the 2030 Agenda goals, the Bank is a signatory of the UN Global Compact since 2008. In September 2019 Eurobank signed the UNEP FI Principles for Responsible Banking (PRB), affirming its commitment to play an active role in implementing the SDGs and the Paris Agreement on Climate Change. In full compliance with its obligations relating to implementing the Principles, the Bank has issued its 3rd PRB Progress Report as part of the Annual Report 2022 – Business and Sustainability.

A dedicated Group-wide programme to address the requirements of the ESG ecosystem

The Group launched an initiative, namely "Program Field", with an aim to develop and implement its Sustainability Strategy, integrate climate risks, fulfil its UNEP FI PRB signatory commitments and ensure readiness to comply with sustainability-related regulations (i.e. "EU Green Deal", ECB Guide on climate-related and environmental risks, EU Taxonomy Regulation, etc.). Through this initiative, the Group has also identified, assessed and implements climate-related and environmental (CR&E) risk action plans within the three Lines of Defence.

Group Sustainability Strategy

Eurobank has expressed the Environmental, Social, Governance (ESG) aspect of its business through the lens of Impact generation. The Sustainability Strategy has been defined in a holistic approach across two pillars of impact: the operational impact arising from its own activities and the financed impact resulting from the Bank's lending and investing activities to specific sectors and clients. These two pillars of impact aim to capture the essence of the Bank's business effect on the climate, the protection of the natural environment, its contribution to addressing societal challenges at large, the prosperity of its own people, its contribution to raising business capacity in the markets where the Bank operates, and the internal processes that build and secure the confidence of its stakeholders.

Eurobank has designed, approved and is currently implementing the Group's Sustainability Strategy including targets and commitments along the two key pillars:

A. Operational Impact Strategy

The Bank aims to create positive economic, social, and environmental impacts from all aspects and areas of its operations. To this end, the Operational Impact strategy comprises of 3 strategic pillars, namely:

- i. Environmental impact with the objective to minimize negative impact across the Bank's value chain to promote environmental stewardship. The aim is to minimize Scope 1 and 2 emissions, become a paperless banking network and extend circular economy practices.
- ii. Employer's impact with the objective to empower people to perform at their best through an environment that promotes ethics and integrity. The aim is to embed diversity and inclusion, encompassing a wellbeing culture, along with stimulating an innovative environment.
- iii. Social and business impact with the objective to drive positive change for entrepreneurs and wider communities to foster sustainable development and ensure social prosperity. The aim is to intensify sustainable procurement practices, rationalize Socio-Economic Impact as well as boost transparency and ESG capacity.

B. Financed Impact Strategy

The Bank endeavours to foster favourable economic, social, and environmental outcomes across all facets and sectors of its financing endeavours, with a commitment to sustainability and responsible stewardship. To achieve this objective, the Financed Impact strategy is structured around four strategic pillars namely:

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

Making progress along the two pillars of the Sustainability Strategy, the Bank aims to maximize its contribution to achieving the Paris Climate Agreement's targets and the UN Sustainable Development Goals. Through a set of actions with measurable targets, the Sustainability Strategy reflects the Group's vision in the short, medium and long term in relation to the environment, its social footprint, with focus on its people, and the ESG impact on the market and its portfolio.

Progress on Operational Impact against targets for 2023

The Group is committed to specific Operational Impact targets including both quantitative and qualitative elements. More specifically, the Bank has successfully managed to accomplish 2023 impact targets. Indicative achievements are as follows:

- Environmental impact
 - Operational Net Zero Action Plan (including carbon reduction curves) in place.
 - Verified operational carbon footprint as per ISO 14064, in line with National Climate Law stipulations.
 - Considerable reduction in total electricity consumption and equivalent Scope 2 emissions of 9,4% for both metrics, in 2023, compared to 2022.
 - 98.04% of total electricity consumed in 2023 was sourced by Renewable Energy Sources (certified guarantees of origin).
 - Car Policy for Hybrid/Electric vehicles approved in September 2023 and is currently applied, aiming at maximizing the percentage of low emissions vehicles in the corporate fleet.
 - As of 31 December 2023, nineteen buildings of the Bank are certified as "green" according to LEED/BREEAM standards.
 - Photovoltaic installations (PV) completed under the Net Metering principle in N. Ionia & Acharnes buildings and energy production scheduled to start in 2024.
 - Establishment of a special purpose vehicle (Eurobank Renewables S.A. - EuroRES) for developing standalone Photovoltaic (PV) Plants in central Greece.
 - The "Just Go Zero" new recycling program is in operation for the Nea Ionia complex, the Central Warehouse and the new Headquarter buildings.
- Employer's impact
 - Launch of the "myProsperity" initiative (inspirational talks by external experts) in July 2023, as part of the Bank's Wellbeing Framework.
 - Activation of the Culture Shift program in September 2023 and launch of the 12 principles program "We think innovatively, we work differently", promoting new ways of collaboration in the workplace.
 - Launch of training programs to promote diversity and inclusion.
 - Launch of an Anti-Harassment learning program, addressed to all employees.
 - Completion of wellbeing initiatives to promote mental health.
 - Design and execution of a full scope People Engagement Survey, including a wellbeing and life-work-balance section.
- Social and business impact
 - Continuous initiatives through the broad programs "Moving Education Forward" and "Moving Family Forward".
 - Resilience and recovery: Continuing contribution supporting society through natural disaster restoration efforts, mobilizing employee volunteer teams.
 - ESG evaluation criteria for IT and non-IT procurement tenders in place.
 - Launch of inclusion initiatives targeting specific social groups.
 - Continuous support to entrepreneurs and startups through the enter.grow.go (egg) Accelerator / Incubator (11th consecutive annual cycle run in 2023).
 - Extensive ESG upskilling programs for all staff members and dedicated sessions to specific staff groups on emerging ESG topics.
 - ESG External Capacity Building: awareness initiatives for clients, including the Digital Academy series of ESG webinars: 2 workshops took place for "Energy Transition / Green Buildings" and "ESG: New model of Sustainable Tourism" with 324 clients participating.

The operational impact initiatives are detailed in the Annual Report – Business & Sustainability (<https://www.eurobank.gr/en/group/esg-environment-society-governance/esg-reporting>).

Progress on Financed Impact against targets for 2023

The Group is committed to specific Financed Impact targets which include both qualitative and quantitative elements. More specifically, the relevant achieved targets for 2023 included the following:

Qualitative targets

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- Roll-out of our Sustainability Strategy leading to tangible outcomes
- Significant progress in the integration of CR&E risks in our 3 LoD Model
- Incorporation of climate risk elements into the Remuneration Policy
- Deployment of the ESG Questionnaire, which has been developed at Interbank level with the coordination of the Hellenic Bank Association
- Integration of the ESG Risk Assessment process, a combination of the internal Climate Risk Scorecard and the Interbank ESG Questionnaire
- Operationalisation of the web-based Sustainable Finance Assessment Tool for the classification and evaluation of sustainable financing opportunities for Corporate portfolio
- Assessment of CR&E risks through Sectoral Analysis and forward-looking Scenario Analysis, as part of the Task Force on Climate-Related Financial Disclosures (TCFD) report
- Alignment of our Risk Appetite with the articulated Sustainability Strategy
- Incorporation of climate risk aspects into collateral valuation
- Publication of the TCFD Climate-related & Environmental Risk Report
- Disclosure of Eurobank's GHG financed emissions for loans, bonds and shares positions based on the Partnership for Carbon Accounting Financials (PCAF) methodology
- Performance of training sessions for our employees in relation to Climate Risk, Sustainable Financing, ESG Risk Disclosures and ESG Risk Assessment
- Awareness initiatives for our clients, including the Digital Academy series of ESG webinars

Quantitative targets

- More than 20% of new corporate disbursements are classified as Green/Environmental
- More than 50% of new disbursements in Energy Sector were directed to RES
- Solid 100% of disbursements related to construction of new buildings were directed to green buildings.
- More than 2 times increase in our new green disbursements towards households and small businesses.
- € 2.1bn Green/Environmental Exposures as of 31.12.2023, c. 14% of CIB portfolio
- €0.2bn in Assets under Management in ESG Focused mutual funds
- €0.6bn exposure in Green/Sustainable Bonds in our Banking Book

Eurobank has set the following targets based on its Financed Impact Strategy for the following years:

Portfolio targets

New disbursements

- €2bn in new green disbursements to businesses by 2025
- 20% of the annual new Corporate & Investment Banking (CIB) portfolio disbursements to be classified as Green/ Environmentally sustainable.

Green stock / Exposure evolution

- 20% stock of green exposures by 2027 for the CIB portfolio (up from 11% in 2022)

Recovery and Resilience Facility (RRF)

- Mobilize €2.25bn total green RRF funds in the Greek economy by 2026.

Sectoral targets

Renewable energy

- 35% of new disbursements in the energy sector will be directed to Renewable Energy Sources (RES) financing.

Green buildings

- 80% of disbursements related to the construction of new buildings will be allocated to green buildings.

Next milestones

Portfolio alignment and net zero

- Commit to the Net Zero Banking Alliance at a Group level within 2024.
- Align loan portfolio and investments with a net zero carbon footprint by 2050 by developing a robust action plan and roadmap including intermediate targets to net zero and commitment. Actively support clients' climate transition journey with an ambition to further increase sustainable financing going forward.
- Implement the ESG Risk Assessment supported by the roll out of the Hellenic Bank Association initiative (Interbank ESG Questionnaire), ensuring a harmonized assessment approach for Bank's clients.
- Further integrate climate risk regulatory requirements into its business strategy and risk management framework, leveraging on key initiatives: a) Governance, policies, and control framework, b) Climate risk modelling and data management and c) Commercial strategies/ sector policies.

The Operational and Financed pillars of the Sustainability Strategy are combined for addressing Eurobank's path towards Net Zero by 2050. In line with Eurobank's commitment to the UNEP FI Principles for Responsible Banking, development of the Sustainability Strategy is aligned with the requirements for identifying the most significant positive and negative impacts on the societies and environment where it operates.

ESG Governance

Sustainability at Eurobank is deployed across an ESG governance structure that addresses both regulatory requirements and voluntary commitments. BoD oversight with respect to Sustainability Strategy is addressed through the inclusion of ESG items in the Board Meetings agenda, as per international best practice. The Three Lines of Defence model enhances risk management and control by clarifying roles and responsibilities within the organization Eurobank's updated governance structure also ensures that the management of relevant climate-related and environmental risks is integrated into the Bank's three lines of defence, as well as aims to further enhance the effective oversight of ESG and CR&E matters at management / Board level.

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

In addition, the Bank has assigned an executive member as the BoD member responsible for climate and environmental risks. As part of his duties, the member responsible updates the Board Risk Committees (BRC), which in accordance with their Terms of Reference are responsible to oversee, among others, the climate change and environmental related risks at least on a semi-annual basis.

Eurobank has also established the Environmental, Social & Governance Management Committee (ESG ManCo), chaired by the BoD member responsible for climate-related and environmental risks. The ESG ManCo provides strategic direction on Environmental, Social & Governance (ESG) initiatives, reviews the Sustainability Strategy prior to approval, intergrates the elements of the Sustainability Strategy into the Eurobank's business model and operations, approves eligible assets of Green Bond Frameworks, regularly measures and analyses the progress of the ESG goals and performance targets, as well as ensures the proper implementation of ESG related policies and procedures in accordance with supervisory requirements and voluntary commitments.

Further information on the ESG governance structure for the oversight and management of sustainability and climate related & environmental matters is provided in the TCFD – Climate-related and Environmental Risk Report.

ESG & CR&E Data

The Group recognizes the importance of relevant and reliable data in order to produce meaningful information, appropriate for decision-making purposes. Having already performed an assessment of CR&E data availability in its internal systems against regulatory requirements/ expectations, the Group continues to enhance its environmental risk data aggregation capabilities and IT infrastructure accordingly, while also using appropriate controls and safeguards to ensure the accuracy and completeness of the compiled information. The Group seeks to further improve environmental risk data granularity, through the allocation of detailed roles and responsibilities for the purposes of CR&E data management and the implementation of approaches for the remediation of identified data gaps (i.e., engagement with external data providers, development of methodological approaches for the estimation of required information).

The ESG Unit is responsible for the design and monitoring of the implementation of the Operational Impact Strategy (OIS), the monitoring of the Operational ESG performance and coordination of ESG linked operational activities that enhance the Bank's Impact. In this context, the Unit is responsible for the collection, calculation and review of data related to the operational impact in line with the associated certified management systems (ISO 14001/EMAS, ISO 50001, ISO 14064). The Head of ESG acts as secretary to the ESG Management Committee.

The Group Climate Risk Division is responsible for establishing internal reporting and disclosure processes for the financed impact as well as the oversight of the associated data collection, in line with the Group's data governance framework.

Internal ESG awareness and capacity building

The Group is placing great emphasis on building capacity among its employees, so they be able to support its clients on their sustainability journey and their green transition. To this end, in addition to launching ESG initiatives for its clients, the Bank implements an ESG upskilling plan for its employees. Apart from the general upskilling programmes, within 2022-2023 the Bank conducted dedicated sessions tailored to the requirements of specific business units and functions, to enhance their understanding, crucial for delivering the Bank's Strategy. Eurobank's internal awareness sessions regarding ESG and CR&E matters cover both members of the management body and other stakeholders across the Bank (e.g. Business Units). Additionally, the Bank has offered trainings to stakeholders from all Three Lines of Defense (i.e., Business Units, Risk Management Units, Internal Audit function) regarding the SFF in order to enhance their understanding of sustainable financing criteria.

ESG ratings

The Bank actively participates in internationally recognised ESG ratings to highlight the continuous improvement in its environmental, social and governance performance, upgrade the relevant disclosures and further enhance investor confidence in its practices. In 2023, the Bank posted significant improvements compared to 2022 in important ESG ratings such as Sustainalytics (from 12.1 to 10.6, maintaining the “Low Risk” mark), MSCI (from BBB to A), S&P (from 50 to 52), CDP (improved by 2 notches from D to B) and FTSE (from 2.8/5 to 3.4/5) and ISS ESG (from E:2/ S:2/ G:5 to E:1/ S:2/ G:3).

Specially with respect to Sustainalytics, the Bank achieved the international ESG Regional Top Rated distinction, the ESG Industry Top Rated distinction for the 2nd consecutive year and has been included in the Morningstar Sustainalytics' 2024 Top-Rated ESG Companies List. These distinctions are a strong demonstration of Eurobank's commitment to ESG practices and rank it among the best performing banks globally. Eurobank ranked 45th among 1,030 participating banks. This remarkable recognition was based on an assessment of the Bank's performance and management practices across a wide range of ESG impacts including Human Capital, Data Protection and Security, Business Ethics, Corporate Governance, Product Governance, and Integration of ESG criteria into financial activities.

In the context of networking with market for sustainable development issues, the Bank participates in the ESG Coordinating Committee of the Hellenic Bank Association, the Corporate Responsibility Committee of the American-Hellenic Chamber of Commerce and the Greek Network of the UN Global Compact.

Protection of environment

As climate change is becoming a dominant threat for the planet and its people, the Group takes on an active role, with actions that benefit the environment for the benefit of future generations. The Bank systematically manages its operational environmental impact. To this end, Eurobank has adopted an Environmental Policy, an Energy Management Policy and a Water Management Policy, aiming to protect the environment in all aspects of its operations.

In line with these policies, the Bank applies certified management systems, in accordance with International Standards, including an Environmental Management System (ISO 14001, EMAS) and an Energy Management System (ISO 50001), publishes an annual Environmental Report in accordance with the European EMAS Regulation (Eco-Management and Audit Scheme), and since 2022 certifies its carbon footprint according to the international ISO 14064 Standard. The implementation of these management systems is supported by relevant e-learning training programs. Furthermore, the Bank, has established sustainability practices in procurement, in order to select, where possible, environmentally and socially responsible goods and suppliers.

Moreover, the international subsidiaries of the Group are actively following Eurobank's footsteps towards environmental protection. As a result, Eurobank Cyprus was certified according to ISO 14001 in 2023 and listed in the European Eco-Management and Audit Scheme (EMAS) Register for Environmental Management, underscoring its commitment to environmental protection and sustainable practices.

The environmental performance, with respect to the improvement of the operational environmental footprint, is monitored through specific environmental indicators in order to identify any deviations and take corrective actions and is included in the Annual Report – Business & Sustainability and the Environmental Report (as per EMAS Regulation). Both reports are assured by independent parties and are available on the Group's and the Bank's websites (www.eurobankholdings.gr and www.eurobank.gr respectively).

Environmental performance data are monitored at Group level (specifically for energy, water and waste). However, the related Management Systems (ISO 14001/EMAS, ISO 50001 and ISO 14064) and corresponding certification scopes apply only at Bank level and therefore environmental performance is assured and reported only at Bank level.

In the context of minimising its environmental impact, the Bank has implemented an integrated action plan to reduce paper consumption and fully digitize its operations. As a result of these efforts in 2023, the paper supply amounted to 188 tons. In addition, the increase in the use of the e-statement service continued for another consecutive year, as more than 190,000 additional e-Banking users chose e-statements, resulting in the additional savings of 420,000 physical statements. The Bank's financial savings from the discontinuation of physical statements are also substantial, amounting to €38m since the service became available.

According to its Water Management Policy, the Bank aims to responsibly manage the use of water resources and efforts for savings. In 2023, the water consumption amounted to 54,894m³, which represents a marginal increase of 0.80% compared to 2022.

In the view of circular economy and the Bank's commitment to implementing comprehensive waste management practices, aiming to recycle or redirect all solid waste it generates, the Bank has achieved a 3.9% decrease in the total waste directed to landfill and has concurrently decreased total solid waste (recycled & domestic) by 9.3% compared to 2022.

The Group is actively involved in a series of International and European initiatives for environmental protection and Sustainable Development, such as the EU Eco-Management and Audit Scheme (EMAS) and the Mastercard's Priceless Planet Coalition global initiative.

Energy and Emissions Management

The importance of Climate Change makes energy consumption monitoring one of the most important environmental priorities of the Bank. The Bank implements a certified Energy Management System (EMS) in accordance with the ISO 50001 standard, with the purpose of responsible energy management in all the Bank's facilities (it concerns all the Bank's Administration Buildings / Branches and covers 100% of its operations), which aims to minimize energy cost, the environmental impact of harmful greenhouse gas emissions, as well as the depletion of fossil fuels.

In accordance with the applicable legislative requirements (Greek Climate Law 4936/2022) and international best practices, the Bank was certified according to the International Standard ISO 14064 for the quantification and reporting of greenhouse gas emissions (Category 1-7), with the aim of the reduction of greenhouse gas emissions and its environmental footprint.

The Bank also maintains the corresponding matching in line with the methodology of the "GHG Protocol Corporate Accounting and Reporting Standard" (Scope 1, 2 & 3).

Through the certified management systems, Eurobank monitors its performance and minimises its carbon footprint by:

- Setting specific targets.
- Undertaking mitigation initiatives.
- Designing and developing projects to protect the environment and improve the use of natural resources.

In order to achieve these broader objectives, as well as the specific quantitative ones, environmental programs are designed and implemented within the Environmental Management System, while for energy and greenhouse gas emissions, actions are carried out within the Energy Management System. To this end, the Bank addresses its:

- Identified negative impacts through in-house operations which contribute to the release of Greenhouse Gas emissions as a direct factor contributing to climate change.
- Positive impacts through energy reduction and efficiency in operations.

Direct Green House Gases (GHG) Emissions (Scope 1) result from the Bank's consumption of natural gas and heating oil to heat buildings and the use of fuel for the Bank's own vehicles for transportation within the Attica region. It also includes the data on fluorinated gases (F-gases) released by the air conditioning installations and automatic fire extinguishing systems of the Bank (fugitive emissions), as well as the greenhouse gas emissions from the use of leased company cars by the Bank's employees.

Eurobank is undertaking the complete replacement of its vehicle fleet, offering users purely electric or hybrid vehicles. By the end of 2025, 75% of the fleet will be replaced, and within a 4-year period, all corporate vehicles will be electric or hybrid electric.

Regarding electric energy use (indirect emissions - Scope 2), the Bank calculates its emissions using both the location-based and market-based methods, using national annual CO₂ emission conversion factors. The Bank, demonstrating a long-term commitment to environmental and energy management, displayed remarkable reflexes, during the current energy crisis.

To achieve its target of a 10% reduction in electricity consumption, cumulative for the years 2022-2023, Eurobank has taken various actions, including:

- Replacement of air conditioning/ventilation systems and lighting in 120 locations in 2022 and in 55 branches and 2 office buildings in 2023.
- Replacement of over 3,500 lights with new LED technology, conversion of air conditioning systems to inverter, and a series of energy-saving interventions, especially in the Data Center of the building complex in Nea Ionia.
- Self-production of energy through the construction of photovoltaic panels on the roof of the same complex and the Bank's building in Menidi, while efforts for licensing autonomous RES installations are underway.
- Central temperature control programming.
- Transition of IT applications from physical servers to cloud environments.
- Deactivation of illuminated signs at branches during nighttime hours.

In this context, in 2023 the total electricity consumption was at 34,721 MWh decreased by 9.38% compared to 2022, exceeding the target of 3% decrease set for 2023. The attainment of 16% reduction for electricity consumption cumulatively for the years 2022 and 2023, exceeds Eurobank's declared commitment for 10% reduction for the same period. Additionally, natural gas consumption was at 2,269 MWh, decreased by 28.25%, while the declared target for Electric Energy consumption for 2024 is a decrease by 5%. The total energy consumption (all energy sources) was decreased by 10.88% compared to 2022.

Furthermore, 98.04% of total electricity consumed was sourced by Renewable Energy Sources (RES), certified through "Guarantees of Origin", while the same process will continue for 2024. Compared to 2022, this indicator was improved by 0.15%. The total energy consumption per employee was 6,159 (KWh/employee), decreased by 8.14% while total energy consumption by surface area was 141 (KWh/m²), also decreased by 9.4%.

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The direct greenhouse gas emissions (scope 1) in carbon equivalents was at 2,262 tCO₂e, decreased by 4.43%, while the indirect (scope 2) was at 18,545 tCO₂e also decreased by 9.38%. The declared target for emissions reduction for 2024 is -2% for Scope 1 and -5% for Scope 2.

Regarding Operational Scope 3 emissions, the Bank monitors multiple emission categories related to business travel, employees' commuting, waste generated, transportation and distribution of goods, as well as cloud computing usage. Operational scope 3 emissions are calculated at 3,912 tCO₂e representing a 25,3% decrease compared to 2022.

As of 31 December of 2023, nineteen buildings of the Bank are certified as "green" according to LEED/BREEAM standards. Certified properties have been included in the SBC Yearbook for Green Buildings.

Recently, Eurobank's headquarters moved to a new, privately owned building in the historic center of Athens. Eurobank underwent a radical reconstruction and energy upgrade, transforming it into a modern "green" building with high aesthetics and standards, incorporating bioclimatic features in line with international standards. This choice underscores Eurobank's commitment to a modern approach to resource management with a focus on Sustainability. The relocation to the new Headquarters building has a direct and significant effect on the environmental impact, including a 37% reduction in energy consumption per employee or a 47% reduction in energy consumption per square meter.

The environmental performance data may be modified as per the outcome of the assurance engagement of the Environmental Report disclosures. The final data will be available in the Annual Business & Sustainability Report 2023. Further to issuance of new emissions conversion coefficients from the Ministry of Environment, the environmental 2022 data regarding GHG emissions are restated. Changes in conversion coefficients may affect the emissions targets.

Employee and Social Matters

Employee Engagement

Group's employees constitute its greatest asset as far as development and sustainability are concerned. Starting from its recruitment process, the Group aims to establish a long-term and mutually beneficial relationship with every employee. As of 31 December 2023, the Group employed 10,728 (Dec.2022: 11,328) employees of which 4,405 (Dec.2022: 5,060) abroad.

To ensure equal and fair opportunities to all employees, the Group follows several guidelines surrounding Compensation & Benefits, Recruitment, People & Talent Development, Performance Management, Kniship and Health & Safety, Learning, Engagement & Communication. In 2022, the Bank launched three new policies on C-Level Succession Planning, Diversity, Equity & Inclusion and Workplace anti-Violence & anti-Harassment, while its objective is to recruit and retain its employees regardless of race, religion, age, gender, sexual orientation or disability. The Group strives to ensure that its workforce reflects the communities in which it operates and the international profile of the organization. The Group recognizes that diversity is a key component of a responsible business strategy in support of its international operations. Related matters mentioned above are also addressed in the 2020 Code of Conduct & Ethics for the Group.

The Group is constantly revising its compensation and benefits policies, taking into account market trends, and aiming to create a competitive offering that will attract, engage and retain its employees, while at the same time complies to all regulatory and legal requirements. As a result, the basic principles of the compensation and benefits framework which ensure alignment between individual objectives and the Group's business strategy, as well as the long-term value creation for the shareholders, are the following:

- a) Ensure gender-neutral compensation policies.
- b) Safeguard that total reward is sufficient for retaining and attracting executives with high skill and expertise.
- c) Ensure internal equity between Business Units.
- d) Avoid taking excessive risks, including direct and indirect sustainability risk.
- e) Link compensation with long-term performance.

Furthermore, the Bank has set up the Eurobank Group's Occupational Pension Fund, seeking to provide long-term support to all its employees, while committing to strong ESG standards. The establishment of the Occupational Pension Fund (OPF), acting as an additional pillar of a modern Retirement Scheme, allows all Group employees to participate on a voluntary basis. Following a written agreement between the employees and the employer, the OPF is set up as a Private Legal Entity to work in tandem and complement the mandatory Public Pension System.

Internal Job Market (IJM)/ Internal Mobility

The Bank focuses on deploying its existing workforce to meet internal staffing needs, according to their qualifications. In this context, the Bank actively promotes equal opportunities for all employees to fully participate in IJM, regardless of role, level and general division. In 2023, 76 Job openings were published in Internal Job Market, 300 internal candidates applied and 48% of job vacancies in Greece were filled internally.

Learning

Building and strengthening professional expertise with updated skills and capabilities, as well as providing modern learning curriculums and methodologies constitute a major priority for the transformation strategy of

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the Group. The Group's leading Learning Management System offers enhanced self-service capabilities to all employees that boost learner engagement, while redefining and upgrading the knowledge and skills needed in the workplace (reskilling & upskilling).

The size of investment in learning for 2023 is reflected briefly in the following indicators:

- a) The total number of learning participations reached 84,659 in Greece,
- b) The total number of training hours exceeded 206,500 hours for employees working in Greece,
- c) Over 83% of the learning activity regarding employees working in Greece takes place online or through virtual classrooms.

Upskilling, capitalizing on technology and learning certifications constitute the axes of the strategic learning framework of the Group. More specifically:

- a) LinkedIn Learning Solutions: The strategic partnership with LinkedIn Learning allows all Group employees in Greece to access the platform's online learning courses and highlights the Group's actual commitment to addressing current needs of the current era and helping its people further develop their skills. In addition, The Group has extended its partnerships with other internationally recognized learning platforms such as Interskill, Microsoft LxP and Udemy, offering thousands of courses on cutting-edge technologies.
- b) Leadership skills: The Group's Top Management and the Heads of the Group's subsidiaries get the latest information from the world of business while they get the opportunity to connect and communicate online about the latest trends in strategic leadership transformation. During 2023, emphasis was placed on handling strategic complex challenges within a VUCA environment and the rise of technological issues, around Cloud governance and Security. In addition, a specialized management development program, addressed to Retail Branch Network's Area managers, aims at the successful transition to a new model of people-based leadership, aligned with Group's principles.
- c) Code of Conduct & Ethics (CoCE): a digital learning program for all Group's employees in Greece and Cyprus, aiming to establish a baseline knowledge of Eurobank's code of conduct & ethical standards, in order to reinforce professional ethical culture (associated with ESG indicators).
- d) Anti-money laundering (AML) Workshops: in collaboration with ICA (Internal Compliance Association), highly practical and interactive virtual workshops, addressing approximately 1,000 managers in Retail, Corporate and Private Banking Networks, as well as all AML related central units. Moreover, Anti-money laundering (AML) video-based workshops, addressing approximately 4,000 employees in the above mentioned business and central units.
- e) Preventing and managing Violence & Harassment in the workplace: a digital learning initiative for all Group's employees in Greece, aiming to acknowledge behaviors and effects of Violence & Harassment at work, and develop the appropriate actions for the safety of the working environment. Moreover, a virtual workshop for 1,250 Managers launched in October 2023, providing practical knowledge and skills to prevent and manage the behaviors and incidents of Violence & Harassment in their team.
- f) "This is how we Hybrid": a blended learning experience, consisting of 3-modules, that supports employees participating in the hybrid working model to develop essential skills (growth mindset, energy management and teaming in hybrid)
- g) Cybersecurity awareness: all newcomers in Greece have the assignment to complete a digital learning program that provides awareness on cyber security issues, so that they can recognize potential risks and apply the right practices. In addition, the same assignment applies for all the Group's Top Management and the Heads of the Group's subsidiaries in Greece, while an in-class Cyber-War game live workshop is delivered for ExBo members, General Managers and CEO's - Subsidiaries in Greece.
- h) "PROSPER": a customized talent development program aiming to equip the talent pools with future-proof leadership skills and state of the art knowledge and experiences in numerous fields such as ESG, Innovation and Strategy. Within 2023 Prosper-Class 2022 was completed.
- i) ESG Thinking: a 3-module digital learning program with the aim to increase awareness on all ESG related matters, as well as familiarize all employees on the Group's strategic priorities around the ESG agenda.
- j) Role-specific certification of knowledge and skills: The Group supports its employees acquire all the professional and regulatory certifications required by their role within the organization, offering web-based courses and virtual classes to help them prepare for their certification exams.

To fully meet employees' and the Group's learning needs, the Group implements policies and procedures certified according to the ISO 9001 standard. At the same time and since 2015 the Bank holds, the ACCA Approved Employer (Professional Development Stream) distinction, documenting the high learning standards provided to its employees. Aimed at empowering employees on more demanding roles and enhance leadership capabilities, the Group Human Resources Division designs and implements specialized programs, such as Development & Succession planning, Talent Development & Management, Career Development & Planning, Knowledge & Experience Sharing (mentoring & reverse mentoring).

Talent Management Programme

In 2023 the Bank concluded the assessment and implementation of the bank-wide Talent Management Programme, aiming at the identification, development, retention and effectively utilization of a robust talent pipeline. Also, it has designed and introduced new segmentation for the Talent pool with a focus on mobility as well as structured talent career discussions providing talents focused career plans with mapped next career moves. Talent development programs aiming at upskilling and reskilling the Talent pool run across the Bank.

Performance Management

Performance Management in the Group has a transparent, consistent and effective framework concerning continuous improvement of the employees and aligning with the strategic objectives and values of the Group.

Its framework translates the Group's strategy into tangible quantitative business goals ("what") for all employees and supports a common culture by driving the Group's organizational capabilities and qualitative competencies ("how") throughout the organization. Performance Management is grounded on two main tools implemented in Greece & Cyprus and are formally implemented on SAP SuccessFactors access. Both tools have a developmental focus and continuous feedback on their core.

Career Development

Career Development is of great importance for the Group. In this context, the Group utilizes both Development Plans and Improvement Plans, giving value to a wide range of functionalities like Career Development. On that basis, employees can design with support by their manager and depending on their personal needs, either a Development Plan to support further their professional advancement and career planning or an Improvement Plan which serves as roadmap to enhance their performance and address areas needing improvement. Both Plans aim, through relevant training and development activities, to further develop employees' skills and behaviors, bolstering their profile to match either their current role or a different one in the future.

C-Level Succession Planning

The Bank's C-Level Succession Planning framework is assessed annually following a structured and comprehensive process, according to the guidelines of the Bank's Nomination and Corporate Governance Committee and the BoD of the Bank. The Bank has a C-level Succession Planning Policy in place, to ensure executive 'bench strength' for the C-level roles aligned with the Group strategy, purpose and leadership culture, aiming to achieve business continuity and growth.

Diversity, Equity & Inclusion

In 2023, the Bank launched the 2nd Season of Women in Banking (WiB) - Transforming Leadership, following the successful and multi-awarded 1st Season. WiB is a Leadership Acceleration program, focusing on how women at Eurobank can accelerate their progression to higher hierarchical positions, participate in transforming leadership within the Bank, and serve as ambassadors of an inclusive and non-discriminatory work environment. It's a program by women for women, combining mentoring with continuous learning through interactive workshops, virtual masterclasses, gaming, and other activities.

In 2023 and for second consecutive year the Bank was included in the Bloomberg Gender Equality Index (GEI). This distinction reflects the Bank's commitment to support responsible development without discrimination and its commitment in the application of Diversity, Equity & Inclusion criteria and more generally of ESG in all aspects of the Group's operations.

Improving Employee Experience

The Group, through the investment in the SAP SuccessFactors upgrades the working environment and expands the possibilities of cooperation. As part of the project, the basic technological infrastructure has been enriched with modern applications related to the acquisition of "talent" (talent acquisition) and performance appraisal. The applications of the SAP SuccessFactors platform improve the daily communication in the Group, increase the degree of autonomy and mobility of the users, while managers can monitor and manage their teams. More particularly, the functions are available both from the office space and "smart" devices and the users, among others:

- a) Have access, wherever they are, to their personal profiles and contact details of their colleagues,
- b) Register and manage with self-service process, license requests and change of personal data,
- c) Have access to learning and training planning for themselves and their teams, can attend online courses and connect to online libraries that are available (Learning Management System),
- d) Have access to a modern evaluation and continuous feedback application.

Strengthening Dialogue & Information

Eurobank's internal corporate intranet serves as a vital resource for the employees, keeping them informed on all strategic, business, HR and technology-related matters. It is a digital platform that promotes the Bank's actions and initiatives, providing the employees with immediate access to important information. Within the intranet, employees can peruse information pertaining to social issues, physical or virtual visits by the management team, corporate functions, as well as interviews conducted by the Group's management for both print and digital media etc. Additionally, to encourage internal social networking and the exchange of information and ideas, the Yammer platform is also available to the employees. To communicate its strategy and foster 2-way dialogue between the management team and the employees, Eurobank held executive meetings, with extended number of the members of the management team participating. At the same time, visits took place in regional markets across Greece. Additionally, onsite visits from Retail Management took place in regional markets across Greece. Strengthening the Bank's profile, as a modern and attractive employer, in the midst of a dynamic process of transformation both technologically and operationally, Eurobank also organised CEO Breakfasts.

Remote Working

In 2023, the Group maintained its pursuit of continuous improvement of the Hybrid Work Model, the combination of alternating between working on premises and at home. This effort aligns with the Group's increasing environmental sensibilities, and the continued focus on a positive and modern employee experience. In order to further improve said experience, a questionnaire pertaining to how Group employees experienced the first year of officially working with the Hybrid Model and what suggestions they might have for its improvement, was launched. The results were resolutely positive, and in late 2023, a few of the suggestions employees proposed,

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such as the scheduling of remote work without needing manager approval, were implemented, showcasing the Group's commitment to enhancing the Hybrid Model, despite its already successful run.

Recognition and Reward Policy

In acknowledgment of long-term loyalty, the Group bestows commendations upon its employees marking 15 and 25 years of dedicated service.

Furthermore, Eurobank values highly education and recognises the importance of rewarding exceptional academic performance. In line with this, it has launched a merit-based reward programme for top-performing students, known as "Aristouchoi". The programme awards monetary prizes to both the employees and their children who have achieved outstanding results in secondary school or higher education. Eurobank also extends this recognition to those who are pursuing postgraduate degrees or PhDs. Over the past 21 years, Eurobank has presented awards to more than 3,500 deserving students. In 2023 Eurobank proudly presented 356 awards for the 2021-2022 school/academic year.

In alignment with the ethos of community engagement, the Group has established and actively backs the "Team Up" initiative, a voluntary program involving employee participation since 2018. Throughout the year, a total of 10 events were organized, during which 1,300 employees generously volunteered over 2,358 hours of service, exemplifying the Group's commitment to giving back to the community.

In 2023 Eurobank also established the Eurobank Running Team, a running team open to employees from across the entire organization. This initiative aims to facilitate interactions among colleagues, foster a sense of community and inclusion within the organization.

Support at work - HR4U

The call center "HR4U" supports the employees of the Bank and responds daily at each employee's request, taking all the necessary actions for their best service. In 2023, more than 27,673 requests were seen to HR4U. Topics include a wide range of questions about benefits and programs, as well as urgent needs.

Labour Unions

The Group respects employees' constitutional right to membership in Labour Unions. Six such Unions are currently active within the Bank, representing 85,08% of the staff, i.e. 5,142 employees. The most multitudinous of these Unions is recognized as the official representative Union in labour negotiations with the Bank's Management. All employees of the Bank are employed full-time and covered by collective labour agreements (industry-wide and enterprise-level), while labour relations are regulated by the current laws and the Bank's Statute of Internal Service. Furthermore, the Bank's Management cooperates with the labour unions and supports the scheduled working meetings to strengthen the dialogue and to monitor the developments in the working environment.

Corporate Social Responsibility

Driven by its sense of responsibility and commitment to giving back to society, the Group has made corporate responsibility one of the foundations of its strategic planning, which is directly linked to the UN Sustainable Development Goals (SDGs). Through its corporate responsibility strategy, and responding to the needs of today's ever-changing environment, the Group aims to actively contribute to improving the economy and society where it operates, by adopting responsible practices that promote transparency and business ethics.

The Bank has a solid framework of procedures for the implementation of its Corporate Social Responsibility (CSR) strategy, aiming at maximizing the value created by CSR initiatives and shielding the Organization from the possibility of corruption, conflict of interest and money laundering. The annual Corporate Social Responsibility action plan is approved, as part of the Marketing & Corporate Communication budget formulation process, by the Communication Committee (COMCOM) in which the CEO, the deputy CEOs and the Group General Manager of Marketing & Corporate Communication participate. Finally, all expenses related to sponsorships, donations and other Corporate Social Responsibility actions are subject to approval levels depending on the amount but also the criticality and importance for the Bank and their recipients.

Corporate social responsibility is based on the following pillars:

Education

Education is a key pillar of the Bank's corporate responsibility strategy. In this context, in 2003 the Bank launched Moving Education Forward, according to which awards are provided to high-school graduates across Greece who achieve top marks in the annual national university entrance exams. In the last 21 years it has been running, a total of 22,572 students have been awarded, many of whom have gained recognition in the economic, academic and scientific life of Greece. The Bank awarded 1.035 top graduates during the 2022-2023 school year.

Supporting the Society

Moving Family Forward is a corporate social responsibility initiative, aiming to address the country's demographic challenge, by providing young families with incentives for taking the decision to have children. It focuses on the eastern borders of Greece - Prefecture of Evros, North Aegean islands and the Dodecanese and includes collaborations with non-governmental organisations (NGOs) for supporting future and young parents, offering banking products with favourable terms for customers in those areas and several actions for setting the demographic challenge higher in the agenda of public dialogue.

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The Bank has announced that it will contribute directly and significantly to the restoration of the natural wealth of Rhodes which was affected by the catastrophic fires during the summer of 2023. In this context, it has funded a special study for prevention as well as anti-flooding projects in the affected areas of the island. Additionally, following the devastating floods in Thessaly, the bank has announced its substantial support of the restoration of the affected areas alongside the Hellenic Bank Association. The total support of the four systemic banks amounts to €50m. Moreover, the Bank has responded to the ever-increasing needs of the National Health System once more by proceeding with the construction of 6 negative pressure units in the Special Respiratory Infections Unit of the Sotiria Thoracic Diseases Hospital of Athens.

In 2023 the Bank supported 33 NGOs and institutions operating across Greece, which mainly support children and vulnerable social groups, with the amount of €440,000. In addition, it has been steadily supporting the important work of the PNOE – Friends of Children's Intensive Care non-profit association, helping it meet its objective, which is to create and equip paediatric Intensive Care Units (ICUs) and to support children hospitalised in ICUs and their parents. In particular, in 2000 the Bank launched the EuroLine card and has since been donating 0.20% of the total value of transactions carried out by EuroLine cardholders to this cause.

Access to financial services for all /Financial inclusion

As part of the EaSI programme for employment and social innovation, the Bank has been working with the Action Finance Initiative (AFI), providing micro-credit facilities (up to €12,500 per individual) to support the long-term unemployed, vulnerable social groups and businesspeople with limited access to bank loans. This way, it offers them the opportunity to create their own job (self-employment) or establish small businesses resulting in the creation of new jobs. In 2023, through the AFI, 88 entities have been provided with credit facilities amounting in total to € 0.99m, with favourable terms, which are guaranteed by the EIF. We have strategically forged alliances with esteemed partners.

Digital literacy and inclusion

The Bank has launched the “Eurobank Digital Academy for Business”, a resource hub on digital skills for Greek companies’ technology as a key enabler, and digital transformation as a growth strategy and a competitive edge. Since 2019, 19 events have been held with 1,685 participations, of which 3 events with 1,023 participants in 2022. In addition, the Bank has created a dedicated hotline for digitally illiterate elder groups who wish to access its digital channels.

Supporting entrepreneurship and innovation

The Bank actively contributes to economic growth and recognises the importance of entrepreneurship as a major lever for the expansion of the Greek economy. It focuses on supporting the extroversion of Greek businesses and encouraging new business initiatives. In this context, the Bank has launched Exportgate, an international trade portal that promotes the business networking of Greek and Cypriot companies worldwide.

In a strategic partnership with Banco Santander for Global Trade, the Bank has joined the “Trade Club Alliance”, the first Global Digital Business Interconnection Network, supported by 13 international banking groups. Using artificial intelligence and other technologies, the network connects more than 22,700 businesses in more than 60 countries.

In 2016 the Bank, in partnership with Grant Thornton, established the Growth Awards to award business excellence as a growth lever of the Greek economy. To date, the 7 Growth Awards ceremonies have awarded 44 of the most robust Greek enterprises.

In the area of innovative youth entrepreneurship, the Bank has established the egg-enter•grow•go initiative, a comprehensive business incubation and acceleration programme, in partnership with Corallia. Since 2013 the egg has been continuously helping the Greek startup community to improve its competitiveness within a challenging global market, under 3 main pillars extroversion, financing and business networking. It has been playing a crucial role in shaping the Greek startup scene, boosting innovative entrepreneurship through the egg Start-Up (incubator) and egg Scale-Up (accelerator) platforms. In particular, its business and social footprint includes, among other:

- a) More than €12m has been invested in the egg accelerator by the Bank, €3.2m which has been provided by the Bank as financing to 49 egg startups, and €45.8m in equity funding, which has been drawn by 67 businesses,
- b) 350 startups which have been created through the egg, 183 startups which have become businesses, 101 of which with a combined turnover of €12,25m. Specifically, during 2023, 36 startups have been created through the egg and 29 startups have become businesses.

The Corporate Social Responsibility actions are described in the Annual Report 2022 – Business & Sustainability, which is published on www.eurobankholdings.gr.

Respect of Human Rights

The Group, in accordance with its Statement of Human Rights, is committed to respecting and promoting human rights and to avoid unintentionally causing or contributing to adverse human rights impacts that may affect its employees, suppliers, contractors, clients and other parties directly linked to its operations, products or services. In line with international leading practice, it has established pertinent policies and procedures, such as the Code of Conduct and Ethics, that reflect this commitment. The Group acknowledges the UN Guiding Principles on Business & Human Rights and, in particular, the corporate responsibility to respect human rights.

One of the most important priorities for the Group is to ensure that all employees are treated with respect and dignity, including the exclusion of forced and child labor, fair and equitable compensation and working hours, freedom of association, data privacy and respect of freedom to act. In addition, a safe, healthy and inclusive work environment is promoted. The Group applies a zero-tolerance approach for any forms of violence, harassment and sexual harassment in the workplace and such violations are strictly prohibited for all. In addition, the Group engages with suppliers and external providers / contactors who respect human rights, labor rights, employment laws and environmental regulations.

A strong relationship of trust that respects human rights is cultivated in all of the Group's activities with its customers. Key elements of maintaining responsible customer relationships include responsible provision of information and customer service, personal data protection and complaints management. The Group applies the regulatory framework and the Banking Code of Conduct and has control mechanisms in place to ensure compliance with the legislative framework.

The Group ensures that individuals (e.g. employees, customers) can exercise their rights regarding their personal data. It implements appropriate technical and organizational measures, which are designed to implement data-protection principles, in an effective manner and to integrate the necessary safeguards into the processing in order to meet the requirements of the General Data Protection Regulation (GDPR) and any other applicable privacy legislation and protect the rights of individuals.

All of the Group's stakeholders are encouraged to bring to the Group's attention instances where its business services have potential or real human rights impacts. The Group applies the Policy of Reporting Unethical Conduct in line with which any actual, attempted or suspected unethical conduct can be reported by any member of the Group's staff and concerned third parties.

Supply Chain

The Bank has established and implements a Procurement Policy, which sets out the general principles and rules governing the procurement of goods and services. Its implementation ensures the transparency, objectivity and integrity of procurement execution, while ensuring suppliers' compliance with applicable local, national and international legislative and regulatory requirements, through appropriate mechanisms, as a prerequisite for starting and maintaining a business relationship with them. In addition, the establishment of an Outsourcing Policy ensures the effective monitoring of third party relations based on the relevant risks that arise.

The Bank operates with a centralized and upgraded procurement model, which covers both domestic and foreign subsidiaries, managing requests for procurement of goods and services through a single purchasing system as well as a contract management system, which facilitate approval flows, while achieving efficiency in the execution of purchases, based on the final bidder principle, as well as in the finalization of new assignments or renewals and contracts. For the most effective monitoring of contract completion, Group Procurement Unit established a special indicator based on which the time of completion of a contract is recorded from the date of dispatch of the relevant assignment (supply, work or services) to the supplier. In addition, in order to minimize its environmental footprint and efficiency, the Bank uses an electronic invoicing system, in cooperation with specific suppliers, while at the same time, electronic auctions are conducted for the supply of certain types of goods and services.

Group Procurement Unit evaluates the Bank's suppliers on the basis of qualitative and quantitative criteria, in order to assess risks such as the quality of services, the financial condition, business continuity of the supplier and its legal/regulatory compliance. Specifically, on an annual basis, it measures and weights all key financial data from suppliers' balance sheets, while supplementing the evaluation with qualitative data, such as ISO certifications, through special targeted questionnaires to specialized evaluators from various business units of the Bank together with evaluators of the Procurement Unit. In the end, a weighted objective score is obtained for each supplier reflecting the progress and quality of the relationship between the Bank and the supplier.

In addition, the Bank monitors through Procurement Unit operational key risk indicators, such as suppliers with low ratings as well as complaints from internal customers and suppliers that have not been resolved on time, with the aim of initiating corrective actions.

In addition, for reasons of transparency and safeguarding the interests of the Group, the Bank adheres to the Due Diligence process for the inclusion of a new supplier in the Bank. Based on this process, the new entrant supplier is obliged, among other conditions, to submit published financial statements and all necessary financial data for a period of three years, information on the legal form of the company, its beneficial owners and legal representatives, as well as regulatory certifications it holds, aiming at the completeness of a supplier's file with the Bank.

On an annual basis, the Bank conducts an evaluation for IT suppliers, consulting, technical and construction services, as well as for other goods and services, maintaining, for quality and risk management reasons, specific indicators that measure the degree of dependence of suppliers and the Bank on the relationship between them in terms of the total turnover of each party. In addition, in the context of enriching and updating its relationship with suppliers, the competent unit for business customers of the Bank provides information and feedback on the corporate relationship of each supplier, in order to have a complete picture of the relationship with a supplier.

As a rule, if during the evaluation of suppliers a low score of one of them is derived, then an exploratory process and actions are followed to improve the products / services provided or potentially replace these suppliers.

The Bank's suppliers and respective relations with each of them are reviewed at regular intervals through formal procedures. The Procurement Committee ensures that the relevant procedures are followed, both in relation to the necessity of the procurement and in terms of the containment of operating costs.

In the context of the implementation of Sustainable Procurement practices, ESG criteria have been established for the tendering process of both IT and non-IT goods and services, in accordance with the provisions of the tendering procedure. Factors related to the impact of a product/ service/ project on ESG issues of the company / supplier, are taken into account. As such, contributing to the protection of the environment, green development and the local community is considered to have a positive effect.

In addition, regarding governance factors, certifications are requested from suppliers (e.g. ISO 9001, 14001, 50001), as well as disclosures regarding their operating footprint, ESG Ratings results and Sustainability Report. According to the applicable procedure, these criteria are incorporated in a specific section on Requests for Proposals (RFPs)/ Requests for Quotations (RFQs) and are examined during the technical evaluation phase.

The overall objective is to select, where possible, environmentally and socially responsible goods from suppliers that are aligned with those principles. Procurement processes are part of the Bank's certified Management Systems in accordance with the international standards ISO 9001, ISO 14001 and ISO 50001. Furthermore, the Bank cooperates mainly with suppliers that are active and registered or have an office in Greece, promoting and supporting the local economy.

It is noted that in 2023, the Bank, through the Group Procurement Unit, wishing to promote the principles of sustainable procurement, initiated the necessary actions for certifying its sustainable procurement practices as per the international standard ISO 20400 (Sustainable Procurement Management System), thus contributing positively to society and the economy through making sustainable purchasing decisions and encouraging suppliers and other stakeholders to do the same.

Anti -Corruption and Bribery

Actions against corruption and bribery incidents

The Group is committed to pursuing the fundamental values of integrity, transparency and accountability. It is also committed to safeguarding its reputation and client base.

The Group follows best business practices, having accepted and integrated in its culture the ten principles of the UN Global Compact. The 10th principle on Anti-Corruption states that "Businesses should work against corruption in all its forms, including extortion and bribery". The Group has adopted a zero tolerance approach against all types of fraud, including bribery. In accordance with the relevant legislation, the Group prohibits bribery in any form either direct or indirect (through a third party). The principle of zero tolerance applies to all staff and prohibits all forms of bribery, whether active or passive, direct or indirect and is also reflected in contractual documents adopted when entering into relationships with third parties, either natural or legal. The principle of zero tolerance also applies to clients of the Group, as the Organisation for Economic Co-operation and Development (OECD) anti-bribery convention is followed.

In this context, the Group has adopted the following policies and procedures to govern the treatment of bribery and corruption cases encountered:

- a) Code of Conduct and Ethics,
- b) Anti-Bribery & Corruption Policy (policy statement is posted on the Group's website),
- c) Policy for Reporting Illegal or Unethical Conduct,
- d) Management of Sponsorships and Donations.

Recognizing that any involvement in cases of bribery not only constitutes a crime, but also reflects adversely on its reputation and client base, the Group takes the following measures aimed at limiting its exposure to bribery:

- a) Setting out a clear approach to deal with the risk of bribery,
- b) Establishing a robust system of internal controls that does not tolerate bribery and corruption,
- c) Establishing mechanisms for monitoring potential incidents of bribery,
- d) Providing confidential reporting mechanisms and encouraging their use by both staff and third parties by setting out measures for their protection.
- e) Providing ongoing training and briefing to staff on the prevention and identification of bribery and corruption incidents.

Group Compliance is responsible for issuing policies and procedures to combat bribery and corruption cases. Each unit of the Bank is responsible for complying with the existing policies. Internal Conduct & Ethics of Group Compliance carries out risk assessment exercises on anti-bribery and anti-corruption issues and performs specialized monitoring exercises for potential violations. Forensic Audit & Special Projects of Group Internal Audit investigates all cases of suspected internal fraud / corruption.

Actions against Money Laundering (ML) and Terrorist Financing (TF)

Money Laundering (ML) and Terrorist Financing (TF) activities are threats against the integrity and stability of the international financial system that may cause significant economic losses and reputational damages for the Group. The Group has responsibility towards its customers, shareholders, and authorities to conduct business in a lawful and ethical way.

Based on the implementation of the Anti-money laundering/ combating the financing of terrorism and Sanctions Policy (the Policy) and of a set of interpretative documents, the Group aims at achieving the following objectives:

- a) Maintaining its integrity, credibility, and reputation against such threats,
- b) Implementing internationally accepted best practices,
- c) Implementing and complying with all the legal and regulatory requirements that govern its operations,
- d) Ensuring that its business, channels, products, and services are not used, intentionally or unintentionally, to facilitate ML and/or TF,
- e) Ensuring that sanctions measures and controls assist in applying effectively applicable regulation,
- f) Ensuring that adequate processes, systems, and controls are in place, up to date and fit for purpose, in order to detect, prevent and deter any activities related to ML/ TF and Sanctions violations.

The requirements set forth in the Policy apply to the Group, including all its staff, all its functions and units, as well as third parties who are given access to Group's information and premises.

The Group's AML/CFT and Sanctions Control Framework includes policies, guidelines and procedures for conducting business activity consistent with legal and regulatory requirements and the AML Compliance Risk Appetite.

At the same time, AML/CFT and Sanctions Governance Structure, determines Roles and Responsibilities that are allocated among the Three Lines of Defence, including the role and responsibilities of the Money Laundering Reporting Officer (MLRO) and Group MLRO, together with ongoing training necessary to support effective execution of their roles and responsibilities.

Group's implementation of the EU Taxonomy Regulation

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 obligates financial and non-financial entities subject to the Non-Financial Reporting Directive (NFRD) to disclose the alignment of their activities.

Separate reporting requirements and extensive criteria are established for financial and non-financial undertakings under the Art.8 Delegated Act of EU Taxonomy Regulation. Article 8 of the Taxonomy Regulation states that companies subject to the Non Financial Reporting Directive (NFRD), including financial companies, must publish to what extent their activity is eligible and aligned with the Taxonomy criteria.

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 (CCA) and climate change mitigation (CCM).

In 2023, two new Delegated acts issued by the European Commission have been 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 reporting year, credit institutions shall disclose, according to the EU Taxonomy regulation, taxonomy eligibility and taxonomy alignment information on the first two environmental objectives (CCM and CCA) and taxonomy eligibility information for the additional four objectives, and more specifically:

- 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.

Therefore, for the first time in 2023, credit institutions will publish the Green Asset Ratio (GAR), on each of the first two environmental objectives (CCM and CCA), which determines the extent to which the Group's assets finance and are invested in taxonomy-aligned economic activities, that 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, activities, to be taxonomy-aligned, 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).

With the gradual adoption of the new Corporate Sustainability Reporting Directive (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.

Integration of Taxonomy in the Group's business strategy, operating model, products and customers

In line with best market practices, the Group has integrated the requirements of the EU Taxonomy within its three Lines of Defense with key roles consisting of:

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- client engagement in the context of ESG/Climate Risk and Sustainable Finance Assessment,
- establishment and monitoring of climate risk and EU Taxonomy-related KPIs to ensure alignment with risk limits and sustainable financing strategy/targets as well as
- the development of relevant disclosures.

As part of its sustainability strategy, the Group is implementing initiatives that will, among others, enable it to increase the share of taxonomy-aligned assets in the coming years:

- a) Development of sectoral near, mid and long-term financed emissions reduction pathways, in line with science-based decarbonisation pathways.
- b) Performing perimeter analysis of Taxonomy-related sectors, counterparties and financings affecting the Green Asset Ratio and developing action plans for increasing Taxonomy-aligned financings in the future.
- c) Further integrating ESG, CR&E risks and sustainable financing considerations in the business planning process (e.g., project budgeting and prioritisation), to reflect the Group's business strategy and relevant targets.

Committed to being transparent about its approach and to ensure that decision-making is in line with best practices in environmental protection and sustainability, Eurobank has developed guiding frameworks, defining the approach and criteria for classifying its financing and investing activities as sustainable:

The Sustainable Finance Framework

Through its Sustainable Finance Framework (SFF), the Group is able to classify sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing in line with the financed impact strategy. The SFF has been drawn from international best practices and is based on two key guiding frameworks: The ICMA principles on sustainable financing (Green Bond Principles, Green Loan Principles and Sustainability-linked Bond Principles) and the EU Taxonomy. Currently, the SFF follows the EU Taxonomy criteria on a best effort basis. The Group aims to further align the SFF with the EU Taxonomy requirements. Along the same lines, Eurobank will closely monitor the developments of the EU Taxonomy, to update its SFF and embed the relevant requirements to the extent possible. The SFF defines two levels of transaction alignment:

- SFF alignment - Fulfilment of criteria dictated by best market practice
- EU Taxonomy alignment - Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, DNSH, minimum social safeguards)

Through the dedicated purpose financing approach (i.e. known use of proceeds) the Group assesses and classifies financings / transactions as "Not SFF aligned", "SFF aligned" or "SFF & EU Taxonomy aligned".

For general purpose financing / transactions (i.e. not known use of proceeds) the SFF defines two other approaches:

- a) Company Business mix - Financing to companies that fulfil the eligibility green/ social criteria and derive the majority of their revenues from eligible activities.
- b) Sustainability-linked loans - Financing linked to ambitious and predefined Sustainability Performance Targets (SPTs).

As part of the integration of sustainable financing and the SFF into its core operations, the Group has developed governance structures and functions as well as a digital tool (Sustainable Finance Framework assessment tool) that facilitate the day-to-day implementation of the SFF.

The SFF assessment tool supports the process of assessing the financings / transactions against the criteria defined in the SFF and the EU Taxonomy and incorporates both the internal criteria defined by the Group, as well as the assessment steps and criteria defined by the EU Taxonomy regulation. Through the Sustainable Finance Framework assessment tool, users categorise financing to the applicable eligible activity and are guided through the assessment steps which involve substantiating alignment with the criteria of each step, including Taxonomy alignment assessment (Technical Screening Criteria, Do Not Significant Harm criteria, Minimum Social Safeguards).

Going forward, the Group's key priorities include the development of a strong and realistic sectoral roadmap towards net zero and the increasing client support towards climate transition and sustainable financing. This plan also entails the gradual, over the years increase of the Group's Taxonomy-aligned assets.

Approach for the preparation of disclosures relating to Article 8 of the Taxonomy Regulation

The preparation of mandatory reporting of taxonomy eligibility and alignment is based on the prudential consolidation for the Group, 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 align Taxonomy reporting with its core activities, provides the key performance indicators (KPIs) and other disclosure requirements related to its dominant financial undertakings as laid down in the Art. 8 Delegated Act.

For the current year, credit institutions shall disclose the aggregate GAR for covered on-balance sheet assets and the breakdown by environmental objective and by type of counterparty. In addition, credit institutions shall disclose the percentage of their total assets that are excluded from the numerator and the denominator of the GAR. Credit institutions shall also disclose 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 Delegated Regulation (EU) 2021/2178, 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'). Specifically, 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 the Non-Financial Reporting Directive (NFRD). This information may not include economic activities under the new Delegated Acts for the additional four environmental objectives, as this information is currently limited.

In order to determine which companies are subject to the NFRD, an assessment is carried out in order 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 enterprise 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 companies subject to NFRD and companies not subject to NFRD has been carried based on internal customer segmentation in the core banking systems as well as external information.

The Taxonomy-aligned assets presented include 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. For financial undertakings subject to NFRD, the Group's exposures have been weighted to the counterparty's proportion of Taxonomy-aligned assets.

For financial undertakings the information is limited as this is the first year of alignment reporting, and most of the financial undertakings have not yet published their 2023 annual reports. Therefore, the Taxonomy reporting for financial undertakings is based on data publicly available from 2022 which do not include information for alignment.

Financial and non-financial undertakings that do not meet the aforementioned requirements are identified as non-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 in mandatory reporting are not allowed. Therefore, assets on the Group's balance sheet to non-NFRD undertakings are not assessed for taxonomy eligibility. Assets of non-NFRD counterparties, derivatives, hedge accounting and on-demand interbank loans are not included in the calculation of Taxonomy-eligible and Taxonomy-aligned assets.

For specific purpose financing where the use of proceeds is known, project-specific KPIs are used in the assessment for Taxonomy-eligibility and Taxonomy-alignment to the extent that Taxonomy eligibility and Taxonomy alignment can be demonstrated for the underlying transaction. As part of the Sustainable Finance alignment procedures, standalone dedicated purpose financings are assessed to evaluate alignment with the EU Taxonomy requirements. The assessment is carried out with prudential principles, based on available documentary evidence provided by the counterparties, required to ensure adherence to EU Taxonomy and based on applicable National Legislation in specific financing cases (i.e. Resilience and Recovery Fund investments, which embed the Do No Significant Harm assessment).

In relation to households, loans collateralised by residential real estate, loans granted for renovation purposes and loans granted with purpose to finance the purchase of vehicles were assessed for taxonomy-alignment.

In the current year, the Group is also reporting its exposure to economic activities related to fossil gas and nuclear energy for the first time, according to Commission Delegated Regulation (EU) 2022/1214. Hence, the taxonomy-non-eligible nuclear energy related activities are included in the denominator of our key performance indicators. The Group also uses the relevant templates included in the Delegated Act to disclose information for nuclear and fossil gas related activities.

The Group's approach for the disclosures prepared as of 31 December 2023 is based on the best effort to adhere to the applicable regulations and new regulatory developments. In accordance with the guidance published in December 2023 FAQs, no estimates were included in the calculation of eligibility and alignment for mandatory disclosures presented.

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The Group 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. For the Group’s processes to ensure data quality, please refer to the “ESG data” section.

Results

The Group’s total green asset ratio based on turnover and total green asset ratio based on CAPEX, as at year-end 2023 cover the two climate-related EU environmental objectives (CCM and CCA) and are presented in the summary below:

Summary EU Taxonomy KPIs		31 December 2023			
		Gross carrying amount (in € million)	Turnover KPIs		Capex KPIs
GAR - Covered assets in both numerator and denominator	21,655				
Assets excluded from the numerator for GAR calculation (covered in the denominator)	38,795				
Taxonomy-eligible assets		12,605	20.90%	14,481	24.00%
Taxonomy-aligned assets		1,484	2.50%	2,088	3.50%
Total GAR assets	60,449				
Total assets	81,165				
Impairment for loans and advances at amortised cost, debt instruments and other adjustments, according to EU taxonomy methodology	(1,384)				
Total assets according to the Consolidated balance sheet as at 31 December 2023	79,781				

The reported main and additional KPIs calculated on 31 December 2023 for the Group, including the reporting templates as set out in the Taxonomy Regulation and FAQs, are presented in the Appendix 1. Eligibility information for the additional four environmental objectives have not been reported for 2023 as there are no available data by the counterparties, based on the latest published taxonomy information. Moreover, comparative information for 2022 is not reported.

Corporate Governance Statement

In compliance with the art. 17 of the Law 4706/2020 for the listed companies, which stipulates that listed companies should adopt and implement a corporate governance code, prepared by a recognized and reputable body, and following a relevant resolution of the Board of Directors of Eurobank Holdings on 29 September 2021, Eurobank Holdings has adopted and implements the Hellenic Corporate Governance Code (Code). The Code has been posted on Eurobank Holdings' website (www.eurobankholdings.gr).

The Corporate Governance Statement for the year 2023, attached herewith, is an integral part of the Directors' Report, and outlines how the principles stipulated by the Code were applied, during 2023, to Eurobank Holdings and to Eurobank S.A. (100% subsidiary of Eurobank Holdings).

Georgios Zanias
Chairman

Fokion Karavias
Chief Executive Officer

28 March 2024

APPENDIX 1

Reporting templates in accordance with Delegated Regulation (EU) 2021/2178, Annexes VI and XII

0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets ⁽¹⁾	KPI ⁽³⁾	KPI ⁽⁴⁾	% coverage (over total assets) ⁽⁵⁾	% 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	1,484	2.5	3.5	74.5	47.8	25.5

		Total environmentally sustainable activities ⁽²⁾	KPI ⁽³⁾	KPI ⁽⁴⁾	% 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)	650	6.9	11.0	31.5	N/A	N/A
	Trading book ⁽⁶⁾						
	Financial guarantees ⁽⁷⁾	44	1.9	6.5			
	Assets under management ⁽⁷⁾	24	0.4	2.1			
	Fees and commissions income ⁽⁶⁾						

(1) Total environmentally sustainable assets used for turnover KPI. Total environmentally sustainable assets used for Capex KPI amounts to €2,088m

(2) Total environmentally sustainable assets used for turnover KPI. Total environmentally sustainable assets used for Capex KPI amounts to €1,042m for GAR flow

(3) Based on the Turnover KPI of the counterparty

(4) Based on the CapEx KPI of the counterparty

(5) % of assets covered by the KPI over Group's total assets

(6) "Trading book" and "fees and commissions income" KPIs shall apply from financial year 2025 onwards

(7) Total environmentally sustainable assets used for turnover KPI. Total environmentally sustainable assets used for Financial guarantees - Capex KPI amounts to €152m and for assets under management is €116m.

1.Assets for the calculation of GAR - Turnover

Million EUR		Total [gross] carrying amount	31 December 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			
	GAR- Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments no HFT eligible for GAR calculation	21,065	11,393	1,474	1,327	9	62	173	10	-	1	12,015	1,484	1,327	9	63
2	Financial undertakings	2,519	9	4	-	0	0	5	-	-	-	463	4	-	0	0
3	Credit institutions	2,447	-	-	-	-	-	-	-	-	-	446	-	-	-	-
4	Loans and advances	987	-	-	-	-	-	-	-	-	-	169	-	-	-	-
5	Debt securities, including UoP	1,451	-	-	-	-	-	-	-	-	-	275	-	-	-	-
6	Equity instruments	9	-	-	-	-	-	-	-	-	-	1	-	-	-	-
7	Other financial corporations	71	9	4	-	0	0	5	-	-	-	18	4	-	0	0
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	14	-	-	-	-	-	-	-	-	-	1	-	-	-	-
13	Loans and advances	12	-	-	-	-	-	-	-	-	-	1	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	1	-	-	-	-	-	-	-	-	-	0	-	-	-	-
16	of which insurance undertakings	12	-	-	-	-	-	-	-	-	-	2	-	-	-	-
17	Loans and advances	0	-	-	-	-	-	-	-	-	-	0	-	-	-	-
18	Debt securities, including UoP	12	-	-	-	-	-	-	-	-	-	2	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	5,016	1,794	1,434	1,291	9	62	167	10	-	1	1,961	1,444	1,291	9	63
21	Loans and advances	4,286	1,663	1,377	1,291	2	56	95	1	-	-	1,758	1,378	1,291	2	56
22	Debt securities, including UoP	721	126	57	-	6	5	72	9	-	1	198	66	-	6	6
23	Equity instruments	9	5	0	-	0	0	0	-	-	-	5	0	-	0	0

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Million EUR		Total [gross] carrying amount	31 December 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 transitional		Of which enabling	
24	Households	13,512	9,590	36	36	-	-	-	-	-	-	9,590	36	36	-	-		
25	of which loans collateralised by residential immovable property	9,162	9,162	-	-	-	-	-	-	-	-	9,162	-	-	-	-		
26	of which building renovation loans	36	36	36	36	-	-	-	-	-	-	36	36	36	-	-		
27	of which motor vehicle loans	392	392	-	-	-	-	-	-	-	-	392	-	-	-	-		
28	Local governments financing	18	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	18	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
31	Collateral obtained by taking possession: residential and commercial immovable properties	590	590	-	-	-	-	-	-	-	-	590	-	-	-	-		
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	38,795																
33	Financial and Non-financial undertakings	28,901																
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	23,799																
35	Loans and advances	21,576																
36	of which loans collateralised by commercial immovable property	7,074																
37	of which building renovation loans	-																
38	Debt securities	2,038																
39	Equity instruments	185																
40	Non-EU country counterparties not subject to NFRD disclosure obligations	5,102																
41	Loans and advances	4,732																
42	Debt securities	321																
43	Equity instruments	49																
44	Derivatives	897																
45	On demand interbank loans	19																
46	Cash and cash-related assets	502																
47	Other categories of assets (e.g. goodwill, commodities etc.)	8,476																
48	Total GAR assets	60,449	11,983	1,474	1,327	9	62	173	10	-	1	12,605	1,484	1,327	9	63		

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Million EUR		Total [gross] carrying amount	31 December 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	
49	Assets not covered for GAR calculation	20,715														
50	Central governments and Supranational issuers	9,914														
51	Central banks exposure	10,422														
52	Trading book	379														
53	Total assets	81,165	11,983	1,474	1,327	9	62	173	10	-	1	12,605	1,484	1,327	9	63
Off-balance sheet exposures-Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	2,323	360	44	-	3	4	28	0	-	0	387	44	-	3	4
55	Assets under management	5,441	142	21	-	3	7	27	2	-	0	169	24	-	3	7
56	Of which debt securities	629	107	10	-	1	1	13	1	-	0	120	11	-	1	1
57	Of which equity instruments	237	35	11	-	2	6	14	1	-	0	49	13	-	2	6

1.Assets for the calculation of GAR - Capex

Million EUR		Total [gross] carrying amount	31 December 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						
<u>GAR- Covered assets in both numerator and denominator</u>																
1	Loans and advances, debt securities and equity instruments no HFT eligible for GAR calculation	21,065	12,469	2,081	1,327	26	78	333	7	-	1	13,251	2,088	1,327	26	79
2	Financial undertakings	2,519	19	18	-	1	-	4	-	-	-	472	18	-	1	-
3	Credit institutions	2,447	-	-	-	-	-	-	-	-	-	446	-	-	-	-
4	Loans and advances	987	-	-	-	-	-	-	-	-	-	169	-	-	-	-
5	Debt securities, including UoP	1,451	-	-	-	-	-	-	-	-	-	275	-	-	-	-
6	Equity instruments	9	-	-	-	-	-	-	-	-	-	1	-	-	-	-
7	Other financial corporations	71	19	18	-	1	-	4	-	-	-	26	18	-	1	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	14	-	-	-	-	-	-	-	-	-	1	-	-	-	-
13	Loans and advances	12	-	-	-	-	-	-	-	-	-	1	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	12	-	-	-	-	-	-	-	-	-	2	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	12	-	-	-	-	-	-	-	-	-	2	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	Non-financial undertakings	5,016	2,860	2,027	1,291	25	78	329	7	-	1	3,189	2,034	1,291	25	78
21	Loans and advances	4,286	2,498	1,811	1,291	3	67	247	1	-	-	2,745	1,811	1,291	3	67
22	Debt securities, including UoP	721	357	216	-	21	11	82	6	-	1	440	222	-	21	11
23	Equity instruments	9	5	1	-	-	-	-	-	-	-	5	1	-	-	-

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Million EUR		Total [gross] carrying amount	31 December 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		
24	Households	13,512	9,590	36	36	-	-	-	-	-	9,590	36	36	-	-
25	of which loans collateralised by residential immovable property	9,162	9,162	-	-	-	-	-	-	-	9,162	-	-	-	-
26	of which building renovation loans	36	36	36	36	-	-	-	-	-	36	36	36	-	-
27	of which motor vehicle loans	392	392	-	-	-	-	-	-	-	392	-	-	-	-
28	Local governments financing	18	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	18	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	590	590	-	-	-	-	-	-	-	590	-	-	-	-
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)	38,795													
33	Financial and Non-financial undertakings	28,901													
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	23,799													
35	Loans and advances	21,576													
36	of which loans collateralised by commercial immovable property	7,074													
37	of which building renovation loans	-													
38	Debt securities	2,038													
39	Equity instruments	185													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	5,102													
41	Loans and advances	4,732													
42	Debt securities	321													
43	Equity instruments	49													

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Million EUR		Total [gross] carrying amount	31 December 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 enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	
44	Derivatives	897														
45	On demand interbank loans	19														
46	Cash and cash-related assets	502														
47	Other categories of assets (e.g. goodwill, commodities etc.)	8,476														
48	Total GAR assets	60,449	13,059	2,081	1,327	26	78	333	7	-	1	13,841	2,088	1,327	26	79
49	Assets not covered for GAR calculation	20,715														
50	Central governments and Supranational issuers	9,914														
51	Central banks exposure	10,422														
52	Trading book	379														
53	Total assets	81,165	13,059	2,081	1,327	26	78	333	7	-	1	13,841	2,088	1,327	26	79
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	2,323	462	152	-	4	6	25	-	-	-	487	152	-	4	6
55	Assets under management	5,441	287	116	-	3	11	22	1	-	-	309	116	-	3	11
56	Of which debt securities	629	205	64	-	1	3	12	-	-	-	217	64	-	1	3
57	Of which equity instruments	237	82	52	-	2	8	10	1	-	-	92	53	-	2	8

2. GAR sector information - Turnover

Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
1	Other B7 - Mining of metal ores	16	-			16	-			16	-		
2	C10.6.1 - Manufacture of grain mill products	-	-			-	-			-	-		
3	Other C11 - Manufacture of beverages	4	-			4	-			4	-		
4	C13.9.5 - Manufacture of non-wovens and articles made from non-wovens, except apparel	1	1			1	-			1	1		
5	Other C17 - Manufacture of paper and paper products	3	-			3	-			3	-		
6	C18.1.0 - Printing and service activities related to printing	1	-			1	-			1	-		
7	C19.2.0 - Manufacture of refined petroleum products	542	3			542	-			542	3		
8	Other C19 - Manufacture of coke and refined petroleum products	53	1			53	-			53	1		
9	C20.4.2 - Manufacture of perfumes and toilet preparations	27	-			27	-			27	-		
10	C20.5.9 - Manufacture of other chemical products n.e.c.	2	2			2	-			2	2		
11	Other C20 - Manufacture of chemicals and chemical products	4	-			4	-			4	-		
12	C22.2.1 - Manufacture of plastic plates, sheets, tubes and profiles	-	-			-	-			-	-		
13	C22.2.2 - Manufacture of plastic packing goods	2	1			2	-			2	1		
14	C23.5.0 - Manufacture of cement, lime and plaster	-	-			-	-			-	-		
15	C23.5.1 - Manufacture of cement	20	1			20	1			20	2		

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Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
16	Other C23 - Manufacture of other non-metallic mineral products	106	5			106	5			106	9		
17	C24.1.0 - Manufacture of basic iron and steel and of ferro-alloys	89	9			89	-			89	9		
18	C24.4.2 - Aluminium production	11	1			11	-			11	1		
19	C24.4.4 - Copper production	47	-			47	-			47	-		
20	C24.5.1 - Casting of iron	51	5			51	-			51	5		
21	C27.2.0 - Manufacture of batteries and accumulators	-	-			-	-			-	-		
22	C27.3.2 - Manufacture of other electronic and electric wires and cables	92	35			92	-			92	35		
23	Other C29 - Manufacture of motor vehicles, trailers and semi-trailers	10	1			10	-			10	1		
24	D35.1.1 - Production of electricity	1,100	1,087			1,100	-			1,100	1,087		
25	D35.1.3 - Distribution of electricity	164	-			164	-			164	-		
26	D35.1.4 - Trade of electricity	441	-			441	-			441	-		
27	Other D35 - Electricity, gas, steam and air conditioning supply	250	15			250	2			250	17		
28	F41.2.0 - Construction of residential and non-residential buildings	1	-			1	-			1	-		
29	F42.2.2 - Construction of utility projects for electricity and telecommunications	200	200			200	-			200	200		
30	F42.9.9 - Construction of other civil engineering projects n.e.c.	2	2			2	-			2	2		
31	Other F42 - Civil engineering	39	4			39	-			39	4		
32	F43.9.9 - Other specialised construction activities n.e.c.	4	-			4	-			4	-		

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Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
33	G45.1.1 - Sale of cars and light motor vehicles	-	-			-	-			-	-		
34	G45.3.0 - Sale of motor vehicle parts and accessories	5	-			5	-			5	-		
35	Other G45 - Wholesale and retail trade and repair of motor vehicles and motorcycles	1	-			1	-			1	-		
36	G46.3.6 - Wholesale of sugar and chocolate and sugar confectionery	14	-			14	-			14	-		
37	G46.3.9 - Non-specialised wholesale of food, beverages and tobacco	-	-			-	-			-	-		
38	G46.4.5 - Wholesale of perfume and cosmetics	-	-			-	-			-	-		
39	G46.4.6 - Wholesale of pharmaceutical goods	-	-			-	-			-	-		
40	G46.4.7 - Wholesale of furniture, carpets and lighting equipment	21	-			21	-			21	-		
41	G46.5.1 - Wholesale of computers, computer peripheral equipment and software	3	-			3	-			3	-		
42	G46.5.2 - Wholesale of electronic and telecommunications equipment and parts	4	-			4	-			4	-		
43	G46.7.0 - Other specialised wholesale	2	-			2	-			2	-		
44	G46.7.1 - Wholesale of solid, liquid and gaseous fuels and related products	66	1			66	-			66	1		

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Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
45	G46.7.2 - Wholesale of metals and metal ores	11	1			11	-			11	1		
46	G46.7.7 - Wholesale of waste and scrap	4	-			4	-			4	-		
47	G47.1.1 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-			-	-			-	-		
48	G47.7.1 - Retail sale of clothing in specialised stores	2	-			2	-			2	-		
49	G47.7.8 - Other retail sale of new goods in specialised stores	2	-			2	-			2	-		
50	Other H51 - Air transport	4	-			4	-			4	-		
51	H52.1.0 - Warehousing and storage	1	-			1	-			1	-		
52	H52.2.1 - Service activities incidental to land transportation	22	5			22	-			22	5		
53	H52.2.3 - Service activities incidental to air transportation	238	2			238	-			238	2		
54	Other H52 - Warehousing and support activities for transportation	2	2			2	-			2	2		
55	H53.2.0 - Other postal and courier activities	-	-			-	-			-	-		
56	I55.1.0 - Hotels and similar accommodation	43	-			43	-			43	-		
57	Other J58 - Publishing activities	3	-			3	-			3	-		
58	Other J61 - Telecommunications	28	-			28	-			28	-		
59	J62.0.1 - Computer programming activities	1	1			1	-			1	1		

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Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
60	Other J62 - Computer programming, consultancy and related activities	20	-			20	-			20	-		
61	K64.1.9 - Other monetary intermediation	25	3			25	-			25	3		
62	K64.2.0 - Activities of holding companies	35	7			35	-			35	7		
63	K64.3.0 - K64.3.0 - Trusts, funds and similar financial entities	50	-			50	-			50	-		
64	L68.1.0 - Buying and selling of own real estate	185	-			185	-			185	-		
65	L68.2.0 - Renting and operating of own or leased real estate	116	-			116	-			116	-		
66	L68.3.2 - Management of real estate on a fee or contract basis	23	-			23	-			23	-		
67	Other L68 - Real estate activities	9	1			9	-			9	1		
68	M70.2.2 - Business and other management consultancy activities	31	-			31	-			31	-		
69	M71.2.0 - Technical testing and analysis	2	-			2	-			2	-		
70	Other M74 - Other professional, scientific and technical activities	1	-			1	-			1	-		
71	N77.1.1 - Renting and leasing of cars and light motor vehicles	49	2			49	-			49	2		
72	N79.1.1 - Travel agency activities	-	-			-	-			-	-		
73	Other R92 - Gambling and betting activities	421	-			421	-			421	-		
74	Q86.1.0 - Hospital activities	54	-			54	-			54	-		
75	Other unallocated	234	34			234	3			234	37		

2. GAR sector information - Capex

Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
1	Other B7 - Mining of metal ores	16	-			16	-			16	-		
2	C10.6.1 - Manufacture of grain mill products	-	-			-	-			-	-		
3	Other C11 - Manufacture of beverages	4	1			4	1			4	1		
4	C13.9.5 - Manufacture of non-wovens and articles made from non-wovens, except apparel	1	1			1	-			1	1		
5	Other C17 - Manufacture of paper and paper products	3	-			3	-			3	-		
6	C18.1.0 - Printing and service activities related to printing	1	-			1	-			1	-		
7	C19.2.0 - Manufacture of refined petroleum products	542	277			542	-			542	277		
8	Other C19 - Manufacture of coke and refined petroleum products	53	40			53	-			53	40		
9	C20.4.2 - Manufacture of perfumes and toilet preparations	27	-			27	-			27	-		
10	C20.5.9 - Manufacture of other chemical products n.e.c.	2	2			2	-			2	2		
11	Other C20 - Manufacture of chemicals and chemical products	4	-			4	-			4	-		
12	C22.2.1 - Manufacture of plastic plates, sheets, tubes and profiles	-	-			-	-			-	-		
13	C22.2.2 - Manufacture of plastic packing goods	2	1			2	-			2	1		
14	C23.5.0 - Manufacture of cement, lime and plaster	-	-			-	-			-	-		
15	C23.5.1 - Manufacture of cement	20	3			20	-			20	3		

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Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
16	Other C23 - Manufacture of other non-metallic mineral products	106	17			106	-			106	17		
17	C24.1.0 - Manufacture of basic iron and steel and of ferro-alloys	89	9			89	-			89	9		
18	C24.4.2 - Aluminium production	11	8			11	-			11	8		
19	C24.4.4 - Copper production	47	-			47	-			47	-		
20	C24.5.1 - Casting of iron	51	5			51	-			51	5		
21	C27.2.0 - Manufacture of batteries and accumulators	-	-			-	-			-	-		
22	C27.3.2 - Manufacture of other electronic and electric wires and cables	92	33			92	-			92	33		
23	Other C29 - Manufacture of motor vehicles, trailers and semi-trailers	10	2			10	-			10	2		
24	D35.1.1 - Production of electricity	1,100	1,097			1,100	-			1,100	1,097		
25	D35.1.3 - Distribution of electricity	164	-			164	-			164	-		
26	D35.1.4 - Trade of electricity	441	-			441	-			441	-		
27	Other D35 - Electricity, gas, steam and air conditioning supply	250	79			250	3			250	81		
28	F41.2.0 - Construction of residential and non-residential buildings	1	-			1	-			1	-		
29	F42.2.2 - Construction of utility projects for electricity and telecommunications	200	200			200	-			200	200		
30	F42.9.9 - Construction of other civil engineering projects n.e.c.	2	2			2	-			2	2		
31	Other F42 - Civil engineering	39	24			39	-			39	24		
32	F43.9.9 - Other specialised construction activities n.e.c.	4	-			4	-			4	-		

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Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
33	G45.1.1 - Sale of cars and light motor vehicles	-	-			-	-			-	-		
34	G45.3.0 - Sale of motor vehicle parts and accessories	5	-			5	-			5	1		
35	Other G45 - Wholesale and retail trade and repair of motor vehicles and motorcycles	1	-			1	-			1	-		
36	G46.3.6 - Wholesale of sugar and chocolate and sugar confectionery	14	-			14	-			14	-		
37	G46.3.9 - Non-specialised wholesale of food, beverages and tobacco	-	-			-	-			-	-		
38	G46.4.5 - Wholesale of perfume and cosmetics	-	-			-	-			-	-		
39	G46.4.6 - Wholesale of pharmaceutical goods	-	-			-	-			-	-		
40	G46.4.7 - Wholesale of furniture, carpets and lighting equipment	21	-			21	-			21	-		
41	G46.5.1 - Wholesale of computers, computer peripheral equipment and software	3	-			3	-			3	-		
42	G46.5.2 - Wholesale of electronic and telecommunications equipment and parts	4	-			4	-			4	-		
43	G46.7.0 - Other specialised wholesale	2	-			2	-			2	-		
44	G46.7.1 - Wholesale of solid, liquid and gaseous fuels and related products	66	44			66	-			66	44		

REPORT OF THE DIRECTORS

Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
45	G46.7.2 - Wholesale of metals and metal ores	11	1			11	-			11	1		
46	G46.7.7 - Wholesale of waste and scrap	4	-			4	-			4	-		
47	G47.1.1 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	-	-			-	-			-	-		
48	G47.7.1 - Retail sale of clothing in specialised stores	2	-			2	-			2	-		
49	G47.7.8 - Other retail sale of new goods in specialised stores	2	-			2	-			2	-		
50	Other H51 - Air transport	4	-			4	-			4	-		
51	H52.1.0 - Warehousing and storage	1	-			1	-			1	-		
52	H52.2.1 - Service activities incidental to land transportation	22	16			22	-			22	16		
53	H52.2.3 - Service activities incidental to air transportation	238	29			238	-			238	29		
54	Other H52 - Warehousing and support activities for transportation	2	2			2	-			2	2		
55	H53.2.0 - Other postal and courier activities	-	-			-	-			-	-		
56	I55.1.0 - Hotels and similar accommodation	43	-			43	-			43	-		
57	Other J58 - Publishing activities	3	-			3	-			3	-		
58	Other J61 - Telecommunications	28	-			28	-			28	-		
59	J62.0.1 - Computer programming activities	1	-			1	1			1	1		

REPORT OF THE DIRECTORS

Breakdown by sector - NACE 4 digits level (code and label)		31 December 2023											
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + 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		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	
Million EUR		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)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
60	Other J62 - Computer programming, consultancy and related activities	20	-			20	-			20	-		
61	K64.1.9 - Other monetary intermediation	25	-			25	-			25	-		
62	K64.2.0 - Activities of holding companies	35	25			35	-			35	25		
63	K64.3.0 - K64.3.0 - Trusts, funds and similar financial entities	50	18			50	-			50	18		
64	L68.1.0 - Buying and selling of own real estate	185	-			185	-			185	-		
65	L68.2.0 - Renting and operating of own or leased real estate	116	2			116	-			116	2		
66	L68.3.2 - Management of real estate on a fee or contract basis	23	-			23	-			23	-		
67	Other L68 - Real estate activities	9	1			9	-			9	1		
68	M70.2.2 - Business and other management consultancy activities	31	-			31	-			31	-		
69	M71.2.0 - Technical testing and analysis	2	-			2	-			2	-		
70	Other M74 - Other professional, scientific and technical activities	1	-			1	-			1	-		
71	N77.1.1 - Renting and leasing of cars and light motor vehicles	49	5			49	-			49	5		
72	N79.1.1 - Travel agency activities	-	-			-	-			-	-		
73	Other R92 - Gambling and betting activities	421	-			421	-			421	-		
74	Q86.1.0 - Hospital activities	54	-			54	-			54	-		
75	Other unallocated	234	77			234	3			234	80		

REPORT OF THE DIRECTORS

3. GAR KPI Stock - Turnover

% (compared to total covered assets in the denominator)		31 December 2023															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total assets covered
		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 transitional	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	18.8	2.4	2.2	0.0	0.1	0.3	0.0	-	0.0	19.9	2.5	2.2	0.0	0.1	26.0	
2	Financial corporations	0.0	0.0	-	0.0	0.0	0.0	-	-	-	0.8	0.0	-	0.0	0.0	3.1	
3	Credit institutions	-	-	-	-	-	-	-	-	-	0.7	-	-	-	-	3.0	
4	Loans and advances	-	-	-	-	-	-	-	-	-	0.3	-	-	-	-	1.2	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	0.5	-	-	-	-	1.8	
6	Equity instruments	-	-	-	-	-	-	-	-	-	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	0.1	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
13	Loans and advances	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
17	Loans and advances	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

REPORT OF THE DIRECTORS

% (compared to total covered assets in the denominator)		31 December 2023														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					Proportion of total assets covered
		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 transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling						
20	Non-financial corporations	3.0	2.4	2.1	0.0	0.1	0.3	0.0	-	0.0	3.2	2.4	2.1	0.0	0.1	6.2
21	Loans and advances	2.8	2.3	2.1	0.0	0.1	0.2	0.0	-	-	2.9	2.3	2.1	0.0	0.1	5.3
22	Debt securities, including UoP	0.2	0.1	-	0.0	0.0	0.1	0.0	-	0.0	0.3	0.1	-	0.0	0.0	0.9
23	Equity instruments	0.0	0.0	-	-	0.0	0.0	-	-	-	0.0	0.0	-	-	0.0	0.0
24	Households	15.9	0.1	0.1	-	-	-	-	-	-	15.9	0.1	0.1	-	-	16.6
25	of which loans collateralised by residential immovable property	15.2	-	-	-	-	-	-	-	-	15.2	-	-	-	-	11.3
26	of which building renovation loans	0.1	0.1	0.1	-	-	-	-	-	-	0.1	0.1	0.1	-	-	0.0
27	of which motor vehicle loans	0.6	-	-	-	-	-	-	-	-	0.6	-	-	-	-	0.5
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.0
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.0
31	Collateral obtained by taking possession: residential and commercial immovable properties	1.0	-	-	-	-	-	-	-	-	1.0	-	-	-	-	0.7
32	Total GAR assets	19.8	2.4	2.2	0.0	0.1	0.3	0.0	-	0.0	20.9	2.5	2.2	0.0	0.1	26.7

REPORT OF THE DIRECTORS

3. GAR KPI Stock - Capex

% (compared to total covered assets in the denominator)		31 December 2023														Proportion of total assets covered	
		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 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	Of which Use of Proceeds	Of which transitional	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	21.7	3.4	2.2	-	0.1	0.6	-	-	-	23.0	3.5	2.2	-	0.1	26.0	
2	Financial corporations	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	3.1	
3	Credit institutions	-	-	-	-	-	-	-	-	-	0.7	-	-	-	-	3.0	
4	Loans and advances	-	-	-	-	-	-	-	-	-	0.3	-	-	-	-	1.2	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	0.5	-	-	-	-	1.8	
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1	
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	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

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% (compared to total covered assets in the denominator)		31 December 2023														Proportion of total assets covered	
		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 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				
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
20	Non-financial corporations	4.7	3.4	2.1	-	0.1	0.5	-	-	-	5.3	3.4	2.1	-	0.1		
21	Loans and advances	4.1	3.0	2.1	-	0.1	0.4	-	-	-	4.5	3.0	2.1	-	0.1		
22	Debt securities, including UoP	0.6	0.4	-	-	-	0.1	-	-	-	0.7	0.4	-	-	-		
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
24	Households	16.9	0.1	0.1	-	-	-	-	-	-	16.9	0.1	0.1	-	-		
25	of which loans collateralised by residential immovable property	16.2	-	-	-	-	-	-	-	-	16.2	-	-	-	-		
26	of which building renovation loans	0.1	0.1	0.1	-	-	-	-	-	-	0.1	0.1	0.1	-	-		
27	of which motor vehicle loans	0.6	-	-	-	-	-	-	-	-	0.6	-	-	-	-		
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
31	Collateral obtained by taking possession: residential and commercial immovable properties	1.0	-	-	-	-	-	-	-	-	1.0	-	-	-	-		
32	Total GAR assets	22.7	3.4	2.2	-	0.1	0.6	-	-	-	24.0	3.5	2.2	-	0.1		

REPORT OF THE DIRECTORS

4. GAR KPI flow - Turnover

% (compared to flow of total eligible assets)		31 December 2023														Proportion of total new assets covered	
		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 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	13.4	6.8	6.2	0.0	0.1	0.6	0.1	-	-	14.8	6.9	6.2	0.0	0.1	31.1	
2	Financial undertakings	0.0	0.0	-	0.0	0.0	0.0	-	-	-	0.9	0.0	-	0.0	0.0	4.4	
3	Credit institutions	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	4.3	
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	4.2	
6	Equity instruments	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.1	
7	Other financial corporations	0.0	0.0	-	0.0	0.0	0.0	-	-	-	0.1	0.0	-	0.0	0.0	0.2	
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12	of which management companies	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15	Equity instruments	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.0	
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	0.0	-	-	-	-	0.1	

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% (compared to flow of total eligible assets)		31 December 2023															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
		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 transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling							
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	0.0	-	-	-	0.1	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	7.5	6.8	6.2	0.0	0.1	0.6	0.1	-	-	-	8.0	6.8	6.2	0.0	0.1	20.8
21	Loans and advances	7.0	6.5	6.2	0.0	0.1	0.4	0.0	-	-	-	7.4	6.6	6.2	0.0	0.1	19.6
22	Debt securities, including UoP	0.4	0.3	-	0.0	0.0	0.2	0.0	-	-	-	0.7	0.3	-	0.0	0.0	1.2
23	Equity instruments	0.0	0.0	-	-	0.0	0.0	-	-	-	-	0.0	0.0	-	-	0.0	0.0
24	Households	5.9	-	-	-	-	-	-	-	-	-	5.9	-	-	-	-	5.9
25	of which loans collateralised by residential immovable property	5.7	-	-	-	-	-	-	-	-	-	5.7	-	-	-	-	5.7
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	0.2	-	-	-	-	-	-	-	-	-	0.2	-	-	-	-	0.2
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.4	-	-	-	-	-	-	-	-	-	0.4	-	-	-	-	0.4
32	Total GAR assets	13.7	6.8	6.2	0.0	0.1	0.6	0.1	-	-	-	15.2	6.9	6.2	0.0	0.1	31.5

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4. GAR KPI flow - Capex

% (compared to flow of total eligible assets)		31 December 2023														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					Proportion of total new assets covered
		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 transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling						
<u>GAR - Covered assets in both numerator and denominator</u>																
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	21.1	11.0	6.2	0.1	0.1	0.8	-	-	-	22.7	11.0	6.2	0.1	0.1	31.1
2	Financial undertakings	0.2	0.2	-	-	-	-	-	-	-	1.0	0.2	-	-	-	4.4
3	Credit institutions	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	4.3
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	4.2
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1
7	Other financial corporations	0.2	0.2	-	-	-	-	-	-	-	0.2	0.2	-	-	-	0.2
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	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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% (compared to flow of total eligible assets)		31 December 2023															
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
		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 transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling	Of which Use of Proceeds	Of which transitional	Of which enabling				
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1	
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20	Non-financial undertakings	15.1	10.8	6.2	0.1	0.1	0.8	-	-	-	15.9	10.9	6.2	0.1	0.1	20.8	
21	Loans and advances	14.6	10.4	6.2	-	0.1	0.5	-	-	-	15.1	10.4	6.2	-	0.1	19.6	
22	Debt securities, including UoP	0.5	0.4	-	0.1	-	0.2	-	-	-	0.7	0.4	-	0.1	-	1.2	
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
24	Households	5.9	-	-	-	-	-	-	-	-	5.9	-	-	-	-	5.9	
25	of which loans collateralised by residential immovable property	5.7	-	-	-	-	-	-	-	-	5.7	-	-	-	-	5.7	
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
27	of which motor vehicle loans	0.2	-	-	-	-	-	-	-	-	0.2	-	-	-	-	0.2	
28	Local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.4	-	-	-	-	-	-	-	-	0.4	-	-	-	-	0.4	
32	Total GAR assets	21.5	11.0	6.2	0.1	0.1	0.8	-	-	-	23.1	11.0	6.2	0.1	0.1	31.5	

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5. KPI off-balance sheet exposures- Stock- Turnover

		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	
		31 December 2023														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
% (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-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	Of which Use of Proceeds	Of which transitional	Of which enabling				
1	Financial guarantees (FinGuar KPI)	15.5	1.9	-	0.1	0.2	1.2	0.0	-	0.0	16.7	1.9	-	0.1	0.2	
2	Assets under management	2.6	0.4	-	0.1	0.1	0.5	0.0	-	0.0	3.1	0.4	-	0.1	0.1	

5. KPI off-balance sheet exposures- Stock- Capex

		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae	
		31 December 2023														
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
% (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-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	Of which Use of Proceeds	Of which transitional	Of which enabling				
1	Financial guarantees (FinGuar KPI)	19.9	6.5	-	0.2	0.2	1.1	-	-	-	20.9	6.5	-	0.2	0.2	
2	Assets under management	5.3	2.1	-	0.1	0.2	0.4	-	-	-	5.7	2.1	-	0.1	0.2	

5. KPI off-balance sheet exposures- Flow- Turnover

		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae
		31 December 2023													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)			
% (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-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						
1	Financial guarantees (FinGuar KPI)	8.6	1.8	-	-	-	4.5	0.0	-	0.0	13.1	1.8	-	-	0.0

5. KPI off-balance sheet exposures- Flow- Capex

		a	b	c	d	e	f	g	h	i	aa	ab	ac	ad	ae
		31 December 2023													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)			
% (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-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						
1	Financial guarantees (FinGuar KPI)	15.1	11.9	-	-	-	1.4	-	-	-	16.5	11.9	-	-	-

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Template 1 Nuclear 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.	NO
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

Turnover KPI Tables

Row	Economic activities	Amount (in Million EUR) and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (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	-	-	-	-	-	-
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	-	-	-	-	-	-
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 denominator of the applicable KPI	9	-	9	-	-	-
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	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity EN 3 EN referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
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	-	-	-	-	-	-
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	1,475	2	1,465	2	10	-
8.	Total applicable KPI	1,484	3	1,474	2	10	-

Row	Economic activities	Amount (in Million EUR) and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (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	-	-	-	-	-	-
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	-	-	-	-	-	-
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 denominator of the applicable KPI	9	0.6	9	0.6	-	-
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	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity EN 3 EN referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	0.4
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	-	-	-	-	-	-
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	1,475	99.4	1,465	99.4	10	99.6
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	1,484	100.0	1,474	100.0	10	100.0

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Table 9 - Taxonomy-eligible but not taxonomy-aligned economic activities							
Row	Economic activities	Amount (in Million EUR) and Pproportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (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	-	-	-	-	-	-
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	-	-	-	-	-	-
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.	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	52	0	52	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	3	-	3	-	-	-
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 EN 6 EN Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
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	10,476	17	9,864	16	162	0
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	10,531	17	9,920	16	162	0

Table 10 - Taxonomy non-eligible economic activities

Row	Economic activities	Amount (in Million EUR)	%
	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	-	-
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	-	-
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	-	-
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	-	-
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 EN 7 EN the applicable KPI	-	-
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	-	-
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	48,435	80.1
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	48,435	80.1

CapexKPI Tables

Table 1 - Taxonomy-aligned economic activities (denominator)							
Row	Economic activities	Amount (in Million EUR) and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (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	-	-	-	-	-	-
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	2	-	2	-	-	-
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 denominator of the applicable KPI	14	-	14	-	-	-
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	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity EN 3 EN referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
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	-	-	-	-	-	-
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	2,072	3.4	2,065	3.4	7	-
8.	Total applicable KPI	2,088	3.5	2,081	3.4	7	-

Table 2 - Taxonomy-aligned economic activities (numerator)							
Row	Economic activities	Amount (in Million EUR) and proportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (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	-	-	-	-	-	-
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	2	0.1	2	0.1	-	-
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 denominator of the applicable KPI	14	0.7	14	0.7	-	-
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	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity EN 3 EN referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
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	-	-	-	-	-	-
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	2,072	99.2	2,065	99.2	7	100.0
8.	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	2,088	100.0	2,081	100.0	7	100.0

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Table 9 - Taxonomy-eligible but not taxonomy-aligned economic activities							
Row	Economic activities	Amount (in Million EUR) and Pproportion (the information is to be presented in monetary amounts and as percentages)					
		(CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (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	-	-	-	-	-	-
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	-	-	-	-	-	-
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.	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	57	0.1	57	0.1	-	-
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	2	-	2	-	-	-
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 EN 6 EN Regulation 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
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	11,744	19.4	10,969	19.0	327	0.5
8.	Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI	11,803	19.5	11,028	18.2	327	0.5

Table 10 - Taxonomy non-eligible economic activities

Row	Economic activities	Amount (in Million EUR)	%
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	-	-
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	-	-
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	-	-
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	-	-
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 EN 7 EN the applicable KPI	-	-
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	-	-
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	46,559	77.0
8.	Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI	46,559	77.0

APPENDIX 2

Definition of Alternative Performance Measures (APMs) in accordance with European Securities and Markets Authority (ESMA) guidelines, which are included in the Report of Directors/Financial Statements:

- a) **Loans to Deposits ratio:** Loans and advances to customers at amortised cost divided by due to customers at the end of the reported period,
- b) **Pre-Provision Income (PPI):** Profit from operations before impairments, provisions and restructuring costs as disclosed in the financial statements for the reported period,
- c) **Core income:** The total of net interest income, net banking fee and commission income and income from non banking services,
- d) **Core Pre-provision Income (Core PPI):** The core income minus the operating expenses of the reported period,
- e) **Net Interest Margin (NIM):** The net interest income of the reported period, annualised and divided by the average balance of continued operations' total assets (the arithmetic average of total assets, excluding those related to discontinued operations', at the end of the reported period, at the end of interim quarters and at the end of the previous period),
- f) **Fees and commissions:** The total of net banking fee and commission income and income from non banking services of the reported period,
- g) **Fees and commissions over assets ratio:** The Fees and commissions of the reported period divided by the average balance of continued operations' total assets (the arithmetic average of total assets, excluding those related to discontinued operations', at the end of the reported period, at the end of interim quarters and at the end of the previous period),
- h) **Income from trading and other activities:** The total of net trading income, gains less losses from investment securities and other income/ (expenses) of the reported period,
- i) **Cost to Income ratio:** Total operating expenses divided by total operating income,
- j) **Adjusted net profit:** Net profit/loss from continuing operations excluding restructuring costs, goodwill impairment/ gain on acquisition, gains/losses related to the transformation and NPE reduction plans, contributions to restoration initiatives following natural disasters and income tax adjustments,
- k) **Non-performing exposures (NPE):** Non Performing Exposures (in compliance with EBA Guidelines) are the Group's material exposures which are more than 90 days past-due or for which the debtor is assessed as unlikely to pay its credit obligations in full without realization of collateral, regardless of the existence of any past due amount or the number of days past due. The NPE, as reported herein, refer to the gross loans at amortised cost except for those that have been classified as held for sale,
- l) **NPE ratio:** NPE divided by gross loans and advances to customers at amortised cost at the end of the reported period,
- m) **NPE formation:** Net increase/decrease of NPE in the reported period excluding the impact of write offs, sales and other movements,
- n) **NPE Coverage ratio:** Impairment allowance for loans and advances to customers and impairment allowance for credit related commitments (off balance sheet items), divided by NPE at the end of the reported period,
- o) **Provisions (charge) to average net loans ratio (Cost of Risk):** Impairment losses relating to loans and advances charged in the reported period, annualised and divided by the average balance of loans and advances to customers at amortised cost (the arithmetic average of loans and advances to customers at amortised cost, including those that have been classified as held for sale, at the end of the reported period, at the end of interim quarters and at the end of the previous period),
- p) **Return on tangible book value (RoTBV):** Adjusted net profit divided by average tangible book value. Tangible book value is the total equity excluding preference shares, preferred securities and non controlling interests minus intangible assets,

Definition of capital and other selected ratios in accordance with the regulatory framework, which are included in the Report of Directors/Financial Statements:

- a) **Total Capital Adequacy ratio:** Total regulatory capital as defined by Regulation (EU) No 575/2013 as in force, based on the transitional rules for the reported period, divided by total Risk Weighted Assets (RWA). The RWA are the Group's assets and off-balance-sheet exposures, weighted according to risk factors based on Regulation (EU) No 575/2013, taking into account credit, market and operational risk,
- b) **Common Equity Tier 1 (CET1):** Common Equity Tier I regulatory capital as defined by Regulation (EU) No 575/2013 as in force, based on the transitional rules for the reported period, divided by total RWA,
- c) **Fully loaded Common Equity Tier I (CET1):** Common Equity Tier I regulatory capital as defined by Regulation No 575/2013 as in force, without the application of the relevant transitional rules, divided by total RWA,
- d) **Liquidity Coverage Ratio (LCR):** The total amount of high quality liquid assets divided by the net liquidity outflows for a 30-day stress period.
- e) **Minimum Requirements for Eligible Own Funds and Eligible Liabilities (MREL) ratio:** The sum of i) total regulatory capital (at Eurobank S.A. consolidated level) as defined by Regulation (EU) No 575/2013 as in

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force, based on the transitional rules for the reported period ii) part of any Tier 2 instruments to the extent that it does not qualify as Tier 2 capital (amortized part counts towards MREL), and iii) liabilities issued by Eurobank S.A. that meet the MREL-eligibility criteria set out in Regulation (EU) No 575/2013 as in force, divided by RWA.

The following table presents the components of the calculation of the above APMs, which are derived from the Company's consolidated financial statements for the year ended 31 December 2023 and for the year ended 31 December 2022:

Components of Alternative Performance Measures		
€ million	FY 2023	FY22 (Restated) ⁽⁸⁾
Net Interest Income ⁽¹⁾	2,174	1,480
Fees and commissions	544	522
Total Operating income ⁽²⁾	2,914	3,041
Total Operating income, excluding the gain on investment in Hellenic Bank in 2023 and on project "Triangle" in 2022 ⁽²⁾	2,803	2,716
Total Operating expenses, excluding the contribution to restoration initiatives after natural disasters ⁽³⁾	(902)	(857)
Pre-provision income (PPI)	1,999	2,184
Pre-provision income (PPI), excluding the gain on investment in Hellenic Bank and the contribution to restoration initiatives after natural disasters in 2023 and on project "Triangle" in 2022	1,902	1,859
Core Pre-provision income (Core PPI), excluding the contribution to restoration initiatives after natural disasters in 2023	1,816	1,145
Net profit/(loss) from continued operations	1,281	1,345
Gain on project "Triangle" (before tax)	-	325
Gain on project "Triangle" (after tax)	-	231
Restructuring costs, after tax	(29)	(63)
Gain on investment in Hellenic Bank (associate)	111	-
Contribution to restoration initiatives after natural disasters, before tax	(14)	-
Contribution to restoration initiatives after natural disasters, after tax	(10)	-
Loss on projects "Solar" and "Leon", after tax	(48)	-
Loss on projects "Solar" and "Leon", before tax	(67)	-
Adjusted net profit	1,256	1,178
Impairment losses relating to loans and advances	(412)	(276)
Impairment losses for loans, excluding the loss on projects "Solar" and "Leon"	(345)	(276)
NPE formation ⁽⁴⁾	138	40
Non performing exposures (NPE)	1,512	2,156
Due to customers	57,442	55,609
Gross Loans and advances to customers at amortized cost	42,773	41,811
Impairment allowance for loans and advances to customers	(1,258)	(1,572)
Impairment allowance for credit related commitments	(48)	(57)
Due to customers (Greek operations)	39,955	39,575
Gross Loans and advances to customers at amortized cost (Greek operations)	32,308	32,812
Impairment allowance for loans and advances to customers (Greek operations)	(1,003)	(1,332)
Average balance of continued operations' total assets ⁽⁵⁾	79,106	77,672
Average balance of loans and advances to customers at amortized cost ⁽⁶⁾	40,645	38,834
Average balance of tangible book value ⁽⁷⁾	6,957	5,793

⁽¹⁾ 4Q2023 NIM: Net interest income of the fourth quarter 2023 (€573m), annualised, divided by the average balance of continued operations' total assets (€78,902m). The average balance of continued operations' total assets, has been calculated as the arithmetic average of their balances at the end of the reporting period (31 December 2023: €79,781m) and at the end of interim quarter (30 September 2023: €78,023m).

⁽²⁾ International Operations: Operating income: €778m (2022, adjusted: €497m). Greek operations: Operating income: €2,025m, excluding the gain on investment in Hellenic Bank of €111m (2022: €2,219m, excluding the gain on project "Triangle" of €325m).

⁽³⁾ International Operations: Operating expenses: €258m (2022, adjusted: €212m). Greek operations: Operating expenses: €644m, excluding contribution to restoration initiatives after natural disasters of €14m (2022: €645m).

⁽⁴⁾ NPEs formation has been calculated as the decrease of NPE in 2023 (€745m), after deducting the impact of write-offs €405m, classifications as held for sale / sales €493m and other movements (€15m).

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⁽⁵⁾The average balance of continued operations' total assets, has been calculated as the arithmetic average of the their balances at the end of the reporting period (31 December 2023: €79,781m), at the end of interim quarters (30 September 2023: €78,023m, 30 June 2023: €79,137m and 31 March 2023: €79,538m), and at the end of the previous period (31 December 2022: €79,052m). The respective figures for 31 December 2022: €79,052m, 30 September 2022: €81,065m 30 June 2022: €77,847m 31 March 2022: €74,873 and 31 December 2021: €75,521m.

⁽⁶⁾The average balance of loans and advances to customers measured at amortized cost, excluding Eurobank Direktna operations, has been calculated as the arithmetic average of their balances at the end of the reporting period (31 December 2023: €41,515m), at the end of interim quarters (30 September 2023: €40,734m, 30 June 2023: €40,604m and 31 March 2023: €40,137m), and at the end of the previous period (31 December 2022 €40,237m). The respective figures for 31 December 2022: €40,237m, 30 September 2022: €39,754m 30 June 2022: €38,970m 31 March 2022: €37,761 and 31 December 2021: €37,445m.

⁽⁷⁾ The average balance of tangible book value, has been calculated as the arithmetic average of the total equity minus the intangible assets and non controlling interests at the end of the reporting period (31 December 2023: €7,565m), at the end of interim quarters (30 September 2023: €7,221m, 30 June 2023: €7,039m and 31 March 2023: €6,618m) and at the end of the previous period (31 December 2022: €6,340m). The respective figures for 31 December 2022: €6,340m, 30 September 2022: €6,038m 30 June 2022: €5,934m 31 March 2022: €5,380 and 31 December 2021: €5,270m.

⁽⁸⁾ The comparative information has been adjusted due to a) the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. and b) the presentation of operations of Eurobank Direktna a.d. disposal group as discontinued.

Source of financial Information

The Directors' Report includes financial data and measures as derived from the Company's consolidated financial statements for the year ended 31 December 2023 and for the year ended 31 December 2022, which have been prepared in accordance with International Financial Reporting Standards (IFRS). In addition, it includes information as derived from internal information systems, consistent with the Group's accounting policies, such as the selected financial information for the Group's two main reportable segments a) Greek Operations, which incorporate the business activities originated from the Company, the Bank and the Greek subsidiaries and b) International Operations, which incorporate the business activities originated from the banks and the other local subsidiaries operating in Bulgaria, Cyprus and Luxembourg (as described at the relevant section on page 4).

CORPORATE GOVERNANCE STATEMENT 2023

1. Adoption of the Hellenic Corporate Governance Code

In compliance with art. 17 of L.4706/2020 for the listed companies (effective from 18.7.2021 onwards), which stipulates that listed companies should adopt and implement a corporate governance code, prepared by a recognized and reputable body, Eurobank Ergasias Services and Holdings S.A. (Company, Eurobank Holdings, Holdings or HoldCo) has adopted and implements the Hellenic Corporate Governance Code (the Code).

The Code is available on Eurobank Holdings' website (<https://www.eurobankholdings.gr/en/corporate-governance/corporate-governance-principles/>).

Given that the Eurobank Holdings Group (the Group) consists mainly of Eurobank S.A. (Eurobank or Bank) and its subsidiaries (the Eurobank or Bank Group), the present Corporate Governance Statement outlines how the principles stipulated by the Code were applied to both Eurobank Holdings and Eurobank during 2023.

2. Board of Directors⁵

2.1 General

The HoldCo/Bank are managed by their respective Boards of Directors (Board or BoD), which are collectively responsible for their long-term success. The Boards exercise their responsibilities in accordance with the Greek legislation and international best practices, as well as with their Articles of Association and the shareholders' General Meetings' legitimate decisions.

The role of the Board is to offer entrepreneurial leadership to the Group within a framework of prudent and effective controls, facilitating the assessment and management of risks. The Board establishes the Group's strategic objectives, ensures the availability of essential financial and human resources for the Group to fulfil its purpose, and evaluates management performance. It also defines the Group's values and standards, ensuring that its responsibilities to shareholders and other stakeholders are acknowledged and fulfilled. All members of the Board are required to act in the best interests of the Group, aligning with their legal duties.

2.2 Composition of the Board

The members of the Board are elected by the HoldCo's and Eurobank's General Meetings, which determine the exact number of the directors and their term of office, within the limits of the law and of the HoldCo's and Eurobank's Articles of Association and also designates the independent non-executive directors.

During 2023:

- further to the discussions and the decisions reached at HoldCo/Bank NomCo meetings dated 22.06.2023, 23.06.2023 and 27.06.2023 and the resolutions of the HoldCo/Bank Annual General Meeting (AGM) of shareholders 2023, the number of the HoldCo/Bank BoD members increased to fifteen members with the election of Messrs Burkhard Eckes and John Hollows who were appointed as independent Non-Executive Directors. The term of office of the aforementioned new members expires concurrently with the term of office of the other members of the HoldCo/Bank Board and more specifically on 23.07.2024, prolonged until the end of the period the Annual General Meeting for the year 2024 will take place.
- following the Hellenic Financial Stability Fund's (HFSF) divestment from HoldCo, and taking into consideration that the HoldCo and Bank are no longer subject to law 3864/2010 and to the special rights of the HFSF provided for in such law, including HFSF's right to appoint its representative in the HoldCo and Bank Boards and Board Committees, the HFSF representative Mrs. Efthymia Deli, submitted her resignation from the abovementioned positions on 26 October 2023, effective as of 7 November 2023.
- On 31 October 2023, Mr. Andreas Athanasopoulos, Deputy CEO and Executive Member of the HoldCo/Bank BoD submitted his resignation from the above positions with effect from December 31, 2023.

⁵ Information regarding the Board's composition is also included in relevant note of the consolidated accounts of HoldCo and Eurobank respectively.

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Following the above, the current Boards, as of the date of approval of the here-in Statement, consist of thirteen (13) Directors of whom, three (3) executives, three (3) non-executives and seven (7) independent non-executives:

		<u>Eurobank Holdings</u>		<u>Eurobank</u>	
		<u>First appointment</u>	<u>End of Term</u>	<u>First appointment</u>	<u>End of Term</u>
Georgios P. Zanias	Chairperson, Non-Executive Director	Mar. 2019	2024	Mar. 2020	2024
Georgios K. Chryssikos	Vice-Chairperson, Non-Executive Director	Jun. 2014	2024	Mar. 2020	2024
Fokion C. Karavias	Chief Executive Officer	Jun. 2014	2024	Mar. 2020	2024
Stavros E. Ioannou	Deputy Chief Executive Officer	Apr. 2015	2024	Mar. 2020	2024
Konstantinos V. Vassiliou	Deputy Chief Executive Officer	July 2018	2024	Mar. 2020	2024
Bradley Paul L. Martin	Non-Executive Director	Jun. 2014	2024	Mar. 2020	2024
Rajeev K. L. Kakar	Non-Executive Independent Director	July 2018	2024	Mar. 2020	2024
Jawaid A. Mirza	Non-Executive Independent Director	Jun. 2016	2024	Mar. 2020	2024
Alice K. Gregoriadi	Non-Executive Independent Director	Apr. 2020	2024	Apr. 2020	2024
Irene Rouvitha Panou	Non-Executive Independent Director	Apr. 2020	2024	Apr. 2020	2024
Cinzia V. Basile	Non-Executive Independent Director	Dec. 2020	2024	Dec. 2020	2024
Burkhard Eckes	Non-Executive Independent Director	Jul. 2023	2024	Jul. 2023	2024
John Arthur Hollows	Non-Executive Independent Director	Jul. 2023	2024	Jul. 2023	2024

The short CVs of the HoldCo and Eurobank Boards members as summarized below are evidence that the Boards' composition reflects the knowledge, skills and experience required for the execution of their duties, in accordance with the Board Nomination Policy and the HoldCo's/Bank's business model and strategy.

It is also noted that the directorships of the HoldCo and Eurobank Boards members as at 31.12.2023, are outlined in Section 2.7, "Directorships of Board members".

<p><i>Georgios Zanias</i> Chairperson, Non-Executive Director</p> <p>Year of birth: 1955</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>George P. Zanias joined Eurobank as the Chairman of the Board of Directors in 2019. He is also a Professor Emeritus of Economics at the Athens University of Economics and Business and a Member of the Board of IOBE.</p> <p>In the past, Mr Zanias has served as the Minister of Finance (2012), Chairman of the Board of Directors of the National Bank of Greece (2012-2015), Chairman of the Board of the Hellenic Banking Association (2012-2015), Member of the Board of the European Banking Federation (2012-2015), Member of the Board of the American-Greek Chamber of Commerce (2019-2022), Chairman of the Council of Economic Advisors at the Ministry of Finance (2009-2012), General Secretary of the Ministry of Economy and Finance (2001-2004), Chairman and Scientific Director of the National Economic Institute (KEPE) (1998-2001).</p> <p>He has also served as a Director on the Boards of Hellenic Exchanges (2000-2001), Public Debt Management Office (PDMA) (2009-2012), General Bank (1997-1998), CHIPITA SA (2015-2019), the European Financial Stability Mechanism (EFSF/ESM) (2010-2012). Also: Member of the Board of Governors of the Black Sea Trade and Development Bank (2003-2004), Alternate Governor of the Board of Governors of EBRD (2002-2004), Member of the European Securities Committee (2001-2002), Member of the Monetary Policy Committee of the Bank of Greece (May-July 2012), Chairman of the Board of Directors of Piraeus Real Estate SA and Picar SA (2017-2019), Vice Chairman of the Board of ETVA Industrial Zone SA (2018-2019).</p> <p>He holds a Doctorate from Oxford University, an M.Sc. for the University of Reading and a B.Sc. from the Athens University of Economics and Business.</p>
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<p><i>George Chryssikos</i> Vice Chairman, Non-Executive Director of the BoD</p> <p>Membership in Board Committees: <u>Remuneration Committee</u> – Member</p> <p>Year of birth: 1972</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 800.000</p>	<p>Mr. Chryssikos is the Founder and BoD Member of Grivalia Management Company SA and also serves as Chairman & CEO of Grivalia Hospitality.</p> <p>In the past, Mr. Chryssikos had also the following significant posts: Non-Executive Director of the BoD, MYTILINEOS (2017-2019), Member of the BoD, Praktiker Hellas (2014-2019), Member of the BoD and General Secretary, British Hellenic Chamber of Commerce (2014-2017), CEO, Executive Director of the BoD and Chairman of the Investment Committee, Grivalia Properties REIC (2013-2019), Non-Executive Director of the BoD, Lamda Hellix (2013-2017), General Manager, Executive Director of the BoD and Chairman of the Investment Committee, Grivalia Properties REIC (2008), Investment Manager and Member of the Investment Committee, Grivalia Properties REIC (2006).</p> <p>He holds an MBA in Corporate Finance & Strategy from the Columbia Business School, USA, an MSc in Engineering & Construction Management from UC Berkeley, USA, as well as a MEng in Civil Engineering from the National Technical University of Athens.</p>
<p><i>Fokion Karavias</i> Chief Executive Officer (CEO)</p> <p>Year of birth: 1964</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 269.495</p>	<p>Mr. Karavias joined Eurobank in 1997 and served, inter alia, as Senior General Manager, Group Corporate & Investment Banking, Capital Markets & Wealth Management (2014-2015) and Executive Committee Member (2014-2015), General Manager and Executive Committee Member (2005-2013), Deputy General Manager and Treasurer (2002-2005), Head of fixed income and derivative product trading (1997).</p> <p>In the past, Mr. Karavias had also the following significant posts: Treasurer of Telesis Investment Bank (2000), Head of fixed income products and derivatives in Greece of Citibank, Athens (1994) and has also worked in the Market Risk Management Division of JPMorgan NY (1991).</p> <p>He holds a PhD in Chemical Engineering from the University of Pennsylvania, Philadelphia, USA and an MA in Chemical Engineering from the same university, as well as a Diploma in Chemical Engineering from the National Technical University of Athens. He has published articles on topics related to his academic research.</p>
<p><i>Stavros Ioannou</i> Deputy Chief Executive Officer (CEO), Group Chief Operating Officer (COO) & International Activities</p> <p>Membership in Board Committees: Board Digital and Transformation Committee - Member</p> <p>Year of birth: 1961</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 133.154</p>	<p>Mr. Ioannou holds several other posts in the Eurobank Group as member of the BoD of Eurobank Bulgaria AD (since October 2015), Vice-Chairman in Eurobank Cyprus Ltd (since November 2022) and is also the Chairman of the BoD, BE-Business Exchanges SA (since January 2014). Group Private Banking is also in the area of his responsibilities since 2019 while he has been appointed as the responsible BoD member of Eurobank Holdings and Eurobank for climate-related and environmental risks and for the outsourcing function.</p> <p>He is currently Non-Executive Board member of Grivalia Management Company S.A. (since September 2019).</p> <p>In the past, Mr. Ioannou had also the following significant posts: Chairman of the Executive Committee in the Hellenic Banking Association (2020-2022) where he had been member since 2013, Vice Chairman at Cardlink SA (2013-2015), Member of the BoD in Millennium Bank, responsible for Retail, Private Banking and Business Banking (2003), Head at Barclays Bank PLC, responsible for Retail Banking, Private Banking and Operations (1990-1997).</p> <p>He holds an MA in Banking and Finance from the University of Wales, UK and a Bachelor Degree in Business Administration from the University of Piraeus.</p>
<p><i>Kostas Vassiliou</i> Deputy Chief Executive Officer (CEO), Head of Corporate & Investment Banking</p> <p>Year of birth: 1972</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 131.626</p>	<p>Mr. Vassiliou holds several other posts in the Eurobank Group as Chairman of the BoD of Eurobank Factors Single Member SA (since December 2018), Member of the BoD of Eurobank Equities Single Member SA (since March 2015). He also serves as Vice-Chairman of the BoD of Eurolife FFH Insurance Group Holdings SA (since January 2021), Eurolife FFH Life Insurance SA (since December 2020) and Eurolife FFH General Insurance SA (since December 2020).</p> <p>In the past, Mr. Vassiliou had also the following significant posts: Country Manager for Greece, Cyprus and the Balkans, Mitsubishi UFJ Financial Group, London (2000-2005) and Senior Relationship Manager, Mitsubishi UFJ Financial Group, London (1998-2000).</p>

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	He holds an MBA from Boston University, USA and a BA in Business Administration from the Athens University of Economics and Business.
<p><i>Alice Gregoriadi</i> Independent Non-Executive Director</p> <p>Membership in Board Committees: Board Risk Committee – Member Remuneration Committee – Member Board Digital and Transformation Committee – Chairwoman</p> <p>Year of birth: 1968</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mrs. Gregoriadi also serves as an Affiliate Partner – Management Consultant at True North Partners LLP, London, UK. In the past, Mrs. Gregoriadi had also the following significant posts: Hellenic Corporation of Assets & Participations (HCAP), Greece, Non-Executive Board member, Audit Committee member, Corporate Governance and Nominations Committee member (February 2017 – February 2021), JPMorgan, London, UK, various posts as Managing Director (February 2010 – May 2015), IBOS Board Director (April 2010 – August 2014), ABN Amro Bank, Amsterdam, Netherlands & London, UK, various posts as Managing / Executive Director (November 2001 – December 2009), Citibank NA, London, UK, various Senior Executive Director posts (February 1994 – August 2001), Clearing House Automated Payments System (CHAPS), UK, Board Director (June 1997 – July 2000).</p> <p>She holds an MBA from the Manchester Business School, UK (1991-1993), including an MBA international exchange program from the E.J.Cox School of Management, Texas, USA – (1992), an Executive Certification on Blockchain for business from University College London (2019), an Executive Certification on eCommerce from the Darden School of Business, Virginia University, USA (2000) and a BSc in Business Administration from the The American College, Athens, (1987-1990).</p>
<p><i>Rajeev Kakar</i> Independent Non-Executive Director</p> <p>Membership in Board Committees: Audit Committee – Member Board Risk Committee – Chairman Nomination & Corporate Governance Committee – Member Board Digital and Transformation Committee – Vice Chairman</p> <p>Year of birth: 1963</p> <p>Nationality: Indian</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mr. Kakar is a senior international banker with 35 years of financial services experience, and currently also serves as a board member of several Financial Institutions- including Commercial International Bank (Egypt), Gulf International Bank Group Board (Bahrain), Gulf International Bank (Saudi Arabia), UTI Asset Management Company Ltd. (India), and is also a Global Advisory Board member at the University of Chicago's Booth School of Business. In the past Mr. Kakar has also served as board member on several international financial institutions/bank boards - eg., as Board Member of Visa International CEEMEA (United Kingdom 2004-2006), Chairman of the BoD, Fullerton Securities & Wealth Advisors (New Delhi, India 2008-2017), board Member of Fullerton India Credit Company (India 2009-2017), Member of the Board of Commissioners, Adira Dinamika Multi Finance Tbk, subsidiary of Bank Danamon (Indonesia 2010-2013), etc.</p> <p>Between 2006-2018, Mr. Kakar served as the Global Co-Founder of Fullerton Financial Holdings (Singapore) - a wholly owned subsidiary of Temasek Holdings, Singapore. In this role, he also concurrently served as Fullerton's Global CEO of Consumer Banking, Regional CEO for Central Europe, Middle East and Africa, and also as the Founder, Managing Director and CEO of Dunia Finance (Fullerton's UAE subsidiary). Prior to 2016, he was at Citibank for 20 years working across various countries and held various senior management positions, including, his most recent Citibank assignment where he served as the Regional CEO & Division Executive for Citibank-Turkey, Middle East and Africa until Jan 2006.</p> <p>Mr. Kakar holds an MBA, Finance & Marketing from the Indian Institute of Management, Ahmedabad (India) and a Bachelor of Technology, Mechanical Engineering from the Indian Institute of Technology (India).</p>
<p><i>Bradley Paul Martin</i> Non-Executive Director</p> <p>Membership in Board Committees: Board Risk Committee – Member Nomination & Corporate Governance Committee – Vice Chairman</p> <p>Year of birth: 1959</p> <p>Nationality: Canadian</p> <p>Number of shares in Eurobank Holdings: 122.500</p>	<p>Mr. Martin also serves as a Vice Chairman in Strategic Investments of the Fairfax Financial Holdings, where he has been a senior executive since 1998.</p> <p>In the past Mr. Martin has also served as: Member of the BoD, Bank of Ireland (2013-2017), Chief Operating Officer (COO), Fairfax Financial Holdings (2006-2012) and Partner, Torys LLP law firm (before 1998).</p> <p>He holds a BA from Harvard University, USA and an LLB from the University of Toronto, Canada.</p>

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<p><i>Jawaid Mirza</i> Independent Non-Executive Director</p> <p>Membership in Board Committees: Audit Committee – Chairman Nomination & Corporate Governance Committee – Member Board Digital and Transformation Committee – Member Remuneration Committee – Vice Chairman</p> <p>Year of birth: 1958</p> <p>Nationality: Canadian</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mr. Mirza is a strong proponent and practitioner of international corporate governance and brings with him over 35 years of diversified experience and a solid track record in all facets of financial and risk management, technology, mergers and acquisitions, business turnarounds and operation management.</p> <p>In the past, Mr. Mirza was also the lead Director with Commercial International Bank of Egypt, as well as Independent Non-Executive Director with South Africa Bank of Athens (Johannesburg). He also served Commercial Bank of Egypt (CIB) as Managing Director & CEO of Consumer Banking and Group COO. Over the years, Mr. Mirza has worked with global institutions like Citibank and ABN AMRO Bank Ltd where he held several senior positions as CFO European Region, Managing Director and Chief Operating Officer for Global Private Banking, Asset Management and New Growth Markets, Chief Financial Officer for Asian region including Australia/New Zealand and Middle East. Mr. Mirza led several due diligences for acquiring banks in Europe, Asia, and Latin America. Mr. Mirza was also a member of the Top Executive Group (TEG) of ABN AMRO Bank as well as member of the Group Finance and Group COO Board.</p> <p>Mr. Mirza also serves as Non-Executive Independent Director of AGT Food & Ingredients (Canada), IDRF (Canada).</p> <p>Mr. Mirza holds various business management courses from reputable institutions like Queens Business school, Wharton Business school, Stanford Graduate School of Business and is also a member of the Institute of Corporate Directors, Canada.</p>
<p><i>Irene Rouvitha Panou</i> Independent Non-Executive Director</p> <p>Membership in Board Committees: Nomination & Corporate Governance Committee – Chairwoman Audit Committee – Vice Chairwoman</p> <p>Year of birth: 1958</p> <p>Nationality: Cypriot</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mrs. Rouvitha Panou is Independent Non-Executive Director of CAC Cyprus Asset Management Company KEDIPES where she is Member of the Board Audit and Risk Committees, Member of the Board of Trustees of UK-based Stelios Philanthropic Foundation, Member of the Advisory Council of School of Economics & Management University of Cyprus, Member of the British High Commission Judging Panel for UK Study Awards, Member of the International Advisory Committee of Komvos Global Hellenism Network.</p> <p>In the past, she had the following significant posts: Chair of the Board of Cyta (Cyprus' leading integrated electronic communications provider) for two consecutive tenures (July 2016-July 2021), Chair of the Pensions & Grants Fund of the Personnel of Cyta (January 2019-July 2021), Board member of The Cyprus Employers and Industrialists Federation (May 2020-July 2021) and of Cyprus public company Vassiliko Cement, where she was Member of the Board Audit Committee (February 2012-October 2014). She was Independent Non-Executive Director of Alpha Bank Group subsidiaries (Alpha Bank Romania, Alpha Bank Cyprus, Alpha Leasing in Greece), where she was Chair/Member of the Board Audit, Risk and Remuneration Committees (November 2014-April 2020). She was Chair of the Board of Cyprus Development Bank following the Bank's privatisation (September 2008-April 2014). She worked at Laiki Group (HSBC associate bank) (October 1991-November 2006) where she was, among others, Group General Manager (January 2000-November 2006) and Managing Director of Laiki Bank Hellas SA (April 2002-November 2006), also serving as Director on the Boards of Laiki Group and its banking subsidiaries in Greece and Australia. She held senior positions in the field of management and financial services consulting based in Boston, USA (June 1994-September 1991).</p> <p>She graduated from London School of Economics, UK (B.Sc. Economics, Metcalfe Scholar) with postgraduate studies at University of Cambridge, UK (M.Phil. Economics) and Massachusetts Institute of Technology, USA (Master of Science in Management, Fulbright Scholar).</p>
<p><i>Cinzia Basile</i> Independent Non-Executive Director</p> <p>Membership in Board Committees: Board Risk Committee – Vice Chairwoman Remuneration Committee – Chairwoman</p> <p>Year of birth: 1971</p> <p>Nationality: Italian</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>In the past, Mrs. Basile had also the following significant posts: she set up and ran Credit Suisse AG's Investment Bank multi-asset investment management business (Custom Markets) in the UK, Ireland and Luxembourg, Non-Executive Member of the BoD and Chair of the Operating and Risk Committee of Credit Suisse Custom Markets, a sponsored management company of Credit Suisse located Luxembourg (August 2011 – August 2017), Non-Executive Member of the BoD and Chair of the Operating of Custom Markets plc and Custom Markets QIAF, sponsored management companies of Credit Suisse located in Ireland (August 2011 – August 2017), Non-Executive Member of the BoD and Chair of the Operating and Risk Committee of Custom Markets QIAF a subsidiary of Credit Suisse located in Ireland (August 2011 – August 2017).</p>

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	<p>She holds a Juris Doctor Degree from the University of Rome "La Sapienza", Italy and she was awarded a Thesis Scholarship (derivative instruments), London School of Economics, UK.</p>
<p><i>John Arthur Hollows</i> Independent, Non-Executive Director</p> <p>Membership in Board Committees: Board Risk Committee – Member Board Digital and Transformation Committee – Member</p> <p>Year of birth: 1956</p> <p>Nationality: British</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mr. Hollows served for 26 years in the KBC Group as Member of the Boards of Directors, KBC Bank and KBC Insurance (2009-2022), Member of the Executive Committee, KBC Group (2009-2022), Chair of the Board of Directors of Československá obchodní banka, a. s. (ČSOB) and CEO (2014-2022), Member of the Board of Directors of KBC Group N.V., Group Chief Risk Officer (2010-2014), CEO, Central and Eastern Europe and Russia (2009-2010), Senior General Manager, Banking, Central Europe Business Unit, KBC Group, Brussels (2006-2009), CEO, Kereskedelmi es Hitelbank Rt., Hungary (2003-2006), General Manager, Asia Pacific, KBC Bank N.V. (1999-2003), General Manager, Shanghai Branch, KBC Bank N.V. (1997-1999) and Commercial Banking Head, Hong Kong Branch, Kredietbank N.V (1996).</p> <p>In the past. Mr. Hollows served at Barclays Bank PLC as Chief Manager, Taipei Branch (1991-1995), Head of International Trade Services, London (1989-1991), Manager, Export Finance Department, London (1986-1989), Corporate Manager, Watford Branch (1984-1986), Assistant Manager, Cost Control Unit, General Manager's Office (1982-1984) and Graduate Trainee (1978-1982). He has also served as Chair, European Council of Commerce and Trade (1994-1995) and Deputy Chair, British Exporters Association (1989-1991).</p> <p>He holds a Master of Arts, Sidney Sussex College, Cambridge (law and economics).</p>
<p><i>Burkhard Eckes</i> Independent, Non-Executive Director</p> <p>Membership in Board Committees: Audit Committee – Vice Chairman Nomination and Corporate Governance Committee – Member</p> <p>Year of birth: 1960</p> <p>Nationality: German</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mr. Eckes served for more than 30 years at PwC as Senior Advisor, PwC Germany and EMEA (Europe, Middle East and Africa) (2022 - 2023), Global Banking and Capital Markets (BCM), ESG Leader and member of the Global Financial Services (FS) ESG Leadership Team (2019 - 2022), responsible for BCM activities in ESG consulting globally EMEA BCM, Leader and member of the EMEA FS Leadership Team (2017 - 2022), responsible for BCM client relationships, projects and strategy in consulting and assurance services, including development and implementation of banking strategies, business models, supervisory and regulatory requirements and practices, governance, risk management, accounting and reporting best practices, ESG, bank restructuring and bank transformation advice, Member of the Global BCM Leadership Team (2009 - 2022), German BCM Leader and member of the German FS Leadership Team (2009 - 2018), responsible for consulting and assurance services, including HR, people development and statutory audits of large German banks, Chair of the Global Banking International Accounting Group (2002 - 2023) and Partner (1996 - 2022).</p> <p>In the past. Mr. Eckes has served as Chair of the Banks Working Party of Accountancy Europe (former FEE - Fédération des Experts Comptables Européens) (2015 - 2022), Chair of the Banking Committee (Bankenfachausschuss – BFA) of the German Institute of Public Auditors (Institut der Wirtschaftsprüfer - IDW) (2017 - 2022) and member of the BFA (2008 - 2022), Member of the European Parliamentary Financial Services Forum - EPFSF (2012 - 2023) and Member of the Steering Committee Sustainability of IDW (2020 - 2022).</p> <p>He holds an MBA from the University of Saarland, Saarbrücken (1986) and is a Certified Public Auditor (German Wirtschaftsprüfer) (1996).</p>

The short CV of the Secretary to the BoD is the following:

<p><i>Ioannis Chadolias</i> Secretary to the BoD, Head of Group Company Secretariat</p> <p>Secretary to the following Board Committees: Remuneration Committee Nomination & Corporate Governance Committee Board Digital and Transformation Committee</p> <p>Year of birth: 1970</p> <p>Nationality: Hellenic</p> <p>Number of shares: 10.000</p>	<p>Mr. Chadolias is responsible to provide effective company secretarial support to the Board and Board Committees of Eurobank and Eurobank Holdings as well as to their most important Executive Committees, and to safeguard the integrity of the corporate governance framework of these companies.</p> <p>Mr. Chadolias has served within Eurobank Group as Deputy Company Secretary (September 2016 – January 2021), Head of Group Corporate Governance Division (September 2009 – August 2016) and Subsidiaries Control and Compliance Manager (December 2006 – September 2009).</p> <p>He holds a Master of Science (MSc) in Project Analysis, Finance and Investment from the University of York (United Kingdom), a Bachelor Degree in Economics from the Economic University of Athens (Greece) and several professional qualifications.</p>
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There are no limitations regarding the re-election and cessation of Directors in the Articles of Association of the HoldCo/Bank. In cases where a member's membership has expired, the Board has the authority to continue managing and representing the HoldCo/Bank without replacing the expired members, as long as the remaining members constitute more than half of the original number of members prior to the lapse event, and in any case, not fewer than three (3).

As per the Articles of Association of HoldCo/Bank, in compliance with Law 4548/2018, the Board can consist of three (3) to fifteen (15) members. Additionally, in accordance with Law 4706/2020 on corporate governance, independent non-executive Directors are appointed by the General Meeting and must constitute at least one-third (1/3) of the total number of Board members (rounded to the nearest integer), and in any case, not fewer than two (2).

For the year 2023, the HoldCo/Bank Nominations and Corporate Governance Committees, at their meetings held on 30.05.2023 and 12.12.2023, reviewed the independence criteria as per Law 4706/2020, European Commission Recommendation 2005/162/EC and the Joint ESMA and EBA Guidelines on the "Assessment of the suitability of members of the management body and key function holders" (EBA/GL/2021/06). The Committees concluded that the seven Independent Non-Executive Members still meet the relevant independence criteria.

2.3 HFSF and Tripartite Relationship Framework Agreement (TRFA)

After the complete divestment on 9.10.2023 of the shares held by the Hellenic Financial Stability Fund (HFSF) in HoldCo, the HoldCo and the Bank are no longer bound by Law 3864/2010 or the special rights granted to HFSF under that law, nor are they subject to the provisions outlined in the Tripartite Relationship Framework Agreement ("TRFA").

2.4 Division of responsibilities

There is a distinct allocation of responsibilities at the top level of the HoldCo and the Bank, separating the governance functions overseen by the Chairperson from the operational and managerial aspects handled by the Chief Executive Officer (CEO) and Deputy CEOs. Notably, the roles of Chairperson and CEO are held by different individuals.

Chairperson

The Chairperson of the HoldCo/Bank Boards is a Non-Executive Director and does not concurrently serve as Chairperson of either the Risk or Audit Committees. Elected by all Board members, including the Independent Non-Executives, in accordance with L. 4548/2018 and the Articles of Association, the Chairperson presides over Board meetings and ensures their effective and efficient operation and organization.

The Chairperson is responsible to:

- organize and coordinate the work of the Board,
- set the Board's agenda and ensure that adequate time is available for discussion of all agenda items, in particular strategic issues,
- promote a culture of open-mindedness and constructive dialogue,
- facilitate and promote the establishment of good and constructive relationships between the members of the Board and the effective contribution of all non-executive members,
- ensure that the Directors receive accurate, timely and clear information and that their developmental needs are met, with the view of enhancing the effectiveness of the Board as a team,
- ensure continuous and clear communication with the representatives of the Ministry of Finance, the BoG and of other public authorities,
- ensure that the Board as a whole has a satisfactory understanding of the views of the shareholders,
- ensure effective communication with all shareholders as well as the fair and equitable treatment of their interests and the development of constructive dialogue with them in order to understand their positions,
- work closely with the CEO and Corporate Secretary to prepare the BoD and to fully inform its members.

The Board has also elected a Vice-Chairperson. The Vice-Chairperson who is a Non-executive Director, supports the Chair and acts as a liaison between the Chair and the members of the Board.

It is noted that the Board has not appointed a Senior Independent Director.

CEO

The CEO of HoldCo/Bank is responsible and accountable for strategy development and its execution in alignment with the Group's vision. His role involves leading the organization towards the realization of its goals and objectives.

Executive Directors

The Executive Directors of HoldCo/Bank, including the CEO and Deputy CEOs, bear responsibility for the day-to-day management and oversight of the Group, as well as the execution of its strategy as defined by the Board. Additionally, they are tasked with the following responsibilities:

- regularly consulting with non-Executive Directors to assess the appropriateness of the implemented strategy,
- providing updates to the Board, in collaboration with other senior managers of HoldCo/Bank, regarding market conditions and any other developments affecting HoldCo/Bank,
- promptly informing the Board, either jointly or individually in writing, by submitting a report with their assessments and proposals, of crisis situations or risks that are anticipated to impact the financial situation of HoldCo/Bank.

The CEO and Deputy CEOs of HoldCo/Bank fulfill their duties as outlined in the HoldCo's and Bank's Internal Governance Control Manuals (IGCMs), which are endorsed by the respective HoldCo's/Bank's Board. These IGCMs, designed to comply with legal and regulatory standards related to corporate governance, detail the comprehensive framework guiding the direction and supervision of HoldCo/Bank.

Non-Executive Directors

The non-Executive Directors hold the responsibility for promoting and safeguarding the interests of HoldCo and Bank as a whole. Additionally, they are tasked with:

- monitoring and evaluating the strategy and its execution, along with assessing the attainment of objectives,
- ensuring effective oversight of the executive members, including monitoring and evaluating their performance,
- reviewing and providing feedback on proposals presented by the Executive Directors based on available information,
- approving, revising, and overseeing the implementation of the remuneration policy at the Group level.

The non-Executive Directors have the authority to request, following HoldCo's/Bank's established internal procedures, to engage with the executives of the company's senior management. This can be facilitated through regular presentations conducted by the heads of departments and services.

The non-Executive Directors convene at least once a year, or as deemed appropriate, without the presence of executive members to evaluate their performance. During these meetings, the non-Executive Directors do not function as a de facto body or a committee of the Board. In 2023, the HoldCo's/Bank's non-Executive Directors held a meeting on 26.01.2023.

The HoldCo and the Bank encourage the non-Executive Directors to take care of their information regarding all the issues that the respective Board deals with.

The Independent non-Executive Directors have the responsibility to present, either individually or collectively, their own reports to the Annual or Extraordinary General Meeting of Shareholders, in addition to the reports submitted by the Board.

2.5 Operation of the Board

The operation of the Board, including its meeting protocols, decision-making processes and procedural guidelines, is outlined in the HoldCo's/Bank's Internal Governance Control Manual (IGCM). This manual is endorsed by the respective HoldCo's/Bank's Board and is formulated to adhere to legal and regulatory standards concerning corporate governance issues, in addition to considering the relevant provisions of the HoldCo's/Bank's Articles of Association.

Board Meetings

The Board convenes regularly every quarter and on an ad hoc basis whenever required by law or the needs of HoldCo and Bank. Annually, and within the 3rd Quarter of the preceding year, the Board establishes an annual calendar of meetings for the Board and its Committees, along with an annual action plan. This plan is adjusted as necessary to ensure the proper, comprehensive and timely execution of its responsibilities, as well as the thorough examination of all matters requiring decisions. Any updates or amendments to the annual calendar are promptly communicated to all Board and Board Committees members to facilitate their planning.

Board meetings are convened with a notice period of at least two (2) business days or at least five (5) business days if the meeting is held outside the HoldCo/Bank's registered office, as mandated by Company Law 4548/2018 provisions. The invitation must clearly state the agenda items. If the agenda is not clearly mentioned, a decision can only be made when all Board members are present or represented, and no objections are raised regarding the meeting's convocation and decision-making. Documents submitted to the Board are typically circulated along with the agenda.

Dissemination of Information

The Board utilises technological tools with the necessary security specifications for real-time information and facilitates the connection and information of members.

The CEO and senior management shall ensure that any information necessary for the performance of the duties of the members of the Board is available to them at any time.

Quorum in the Board Meetings

The Board is deemed to have a quorum and conducts valid meetings when at least half plus one of its members are present or represented. The number of present or represented members cannot fall below three (3), disregarding any resulting fraction when determining the quorum. Decisions of the Board are made by an absolute majority of the Directors present or represented. In the event of a tie vote, the Chairperson of the Board does not have a decisive vote.

Board Decisions and Minutes

Decisions are taken following discussions which exhaust the agenda items to the satisfaction of all members present. Board meetings minutes are kept by the Company Secretary of the Board, are approved at subsequent Board meetings and signed by all members present. Finally, the drawing up and signing of minutes by all the members of the Board or their representatives is equal to a decision of the Board, even if no meeting has preceded.

Company Secretary

The Boards of HoldCo/Bank are assisted by a capable, skilled, and experienced Company Secretary to ensure adherence to internal procedures and policies, as well as compliance with relevant laws and regulations, enabling effective and efficient operations. The Company Secretary of HoldCo/Bank holds a senior management position and is appointed or dismissed by the Board based on the recommendation of the Chair.

The Company Secretary serves as the head of the Group Company Secretariat, a division within the Bank. In collaboration with the Chair, the Company Secretary holds several responsibilities, including:

- ensuring prompt, transparent, and comprehensive communication to the Board and Board Committees,
- managing the integration of new members into the Board and Board Committees,
- organizing General Meetings of Shareholders,
- facilitating communication between shareholders and the Board,
- facilitating communication between the Board and senior management.

Furthermore, the Company Secretary is tasked with providing advice to the Board, through the Chairperson, on all governance matters and ensuring adherence to Board procedures.

All members are entitled to access the advice and services offered by the Company Secretary, who is responsible for facilitating their orientation and supporting their professional growth.

2.6 Attendance of Board members in the Board and Board Committees

In accordance with HoldCo's and Bank's Board and Board Committees' Attendance Policy, the Board members are expected to attend all Board and Board Committees' meetings to which they are appointed.

It is accepted, though, that the Board members may be unable to attend some meetings due to conflicts with other commitments or other unforeseen circumstances. In this context, a mandatory minimum attendance of not less than 85% for each member should be achieved every calendar year. Individual meetings up to 15% can be missed only if a valid excuse is provided.

In addition, according to L. 4706/2020, in case of unjustified absence of a Board member in at least two (2) consecutive meetings of the Board, this member shall be considered as resigned. This resignation is established by a decision of the Board, which replaces the member, in accordance with the procedure provided by the law.

During 2023, HoldCo/Bank NomCo reviewed the attendance of Directors to the Board and Board Committees on 30.05.2023 and on 12.12.2023. In addition, during 2023, the average Directors' of HoldCo and Eurobank Board attendance was as follows:

<u>Company</u>	<u>Meetings</u>		<u>Average ratio of Directors' attendance</u>	
	<u>2023</u>	<u>2022</u>	<u>2023</u>	<u>2022</u>
HoldCo	24	20	96.4%	99.6%
Bank	23	21	96.3%	98%

During 2023, at individual level, the attendance of the Directors to the Board (with the exception of Mr. Andreas Athanasopoulos), stood above the 85% threshold. However, Mr. Andreas Athanasopoulos provided representation proxies for his missed Board attendances (21 out of 24 meetings), leading to an attendance rate (physical and under representation) of 100%.

In particular, the Directors' attendance rates at the Board meetings in 2023 were the following:

	Eurobank Holdings Board			Eurobank Board		
	Eligible to attend	Attended in person (# and %)		Eligible to attend	Attended in person (# and %)	
Georgios Zanias, <i>Chairperson, Non-Executive Director</i>	24	24	100%	23	23	100%
Georgios Chryssikos, <i>Vice-Chairperson, Non-Executive Director</i>	24	22	92%	23	21	91%
Fokion Karavias, <i>Chief Executive Officer</i> ¹	24	24	100%	23	23	100%
Stavros Ioannou, <i>Deputy Chief Executive Officer</i>	24	24	100%	23	23	100%
Konstantinos Vassiliou, <i>Deputy Chief Executive Officer</i>	24	24	100%	23	23	100%
Andreas Athanasopoulos, <i>Deputy Chief Executive Officer</i> ¹	24	21	88%	23	19	83%
Bradley Paul Martin, <i>Non-Executive Director</i>	24	22	92%	23	23	100%
Rajeev Kakar, <i>Non-Executive Independent Director</i>	24	23	96%	23	23	100%
Jawaid Mirza, <i>Non-Executive Independent Director</i>	24	24	100%	23	23	100%
Alice Gregoriadi, <i>Non-Executive Independent Director</i>	24	24	100%	23	23	100%
Irene Rouvitha Panou, <i>Non-Executive Independent Director</i>	24	23	96%	23	22	96%
Cinzia Basile, <i>Non-Executive Independent Director</i>	24	23	96%	23	23	100%
Burkhard Eckes, <i>Non-Executive Independent Director</i> ²	13	13	100%	13	11	85%
John Arthur Hollows, <i>Non-Executive Independent Director</i> ²	13	11	85%	13	11	85%
Efthymia Deli, <i>Non-Executive Director, HFSF Representative</i> ³	20	20	100%	19	18	95%

¹ Mr. Andreas Athanasopoulos resigned on 31.12.2023.

² Mr. Burkhard Eckes and Mr. John Arthur Hollows were appointed as BoD members on 20.07.2023.

³ Ms. Efthymia Deli resigned on 7.11.2023.

The average Director's attendance rates to HoldCo's and Eurobank's Board Committees, along with the individual attendance rates per Board Committee are presented separately, under the subsection of the present Corporate Governance Statement, referring to the Board Committees.

2.7 Directorships of Board members

The directorships of the Board members (including significant non-executive commitments to companies and non-profit organisations) are notified before their appointment to the Nomination & Corporate Governance Committee (NomCo) Chairperson and/or the NomCo in accordance with the HoldCo and Bank External Engagements Policy. In parallel, the Board members notify changes regarding their directorships to the Bank Group Company Secretariat as soon as they occur.

The number of directorships which may be held by the Board members at the same time comply with the provisions of art. 83 of the Law 4261/2014 (Law), according to which the Directors shall not hold more than one (1) of the following combinations of directorships at the same time: a) one (1) executive directorship with two (2) non-executive directorships; and b) four (4) non-executive directorships. This restriction is not applied to directorships within the Group. Bank of Greece (BoG) as the competent authority may allow Board members to hold one (1) additional non-executive directorship.

In addition, it is noted that directorships in organizations, which do not pursue predominantly commercial objectives, do not count for regulatory purposes.

In the context of Board's overall effectiveness assessment through which the NomCo assesses annually the knowledge, skills, experience and contribution of individual Board members and of the Board collectively and reports to the Board accordingly, the Board members' directorships were also reviewed for 2023. The relevant review revealed that all Board members are compliant with the Law's provisions.

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HoldCo and Eurobank Board Members' Directorships (including Directorships within Eurobank Group) as at 31.12.2023

Georgios Zanias – *Chairperson, Non-Executive Director*

Foundation for Economic and Industrial Research (IOBE) – *Board Member*¹

Georgios Chryssikos – *Vice-Chairperson, Non-Executive Director*

Grivalia Management Company S.A. – *Vice Chairman, Non-Executive Director*

Grivalia Hospitality S.A. – *Chairman of the BoD, Chief Executive Officer*

Fokion Karavias – *Chief Executive Officer*

Hellenic Bank Association (HBA) – *Vice Chairman*¹

Stavros Ioannou – *Deputy Chief Executive Officer*

Grivalia Management Company S.A. – *Non-Executive Director*

Be-Business Exchanges S.A. of Business Exchanges Networks and Accounting and Tax Services – *Chairman*

Eurobank Cyprus Ltd – *Non-Executive Director*²

Eurobank Bulgaria AD – *Non-Executive Director, Supervisory Board*²

Konstantinos Vassiliou – *Deputy Chief Executive Officer*

Hellenic Exchanges – Athens Stock Exchange S.A. – *Non-Executive Director*

Marketing Greece S.A. – *Non-Executive Director*¹

Eurolife FFH General Insurance Single Member S.A. – *Vice Chairman, Non-Executive Director*³

Eurolife FFH Life Insurance Single Member S.A. – *Vice Chairman, Non-Executive Director*³

Eurolife FFH Insurance Group Holdings S.A. – *Vice Chairman, Non-Executive Director*³

Eurobank Equities Investment Firm Single Member S.A. – *Non-Executive Director*²

Eurobank Factors Single Member S.A. – *Chairman*²

Bradley Paul Martin – *Non-Executive Director*

Blue Ant Media Inc.- *Non-Executive Director*

AGT Food and Ingredients Inc – *Non-Executive Director*

Rajeev Kakar – *Non-Executive Independent Director*

Gulf International Bank, Bahrain – *Non-Executive Director*⁴

Gulf International Bank, Kingdom of Saudi Arabia – *Non-Executive Director*⁴

Commercial International Bank (CIB) – *Non-Executive Director*⁷

Commercial International Bank (CIB) Kenya Limited – *Non-Executive Director*⁷

UTI Asset Management Co. Ltd (UTIAMC) – *Non-Executive Director*

Jawaid Mirza – *Non-Executive Independent Director*

AGT Food and Ingredients Inc – *Non-Executive Director*

Commercial International Bank (CIB) – *Non-Executive Director*⁷

Alice Gregoriadi – *Non-Executive Independent Director*

Hellenic Blockchain Hub – *Non-Executive Director*¹

Cinzia Basile – *Non-Executive Independent Director*

Creditis Servizi Finanziari S.p.A. – *Non-Executive Director*⁶

Brent Shrine Credit Union (trading name My Community Bank) – *Non-Executive Chair of the Board*¹

Zenith Service S.p.A. – *Non-Executive Director*

Nikko Europe Asset Management – *Non-Executive Director*⁵

Nikko AM Global Umbrella Fund – *Non-Executive Director*⁵

Fincentro Finance S.p.A. – *Non-Executive Director*⁶

Irene Rouvitha Panou – *Non-Executive Independent Director*

Stelios Philanthropic Foundation – *Member of the Board of Trustees*¹

Cyprus Asset Management Company Ltd (KEDIPES) – *Non-Executive Director*

Burkhard Eckes – *Non-Executive Independent Director*

Solaris SE – *Non-Executive Member of Supervisory Board*

Bank Pictet & Cie (Europe) AG – *Non-Executive Member of Supervisory Board*

Inexogy Energy Holding KGaA – *Non-Executive – Chairman of Supervisory Board*

John Hollows – *Non-Executive Independent Director*

None

¹ Organization that does not pursue predominantly commercial objectives.

² Company that belongs to Eurobank Group and along with directorships in HoldCo, Eurobank and the other companies of the Group is considered as 1 (one) directorship for each Board member.

³ Company that belongs to Eurolife FFH Group and along with directorships in the other companies of that group, is considered as 1 (one) directorship for each Board member.

⁴ Company that belongs to Gulf International Bank Group and along with directorships in the other companies of that group, is considered as 1 (one) directorship for each Board member.

⁵ Company that belongs to Nikko Asset Management Group and along with directorships in the other companies of that group, is considered as 1 (one) directorship for each Board member.

⁶Company that belongs to Columbus HoldCo S.a.r.l Group and along with directorships in the other companies of that group, is considered as 1 (one) directorship for each Board member.

⁷Company that belongs to Commercial International Bank (CIB) Group and along with directorships in the other companies of that group, is considered as 1 (one) directorship for each Board member.

2.8 Conflicts of interest

The Group has implemented a "Conflicts of Interest Policy," endorsed by the HoldCo's and Eurobank's Board of Directors, which includes a set of policies, procedures, systems, and controls to identify, prevent, and manage situations that may lead to actual, potential, or perceived conflicts of interest arising from the Group's business activities.

To prevent conflicts of duties, the Group has established procedures that segregate the executive and non-executive responsibilities of Board members, including differentiating the responsibilities of the Chairperson of the Board from the executive responsibilities of the CEO. These procedures ensure effective segregation of duties to avoid incompatible roles, conflicts of interest among Board members, Management, and Executives, and the misuse of inside information or assets.

Board members are expected to:

- adhere to high standards of professional ethics and apply the principles of the Conflicts of Interest Policy,
- act independently, making sound, objective, and independent decisions and judgments,
- disclose any personal interests that may conflict with Holdings' (or the Group's) interests or any other potential conflicts of interest,
- maintain privacy and confidentiality of non-public information and avoid behaviors constituting market abuse or conflict of interest.

Board members are required to disclose any engagements, directorships, or interests outside the Group and provide any necessary information to the Group. They must also disclose ongoing or new facts that may affect the assessment of conflict of interest and independence of mind.

All actual or potential conflicts of interest at the Board level should be communicated, discussed, documented, decided upon, and managed/mitigated by the Group. Persistent conflicts of interest are managed continuously, while one-off conflicts arising unexpectedly are addressed with specific measures. Board members must abstain from voting on matters where they have identified conflicts of interest.

2.9 Remuneration

Eurobank Holdings has established a Board of Directors' Remuneration Policy (Remuneration Policy) in accordance with the relevant requirements of Law 4548/2018 (the Law), with the latest version of the Policy approved by the Annual General Meeting of Shareholders on 20.7.2023. This Remuneration Policy has been designed to meet the specific provisions of the Law, including articles 109, 110, 111, 112, and 114.

The Remuneration Policy outlines the essential components and considerations of the remuneration structure for Board members. Its objective is to ensure that remuneration is fair, gender-neutral, and adequate to retain and attract directors possessing the necessary skills and experience to develop and implement Eurobank Holdings' business strategy. Additionally, it aims to safeguard the long-term interests and sustainability of the organization by avoiding excessive risk-taking. This is accomplished through continuous monitoring of market trends and best practices at both domestic and global levels. The remuneration framework defines the salary structure and ranges, tailored to attract and retain talented individuals appropriately.

In establishing the Remuneration Policy, external and independently produced benchmarking analyses of remuneration in the financial and banking sectors in Greece are utilized. This benchmarking also includes the remuneration framework for Board members, ensuring alignment with industry standards and best practices.

In addition, regarding the Remuneration Policy, it is noted that:

- the process of its development is characterised by objectivity and transparency,
- the Board members exercise independent judgment and discretion when approving and recommending to the General Meeting its approval and generally when approving any remuneration, taking into account both individual performance and the performance of the company.

Eurobank Holdings produces, for each financial year, a Remuneration Report concerning the remuneration and other financial benefits paid to each Executive and Non-Executive Directors of the Board during the reporting financial year, in line with the requirements of Article 112 of the Law. The Eurobank Holdings Remuneration Report for 2022 (<https://www.eurobankholdings.gr/-/media/holding/omilos/grafeio-tupou/etairikes-anakoinoseis/2023/etairiki-anakoinosi-28-06-23/ekthesi-apodoxon-2022-eng.pdf>) has been approved by the Annual General Meeting on 20.7.2023 and for reasons of transparency and efficient information, presents clearly the additional remuneration of the Board members participating in committees.

The remuneration of the executive Directors, as well as the senior management of the company, are related to the size of the company, the extent of their responsibilities, the corporate strategy, the company's objectives and their realisation, with

the ultimate goal of avoiding excessive risk-taking including with respect to direct or indirect sustainability risks and creating long-term value in the company.

In addition, regarding the remuneration of the executive Directors, it is noted that:

- the Stock Options that are provided to them are completely matured after four (4) years from the date of granting,
- they have not received bonus during 2023, therefore there was no need for the Board to examine the refund of all or part of the bonus awarded to them, due to breach of contractual terms or incorrect financial statements.

Due to same composition of the Board of the HoldCo and Bank and since the Directors are paid solely by one of the two, that being the Bank, any reference to the remuneration and /or the benefits payable to the Directors of Eurobank Holdings, applies to the relevant remuneration they receive as Directors of the Bank.

The 2023 Board and key management remuneration disclosure is included in the relevant note of the consolidated accounts of Eurobank Holdings and in compliance with the provisions of the Company Law 4548/2018 and in order to ensure adequate transparency to the market of the remuneration structures and the associated risks, is uploaded at website www.eurobankholdings.gr.

2.10 Board Role and Responsibilities

The principal duties and responsibilities of the HoldCo/Bank's Board encompass a wide range of strategic, oversight, and governance functions:

- review, guide, and approve the strategy, major plans of action, risk policy, business and restructuring plans, and set performance objectives,
- monitor performance and oversee major capital expenditures, acquisitions, divestitures, and formation of new entities, including special purpose vehicles,
- ensure the availability of necessary financial and human resources, as well as an internal control system,
- approve the annual budget and monitor its implementation quarterly,
- approve the three-year business plan and monitor its implementation,
- review and approve at least annually the risk strategy and risk appetite, ensuring alignment with overall business strategy and other plans,
- receive and discuss comprehensive risk reports on a quarterly basis,
- develop and deliver objectives in agreed restructuring plans under applicable laws,
- provide oversight to senior management and approve corporate governance practices and values,
- set standards shaping corporate culture and integrate desired culture into systems, policies, and behaviors,
- approve risk and capital strategy and monitor CEO and Executive Board implementation,
- approve organization chart and related policies as required by law or internal processes,
- ensure rigorous processes for monitoring organizational compliance with strategy, risk appetite, laws, and regulations,
- select, compensate, monitor, and replace key executives as needed and oversee succession planning,
- align executive and board remuneration with long-term interests of Group and shareholders,
- facilitate formal and transparent board nomination and election processes,
- monitor and manage potential conflicts of interest among management, board, and shareholders,
- ensure integrity of accounting and financial reporting systems, including independent audit and control systems,
- review and monitor Non-Performing Loans (NPL) and Non-Performing Exposures (NPE) performance,
- oversee disclosure and communication processes,
- determine appropriate level of remuneration for Board and Committees' members pending ratification,
- address matters related to new technologies and environmental issues,
- identify and engage with important stakeholders, understanding their interests and interactions with Group strategy,
- facilitate open dialogue with stakeholders and utilize various communication channels for effective engagement and understanding.

These duties collectively contribute to the effective governance, strategic direction, risk management, and sustainable growth of the HoldCo/Bank and its operations.

2.11 Main issues the Board dealt with during 2023

In 2023, the HoldCo's/Bank's Board has reviewed the corporate strategy, the main risks to the business and the system of internal controls.

In more detail, in discharging its responsibilities for 2023 the main issues Holdco's/Bank's BoDs dealt with related to:

- | <u>Eurobank Holdings</u> | <u>Bank</u> |
|--|--|
| <p>a) <u>Governance:</u></p> <ul style="list-style-type: none">• approval (subject to the approval of the Annual General Meeting (AGM)) of the nomination of new member/s to the BoD and AC• approval of changes at the Board Committees' composition• approval of revised Terms of Reference of the Nomination and Corporate Governance Committee and the Remuneration Committee.• preparation and convocation of the Shareholders General Meeting• annual evaluation of the Board and the Board Committees and approval of the 2023 Action Plan that included recommendations from the BoD and BoD Committees Self-Assessment 2022• review of the attendance of Directors to the Board and Board Committees• approval by the Non-Executive Directors of the BoD of CEO's performance evaluation for 2022 and of his financial and non-financial objectives for 2023• approval of the External Engagements Policy, the Board and Board Committees Evaluation Policy, the Policy for Reporting Illegal or Unethical Conduct & the appointment of the Report Receiving & Monitoring Officer the Group Compliance Policy, the Conflicts of Interest Policy, the Anti-Bribery and Corruption Policy and the Dividend Distribution Policy• approval and further submission to the Annual General Meeting for approval, of the Board Nomination Policy• approval by the Non-Executive Directors of the Board of the Remuneration Policy and the Separation Policy• approval and further submission to the Annual General Meeting for approval, of the 'Board and Board Committees' fees for Non-Executive Directors, the Remuneration Policy for the Directors and the Remuneration Report for the financial year 2022• approval of the 8th stock option plan implementation for 2023• approval by the Non-Executive Directors of a Voluntary Exit Scheme (VES)• approval by the Non-Executive Directors of the Remuneration Framework of Eurobank Holdings and the Group Variable Remuneration Pool• approval of HoldCo's Internal Governance Control Manual• approval of the revised HoldCo Group Organizational Chart• regular update on Board Committees' matters• approval of Board and Board Committees calendar for 2024,• various remuneration issues• approval and further submission to the Annual General Meeting for approval, of the appointment of the auditors for the financial Year 2023• discussion on the Preliminary Supervisory Review and Evaluation Process (SREP) assessment of 2023 and updates for the relevant decisions• approval of the next steps following the disposal of HFSF's entire stake in HoldCo. | <p>a) <u>Governance:</u></p> <ul style="list-style-type: none">• approval (subject to the approval of the Annual General Meeting (AGM)) of the nomination of new member/s to the BoD and AC• approval of changes at the Board Committees' composition• approval of revised Terms of Reference of the Nomination and Corporate Governance Committee and Remuneration Committee• preparation and convocation of the Shareholders General Meetings• annual evaluation of the Board and Board Committees and approval of the 2023 Action Plan that included recommendations from the BoD and BoD Committees Self-Assessment 2022• review of the attendance of Directors to the Board and Board Committees• approval by the Non-Executive Directors of the BoD of CEO's performance evaluation for 2022 and of his financial and non-financial objectives for 2023• approval of the Board Nomination Policy, Group Subsidiary Board Remuneration Policy, the External Engagements Policy, the Board and Board Committees Evaluation Policy, the Policy for Reporting Illegal or Unethical Conduct & the appointment of the Report Receiving & Monitoring Officer, the Group Compliance Policy, the Dividend Distribution Policy, the Conflicts of Interest Policy, the Anti-Bribery and Corruption Policy and the AML/CFT and Sanctions Policy• approval by the Non-Executive Directors of the Board of the Remuneration Policy and the Separation Policy• approval and further submission to the Annual General Meeting for approval, of the Board and Board Committees' fees for Non-Executive Directors• update on the implementation of the Group Subsidiary Board Remuneration Policy through the Group during 2022• approval by the Non-Executive Directors of a Voluntary Exit Scheme (VES)• approval by the Non-Executive Directors of the Remuneration Framework of Eurobank Holdings and the Group Variable Remuneration Pool• approval of Bank's Internal Governance Control Manual• approval of the revised Eurobank Group Organizational Chart• regular update on Board Committees' matters• approval of Board and Board Committees calendar for 2024• various remuneration issues, including issues of the international subsidiaries (performance related variable remuneration, remuneration adjustments etc)• approval and further submission to the Annual General Meeting for approval, of the appointment of the auditors for the financial Year 2023•• update from its international banking subsidiaries• approval of credit facilities to related parties |

- Approval of the appointment of the BoD member responsible for the implementation of the Greek AML Law
 - approval of the next steps following the disposal of HFSF's entire stake in HoldCo.
- b) Environmental, Social & Governance (ESG) issues:
- approval of the Environmental and Social Governance (ESG) Strategy
 - update on various ESG matters
 - update by the responsible BoD member for climate-related and environmental risks
- c) Strategic issues including Corporate and other actions:
- discussion of various strategy issues
 - approval of the share capital increase following the exercise of stock option rights (stock options) and amendment of article 5 of the Articles of Association of the Company according to article 113 par. 3 of l. 4548/2018.
 - approval (subject to the approval of The Annual General Meeting (AGM) of the share buyback of HFSF's shares
 - approval of the issuance of a common bond loan in the context of share buyback of HFSF's shares
- b) Environmental, Social & Governance (ESG) issues:
- approval of the Environmental and Social Governance (ESG) Strategy
 - update on various ESG matters
 - update by the responsible BoD member for climate-related and environmental risks
 -
- c) Strategic issues including Corporate and other actions:
- discussion of various strategy issues
 - approval of the merger of the Bank with "STANDARD SINGLE MEMBER REAL ESTATE SOCIETE ANONYME" by way of its absorption by the Bank
 - approval of the merger of the Bank with "CLOUD HELLAS SINGLE MEMBER KTIMATIKI S.A." by way of its absorption by the Bank
 - approval of the merger of the Bank with "ADEXA MONOPROSOPI ANONYMI ETAIREIA DIACHEIRISHS KAI EKMETALLEFSHS AKINITON" by way of its absorption by the Bank
 - approval of sale in Serbia (Project Leo)
 - approval of acquisition of additional stake in Hellenic Bank (Project Hermione)
 - approval of revised Real Estate Owned (REO) Strategy
 - approval of Real Estate acquisitions
 - approval of Arbitration Agreements and authorizations
 - approval of Bank's Covered Bonds Programme II of up to €5b
 - approval of HAPS Securitization of a Syndicated Corporate Positions across all four systemic banks of c.1.2bn (Project Solar)
 - approval of Covered Bond Programme II - Use of the "European Covered Bond (Premium)" label
 - approval of Bank's Covered Bond Programme III up to €5 billion
 - discussion of an NPE portfolio sale (Project Leon)
- d) Capital adequacy:
- approval of the 2023 Internal Capital & Liquidity Adequacy Statements (CAS & LAS) in the context of the Internal Capital & Liquidity Adequacy Assessment Process (ICAAP & ILAAP 2023).
 - approval of ad-hoc data collection on financial and macroeconomic projections
 - update on capital projections and MREL plan
- d) Capital adequacy:
- approval of the 2023 Internal Capital & Liquidity Adequacy Statements (CAS & LAS) in the context of the Internal Capital & Liquidity Adequacy Assessment Process (ICAAP & ILAAP 2023)
 - approval of ad-hoc data collection on financial and macroeconomic projections
 - approval of securitizations of the Bank's receivables from portfolios of business and other loans.
- e) Business monitoring:
- approval of the 2022 annual financial statements and the 2023 interim financial statements
 - approval of the Annual Budget 2024 and the 3-Years Business Plan for the period 2024-2026
 - discussion of 2023 performance versus budget
 - discussion of business developments and liquidity.
 - discussion of the top-down Business and Capital Plan 2023-2025
- e) Business monitoring:
- approval of the 2022 annual consolidated financial statements and the 2023 interim consolidated financial statements
 - approval of the Annual Budget 2024 and the 3-Years Business Plan for the period 2024-2026
 - approval of the Group's NPE Targets for the period 2023-2025 and the NPE management Strategy
 - update on significant subsidiaries activities and strategic priorities
 - discussion of 2023 performance versus budget

f) Risk Management and Internal Control:

- briefing on the assessment on Internal Audit Group and Group Compliance annual regulatory reports
- update on significant internal audit and compliance issues
- update on significant legal issue
- approval of the Risk Appetite Framework, Group Risk and Capital Strategy and Risk Appetite Statements
- approval of Risk Identification and Materiality Assessment (RIMA) framework and reports
- approval of the updated Funding Plan
- approval of the consolidated Pillar 3 Reports (capital and risk management disclosures) for 2022, 3M2023, 6M2023 and 9M2023
- regular briefing on Board Risk and Audit Committees' matters
- update on significant risk issues, including the Group Chief Risk Officer's Annual Report for the year 2022
- update on the 2022 Annual Activity Report of the Audit Committee before submission to the Annual General Meeting
- approval of new or revised policies and plans as per the legal and regulatory framework and internal processes, including the Non-Financial Risk Management Policy, the Non-Financial Risks Improvements Plan and the Outsourcing Policy
- approval of the 2023 Group Recovery Plan
- approval of the appointment of Group Corporate Security as the Control Function responsible for managing and overseeing "Information and Communications Technology (ICT) and Security risks", as per BoG Executive Committee's Act 190/2/16.6.2021 requirements, which adopts European Banking Authority (EBA) Guidelines on ICT and Security Risk Management.

g) Transformation Project:

- received regular updates on the transformation project.

- review of business developments and liquidity.

f) Risk Management and Internal Control:

- briefing on the assessment on Internal Audit Group and Group Compliance annual regulatory reports
- update on significant internal audit issues
- update on significant compliance issues, including the Anti-money Laundering Business Risk Assessment and Compliance Risk Assessment
- update on significant legal issue
- approval of the Risk Appetite Framework, the Group Risk and Capital Strategy and Risk Appetite Statements
- approval of Risk Identification and Materiality Assessment (RIMA) framework and reports
- approval of the consolidated Pillar 3 Report (capital and risk management disclosures) for 2022
- update on credit and NPE related issues through various reports
- regular briefing on Board Risk and Audit Committees' matters
- update on significant risk issues, including the Group Chief Risk Officer's Annual Report for the year 2022
- update on the 2022 Annual Activity Report of the Audit Committee before submission to the Annual General Meeting
- approval of new or revised policies as per the legal and regulatory framework and internal processes, including the Non-Financial Risk Management Policy, the Non-Financial Risks Improvements Plan and the Outsourcing Policy
- initial approval for the successor of the Chief Audit Executive (to be effective within 2024)
- approval of the appointment of Group Corporate Security as the Control Function responsible for managing and overseeing "Information and Communications Technology (ICT) and Security risks", as per BoG Executive Committee's Act 190/2/16.6.2021 requirements, which adopts European Banking Authority (EBA) Guidelines on ICT and Security Risk Management.

g) Transformation Project:

- received regular updates on the transformation project.

Board Strategy Day

In addition to the formal meetings concerning Eurobank's annual budget and its 3-year business plan, an annual strategy meeting, known as the Board Strategy Day, is held outside the regular Board of Directors' meetings. During this informal gathering, no formal minutes are kept. The purpose of the Board Strategy Day is to provide ample time for Board members to engage in discussions and deliberations regarding the top strategic initiatives relevant to Eurobank's growth and its competitive position among its peers.

The most recent Board Strategy Day took place on 29 and 30 September 2023, with a primary focus on Transformation priorities and in-depth analyses of key transformation streams.

2.12 Board and Board Committees overall effectiveness assessment

Board and Board Committees Evaluation conducted internally

The HoldCo/Bank NomCo is tasked with evaluating the structure, size, composition, and performance of the Board and its Committees, making recommendations for necessary changes. The NomCo oversees the self-evaluation of the Board's and Committees' effectiveness (Internal Evaluation), typically using a self-assessment questionnaire.

The 2023 Internal Evaluation utilized Board self-assessment questionnaires as the primary tool. These questionnaires, administered through Diligent's secure web-based platform, covered various areas such as strategy oversight, engagement with management, risk management, Board composition, dynamics, Chairperson's role, secretarial support, and Board Committees' effectiveness.

The results of the Internal Evaluation indicated that the HoldCo/Bank Boards continued to function effectively in 2023, similar to 2022. The key findings in different areas are as follows:

Strategy:

- Positive impression regarding the Board's role in strategy, including review and approval of business plans and budget.

Relationship with Management:

- Positive view on senior management performance and frequency of reporting to the Board.

Strategic HR and Remuneration:

- Improvement noted in remuneration practices.

Risk Governance and Internal Control:

- Board has a comprehensive understanding of risk profile and exercises adequate oversight over risk management.

Board Profile and Composition:

- Adequate knowledge, skills, experience, and diversity within the Board.

Board Functioning and Dynamics:

- Adequate meeting frequency, preparedness, agenda planning, and constructive discussions.

Board Chairman's Role:

- Reflects the leadership needs of the Board effectively.

Board Secretarial Support:

- Effective support provided with timely delivery of documents and quality Board packs and minutes.

While the evaluation highlighted positive aspects, it also identified areas for improvement, particularly in enhancing risk governance and internal control, focusing on non-financial risks like climate and cybersecurity.

The main conclusions of the Internal Evaluation regarding Board Committees have been integrated into the relevant sections detailing the Committees' functioning and operations.

Assessment of the knowledge, skills and experience (KSE) of the Board collectively as well as the KSE and contribution of individual Board members.

The NomCo has also the responsibility to assess the knowledge, skills and experience (KSE) of the Board collectively as well as the KSE and contribution of individual Board members and to report to the Board accordingly.

Individual Evaluations

The individual evaluations (i.e. the assessment of the Board Chairperson, the assessment of NEDs and the assessment of the Executive Directors) take into account the status of the member (executive, non-executive, independent), the participation in committees, the undertaking of specific responsibilities / projects, the time devoted, the behavior and the use of knowledge and experience.

A. Assessment of the Board Chairperson

The Board Chair's evaluation is part of the Internal Evaluation (mentioned above) and is conducted by all other Board members via the Questionnaire for the self-evaluation of the Board's and the Board Committees' effectiveness.

The HoldCo/Bank Board Chair's evaluation in 2023 remained very strong (similarly to the respective evaluation in 2022).

B. Assessment of the Non-Executive Directors' (NEDs), excluding the Chairperson, contribution to the Board

The Board Chair is responsible to conduct the assessment of the NEDs' contribution to the Board and present the results to the NomCo.

The assessment of the NEDs' contribution to the Board is performed in the following discrete steps:

- the NomCo approves the NEDs self-evaluation questionnaire,
- the questionnaire is distributed to the NEDs. Responses are strictly confidential and can only be sent to the Board Chair and/or those expressly mandated to assist in the task by him/her,
- the Board Chair holds confidential one-on-one interviews with each NED, using the individual NEDs self-evaluation Questionnaire as an input,
- the Board Chair presents an overall report on his findings to the NomCo,
- the Board Chair's views on NEDs performance and contribution of knowledge, skills and experience are presented and discussed at the NomCo also during the process of developing the NomCo's proposals for discussing the (re)appointment / succession planning of individual Board members.

In accordance with the procedure described above, the 2022 annual assessment of the NEDs' contribution to the HoldCo/Bank Board was directed by the Board Chair with the use of an individual self-evaluation questionnaire consisted of 10 questions aiming to identify the strengths and areas for improvement of individual Directors across the following 5 areas:

- contribution to overall Board profile skillset
- Board participation and quality of contributions to Board deliberations
- punctuality and attendance
- team Spirit and demeanor
- independent Thinking and Constructive Challenge

The 2023 annual assessment of the NEDs' contribution to the HoldCo/Bank Board demonstrated that the NEDs adequately meet expectations for effectively accomplishing their role as Directors of the HoldCo/Bank.

C. Executive Directors' Performance Evaluation

The evaluation of the Executive Directors' performance, including the CEO and Deputy CEOs, is conducted separately through a structured process involving the CEO, the NomCo, and the Board Remuneration Committee (RemCo). This evaluation occurs annually and is based on both qualitative and quantitative Key Performance Indicators (KPIs) that are approved by the Non-Executive Directors each year.

Specifically for the CEO, the RemCo proposes relevant KPIs related to the CEO's remuneration to the Non-Executive Directors for approval. The CEO's performance is then assessed based on these approved KPIs. The results of the evaluation are communicated to the CEO and are considered in determining his remuneration.

Collective Suitability Assessment

During 2023, in addition to the evaluation of the Board of Directors' performance, an assessment of the Board's collective suitability was conducted based on the Joint ESMA/EBA Guidelines on the assessment of the suitability of members of the management body and key function holders (EBA/GL/2021/06). This assessment was carried out with the support of the NomCo.

The assessment focused on evaluating whether the Board of Directors collectively possesses the necessary knowledge, skills, and experience to understand the business model, strategy, risks, and various governance-related matters. It concluded that the Board is collectively suitable to comprehend these areas effectively. However, the evaluation also emphasized the potential for improvement in certain skillsets, particularly in areas such as technology and digitization, specific business lines and products, various geographies, and subsidiaries.

2.13 Directors' Induction and Continuous Professional Development Process

All new Board members undergo a comprehensive Induction Program designed to achieve several key objectives. Firstly, it aims to convey the vision and culture of the HoldCo/Bank. Secondly, it covers practical procedural duties to ensure a smooth transition into their roles. Thirdly, it aims to expedite their productivity by reducing the time needed to familiarize themselves with their responsibilities. Fourthly, it integrates them as valued members of the Board. Fifthly, it familiarizes them with the HoldCo/Bank's organizational structure. Lastly, it provides an understanding of the HoldCo/Bank's business, strategy, market dynamics, relationships, and its people.

Upon their appointment, new Board members also receive a Manual of Obligations outlining their main responsibilities towards Supervisory Authorities and the HoldCo/Bank. This manual informs them about local regulations and the Board's procedures. Additionally, meetings and presentations are arranged with Key Executives of the HoldCo/Bank to provide new Directors with a comprehensive overview of the organization.

Recognizing the importance of continuous professional development, the HoldCo/Bank provides resources for ongoing knowledge and skill enhancement for all Board members. In 2023, this included formal training sessions on Workforce issues in banking, Cloud providers and data protection, Cyber resilience and security awareness, and Generative Artificial Intelligence Challenges and Opportunities. Furthermore, Board members received regular updates, reports, and presentations from senior management on operational and strategic targets, as well as updates on risk, audit, compliance, financial, human resources, legal, and regulatory matters. They also received regular and ad-hoc research and economic bulletins from Eurobank's Economic Analysis and Financial Markets Research Division.

3. Board Committees

The Boards of HoldCo/Bank are assisted in carrying out their duties by Board Committees to whom they delegate some of their responsibilities. In addition, the Boards approve their terms of reference, receive regular and ad hoc reports from them and assess their performance as per the provisions of the Board and Board Committees Evaluation Policy.

3.1 Audit Committee⁶

The primary function of the Audit Committee (AC) is to assist the Board in discharging its oversight responsibilities primarily relating to:

- the review of the adequacy of the Internal Control and Risk Management systems and the compliance with rules and regulations monitoring process,
- the review of the financial reporting process and satisfaction as to the integrity of the HoldCO's Financial Statements,
- the External Auditors' selection, performance and independence,
- the effectiveness and performance of the Internal Audit and of the Compliance function.

In addition, in the context of AC's responsibility to safeguard External Auditors' independence, the AC ensures that the nature of non-audit services, prior to their being undertaken by the External Auditors, has been reviewed and approved as required and that there is proper balance between audit and non-audit work in accordance with Group's / Bank's policy on External Auditors' Independence.

AC Membership/Composition

The HoldCo/Bank's AC are Committees consisted exclusively by Board members and their compositions have been approved by the General Meetings of the Shareholders (as per the legal framework), following the recommendation of the NomCos to the Boards. The tenure of the Committee members coincides with the tenure of the HoldCo/Bank's Boards, with the option to renew their appointment, but in any case, the service in the Committees should not be more than nine (9) years in total. The Chairperson of the Committees is appointed by the members of the Committees, while the Committee's members may also appoint a Vice Chairperson.

All AC members have sufficient knowledge in the field of HoldCo/Bank's activities and the necessary skills and experience to carry out their duties and meet the requirement of established knowledge and experience in auditing and/or accounting. The ACs consist of four (4) independent non-executive Directors of the Board. In particular, the HoldCo/Bank's AC composition is outlined below:

AC Chairperson:	Jawaid Mirza, <i>Non-Executive Independent Director of the Board</i>
AC Vice-Chairperson:	Burkhard Eckes, <i>Non-Executive Independent Director of the Board</i>
AC Members:	Irene Rouvitha Panou, <i>Non-executive Independent Director of the Board</i> Rajeev Kakar, <i>Non-Executive Independent Director of the Board</i>

It is noted that in line with the provisions of article 44 of law 4449/2017, as in force, and further to the decision of the HoldCo/Bank's Annual General Meetings of Shareholders as of 20.7.2023 regarding the recomposition of the Audit Committees and more specifically regarding their type, composition and term of office; and the BoDs' decision of 23.06.2023 (in combination with 27.06.2023) and 20.07.2023 regarding the nomination and appointment of a new member to the ACs respectively, and in particular of Mr. Burkhard Eckes, following relevant recommendations by the NomCos of 22.06.2023, the ACs decided on their constitution and on the appointment of their Chairman.

Compared to the previous ACs' composition and following the recomposition of the ACs on 20.07.2023, the ACs' members remained four (4) since Ms. Efthymia Deli submitted her resignation on 27 October 2023, effective as of 7 November 2023, from the BoDs, ACs and Remuneration Committees that was member at that time.

AC Meetings

The HoldCo/Bank's ACs meet at least eight (8) times per year or more frequently, as circumstances require, report on their activities to the HoldCo/Bank's Boards on a quarterly basis and submit the minutes of their meetings and the annual Activity Reports (before their submission to the HoldCo/Bank Shareholders' Annual General Meeting) to the HoldCo/Bank's Boards.

Quorum in the AC Meetings

The ACs' meeting is in quorum and meets validly when half of its members plus one are present or represented, provided that at least three (3), including the Chairperson or the Vice Chairperson, are present. Each member of the Committee may validly represent only one of the other Committee members. Representation in the Committee may not be entrusted to persons other than the members thereof.

⁶ HoldCo/Bank's Audit Committees' Terms of Reference Hold may be found at the HoldCo/Bank websites (www.eurobankholdings.gr & www.eurobank.gr).

AC Decisions

The AC resolutions are validly taken by an absolute majority of the members who are present and represented. In case of a tie of votes, the Chairperson and in case of his/her absence the Vice Chairperson has the casting vote. The Board is informed whenever a decision of the AC is not reached unanimously.

Attendance to the AC Meetings

During 2023 the attendance details for the Audit Committee were as follows:

<u>Company</u>	<u>Meetings</u>		<u>Average ratio of Directors' attendance</u>	
	<u>2023</u>	<u>2022</u>	<u>2023</u>	<u>2022</u>
HoldCo	17	14	100%	100%
Bank	16	14	100%	100%

AC Secretary and Minutes

The AC appoints its Secretary, who reports to the Group Company Secretariat and cooperates with the Chairperson of the Committee. The Secretary is responsible to minute the proceedings and decisions of all Audit Committees' meetings, including the names of those present and in attendance and the action plans and follow ups for assignments, as well as for the issuance of extracts. Decisions, actions and follow ups are disseminated to the responsible parties, as required.

AC Terms of Reference (ToR)

The AC's ToR are reviewed annually and revised if necessary, unless significant changes necessitate earlier revision. The ToR are approved by the Board.

AC's Performance Evaluation

The AC conducted a self-evaluation, and its members expressed satisfaction with the committee's effectiveness and leadership. They commended the AC's efficient use of time, well-planned meetings, and timely scheduling. The Chairperson of the AC was noted for being well-prepared and skilled in guiding discussions through the agenda, fostering critical dialogue, and ensuring all members could express their views freely. Participants were also acknowledged for their preparedness and active engagement in vital discussions, demonstrating a commendable level of challenge.

However, the evaluation identified areas for improvement, notably the need for enhanced oversight on critical audit and compliance issues within major subsidiaries. There was also a call for strengthening cybersecurity mechanisms and Anti-Money Laundering (AML) controls and measures. Additionally, the evaluation emphasized the importance of providing training in new areas to enhance the skills of the Internal Audit Team. These areas of improvement were highlighted to further enhance the effectiveness and capabilities of the AC in fulfilling its responsibilities.

AC's Activity in 2023

For 2023, AC has amongst others:

Eurobank Holdings

- decided on its constitution / reconstitution and the appointment of its Chairman
- approved the revised Internal Audit Mandate and Terms of Reference (ToR) and the revised Compliance Mandate
- approved the annual Plans of Internal Audit and Compliance and monitored their progress
- reviewed and discussed reports with information relating mainly to the Internal Audit and Compliance issues, including quarterly reports from Internal Audit and Compliance functions
- received updates on various legal and regulatory issues
- ensured that an annual evaluation of the System of Internal Controls for the year 2022 has been performed and documented by Internal Audit and prepared its own assessment report on Internal Audit's evaluation. The reports were further submitted to the Board and the BoG in line with the BoG Act 2577/2006
- reviewed the annual Compliance Sector's reports over compliance activities for the year 2022 and prepared its own assessment report thereon. The reports were further submitted to the Board and the BoG, in line with the BoG Governors Act 2577/2006
- in the context of the independent triennial Evaluation of the System of Internal Controls (SIC) per BoG Act 2577, approved the proposed scope of the assignment and the appointment of the firm

Bank

- decided on its constitution / reconstitution and the appointment of its Chairman
- approved the revised Internal Audit Mandate and Terms of Reference (ToR) and the revised Compliance Mandate
- approved and further submitted to the BoD for information the annual and triennial Plans of Internal Audit and Compliance and monitored their progress.
- reviewed and discussed reports with information relating to the System of Internal Controls, including quarterly reports from Internal Audit Group, Compliance, Operational Risk Sector, Clients Relations Office, etc.
- received updates on various legal and regulatory issues
- ensured that an annual evaluation of the System of Internal Controls has been performed and documented by the Internal Audit Group for the year 2022. The Audit Committee has prepared its own assessment report on Internal Audit Group's evaluation. The reports were further submitted to the Board and the BoG in line with the BoG Act 2577/2006
- in the context of the independent triennial Evaluation of the System of Internal Controls (SIC) per BoG Act 2577, approved the proposed scope of the assignment and the appointment of the firm
- focused particularly on the AML function and received regular updates on the AML issues

- reviewed and depending on the case, approved or approved and further submitted to the BoD for approval / information a) the revised Code of Conduct and Ethics, b) the revised Policy for Reporting Illegal or Unethical Conduct and the appointment of Report Receiving & Monitoring Officer in Greece, c) the revised Group Antitrust Compliance Policy, d) the revised Compliance Policy, e) the revised Conflict of Interest Group Policy, f) the revised Anti-bribery and Corruption Policy and g) the revised Insider Dealing Guideline.
- discussed with Management, Internal Audit and External Auditors issues relating to the financial results,
- reviewed and cleared the financial statements and other financial reports and trading updates prior to their release
- discussed with Management the implementation of corrective actions to recommendations made by Internal and External Auditors and Regulatory Authorities
- assessed the effectiveness, objectivity, and independence of the External Auditors for the financial year 2022, discussed the results of their evaluation with Management and Internal Audit and communicated final results to the Board and to the External Auditors
- approved the remuneration of External Auditors for the financial year 2023
- proposed to the Board and the Annual General Meeting of Shareholders for approval the appointment of the External Auditors for the financial year 2023
- approved the External Auditors' Independence Policy and monitored, in line with this Policy, the non-audit services provided by the External Auditor in 2023
- approved the Key Audit Partner (KAP) selection/rotation policy which is addendum of the Holdings Group Tendering Policy and Procedure
- discussed a 5-yr (2024-28) rolling plan on the eligibility of audit firms for the statutory audit of the Group, including potential conflict of interest situations with eligible audit firms, based on Greek Law 4449/17 and EU Reg 537/14, and requirements of the International Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA)
- assessed the performance of the Internal Auditor and the Head of Compliance / Anti-Money Laundering Reporting Officer
- received updates on the progress of the Annual Budget
- in accordance with the provisions of Law 2533/1997, the Audit Committee reviewed reports on substantial stock transactions of the HoldCo's Directors and General Managers which meet the criteria set in Law 2533/1997 and notified the Board
- approved and notified the Board for further submission to the Annual General Meeting, the annual AC Activity Report for 2022
- Discussed the Annual AC Plan for 2024.
- discussed and further submitted to the BoD for discussion the Anti-Money Laundering (AML) Business Risk Assessment and Compliance Risk Assessment
- reviewed the annual Group Compliance Sector's reports over AML and compliance activities of the Bank for the year 2022 and prepared its own assessment report thereon. The reports were further submitted to the Board and the BoG, in line with the BoG Governors Act 2577/2006
- reviewed and depending on the case, approved or approved and further submitted to the BoD for approval / information a) the revised Code of Conduct and Ethics, b) the revised Policy for Reporting Illegal or Unethical Conduct and the appointment of Report Receiving & Monitoring Officer in Greece, c) the revised Group Antitrust Compliance Policy, d) the revised Compliance Policy, e) the revised Conflict of Interest Group Policy, f) the revised Anti-bribery and Corruption Policy g) the revised Insider Dealing Guideline, h) the revised Inducements Policy, i) the revised AML/CFT and Sanctions Policy, j) the revised Order Execution Policy.
- discussed with Management, Internal Audit and External Auditors issues relating to the financial results,
- reviewed and cleared the consolidated financial statements
- discussed with Management the implementation of corrective actions to recommendations made by Internal and External Auditors and Regulatory Authorities
- discussed with the Audit Committee Chairpersons of Eurobank Bulgaria, Eurobank Cyprus and Eurobank Private Bank Luxembourg the key audit issues of the International Subsidiaries
- assessed the effectiveness, objectivity and independence of the External Auditors for the financial year 2022, discussed the results of their evaluation with Management and Internal Audit and communicated final results to the Board and to the External Auditors
- approved the remuneration of External Auditors for the financial year 2023
- proposed to the Board and the Annual General Meeting of Shareholders for approval the appointment of the External Auditors for the financial year 2023
- approved the External Auditors' Independence Policy and monitored, in line with this Policy, the non-audit services provided by the External Auditor in 2023
- assessed the performance of the Chief Audit Executive and the General Manager Head of Group Compliance / Anti-Money Laundering Reporting Officer
- monitored the memberships and the modus operandi of the Audit Committees of the banking subsidiaries, as required, and reviewed their Activity Reports
- in accordance with the provisions of Law 2533/1997, the Audit Committee reviewed reports on substantial stock transactions of the Bank's Directors and General Managers which meet the criteria set in Law 2533/1997 and notified the Board
- approved and notified the Board for further submission to the Annual General Meeting, the annual AC Activity Report for 2022.
- discussed the Annual AC Plan for 2024.

It is noted that in accordance with the Law 4449/2017 as in force, the HoldCo/Bank ACs submit an annual activity report to their Shareholders' Annual General Meeting on the issues dealt with by the ACs during the previous year, also including a description of the sustainability policy followed by each entity.

The 2023 HoldCo/Bank AC Activity Reports which are also part of the 2023 HoldCo/Bank Annual Financial Reports, refer to the AC activity during 2023, the issues addressed and the sustainability policy.

3.2 Board Risk Committee⁷

The purpose of the HoldCo/Bank's Board Risk Committee (BRC) is to assist the Board in the following risk-related issues:

- to advise and support BoD regarding the monitoring of overall actual and future risk appetite and strategy, 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 institution,
- to provide BoD with recommendations on necessary adjustments to the risk strategy,
- to assist BoD in overseeing the implementation of risk strategy and the corresponding limits set,
- to oversee the implementation of the strategies for capital and liquidity management as well as for all other relevant risks, such as credit and market risks as well as non-financial risks such as operational, reputational conduct legal, cyber, outsourcing climate and environmental, in order to assess their adequacy against the approved risk appetite and strategy,
- to oversee the progress made to enhance resolvability in accordance with the requirements of the Resolution Authorities (*for Bank BRC only*),
- to review a number of possible scenarios, including stressed scenarios, to assess how the risk profile would react to external and internal events,
- to oversee the alignment between all material financial products and services offered to clients and the business model and risk strategy. The BRC should 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 (*for Bank BRC only*),
- to provide advice on the appointment of external consultants that BoD may decide to engage for advice or support,
- to assess the recommendations of internal or external auditors and follow up on the appropriate implementation of measures taken,
- to ensure that an appropriate risk management framework has been developed which is embedded in the decision-making process (e.g. new products and services introduction, risk adjusted pricing, internal risk models, risk adjusted performance measures and capital allocation),
- to define the risk management principles and ensure that there are the appropriate methodologies, modeling tools, data sources and sufficient and competent staff to identify, assess, monitor and mitigate risks, and
- to set, approve and oversee the implementation of the institution's risk culture, core values and expectations regarding credit risk.

BRC Membership/Composition

The BRC members are appointed by the BoD, following the recommendation of the NomCo, in accordance with the legal and regulatory framework where applicable. The Chairperson qualifies as independent member with a solid experience in commercial banking and preferably risk and/or Non-Performing Exposures management and is familiar with the Greek and international regulatory framework. The appointment of the Chairperson and the Vice-Chairperson shall go through the NomCo's proposal process and approved by the Board. The tenure of the BRC members coincides with the tenure of the Bank's Board, with the option to renew their appointment, but in any case, the service in the BRC should not be more than nine (9) years in total.

The BRC consists of five (5) non-executive Directors, four (4) of whom are independent, including the Chairperson and the Vice-Chairperson. One (1) of the BRC members is the HFSF Representative. In particular, the BRC composition is outlined below:

BRC Chairperson: Rajeev Kakar, *Non-Executive Independent Director of the Board*

BRC Vice-Chairperson: Cinzia Basile, *Non-executive Independent Director of the Board*

BRC Members: Bradley Paul Martin, *Non-Executive Director of the Board*

Alice Gregoriadi, *Non-Executive Independent Director of the Board*

John Arthur Hollows, *Non-executive Independent Director of the Board*

It is noted that during 2023 and following NomCos' recommendations for the recomposition of the HoldCo/Bank's BoDs Committees, the HoldCo/Bank's BoDs decided on 29.09.2023, Mr. John Arthur Hollows to replace Ms. Efthymia Deli (taking also into consideration that her role as representative of the HFSF would cease after the disposal of HFSF's participation).

BRC Meetings

The BRC meets at least on a monthly basis and the Chairperson updates the BoD members on the material matters covered by the Committee during the previous period (if any) at the quarterly meetings of the BoD.

Apart from the BRC members, the AC's members may also attend BRC sessions when common issues are discussed (i.e. on operational risk matters, on IT security and cyber risks). The Chairperson of the BRC may also invite to the meetings other executives of the Group or external advisors or experts, as deemed appropriate.

⁷ HoldCo/Bank's BRCs' Terms of Reference may be found at the HoldCo/Bank websites (www.eurobankholdings.gr & www.eurobank.gr).

Quorum in the BRC Meetings

Quorum requires the majority of members (half plus one) to be present or represented, provided that no less than three (3) Committee members, including the Chairperson or the Vice Chairperson, are present. Each member of the Committee may validly represent only one of the other Committee members. Representation in the Committee may not be entrusted to persons other than the members thereof. In determining the number of members for the quorum, fractions, if any, will not be counted.

BRC Decisions

The BRC resolutions require a majority vote of the members who are present or represented. In case of a tie, the Chairperson and in case of his/her absence the Vice Chairperson has the casting vote. In case of non-unanimous decisions, the views of the minority are also minuted. The Board is informed of the BRC's minutes.

Attendance to the BRC Meetings

During 2023, attendance details for the Board Risk Committee were as follows,

<u>Company</u>	<u>Meetings</u>		<u>Average ratio of Directors' attendance</u>	
	<u>2023</u>	<u>2022</u>	<u>2023</u>	<u>2022</u>
HoldCo	12	10	100%	95%
Bank	13	14	100%	97%

It is noted that in 2022, Directors provided representation proxies for all missed meetings in HoldCo/Bank's BRCs, leading their overall attendance rates (physical and under representation) at 100% in BRC.

BRC Secretary and Minutes

The BRC appoints its Secretary, who reports to the Group Company Secretariat and cooperates with the Chairperson of the Committee and the Group Chief Risk Officer ("GCRO"). The Secretary is responsible to minute the proceedings and resolutions of all BRC meetings, including the names of those present and in attendance and the action plans and follow ups for assignments, as well as for issuance of extracts. Decisions, actions and follow ups are disseminated to the Bank's responsible Units, as required.

BRC Terms of Reference (ToR)

BRC's ToR are reviewed at least annually and revised, if necessary, unless significant changes in the role, responsibilities, organization and/or regulatory requirements necessitate earlier revision. The ToR are approved by the Board.

BRC's Performance Evaluation

BRC's performance is evaluated annually according to the provisions of the Board and Board Committees Evaluation Policy.

The self-evaluation conducted by the BRC indicates overall satisfaction among its members regarding the Committee's leadership and effectiveness.

Members of the BRC expressed satisfaction with the leadership provided by the Chairperson of the Committee. The Chairperson is reported to be well-prepared for meetings and encourages critical discussions, ensuring that every member can freely express their views. Additionally, members of the BRC are also well-prepared for meetings, leading to a high level of participation in important discussions and maintaining an adequate level of challenge within the Committee.

However, the evaluation also highlighted areas for improvement. Specifically, the BRC's oversight of local market risks and its focus on risks related to cybersecurity, data protection, and geopolitics were identified as areas that should be enhanced. This recognition underscores the importance of continuously evolving risk management strategies to address emerging threats and challenges in these areas effectively.

BRC's Activity in 2023

For 2023, the BRC has, amongst others:

Eurobank Holdings

- monitored the Group's overall actual and future risk appetite and strategy, 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
- approved, among others, the following regulatory and other reports, including risk policies and frameworks:
 - Internal Capital & Liquidity Adequacy Assessment processes ICAAP/ILAAP
 - Capital Adequacy Statements, Liquidity Adequacy Statements
 - Risk Identification and Materiality Process (RIMA) Report
 - Group Recovery Plan

Bank

- monitored Eurobank's overall actual and future risk appetite and strategy, 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 institution
- monitored qualitative and quantitative aspects of credit, market, liquidity and operational risks,
- reviewed Information and Communication Technology (ICT) Risk and Security (incl. Cyber Security), Physical Security and Fraud detection
- reviewed General Data Protection Regulation (GDPR) and Payment Services Directive 2 (PSD2) status
- approved, among others, the following regulatory and other reports, including risk policies and frameworks

- approved the GCRO Annual Report
- approved the Group Risk and Capital Strategy and Risk Appetite Framework as well as Risk Appetite Statements incl. RAS dashboard
- Single Resolution Board's (SRB's) Working Priorities and Eurobank's Resolvability Work Programme (Bail in playbook, etc.)
- Minimum Requirement for Own Funds and Eligible Liabilities (MREL) Issuance plan & Targets
- Non-performing Exposures (NPE) Reduction Plan 2023-2025: Summary report, impairments and key risk metrics
- EBA Dashboard
- reviewed and/or approved:
 - Early Warning Framework
 - Forbearance reporting
 - Risk Parameters monitoring
 - Outsourcing reports incl. OSI regarding IT Outsourcing
 - SRT Securitisations performance updates
 - ALM tool governance framework guideline
- approved several policies incl. market risk, counterparty risk, liquidity, credit, collection etc.
- EBA Stress Test Exercise 2023
- Climate Related and Environmental Risk Disclosures

3.3 Remuneration Committee⁸

The HoldCo/Bank's Boards have delegated to the respective RemCos the responsibilities (a) to provide specialized and independent advice for matters relating to remuneration policy and its implementation at HoldCo/Bank Group level and for the incentives created while managing risks, capital and liquidity, (b) to safeguard the proper exercise of its duties and responsibilities, the efficient alignment of the personnel's remuneration with the risks the HoldCo/Bank undertakes and manages and the required alignment between the HoldCo/Bank and the Group, and (c) to approve or propose for approval all exposures of Key Management Personnel⁹ and their relatives (spouses, children, siblings). The Non-Executive Directors of HoldCo/Bank have the responsibility to approve and periodically review HoldCo/Bank's remuneration policy and oversee its implementation both at Bank and Group level.

The implementation of the HoldCo/Bank remuneration policy is in line with the provisions of Laws 3864/2010, 4261/2014 and Bank of Greece Governor's Act 2650/2012.

The HoldCo/Bank RemCo is also responsible to:

- determine the remuneration system for the members of the Board of Directors and the senior executives and to make a relevant recommendation on them to the Board of Directors, which decides on them or to make recommendations to the General Meeting, where required,
- propose to the Non-Executive Directors of the HoldCo/Bank's BoD for their approval the goals and objectives relevant to the HoldCo/Bank's CEO remuneration and evaluate his/her performance in light of these goals and objectives,
- guide and monitor the external remuneration consultant (if hired) and ensure that it receives appropriate reporting from him/her. In addition, HoldCo/Bank RemCo ensures that the external consultant is referred in the HoldCo/Bank's annual report of the year hired and/or completed his/her work, together with a statement of any possible relationship between him/her and the HoldCo/Bank or with members of the HoldCo/Bank's Board individually.

RemCo Membership/Composition

The RemCo members are appointed by the Board.

In the event that the Chairperson of the Bank's Board is a member of the RemCo, she/he cannot participate in the determination of his/her remuneration.

The tenure of the RemCo members coincides with the tenure of the HoldCo/Bank's Board, with the option to renew their appointment, but in any case, the service in RemCos should not be more than nine (9) years in total.

⁸ HoldCo/Bank's Remuneration Committees' Terms of Reference may be found at the HoldCo/Bank websites (www.eurobankholdings.gr & www.eurobank.gr).

⁹ Key Management Personnel includes: Bank's Executive and Non-Executive BoD members, Executive Board (ExBo) members, General Managers non-members of the ExBo and the Heads of Group Internal Audit, Group Compliance, Group Risk Management.

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The RemCos consists of four (4) non- executive Directors three (3) of whom are independent Directors, including the Chairperson and the Vice-Chairperson. In particular, the HoldCo/Bank RemCo composition is outlined below:

RemCo Chairperson: Cinzia Basile, *Non-executive Independent Director of the Board*

RemCo Vice-Chairperson: Jawaid Mirza, *Non-Executive Independent Director of the Board*

Members: George Chryssikos, *Non-Executive Director of the Board*

Alice Gregoriadi, *Non-Executive Independent Director of the Board*

Compared to the previous RemCo's composition, the number of RemCo members decreased from five (5) to four (4) since Ms. Efthymia Deli submitted her resignation on 27 October 2023, effective as of 7 November 2023, from the HoldCo/Bank BoDs, ACs and Remuneration Committees that was member at that time.

RemCo meetings

HoldCo/Bank's RemCo meets at least twice a year and minutes are kept.

Quorum in RemCo meetings

HoldCo/Bank's RemCo is in quorum and meets validly when half of its members plus one (1) are present or represented (fractions, if any, are not counted), provided that no less than three (3) members, including the Chairperson or the Vice Chairperson are present. Each member of RemCo may validly represent only one of the other RemCo members. Representation in RemCo may not be entrusted to persons other than the members thereof.

RemCo Decisions

RemCo's resolutions are validly taken by an absolute majority of the members who are present or represented. In case of a tie, the Chairperson and in case of his/her absence the Vice Chairperson of RemCo shall have the casting vote. In case of non-unanimous decisions, the views of the minority should also be minuted. The Board shall be informed whenever a decision of the Committee is not reached unanimously.

Attendance to the RemCo meetings

During 2023 the attendance details for the Remuneration Committees were as follows:

<u>Company</u>	<u>Meetings</u>		<u>Average ratio of Directors' attendance</u>	
	<u>2023</u>	<u>2022</u>	<u>2023</u>	<u>2022</u>
HoldCo	12	6	97%	100%
Bank	12	8	98%	100%

The Directors' individual attendance rates at the RemCo meetings in 2023 were the following:

	Eurobank Holdings' RemCo			Eurobank RemCo		
	Eligible to attend	Attended in person (# and %)		Eligible to attend	Attended in person (# and %)	
Cinzia Basile, <i>RemCo Chairperson</i>	12	12	100%	12	12	100%
Jawaid Mirza, <i>RemCo Vice-Chairperson</i>	12	12	100%	12	12	100%
George Chryssikos, <i>RemCo member</i>	12	11	92%	12	11	92%
Alice Gregoriadi, <i>RemCo member</i>	12	12	100%	12	12	100%
Efthymia Deli, <i>RemCo member until 7.11.2023</i>	10	9	90%	10	10	100%

It is noted that in 2023, Mr. George Chryssikos provided representation proxies for his missed meetings in HoldCo/Bank's RemCos, leading his overall attendance rate (physical and under representation) at 100% in RemCo.

RemCo Secretary and Minutes

RemCo appoints its Secretary, who reports to the Group Company Secretariat and cooperates with the Chairperson of RemCo and the Group Human Resources Deputy General Manager. The Secretary is responsible to minute the proceedings and resolutions of all RemCo's meetings, including the names of those present and in attendance and the action plans and follow ups for assignments, as well as for issuance of extracts. Decisions, actions and follow ups are disseminated to the Bank's responsible Units, as required.

RemCo Terms of Reference (ToR)

RemCo's ToR are reviewed annually and revised, if necessary, unless significant changes in the role, responsibilities, organization and/or regulatory requirements necessitate earlier revision. The ToR are approved by the Board.

RemCo's Performance Evaluation

RemCo's performance is evaluated annually according to the provisions of the Board and Board Committees Evaluation Policy. The self-evaluation conducted by RemCo members reflects overall satisfaction with the Committee's effectiveness and leadership.

According to the evaluation, RemCo members believe that the Committee utilizes its time effectively and has good planning and scheduling of meetings. The material for meetings is provided in advance, allowing both the Chairperson and members to be well prepared. The discussions within RemCo are described as open and sufficiently thorough, with members actively engaged, possessing high levels of knowledge, and acting independently to ensure an adequate level of challenge.

However, the evaluation also emphasized the need to maintain a focus on remuneration matters. While improvements have been made in this area, it is suggested that remuneration should continue to be regularly assessed against relevant local and international benchmarking. This ongoing assessment ensures that remuneration practices remain competitive and aligned with industry standards.

RemCos' Activity in 2023

For 2023, RemCo has amongst others:

Eurobank Holdings

- proposed to the BoD for approval the revised RemCo Terms of Reference
- reviewed and proposed to the Non-Executive Directors for approval the Remuneration Policy of the HoldCo
- reviewed and proposed to the Board and the Annual General Meeting (AGM) for approval the Remuneration Policy for Directors
- reviewed and proposed to the Non-Executive Directors for approval the Remuneration Framework of the HoldCo
- reviewed and proposed to the Non-Executive Directors for approval the Variable Remuneration - Key Performance Indicators & Key Risk Indicators and the Group Variable Remuneration Pool
- Reviewed and approved the Material Risk Takers' List
- discussed the remuneration policy implementation at Group level
- discussed the Remuneration Policy Review – Follow up (for the Year 2021), conducted by the Internal Audit Group
- proposed to the Board and Annual General Meeting (AGM) for approval the Board and Board Committees' Fees for Non-Executive Directors of the HoldCo (Actual Fees 2022 & Estimated Fees 2023)
- proposed to the Board for approval the Remuneration Report for the financial year 2022
- proposed to the Non-Executive Directors of the Bank for approval the CEO's Performance Evaluation for 2022 & CEO's Financial and Non-Financial objectives for 2023
- approved the Remuneration Disclosures for 2022
- reviewed the implementation of the Board and Board Committees' attendance policy
- approved the Remuneration Disclosures for 2022
- proposed to the Non-Executive Directors for approval a Voluntary Exit Scheme (VES)
- proposed to the BoD for approval the 8th Stock Option Plan Implementation for 2023
- depending on the case, approved or proposed to the Non-Executive Directors for approval various remuneration issues and borrowing requests
- discussed the Supervisory Review and Evaluation Process (SREP) findings regarding Human Resources matters
- proposed to the Non-Executive Directors for approval the Separation Policy
- approved the revised benefits Policy
- approved the proposal to assign to External Consultants to conduct a benchmarking exercise for Top Management Remuneration

Bank

- proposed to the BoD for approval the revised RemCo Terms of Reference
- reviewed and proposed to the Non-Executive Directors for approval the Remuneration Policy of the Bank
- reviewed and proposed to the Non-Executive Directors for approval the Remuneration Framework of the Bank
- reviewed and proposed to the Non-Executive Directors for approval the Variable Remuneration - Key Performance Indicators & Key Risk Indicators and the Group Variable Remuneration Pool
- Reviewed and approved the Material Risk Takers' List
- discussed the remuneration policy implementation at Bank and Group level
- discussed the Remuneration Policy Review – Follow up (for the Year 2021), conducted by the Internal Audit Group
- proposed to the Board and Annual General Meeting (AGM) for approval the Board and Board Committees' Fees for Non-Executive Directors of the Bank (Actual Fees 2022 & Estimated Fees 2023)
- proposed to the Non-Executive Directors of the Bank for approval the CEO's Performance Evaluation for 2022 & CEO's Financial and Non-Financial objectives for 2023
- reviewed the implementation of the Board and Board Committees' attendance policy
- discussed and further submitted to the Board for information the implementation of the Group Subsidiary Board Remuneration Policy through the Group during 2022
- approved the Remuneration Disclosures for 2022
- proposed to the Non-Executive Directors for approval a Voluntary Exit Scheme (VES)
- depending on the case, approved or proposed to the Non-Executive Directors for approval various remuneration issues of the international subsidiaries (remuneration framework, performance related variable remuneration, remuneration increases etc)
- depending on the case, approved or proposed to the Non-Executive Directors for approval various remuneration issues, borrowing requests and incentive schemes
- received and reviewed the annual updates of the RemCo Chairpersons of Group's banking subsidiaries
- approved the appointment of RemCo Chairperson in Eurobank Direktna Serbia and Eurobank Cyprus
- .
- discussed the Supervisory Review and Evaluation Process (SREP) findings regarding Human Resources matters

- discussed the Annual RemCo Plan for 2024.
- proposed to the Non-Executive Directors for approval the Separation Policy
- approved the revised benefits Policy
- approved the proposal to assign to External Consultants to conduct a benchmarking exercise Top Management Remuneration
- discussed the Annual RemCo Plan for 2024.

3.4 Nomination and Corporate Governance Committee¹⁰

Eurobank Holdings and the Bank's Boards have delegated to the NomCos the responsibilities (a) to lead the process for Board and Board Committees appointments, including the identification, nomination and recommendation of candidates for appointment to the Board, (b) to consider matters related to the Board's adequacy, efficiency and effectiveness and (c) review the Group's corporate governance policies, procedures and arrangements. The Committees were renamed Nomination and Corporate Governance Committees in order to accurately reflect their expanded purpose.

The NomCo, in carrying out its duties, is accountable to the Board.

In particular, among others, the NomCo is responsible:

- at least annually and in accordance with Board and Board Committees Evaluation Policy, to assess the structure, size, composition and performance of the BoD and make recommendations to the BoD with regard to the need for its renewal and/or any other changes it considers appropriate,
- at least annually and in accordance with Board and Board Committees Evaluation Policy, to assess the knowledge, skills, experience and contribution of individual Board members and of the Board collectively and report to the BoD accordingly,
- in the context of Board and Board Committees Evaluation Policy implementation, to determine the evaluation parameters based on best practices and ensure the effectiveness of the evaluation of the Board, the individual evaluation of Non-Executive Directors, including the Chair, the succession plan of the Chief Executive and the members of the Board, the targeted composition of the Board of Directors in relation to the strategy and Board Nomination Policy,
- to play a leading role in the nomination process and the design of the succession plan for the members of the Board and senior management,
- to review at least once every two years and recommend for the approval of the BoD the BoD Nomination Policy,
- to ensure that the nomination process, as this is defined in the BoD Nomination Policy, is clearly defined and applied in a transparent manner and in a way that ensures its effectiveness,
- to ensure that there is adequate, step-wise succession planning for Board members so as to maintain an appropriate level of continuity and organizational memory at Board level, especially when dealing with sudden or unexpected absences or departures of Board members,
- to monitor the Board succession planning in order to ensure the smooth succession of the members of the Board with their gradual replacement in order to avoid the lack of management,
- to ensure that the succession framework takes into account the findings of the evaluation of the Board in order to achieve the necessary changes in composition or skills and to maximise the effectiveness and collective suitability of the Board,
- to review at least annually and always before the initiation of the CEO succession process the qualifications required for the position of the CEO, to ensure that there is a viable pool of internal and external candidates and also to ensure that the CEO is involved in all the areas of CEO Succession Plan, including the assessment of the nominees for his/her position, as he deems appropriate,
- to ensure that the CEO is involved in the succession planning process of the senior executives at the level of the CEO minus one, including the assessment of nominees for the said positions.

As far as NomCos of subsidiaries are concerned, neither the HoldCo NomCo nor the Eurobank NomCo replace them. However, the Eurobank NomCo has the overall responsibility to oversee that the NomCos of subsidiaries comply with its standards, modus operandi and governance framework.

NomCo Membership/Composition

NomCo members are appointed by the Board. The tenure of NomCo members coincides with the tenure of the Board, with the option to renew their appointment, but in any case, the service in NomCo should not be more than nine (9) years in total.

¹⁰ HoldCo/Bank's NomCos' Terms of Reference may be found at the HoldCo/Bank websites (www.eurobankholdings.gr & www.eurobank.gr)

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The NomCo as of the date of approval of the here-in Statement, consists of five (5) non-executive Directors, four (4) of whom are independent Directors, including the Chairperson who may not serve as the Chairperson of the Remuneration Committee. The NomCo composition is outlined below:

NomCo Chairperson: Irene Rouvitha Panou, *Non-Executive Independent Director of the Board*

NomCo Vice-Chairperson: Jawaid Mirza, *Non-Executive Independent Director of the Board*

Members:
Burkhard Eckes, *Non-Executive Independent Director of the Board*
Rajeev Kakar, *Non-Executive Independent Director of the Board*

Bradley Paul L. Martin, *Non-Executive Director of the Board*

It is noted that during 2023 and following NomCos' recommendations for the recomposition of the HoldCo/Bank's BoDs Committees, the HoldCo/Bank's BoDs decided on 29.09.2023:

- to appoint Mr. Burkhard Eckes as new NomCo member, in replacement of Ms. Efthymia Deli Deli (taking also into consideration that her role as representative of the HFSF would cease after the disposal of HFSF's participation).
- Mr. Jawaid Mirza to swap his NomCo status with that of Mr. Bradley Paul Martin, i.e. Mr. Jawaid Mirza to undertake the position of NomCo's Vice Chair (previously held the position of NomCo's member) whereas Mr. Bradley Paul Martin to undertake the position of NomCo's member (previously held the position of NomCo's Vice Chair)

NomCo Meetings

NomCo meets at least twice a year and minutes are kept.

Quorum in the NomCo Meetings

NomCo is in quorum and meets validly when half of its members plus one (1) are present or represented (fractions, if any, are not counted), provided that no less than three (3) members, including the Chairperson or the Vice Chairperson are present. Each member of NomCo may validly represent only one of the other NomCo members. Representation in the NomCo may not be entrusted to persons other than the members thereof.

NomCo Decisions

NomCo's resolutions are validly taken by an absolute majority of the members who are present or represented. In case of a tie, the Chairperson and in case of his/her absence the Vice Chairperson of NomCo shall have the casting vote. In case of non-unanimous decisions, the views of the minority should also be minuted. The Board shall be informed whenever a decision of the Committee is not reached unanimously.

Attendance to the NomCo meetings

During 2023 the attendance details for the NomCo were as follows:

<u>Company</u>	<u>Meetings</u>		<u>Average ratio of Directors' attendance</u>	
	<u>2023</u>	<u>2022</u>	<u>2023</u>	<u>2021/2022</u>
HoldCo	11	6	100%	97%
Bank	11	7	100%	98%

It is noted that in 2022, representation proxies were provided for all missed meetings in HoldCo/Bank NomCo, leading the overall attendance rate (physical and under representation) at 100% in HoldCo/Bank NomCo.

NomCo Secretary and Minutes

NomCo appoints its Secretary, who reports to the Group Company Secretariat and cooperates with the Chairperson of NomCo. The Secretary is responsible to minute the proceedings and resolutions of all NomCo's meetings, including the names of those present and in attendance and the action plans and follow ups for assignments, as well as for issuance of extracts. Decisions, actions and follow ups are disseminated to the responsible parties, as required.

NomCo Terms of Reference (ToR)

NomCo's ToR are reviewed annually and revised, if necessary, unless significant changes in the role, responsibilities, organization and/or regulatory requirements necessitate earlier revision. The ToR are approved by the Board.

NomCo's Performance Evaluation

NomCo's performance is evaluated annually according to the provisions of the Board and Board Committees Evaluation Policy.

The self-evaluation conducted by the NomCo indicates overall satisfaction among its members regarding the Committee's effectiveness and leadership.

NomCo members believe that the Committee utilizes its time effectively and demonstrates good planning and scheduling of meetings. The Chairperson of NomCo is reported to be well prepared for meetings, facilitating effective navigation through

the agenda, encouraging critical discussion, and ensuring that all members can freely express their views. The members of the NomCo are also well-prepared, leading to a high level of participation in important discussions and maintaining an adequate level of challenge within the Committee.

However, the evaluation also highlighted areas for improvement, particularly focusing on succession planning. The Committee believes that more attention should be given to succession planning efforts, which should include additional training and career planning for potential successors. This emphasis on succession planning is crucial for ensuring the long-term sustainability and effectiveness of leadership within the organization.

NomCo's Activity in 2023

For 2023, NomCo has amongst others:

Eurobank Holdings

- Proposed to the BoD for approval the revised NomCo Terms of Reference
- reviewed for further update of the Board, the Board and Board Committees 2022 self-evaluation and the Board's overall effectiveness assessment
- discussed and proposed to the Board for approval the new composition of the Board Committees and other Board and Board Committees' matters
- proposed to the Board and the AGM for approval the new BoD and AC members
- reviewed and proposed to the Board for approval the External Engagements Policy and the Board and Board Committees Evaluation Policy. In addition, reviewed and proposed to the BoD and AGM for approval the Board Nomination Policy
- reviewed and proposed to the Board for approval the revised HoldCo Group Organizational Chart
- proposed to the Board for approval the Internal Governance Control Manual
- reviewed and proposed to the Audit Committee and the Board for approval the 2022 Corporate Governance Statement
- proposed to the Non-Executive Directors for approval the appointment of a Senior Executive
- discussed the handling of potential conflicts of interest following the resignation of an Executive BoD member, effective as of 31.12.2023
- reviewed and updated the Board on Senior Executives succession plan
- approved external engagements for Board members
- reviewed the independence of the Independent Non-Executive directors
- reviewed the attendance of Directors to the Board and Board Committees
- reviewed and proposed to the BoD for approval the 2023 Action Plan including recommendations from the BoD and BoD Committees Self-Assessment 2022
- discussed the NomCo Annual Plan for 2024
- discussed and submitted a proposal to the BoD regarding the term of office of the Non-Executive BoD member/HFSF representative following the HFSF's share buyback.

Bank

- Proposed to the BoD for approval the revised NomCo Terms of Reference
- reviewed for further update of the Board, the Board and Board Committees 2022 self-evaluation and the Board's overall effectiveness assessment
- discussed and proposed to the Board for approval the new composition of the Board Committees and other Board and Board Committees' matters
- proposed to the Board and the AGM for approval the new BoD and AC members
- reviewed and proposed to the Board for approval the External Engagements Policy, the Board and Board Committees Evaluation Policy and the Board Nomination Policy
- reviewed and proposed to the Board for approval the revised Eurobank Group Organizational Chart
- proposed to the Board for approval the Internal Governance Control Manual
- approved the selection of candidates as members of the Board of Directors and/or CEOs of Group's significant subsidiaries
- approved the NomCo Chairperson of Eurobank Cyprus
- proposed to the Non-Executive Directors for approval the appointment of a Senior Executive
- discussed the handling of potential conflicts of interest following the resignation of an Executive BoD member, effective as of 31.12.2023
- received and reviewed the annual updates of the NomCo Chairpersons of Group's banking subsidiaries
- reviewed and updated the Board on Senior Executives succession plan
- approved external engagements for Board Members and General Managers / Executive Board (ExBo) members that are not Board Members
- reviewed the independence of the Independent Non-Executive directors
- reviewed the attendance of Directors to the Board and its Committees
- reviewed and proposed to the BoD for approval the 2023 Action Plan including recommendations from the BoD and BoD Committees Self-Assessment 2022
- discussed the talent development and mobilization practices in Eurobank
- discussed the NomCo Annual Plan for 2024
- discussed and submitted a proposal to the BoD regarding the term of office of the Non-Executive BoD member/HFSF representative following the HFSF's share buyback.

Board of Directors Diversity Policy

The HoldCo/Bank Board of Directors Diversity Policy outlines the organization's commitment to diversity on the Board in line with international best practices and applicable legal requirements.

According to the Policy, the Board's diversity encompasses various factors such as skills, educational and professional background, geographical origin, gender, age, and other relevant qualities of Directors. The NomCo is responsible for considering diversity when assessing the composition and structure of the Board.

During the review process of the Board collective suitability, NomCo members discuss and agree on measurable objectives for achieving diversity on the Board. These objectives are also considered during the (re)appointment and succession planning of individual Board members, in accordance with the Board and Board Committees Evaluation Policy.

One of the specific targets outlined in the Policy is related to gender diversity. NomCo aims for at least 25% representation of the less represented gender on the Board, calculated based on the total Board size. This target is set for the next three years, with the intention to maintain the actual percentage above the minimum target at all times, considering industry trends and best practices.

As of 31.12.2023, the representation of the female gender on the Board met the provisions of Greek Law, which requires at least 25% representation. If there is a fractional result, the percentage is rounded to the previous integer. This indicates that the HoldCo/Bank is meeting its diversity objectives, particularly concerning gender representation on the Board.

Senior Management Diversity

The Bank/HoldCo has taken significant steps to enhance gender diversity and support career growth for women executives. These efforts are aimed at creating a pipeline of eligible female professionals who can potentially join the Executive Committee and/or Board.

One key initiative is the annual Succession Planning exercise, which identifies potential successors and has seen a 27% increase in the participation of women successors in the pool. This demonstrates a commitment to promoting gender diversity at senior levels within the organization.

Additionally, the Bank is actively involved in initiatives like "the Boardroom" initiative in Greece, which supports senior female leaders aiming to become Board members in major organizations. By sponsoring such initiatives, the Bank encourages its employees and clients to seize opportunities for leadership roles.

In the long term, the Bank has launched the "Women In Banking" program, a Women Leadership Acceleration program. This program focuses on supporting the career growth of high-potential women in middle management roles, with the goal of preparing them for transition to top executive roles in the future.

Furthermore, the Bank's Human Resources department is continuously examining additional actions to further enhance diversity at the senior and senior management levels within the Bank/HoldCo. These efforts reflect a strong commitment to promoting gender diversity and supporting the professional growth of women within the organization.

Board Nomination Policy

The HoldCo/Banks' Board Nomination Policy sets out the guidelines and formal process for the identification, selection and nomination of candidates for the Board. The Policy ensures that such appointments are made: (a) in accordance with legal and regulatory requirements; (b) with due regard to the expectations of the major shareholders and (c) on the basis of individual merit and ability, following a best practice process.

The primary objectives of the Policy are to:

- define the general principles which guide the NomCo as it discharges its role across all stages of the nomination process,
- devise the specific criteria and requirements for Board nominees,
- establish a transparent, efficient and fit-for-purpose nomination process,
- ensure that the structure of the Board (including the succession planning) meets high ethical standards, has optimal balance of knowledge, skills and experience and is aligned with the current regulatory requirements.

The Board supported by NomCo shall nominate candidates who meet the following nomination criteria:

- *Reputation along with honesty, integrity and trust*
 - a) Reputation: Sufficiently good repute, high social esteem and adherence to the reputation, honesty, and integrity criteria of the applicable regulatory framework
 - b) Honesty, integrity and trust: Demonstration of the highest standards of ethics, honesty, integrity, fairness, and personal discipline, through personal history, professional track record or other public commitments

- *Knowledge, skills, experience (KSE) and other general suitability requirements*
 - a) Understanding of the HoldCo/Bank: Sufficient KSE for the development of a proper and up-to-date understanding of the business, culture, group structure, governance arrangements, supervisory and regulatory context, product and geographic markets of operations, stakeholders and risks of the HoldCo and its subsidiaries
 - b) Seniority: Several years of experience in a generally recognised position of leadership in the candidate's field of endeavour
 - c) Independent mind-set and ability to challenge: Ability of forming and expressing an independent judgement on all matters that reach the Board and candour to challenge proposals and views on these matters by management and other candidates
 - d) Collegiality, team skills and leadership: Ability to contribute constructively and productively to Board discussions and decision making along with ability of leading such discussions as chair or vice-chair of specific committees or the Board as a whole
 - e) Additional criteria for the nomination of Executive Directors: Proven, through current and previous executive positions, knowledge, skills, experience and character to lead the HoldCo/Bank and its subsidiaries in the achievement of strategic objectives, along with willingness to enter into full time employment with the HoldCo/Bank.
- *Conflicts of interest and independence of mind*

NomCo examines the personal, professional, financial, political and any other possible interests and affiliations of candidates, ensuring that the candidates do not have actual, potential or perceived conflicts of interest which cannot be prevented, adequately mitigated or managed under the written policies of the HoldCo/Bank, that would impair their ability to represent the interests of all shareholders of the HoldCo/Bank, fulfil their responsibilities as Directors and make sound, objective and independent decisions (act with independence of mind).

In particular, NomCo shall also examine relevant direct and indirect monetary interests and non-monetary interests, including those arising from affiliations with and membership in other organisations.
- *Time commitment*

NomCo ensures that all nominees are able to commit the time necessary to effectively discharge their responsibilities as Directors, including regularly attending and participating in meetings of the Board and its Committees.
- *Collective suitability*

The Board should collectively be able to understand the institution's activities, including the main risks, and to take appropriate decisions considering the business model, risk appetite, strategy and markets in which the institution operates, i.e.:

- the composition of the management body should reflect the knowledge, skills and experience necessary to fulfil its responsibilities. This includes that the management body collectively has an appropriate understanding of those areas for which the members are collectively accountable, and the skills to effectively manage and oversee the institution, including the following aspects:
- the business of the institution and main risks related to it,
- each of the material activities of the HoldCo/Bank,
- relevant areas of sectoral/financial competence, including financial and capital markets, solvency and models, environmental, governance and social risks and risk factors,
- financial accounting and reporting,
- risk management, compliance, including AML/CFT, and internal audit,
- information/digital technology and security,
- local, regional and global markets, where applicable,
- the legal and regulatory environment,
- managerial skills and experience,
- the ability to plan strategically,
- the management of (inter)national groups and risks related to group structures, where applicable,
- corporate governance,
- ESG issues,
- gender representation, as per the Board of Directors Diversity Policy.

Among others, in overseeing the nomination process, the NomCo shall ensure that there is adequate, step-wise succession planning for Board members so as to maintain an appropriate level of continuity and organizational memory at Board level, especially when dealing with sudden or unexpected absences or departures of Board members. In this respect, the NomCo shall:

- monitor the tenures of Board members and make its nomination proposals in such a manner as to encourage staggered appointments/retirements on the Board, wherever possible. The reappointment of current Board members shall be based on continuing adherence to the criteria established in this Policy,
- ensure that there is an appropriate level of presence of relevant KSEs on the Board, without undue reliance on the expertise of a few Directors,
- review whether there are sufficient Board members who are capable of serving as Board Chair and Committee Chairs, if necessary,
- periodically monitor as required the availability of candidates who could address the Board's succession planning needs,

- take into account account a) the objectives and targets defined in the HoldCo/Bank Board Diversity Policy and b) the findings of the HoldCo and Bank BoD evaluations in order to achieve the necessary changes in composition or skills and to maximise the effectiveness and collective suitability of the HoldCo and Bank BoD.

The Board Nomination Policy is reviewed at least annually by the NomCo and approved by the Board/General Meeting of Shareholders as necessary, unless material changes, regulatory or other, necessitate earlier revision.

CEO Succession Planning

The HoldCo/Bank's CEO Succession Planning Policy (Policy) plays a crucial role in ensuring a smooth transition in leadership. The key elements of the Policy are outlined below:

- **Qualifications for CEO Position:** The NomCo, in collaboration with the current CEO, defines the qualifications required for the position of the CEO. This ensures that the successor possesses the necessary skills, experience, and attributes to lead the organization effectively.
- **Viable Pool of Candidates:** NomCo ensures that there is a viable pool of candidates who meet the required profile for the CEO position. This may involve identifying internal candidates within the organization or considering external candidates as well.
- **Annual Review:** NomCo reviews the qualifications required for the CEO position and the pool of candidates at least annually. This continuous review ensures that the succession planning process remains up-to-date and aligned with the evolving needs of the organization.
- **Selection Process:** NomCo leads the selection process for the CEO successor. This involves evaluating candidates based on their qualifications, experience, leadership capabilities, and fit with the organization's culture and strategic goals.
- **Tailored Induction Program:** Upon the selection of the new CEO, NomCo approves a tailored induction program. This program is designed to facilitate a smooth transition and ensure that the new CEO is equipped with the necessary knowledge, resources, and support to succeed in the role.

Overall, the CEO Succession Planning Policy ensures that the organization is well-prepared for leadership transitions and can maintain continuity and effectiveness in its leadership team.

3.5 Board Digital & Transformation Committee¹¹

The Bank's Board Digital & Transformation Committee (BDTC) is a consultative body that reviews proposals and gives its strategic advice and guidance on such proposals related to the Group's digital, innovation, transformation and cybersecurity, in order to contribute in achieving the vision and strategic goals of the Bank. The BDTC, in carrying out its duties, is accountable to the Bank Board.

BDTC Membership / Chairmanship

The BDTC members are appointed by the Board. The tenure of the BDTC members coincides with the tenure of the Bank's Board, with the option to renew their appointment, but in any case the service in BDTC should not be more than nine (9) years in total.

The BDTC consists of five (5) Directors of whom one (1) executive and (4) independent non-executives. The BDTC composition is outlined below:

BDTC Chairperson: Alice Gregoriadi, *Non-Executive Independent Director of the Board*

BDTC Vice-Chairperson: Rajeev Kakar, *Non-executive Independent Director of the Board*

Members: Jawaid Mirza, *Non-executive Independent Director of the Board*

John Arthur Hollows, *Non-executive Independent Director of the Board*

Stavros Ioannou, *Executive Director of the Board / Deputy Chief Executive Officer, Group Chief Operating Officer (COO) & International Activities*

It is noted that during 2023 and following NomCos' recommendations for the recomposition of the HoldCo/Bank's BoDs Committees, the HoldCo/Bank's BoDs decided on 29.09.2023, Mr. John Arthur Hollows to replace Ms. Efthymia Deli (taking also into consideration that her role as representative of the HFSF would cease after the disposal of HFSF's participation). In addition, on 31 October 2023, Mr. Andreas Athanasopoulos, Deputy CEO and Executive Member of the HoldCo/Bank BoD and member of the Bank BDTC submitted his resignation from these roles, with effect from December 31st, 2023.

¹¹ BDTC ToR may be found at the Bank's website (www.eurobank.gr).

BDTC Meetings

BDTC meets at least twice a year and as each time required, also considering that the annually held Strategy Away Day is a forum in which relevant digital and transformation strategic matters are also discussed, while minutes are kept for all meetings.

Quorum in BDTC

BDTC is in quorum and meets validly when half of its members plus one (1) are present or represented (fractions, if any, are not counted), provided that no less than three (3) members, including the Chairperson or the Vice Chairperson and one non-executive director are present. At all times, the Chairperson or the Vice Chairperson are present and the total number of non-executive (incl. independent nonexecutive) directors should be the majority of the members present or represented. Each member may validly represent only one of the other BDTC members and representation may not be entrusted to persons other than the Committee members.

BDTC Decisions

BDTC’s resolutions are validly taken by an absolute majority of the members who are present or represented. In case of a tie, the Chairperson and in case of his/her absence the Vice Chairperson of BDTC shall have the casting vote. In case of non-unanimous decisions, the views of the minority should also be minuted. The Board shall be informed whenever a decision of the BDTC is not reached unanimously.

BDTC Attendance Rate

During 2023, BDTC held two (3) meetings and the ratio of attendance was 94% (vs. 100% in 2022).

The Directors’ individual attendance rates at the BDTC meetings in 2023 were the following:

	Eurobank ‘s BDTC	
	Eligible to attend	Attended in person (# and %)
Alice Gregoriadi, <i>BDTC Chairperson</i>	3	3 100%
Rajeev Kakar, <i>BDTC Vice-Chairperson</i>	3	3 100%
Jawaid Mirza, <i>BDTC member</i>	3	3 100%
John Arthur Hollows, <i>BDTC member since 20.7.2023</i>	1	1 100%
Stavros Ioannou, <i>BDTC member</i>	3	3 100%
Efthymia Deli, <i>BDTC member until 7.11.2023</i>	2	2 100%
Andreas Athanasopoulos, <i>BDTC member until 31.12.2023</i>	3	2 67%

It is noted that in 2023, Mr. Andreas Athanasopoulos provided representation proxy for his missed meeting in BDTC, leading the overall attendance rate (physical and under representation) at 100% in BDTC.

BDTC Secretary and Minutes

BDTC appoints its Secretary, who reports to the Group Company Secretariat and cooperates with the Chairperson of BDTC. The Secretary is responsible to minute the proceedings and resolutions of all BDTC’s meetings, including the names of those present and in attendance and the action plans and follow ups for assignments, as well as for issuance of extracts. Decisions, actions and follow ups are disseminated to the Bank’s responsible Units, as required.

BDTC Terms of Reference (ToR)

The BDTC ToR are reviewed at least once every two (2) years and revised if necessary, unless significant changes in the role, responsibilities, organization and/or regulatory requirements necessitate earlier revision. The ToR are approved by the Board.

BDTC Performance Evaluation

BDTC’s performance is evaluated annually according to the provisions of the Board and Board Committees Evaluation Policy.

According to the self-evaluation conducted by the BDTC, its members expressed satisfaction with the effectiveness and leadership of the Committee. They are of the opinion that the BDTC utilizes its time efficiently and engages in thorough planning and scheduling of meetings. The Chairperson of the BDTC is consistently well-prepared for meetings and adeptly guides the Committee through its agenda, fostering critical discussions and ensuring that all members have the opportunity to freely express their views. Furthermore, members are adequately prepared for discussions, leading to a high level of participation, which indicates a satisfactory level of challenge within the Committee.

The evaluation also brought attention to areas for potential improvement within the BDTC, particularly in enhancing the planning and scheduling of future meetings. The suggestion is to incorporate more benchmarking and best practices items into the agenda, shifting focus away from matters solely related to the current state of the Bank.

BDTC's Activity

For 2023 BDTC has discussed updates of the Eurobank 2030 Transformation and its 2024 big rocks, including deep dives in various areas. The Committee reviewed among others the IT Architecture Model and strategy to support transformation, the digital maturity and was also updated on innovation benchmarking, walked through the Eurobank's Innovation Center and noted the progress of innovation initiatives.

4. Management Committees

Given that there is no relevant regulatory requirement neither a business need, the CEO has not established committees at HoldCo level.

As regards the Bank, the CEO establishes committees to assist him, as required, in discharging his duties and responsibilities. The most important Committees established by the CEO are the Executive Board, the Strategic Planning Committee, the Management Risk Committee, the Group Asset and Liability Committee, the Central Credit Committees (I & II), the Troubled Assets Committee, the Products and Services Committee (PSC) and the Environmental, Social & Governance (ESG) Management Committee.

Executive Board

The Composition of the Executive Board and short biographical details of its members are summarized below:

<p><i>Fokion Karavias</i> Chief Executive Officer (CEO)</p> <p>Year of birth: 1964</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 269.495</p>	<p>Mr. Karavias joined Eurobank in 1997 and served, inter alia, as Senior General Manager, Group Corporate & Investment Banking, Capital Markets & Wealth Management (2014-2015) and Executive Committee Member (2014-2015), General Manager and Executive Committee Member (2005-2013), Deputy General Manager and Treasurer (2002-2005), Head of fixed income and derivative product trading (1997).</p> <p>In the past, Mr. Karavias had also the following significant posts: Treasurer of Telesis Investment Bank (2000), Head of fixed income products and derivatives in Greece of Citibank, Athens (1994) and has also worked in the Market Risk Management Division of JPMorgan NY (1991).</p> <p>He holds a PhD in Chemical Engineering from the University of Pennsylvania, Philadelphia, USA and an MA in Chemical Engineering from the same university, as well as a Diploma in Chemical Engineering from the National Technical University of Athens. He has published articles on topics related to his academic research.</p>
<p><i>Stavros Ioannou</i> Deputy Chief Executive Officer (CEO), Group Chief Operating Officer (COO) & International Activities</p> <p>Membership in Board Committees: Board Digital and Transformation Committee - Member</p> <p>Year of birth: 1961</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 133.154</p>	<p>Mr. Ioannou holds several other posts in the Eurobank Group as member of the BoD of Eurobank Bulgaria AD (since October 2015), Vice-Chairman in Eurobank Cyprus Ltd (since November 2022) and is also the Chairman of the BoD, BE-Business Exchanges SA (since January 2014). Group Private Banking is also in the area of his responsibilities since 2019 while he has been appointed as the responsible BoD member of Eurobank Holdings and Eurobank for climate-related and environmental risks and for the outsourcing function</p> <p>He is currently Non-Executive Board member of Grivalia Management Company S.A. (since September 2019).</p> <p>In the past, Mr. Ioannou had also the following significant posts: Chairman of the Executive Committee in the Hellenic Banking Association (2020-2022) where he had been member since 2013, Vice Chairman at Cardlink SA (2013-2015), Member of the BoD in Millennium Bank, responsible for Retail, Private Banking and Business Banking (2003), Head at Barclays Bank PLC, responsible for Retail Banking, Private Banking and Operations (1990-1997).</p> <p>He holds an MA in Banking and Finance from the University of Wales, UK and a Bachelor Degree in Business Administration from the University of Piraeus.</p>
<p><i>Kostas Vassiliou</i> Deputy Chief Executive Officer (CEO), Head of Corporate & Investment Banking</p> <p>Year of birth: 1972</p> <p>Nationality: Hellenic</p>	<p>Mr. Vassiliou holds several other posts in the Eurobank Group as Chairman of the BoD of Eurobank Factors Single Member SA (since December 2018), Member of the BoD of Eurobank Equities Single Member SA (since March 2015), Vice-Chairman of the BoD of Eurolife FFH Insurance Group Holdings SA (since January 2021), Eurolife FFH Life Insurance SA (since December 2020) and Eurolife FFH General Insurance SA (since December 2020).</p>

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<p>Number of shares in Eurobank Holdings: 131.626</p>	<p>In the past, Mr. Vassiliou had also the following significant posts: Country Manager for Greece, Cyprus and the Balkans, Mitsubishi UFJ Financial Group, London (2000-2005) and Senior Relationship Manager, Mitsubishi UFJ Financial Group, London (1998-2000).</p> <p>He holds an MBA from Boston University, USA and a BA in Business Administration from the Athens University of Economics and Business.</p>
<p><i>Christos Adam</i> General Manager, Group Risk Management, Group Chief Risk Officer (Group CRO), Eurobank SA</p> <p>Year of birth: 1958</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 120.365</p>	<p>Mr. Adam has been Group CRO since November 2013 and he has served within the Eurobank Group as Deputy General Manager (2005-2013), Head of Group Credit Control Sector (1998-2013) and Senior Account Officer & Senior Manager, Corporate Division (1990-1997). In the past Mr. Adam worked in ANZ Grindlays Greek Branch, he had the position of Account Manager in the Corporate Division.</p> <p>He holds an MBA in Finance from the University of Michigan, Ann Arbor, USA, with full scholarship from the Fulbright Foundation and a Degree in Economics with Honors from the School of Economics & Political Sciences, University of Athens.</p>
<p><i>Thanasis Athanasopoulos</i> General Manager – Head of Group Compliance General Division of Eurobank SA</p> <p>Year of birth: 1973</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 103.888</p>	<p>In the past, Mr. Athanasopoulos has served as Chief Audit Executive of the Alpha Bank Group and Vice President - Audit & Risk Review of the Mellon Financial Corporation.</p> <p>He holds a BSc, Business Administration from the Athens University of Economics and Business, a MSc, Banking from the University of Reading, a MSc, Economic History from the London School of Economics and he is certified as a Fellow Chartered Accountant of ICAEW and a Certified Director (IDP) by INSEAD.</p>
<p><i>Iakovos Giannaklis</i> Deputy Chief Executive Officer, Head of Retail & Digital Banking of Eurobank SA</p> <p>Year of birth: 1971</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 82.421</p>	<p>He is also the Vice-President in the Board of Directors of Worldline Merchant Acquiring Greece S.A.</p> <p>In the past, Mr. Giannaklis held BoD positions in the following entities of Eurobank Group: Eurobank FPS Loans and Credits Claim Management SA (2018-2019), Eurobank Household Lending Services SA (2016-2018), Eurobank Asset Management MFMC (2014-2017) and Eurobank Business Services (2009-2017). He also held the following posts in Eurobank: Head of Retail Banking General Division (2016-2023), Head of Branch Network General Division (2014-2016), Head of Branch Network Commercial Development Sector (2014), and Head of Branch Network Sector (2009-2014).</p> <p>He has also been a member of the BoDs of Eurolife FFH Group Holdings, General Insurance and Life Insurance (2021-2023). Mr Giannaklis also served as Group Deputy General Manager, Retail and Digital, Growth and Transformation in Bank Muscat, Oman (2023)</p> <p>He holds an MBA from the University of Indianapolis, USA and a BA in Business Administration, from the City University of Seattle, USA.</p>
<p><i>Tasos Ioannidis</i> General Manager Markets & Asset Management, Eurobank SA</p> <p>Year of birth: 1968</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 101.962</p>	<p>In the past Mr. Ioannidis has served as General Manager, Head of Global Markets & Treasury (April 2015 - July 2019), Deputy General Manager, Head of Global Markets & Treasury (October 2013 - March 2015), Deputy General Manager, Group Treasurer (April 2009 - October 2013), Deputy General Manager, Group Head of Trading (March 2007 - April 2009). He has also served as Member of the BoD, Eurobank Asset Management MFMC (May 2015 - September 2017), Chairman of the BoD, Eurobank ERB MFMC, former TT ELTA MFMC (February 2014 - September 2015), Member of the BoD, Global Asset Management SA (June 2006 - December 2009), and Member of the BoD, Portfolio Investment SA (June 2002 - April 2003).</p> <p>He holds a MSc in Shipping, Trade and Finance from Cass Business School, London, UK and a BSc, School of Mechanical Engineering from the National Technical University of Athens.</p>
<p><i>Apostolos Kazakos</i> General Manager, Group Strategy, Eurobank SA</p> <p>Year of birth: 1972</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 104.417</p>	<p>Mr. Kazakos has also served as Deputy CEO, Eurobank Equities, the investment banking and brokerage arm of Eurobank Group (May 2010 – August 2013), Assistant General Manager, Head of Group Strategy & Investment Relations, National Bank of Greece (August 2014 – March 2015), General Manager and Head of the Investment Banking, Restructuring & Capital Investment Division, General Bank, Piraeus Group (September 2013 – July 2014), Senior Executive and eventually Head of the Investment Banking Division, Eurobank Equities and Telesis Bank (January 1998 – May 2010).</p> <p>He holds an MSc in International Securities, Investment and Banking, International Securities Market Association (ISMA) from the University of Reading, UK and a Degree in Accounting, Faculty of Administration & Finance</p>

**EUROBANK ERGASIAS SERVICES AND HOLDINGS S.A.
ATTACHMENT TO THE REPORT OF THE DIRECTORS**

	from the International University of Greece (ex-Technological Educational Institute of Central Macedonia).
<p><i>Harris Kokologiannis</i> General Manager, Group Finance, Group Chief Financial Officer (Group CFO), Eurobank SA</p> <p>Year of birth: 1967</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 119.788</p>	<p>Mr. Kokologiannis joined Eurobank in January 2008 as Head of Group Finance and Control until his appointment as Group CFO in July 2013.</p> <p>He has served as Audit Supervisor, Deloitte (Tax, Audit, Management Consultant), Group CFO (Lafarge Cement - Heracles General Cement Company), Director of Finance and Control (L'Oreal Hellas), Group Financial Manager (PLIAS Group).</p> <p>He is a Chartered Accountant in UK, member of the Chartered Institute of Management Accountant (C.I.M.A.), UK. He holds an MBA from the University of Warwick (UK) and a BA in Business Management and Organization from the School of Economics and Business Science (ASOEE).</p>
<p><i>Michalis Louis</i> Head of International Activities & Group Private Banking</p> <p>Year of birth: 1962</p> <p>Nationality: Cypriot</p> <p>Number of shares in Eurobank Holdings: -</p>	<p>Mr. Louis also serves as CEO, Eurobank Cyprus Ltd (since 2007), Member of the BoD, Eurobank Private Bank Luxembourg SA and Member of the Supervisory Board (SB) of Eurobank Bulgaria AD.</p> <p>He holds a MSc in Corporate Finance & Accounting from the London School of Economics and Political Sciences, UK and a Degree in Accounting from Ealing College, UK.</p>
<p><i>Natassa Paschali</i> General Manager, Head of Group Human Resources General Division, (Group CHRO), Eurobank SA</p> <p>Year of birth: 1972</p> <p>Nationality: Greek</p> <p>Number of shares in Eurobank Holdings: 47.968</p>	<p>Mrs. Paschali is the Group Chief Resources Officer (Group CHRO), since June 2018 In the past she has served within the Eurobank Group as Head of People Engagement (January 2017 – June 2018), Head of HR, Eurobank Private Bank Luxembourg SA (parallel assignment), Luxembourg (May 2014 – May 2017), Head of HR Line Management, Wholesale Banking (2008-2016). She also held positions in Citigroup- Citibank International Plc as Head of HR – Vice President, Global Corporate and Investment Banking Group, (July 2006 – June 2008) and Head of Training & Development – Assistant Vice President, Consumer Banking Group, (February 2004 – July 2006)</p> <p>She holds a MSc in Industrial Relations and Personnel Management from the London School of Economics and Political Science (1995-1996) and a BA in English Language and Literature from the University of Athens, School of Philosophy (1991-1995).</p>
<p><i>Ioannis Serafeimidis</i> General Manager, Retail Banking Channels, Eurobank SA</p> <p>Year of birth: 1973</p> <p>Nationality: Hellenic</p> <p>Number of shares in Eurobank Holdings: 44.523</p>	<p>Mr Serafeimidis is also a Non-Executive member of the BoDs in, Eurolife FFH Insurance Group Holdings SA (since July 2023), Eurolife FFH Life Insurance SA (since July 2023) and Eurolife FFH General Insurance SA (since July 2023).</p> <p>In the past Mr. Serafeimidis has served as General Manager and Head of Branch Network, Eurobank, Athens (2019-2023), Executive Director and Head of Retail Banking, Postbank, Sofia (2014-2019), Head of Branch Network, Postbank, Sofia (2011-2014), Senior Executive Manager and Head of Small Business Banking, Bancpost, Bucharest (2008-2011), as well as other significant posts in Eurobank's Branch Network, which he joined in 2002 after a 4 year incumbency in KPMG Management Consulting in Athens.</p> <p>He holds an MSc in International Relations from London School of Economics (UK) and a BSc in Economics from the University College London (UK).</p>

Mrs. Veronique Karalis, Deputy Group Company Secretary, serves as the Secretary of the ExBo.

The ExBo manages the implementation of Group's strategy in line with the Board's guidance. The functioning of ExBo is subject to the provisions of the TRFA. The ExBo is established by the CEO and its members are appointed by the CEO. The ExBo meets on a weekly basis or ad hoc when necessary. Other executives of the Group, depending on the subject to be discussed, may be invited to attend.

The ExBo is in quorum and meets validly when half of its members plus one are present or represented. In determining the number of members for the quorum, fractions, if any, shall not be counted. The ExBo resolutions require a majority vote. The ExBo appoints its Secretary, who reports to the Group Company Secretariat and cooperates with the Chairperson of the Committee. The Secretary is responsible to minute the proceedings and resolutions of all ExBo meetings, including the names of those present and in attendance and the action plans and follow ups for assignments, as well as for issuance of extracts. Decisions, actions and follow ups are disseminated to the Bank's responsible Units, as required. The ExBo Terms of Reference (ToR) are approved by the CEO and revised as appropriate.

The ExBo's key tasks and responsibilities are to:

- manage the implementation of the Group's strategy as developed by the SPC, in line with the BoD's guidance,
- draw up the annual budget and the business plan. The SPC reviews the key objectives and the goals contained therein, as well as the major business initiatives, and submits them to the Board for approval,

- approve issues concerning the Group's strategic choices (e.g. partnerships, share capital increase, issuing convertibles and/or launching debt issuance programs, mergers, acquisitions or disposals, the formation of joint ventures, creation or dissolution of special purpose vehicles, dividend distribution and all other investments or non-material disinvestments¹² by the Group etc.), ensuring these being in line with the approved Group's strategy, if the issue under discussion is less than or equal to €40 million. In case though:
 - a) the issue under discussion exceeds € 40 million,
 - b) a decision of the Board is obligatory by Law or by the Bank's contractual commitments,
 - c) it is deemed necessary by the SPC, taking into account the complexity and nature of the strategic choices under discussion,the issues concerning the Group's strategic choices are approved by the Board following a relevant proposal by the SPC (as per its Terms of Reference),
- monitor the performance of each business unit and country against budget and ensure corrective measures are in place wherever required,
- decide on all major Group's initiatives aiming at transforming the business and operating model, enhancing the operating efficiency and cost rationalization, improving organizational and business structure,
- ensure that adequate systems of internal controls are properly maintained,
- review and approve Bank's Policies (other than Credit Policies that are approved by Management Risk Committee and/or Troubled Assets Committee and/or BRC) that are related to its responsibilities and/or are of critical importance to the Bank, including but not limited to those requiring BoD approval as per the TRFA,
- review the performance of any Committee and /or individuals to whom it has delegated part of its responsibilities, as approved,
- ensure adequacy of Resolution Planning governance, processes and systems,
- hire and retain external consulting firms and approve their compensation and terms of engagement in accordance with Bank's policies and procedures,
- hire and retain investment banking advisors, and approve their compensation and terms of engagement, in accordance with Bank's policies and procedures, where applicable,
- To review the quarterly report of Group Operational Risk Sector (GORS) before submission to the BRC since it entails group wide operational risk issues.

ExBo's performance is evaluated annually according to the provisions of Bank's Management Committees' Policy and its Terms of Reference. For 2023, ExBo performed its self-evaluation. According to this evaluation, it was determined that its overall performance remained strong in all areas with a slight decrease vs. last year. Members of ExBo discussed the following considerations: i) number of items in the agendas being excessive, ii) Meetings' agenda being more focused on regulatory and operational and less strategic and business oriented and iii) supporting material being lengthy and the necessity of an executive summary.

Strategic Planning Committee¹³

The purpose of the SPC is to:

- a) assist Management in planning, developing and implementing the Bank Group's Strategy and
- b) recommend to the Board certain initiatives in relation to the Bank Group's Strategy.

The key tasks and responsibilities of the SPC are:

- within the framework of which the Executive Board draws up the annual budget and the business plan, to review the key objectives and goals contained therein and review major business initiatives, before their submission for approval to the Board,
- to review, analyze and deliberate issues concerning the Bank Group's strategic choices (e.g. strategic partnerships, share capital increase, issuing convertibles and/or launching debt issuance programs, mergers/demergers, acquisitions or disposals, the formation of joint ventures, creation or dissolution of special purpose vehicles, dividend distribution and all other major investments or disinvestments by the Bank Group etc.), ensuring these being in line with the approved Bank Group's strategy. The SPC shall formulate relevant proposals to the Board, if:
 - a) the issue under discussion exceeds € 40 million, while for lower amounts approval will be provided by the Executive Board,
 - b) a decision of the Board is obligatory by Law or by the Bank's contractual commitments,
 - c) it is deemed necessary by the SPC, taking into account the complexity and nature of the strategic choices under discussion,
- to submit to the Board for approval proposals relating to the strategy and the budget of the Property Portfolio as described in the Service Level Agreement between Eurobank and Grivalia Management Company,
- to submit to the Board for approval proposals for the acquisition and disposal of assets other than repossessed assets (as these are defined in the Service Level Agreement between Eurobank and Grivalia Management Company) with book value above € 10 million,
- to submit to the Board for approval proposals for the disposal of repossessed assets (as these are defined in the Service Level Agreement between Eurobank and Grivalia Management Company) with gross book value above € 20 million,

¹² As specified in the Divestment Policy

¹³ Information regarding current composition and short biographical details of its members may be found at the Bank's website (www.eurobank.gr).

- to maintain and take all necessary actions on regulatory and internal capital required to cover all types of risks (incl. strategic and reputational risks, as well as other non-quantifiable risks) and to ensure that capital requirements are met at all times,
- to review and evaluate all major Bank Group's initiatives aiming at transforming the business and operating model,
- to monitor on a regular basis the strategic and the key performance indicators of the Bank Group, including the segmental view,
- to review and, as needed, make proposals to the Board on all other issues of strategic importance to the Bank Group.

The SPC is composed of the following members with voting rights:

- The Chief Executive Officer (CEO)
- The Deputy CEOs
- The Group Chief Risk Officer
- The Group Chief Financial Officer

The Chairman of the Board, the Vice-Chairman of the Board and the General Manager Group Strategy participate in the SPC as a permanent attendees with no voting rights.

The SPC is chaired by the CEO and in case of absence or impediment of the CEO, by the longest serving Deputy CEO in attendance.

The SPC meets on a weekly basis or ad hoc, when necessary, and keeps minutes of its meetings.

The SPC is in quorum and meets validly when a) half of its members plus one are present (fractions are excluded from the computation), provided that at least three members are present and b) SPC's Chairperson or the longest serving Deputy CEO in attendance, entitled to chair the Committee, is present.

The resolutions of the SPC require a majority vote. In case of a tie of votes, SPC's Chairperson has the casting vote. If SPC's Chairperson is absent, the longest serving Deputy CEO in attendance, entitled to chair the Committee, has the casting vote.

In the context of providing support to the Chairperson for ensuring the smooth and proper operation of the SPC, the SPC appoints its Secretary who reports to the Group Company Secretariat and cooperates with the Chairperson of the Committee.

The Secretary is responsible to maintain an annual calendar of the scheduled meetings, which may be revisited depending on unforeseen circumstances, following the approval of SPC's Chairperson. In addition, the Secretary is responsible to organize meeting details (including venues), record the attendance of members and other attendees/invitees, ensure that quorum requirements are met, minute the proceedings and resolutions of all Committee meetings, issue true copies/extracts of the SPC's minutes and notify the responsible managers regarding any issue discussed by the SPC and is relevant to them or on which they need to take action.

The SPC Terms of Reference (ToR) are approved by the CEO and revised as appropriate.

SPC's performance is evaluated annually according to the provisions of Bank's Managements Committees' Policy and its Terms of Reference. According to SPC's self-evaluation for 2023, it was determined that its overall performance and all the specific areas of evaluation i.e. the profile and composition, the organization and administration and the key tasks and responsibilities, are strong.

Management Risk Committee¹⁴

The main responsibility of Management Risk Committee (MRC) is to oversee the risk management framework of the Bank. The MRC ensures that material risks are identified and promptly escalated to the BRC and that the necessary policies and procedures are in place to prudently manage risk and to comply with regulatory requirements.

As part of its responsibility, the MRC, facilitates reporting to the BRC on the range of risk-related topics under its purview.

As part of its mandate, the MRC:

- reviews the Group's risk profile vis-à-vis its declared risk appetite, examines any proposed modifications to the risk appetite,
- reviews and approves the stress testing programme results,
- determines appropriate management actions which are discussed and presented to the ExBo for information and submitted to the BRC for approval.

The MRC maintains at all times a pro-active approach to Management.

The MRC understands and evaluates risks, addresses escalated issues, provides oversight of the Group's risk management framework – including the implementation of risk policies – and informs the BRC of the Group's risk profile. The Group CRO

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updates the ExBo on material risks and issues on a periodical basis. Furthermore, the MRC assists the BRC in defining risk management principles and methodologies thereby ensuring that the Group's Risk Management Framework contains processes for identifying, measuring, monitoring, mitigating and reporting the current risk profile against its risk appetite, limits, and performance targets. Specific responsibilities performed by the MRC are described below:

- revises and presents to the BRC for approval the risk strategy and the risk appetite, the risk limits and the measures for monitoring both financial and non-financial risks, in conjunction with the Board's approval of the annual business plan / strategy,
- monitors : a) current risk exposures at a Group level, b) company-wide compliance with the risk limits, c) Bank's overall risk assessment processes and d) Bank's capability to identify and manage new risk types as they emerge
- performs risk escalation and remediation by reviewing and reporting on any material breaches of risk limits and the adequacy of proposed specific actions to address them,
- reviews the Stress Testing Programme with regards to:
 - its effectiveness and robustness,
 - material risks developed in the risk identification process and scenarios developed in the scenario design process,
 - key modelling assumptions and the stress testing results before the submission to the BRC
- reviews at least on an annual basis the following reports:
 - the Group ICAAP and ILAAP,
 - the Group Recovery Planin compliance with the regulatory requirements and guidelines before final submission to the BRC,
- Regarding the Resolution Planning, the MRC reviews and approves the Bank's resolution planning initiatives to enhance its resolvability material/documents requested by the Resolution Authorities (SRB).

The MRC does not conflict with the GCRO or the Risk Management General Division's responsibilities for Risk governance as prescribed under the Bank of Greece's Governor Act no. 2577/2006. They have responsibility to escalate material risks and issues to the BRC and to update ExBo on material risks and issues on a periodical basis.

The MRC which meets on a monthly basis prior to the BRC meeting or more frequently on an ad-hoc basis, if required, is in quorum and meets validly when half of its members, including the Chairperson or the Vice-Chairperson, plus one are present or represented. Selected attendees can be invited to the MRC meetings, when the topics for discussion fall under their remit or they have the requisite expertise to constructively participate. The finalized minutes are distributed to the BRC, SPC and ExBo members, as prepared by the committee's secretary and approved by its Chairperson. Abstracts of resolutions reached and actions to be taken are provided to Management, SPC and/or ExBo members, as necessary.

Resolutions of the MRC are decided based on a simple majority and in case of a tie vote, the Chairman or the Vice-Chairman in the case of Chairman's absence, has the casting vote. The opinion of the minority is recorded in the meeting minutes whenever a decision of the MRC is not reached unanimously, and the BRC is informed accordingly.

Changes to the ToR of the MRC are reviewed by the MRC at least every two (2) years and revised if necessary, unless significant changes in the composition, role, responsibilities, organization and / or regulatory requirements necessitate earlier revision and are approved by the CEO. The ToR of MRC are also submitted to the BRC for information purposes.

The MRC's performance is evaluated annually according to the provisions of Bank's Management Committees Policy and its Terms of Reference. For 2023, it was determined that its overall performance and all the specific areas of evaluation i.e. the profile and composition, the organization and administration and the key tasks and responsibilities, are strong. Members reviewed key points raised by the self-assessment exercise, noting that the main issues concern members' attendance and participation, the length of the meeting and the agenda as well as the timely submissions. Members exchanged opinions on how to improve the committee and agreed on the need to educate the presenters to be short and concise so as to allow more time for questions/discussion.

Group Asset and Liability Committee (G-ALCO)¹⁵

G-ALCO's primary mandate is to:

- a) formulate, propose, approve, implement and monitor – as the case may be - the Group's i) liquidity position and risk profile and its funding strategies and policies ii) interest rate guidelines and interest rate risk profile and policies iii) Capital investments - as well as FX exposure and hedging - strategy iv) Group's business initiatives and/or investments that affect the bank's capital, market and liquidity risk profile. Further, to approve at a first stage, and recommend to BRC for final approval the respective country limits and the relevant policy/methodology (special attention is given for the approval/monitoring of the limits for countries where Eurobank has a local presence).

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- b) approve or propose – as the case may be - changes to these policies that conform to the Bank’s risk appetite and levels of exposure as determined by the Board Risk Committee (and BoD as the case may be) and Management, while complying with the framework established by regulatory/supervisory authorities.

G- ALCO responsibility is to also review the overall liquidity positions and developments of the Group on a country-by-country level. In this context, international subsidiaries’ ALCOs should report on monthly basis material country developments and decisions (reflected in respective country ALCO minutes) to G-ALCO, based on the above principles and their respective regulatory/supervisory authorities’ instructions and guidelines.

The key tasks and responsibilities of G-ALCO involve the following broad areas:

- Approval of general policies and guidelines, compliance with regulatory requirements, review of activities/investments, risks & exposures
- Liquidity Risk
- Interest Rate Risk in the Banking Book (IRRBB) and Credit Spread Risk in the Banking Book (CSRBB)

Key reports reviewed by G-ALCO:

- Deposit rates evolution (per business unit) and market share evolution (Greece)
- LCR & NSFR evolution on a monthly basis (at a Solo and Group level)
- Liquidity buffer analysis (Solo, Group, and per country).
- Liquidity stress tests
- Liquidity risk analysis/sensitivities
- Market risk analytics reports (PV01 in FVOCI and AC, VaR analysis, historical simulation results and reporting of the relevant KRIs for MTM exposure in OCI & AC, evolution of RWAs for market risk, reports on the level of KRIs related to market risk.
- IRRBB reports: sensitivity of NII and sensitivity of EVE per regulatory framework (EBA IRRBB guideline) & per internal framework
- International subsidiaries’ liquidity buffers and regulatory ratios.

G-ALCO convenes once a month and/or whenever required.

Required quorum for G-ALCO meetings to be effective is six members. In order to have a quorum the presence of its Chairperson and a minimum of three (3) SPC members is required. Decisions on issues are to be taken by majority; in case of a tie vote, the issue under discussion is escalated to ExBo. Additionally, under exceptional circumstances, decisions may be taken by circulation, which is equal to a decision of the G-ALCO, even if no meeting has taken place. A relevant approval memo is then issued by the Secretary.

G-ALCO’s performance is evaluated annually according to the provisions of Management Committees’ Policy and its Terms of Reference. G ALCO’s self-evaluation for 2023 is in progress, while according to G-ALCO’s self-evaluation for 2022, it was determined that: i) its members’ engagement is well appropriate, ii) the G-ALCO continues to function effectively in relation to its mandate and responsibilities, with members engaging in critical discussions during meetings on key risk issues, iii) in light of the increasing complexity and importance of issues arising, the evolution of the regulatory framework and emergence of additional risk considerations, G-ALCO should improve its organizational and operational efficiency with increasing frequency and/or length of meetings as may be required to remain as effective.

Central Credit Committees

Central Credit Committee I

The main objective of Central Credit Committee I (CCCI) is to ensure the objective credit underwriting of relevant exposures of Greek corporate performing and private banking clients, in accordance to the Risk Appetite Framework and the Credit Policy Manual of the Bank and in a way that balances credit risk and return on equity.

The CCCI is chaired by an independent to Business and Risk Professional, convenes at least once a week and all meetings are minuted. Decisions are taken unanimously. If unanimity is not achieved, the credit request is escalated by the Chairperson to the next (higher) approval level requiring a unanimous decision. In case of non-unanimity the final decision lies with the Management Risk Committee (MRC), by majority voting.

The main duty and responsibility of the CCCI is to assess and approve all credit requests for clients in the Greek related corporate performing and private banking portfolio of a total exposure above €50mio and unsecured exposure above €35mio. For total exposure exceeding €75mio and unsecured exposure exceeding €50mio, additional approval by the GCRO is required, while for total exposure exceeding €150mio and unsecured exposure exceeding €100mio, additional approval by the CEO is required. Furthermore, for exposures higher than 10% (or 20% for selected borrowers where no single risk exists) of the Bank’s regulatory capital the additional approval of the Management Risk Committee (MRC) is required. Subsequently, the final approval is granted by the Board Risk Committee (BRC).

Central Credit Committee II

The main objective of the Central Credit Committee II (CCCII) is the same as for the CCCI for lower levels of exposure.

The CCCII convenes at least once a week and all meetings are minuted. Decisions are taken unanimously. If unanimity is not achieved, the request is escalated by the Chairperson to the next approval level.

The main duty and responsibility of CCCII is to assess and approve all credit requests for clients in the Greek related corporate performing and private banking portfolio for total exposure from €20mio up to €50mio and unsecured exposure from €10mio up to €35mio and retail exposures for total limits above €3mio.

Central Credit Committees' performance is evaluated annually according to the provisions of Managements Committees' Policy and its Terms of Reference. The Central Credit Committee's self-evaluation for 2023 is currently in progress.

Troubled Assets Committee¹⁶

The Troubled Assets Committee (TAC) is established according to the regulatory provisions. The main purpose of TAC is to act as an independent oversight body, closely monitoring the Bank's troubled assets portfolio and the execution of its NPE Management Strategy.

The Committee meets at least once per month and/or whenever required if the majority of the members, including the Chairperson, are present. Decisions are taken by majority, are minuted and circulated as appropriate. The Chairman has a casting vote. TAC cooperates with Group Risk Management Division to reach a mutual understanding and develop an appropriate methodology for the evaluation of the risks inherent in the portfolio management. TAC's propositions regarding NPE policy updates are submitted to the Board Risk Committee.

TAC's main responsibilities:

- review internal reports regarding troubled assets management under the regulatory provisions,
- approve the available forbearance, resolution and closure solutions by loan sub-portfolio, and monitor their performance through Key Performance Indicators (KPIs),
- define the criteria to assess the sustainability of credit and collateral workout solutions through the design and use of "decision trees",
- approve, monitor and assess pilot modification programmes and
- supervise and provide guidance and know-how to the respective troubled assets units of Eurobank's subsidiaries abroad.

In compliance with the provisions of the Management Committees' Policy and its Terms of Reference, TAC is in the process of conducting the self-evaluation for 2023, while for 2022, the evaluation concluded that the committee operates effectively, in the areas of Profile and Composition, Organization & Administration as well as regarding the Key Tasks and Responsibilities. However, the evaluation also identified that while the overall quality and quantity of information submitted related to the proposals for assessment by the TAC members is adequate, there is room for further enhancement on providing more details on the quantification of the impact of the proposed for approval actions. Such enhancement will benefit TAC members to make more informed decisions.

Products & Services Committee (PSC)¹⁷

Products & Services Committee (PSC) is responsible for creating and supervising the governance framework for the products and services offered to Eurobank's clients in Greece through the physical and alternative channels, in accordance with the supervisory and regulatory requirements. A governance framework assessing financial and non-financial risks is in place. The PSC approves all new products & services as well as significant modifications in existing ones. The Committee also implements a periodic review of all products and services, according to their risk profile to determine their continuation, modification or discontinuation. The products and services of Remedial & Servicing Sector are excluded and are under the responsibility of TAC (Troubled Assets Committee).

PSC convenes once a month and/or whenever required. Other executives or managers of the Group, depending on the subject to be discussed, may be invited to attend as required.

The PSC is in quorum and meets validly when half of its members plus one are present (fractions are excluded from the computation). For quorum, the Chairperson should be also present.

Decisions require, as a minimum, a majority vote of 50%+1 of the members present in the meeting and are recorded in the meeting's minutes. In case of a tie vote, the Chairperson has the casting vote. All members of the PSC have equal voting

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rights. In case of no reaching a decision due to disagreement of Members, the issue under discussion is escalated to the Executive Board (ExBo).

Additionally, decisions may be taken by circulation, which is equal to a decision of the Committee, even if no meeting has preceded. No resolution can be deemed for high risks products/services by circulation. They will be submitted to a PSC Meeting for discussion and approval or rejection.

The Committee's performance is evaluated annually according to the provisions of the Management Committees' Policy of the Group and its Terms of Reference. Committee's 2023 self-evaluation is still in progress, while according to the Committee's 2022 self-evaluation, its performance was assessed as very strong, it was determined that the Committee's operation is continuously improving and that it functions very effectively, especially in the areas of leadership and PSC Chairperson's contribution in organizing/coordinating meetings and encouraging critical discussions in meetings.

Environmental, Social & Governance (ESG) Management Committee - ESG ManCo¹⁸

The primary mandate of the ESG ManCo is to i) provide strategic direction on ESG initiatives, ii) review the ESG Strategy prior to approval, iii) integrate the elements of the ESG strategy into the Bank's business model & operations, iv) approve eligible assets of Green Bond Frameworks, v) regularly measure and analyze the progress of the ESG goals and performance targets, and vi) ensure the proper implementation of ESG related policies and procedures, in accordance with supervisory requirements and voluntary commitments.

ESG ManCo convenes four times a year and/or ad hoc when necessary. Other Bank employees, depending on the subject to be discussed, may be invited as deemed appropriate.

Required quorum for ESG ManCo meetings to be effective is seven members. In order to have a quorum, the presence of its Chairperson and a minimum of six (6) members is required. Decisions on issues are taken by majority. In case of a tie vote, the Chairperson has the casting vote. Whenever a decision of the ESG ManCo is not reached unanimously, this is recorded in the minutes along with the opinion of the minority. All meetings and decisions are minuted by the Committee's Secretary and distributed to ESG ManCo members.

The Terms of Reference of the ESG ManCo will be reviewed at least every two (2) years and revised if necessary, unless significant changes in the composition, role, responsibilities, organization and / or regulatory requirements necessitate earlier revision.

ESG ManCo's performance is evaluated annually according to the provisions of the Management Committees Policy and Its Terms of Reference. According to the Committee's self-evaluation for 2023, it was determined that it continues to function efficiently and effectively, especially in areas such as ESG ManCo Chairperson encouraging critical discussions in meetings and ensuring constructive dialogue, reviewing ESG Rating results and Secretary duties.

The evaluation highlighted the need to further improve the level of awareness in the Bank as well as to increase the meetings cadence.

Ethics Co¹⁹

The task of the Ethics Committee is to ensure that the Bank's Code of Ethics is observed, to interpret and constantly enrich it, as well as to contribute, generally, to the formulation of a code of values with which the behaviour of the officers and personnel of the Bank, as well as that of third persons that regularly collaborate with the Bank, must comply. Adherence to the rules of ethics contributes, on the one hand, to the protection of dignity and personality of the personnel, and on the other hand, to the good reputation and the protection of the interests of the Bank.

The Ethics Committee convenes once a month, if there are issues to be discussed or, exceptionally, more frequently, in case of an emergency, in a place and time that are stated in the agenda. The Ethics Committee may convene either with the physical presence of its members, or by electronic means. The Committee shall act unanimously.

The Ethics Committee's performance is evaluated annually according to the provisions of Management Committees' Policy. Ethics Committee's performance was evaluated for the first time in 2022 and it was determined that it continues to function effectively, especially in the areas of Profile & Composition as well as Organization & Administration. The Ethics Committee encourages critical discussion and a healthy challenging culture.

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5. Key Control Functions

As part of its overall system of internal controls, HoldCo/Bank have established a number of dedicated control functions whose main responsibility is to act as independent control mechanisms thus reinforcing the control structure of the HoldCo/Bank. The most important functions and their key responsibilities are described below.

5.1 Internal Audit

Eurobank Holdings

Internal Audit ("IA") is an independent, objective assurance and consulting function designed to add value and improve the operations of Eurobank Holdings. IA has adequate organisation structure and appropriate resources to ensure that it can fulfil its roles and responsibilities.

Eurobank's IAG maintains a quality assurance and improvement programme to ensure that the methodology is applied consistently and the objectives and responsibilities of IAG are met. Under the framework of co-operation between IAU and IAG, IA assigns the assessment of the effectiveness of internal audit activities and conformance with IIA Standards to IAG.

In order to safeguard its independence, IA reports functionally to the Audit Committee and administratively to the CEO. The Board has delegated the responsibility for monitoring the activity of the IA to the Audit Committee of the HoldCo. IA is headed by the Chief Internal Auditor (CIA) who is appointed by the Audit Committee. The latter also assesses the CIA's performance.

The mission of IA is to enhance and protect organisational value by providing risk-based and objective assurance, advice and insight. The key assurance and consulting responsibilities of IA are to:

- provide reasonable assurance, in the form of an independent opinion, as to the adequacy and effectiveness of the internal control framework of the HoldCo,
- assist Management on the prevention and detection of fraud or defalcation or unethical practices and undertake such special projects as required,
- assist Management in enhancing the system of internal control including improvement of existing policies and procedures.
- follow-up to ascertain that appropriate action is taken on reported audit findings within agreed deadlines,
- carry out specific responsibilities required by Regulatory Authorities and/or participate in HoldCo's projects in an assurance or consulting capacity.

Eurobank

Internal Audit Group ("IAG") is an independent, objective assurance and consulting function designed to add value and improve the operations of Eurobank and its subsidiaries. IAG has adequate organisation structure and appropriate resources to ensure that it can fulfil its roles and responsibilities.

IAG comprises the "Internal Audit Sector", the "Forensic Audit Division", the "International Audit Division" and the "Business Monitoring and Organisational Support Division". IAG also has a Quality Assurance function (QAF), to assess the effectiveness of the Group's internal audit activities and conformance with IIA Standards. QAF operates as Centre of Excellence for Audit Standards & Methodology, acting as an advisor to IAG Management in topics related to quality improvement and methodology. In addition, the Data Analytics Centre of Excellence (DAnCoE) unit of IAG aims to enhance people skills towards data analytics, enable the generation of data-driven insights and provide valuable perspectives to Management of the Group.

In order to safeguard its independence, IAG reports functionally to the Audit Committee and administratively to the CEO. The Board has delegated the responsibility for monitoring the activity of the IAG to the Audit Committee of the Bank. IAG is headed by the Group Chief Audit Executive (CAE) who is appointed by the Audit Committee. The latter also assesses the CAE's performance.

The key assurance and consulting responsibilities of IAG are to:

- provide reasonable assurance, in the form of an independent opinion, as to the adequacy and effectiveness of the internal control framework of the Bank and its subsidiaries. In order to form an opinion, IAG establishes and carries out a programme of audit work (based on the risk assessment of the audit universe),
- assist and advise Management on the prevention and detection of fraud or defalcation or unethical practices and undertake such special projects as required,
- assist Management in enhancing the system of internal control including improvement of existing policies and procedures,
- follow-up to ascertain that appropriate action is taken on reported audit findings within agreed deadlines,
- carry out any other specific duties required by the Regulatory Authorities,
- participate in Bank projects in an assurance or consulting capacity,
- assess the performance of the Group's internal audit functions, which have a direct reporting line to IAG.

5.2 Risk Management

Eurobank Holdings

As part of its overall system of internal controls HoldCo has engaged in a Service Level Agreement (SLA) with Eurobank in order to receive supporting and advisory services in all areas of risk management (credit, market, liquidity and operational risks) undertaken by the Group. The most important services provided through the above-mentioned SLA are described below:

- Provision of advice on:
 - Identification, evaluation and monitoring of credit risk,
 - Ensuring policy and instructions (strategy and products) recommended by business owners and Servicers are aligned to applicable credit policy manual and regulatory guidelines,
 - Standardization of procedures and guidelines,
 - Update and maintenance of the risk strategic framework master document,
 - Participation in systemic bank consultation committees,
 - Review new remedial products and initiatives prior submission to TAC or approval
- Coordination of NPE related regulatory reporting,
- Provision of input for SSM submission and 3-year business plan, monthly MIS actual data (including Greek and International subsidiaries),
- Advising on identification, support/advise, recording and evaluation of liquidity risks and financial monitoring,
- Advising in the identification, assessment, recording and monitoring of operational risks (e.g. RCSA, events capture, outsourcing etc.),
- Advising in the identification, assessment, recording and monitoring of climate risk.

Eurobank

The Group Risk Management, which is headed by the Group Chief Risk Officer (GCRO), is independent from the business units and has full responsibility for monitoring the material risks, as identified through the Risk Identification and Materiality Assessment (RIMA) process and listed in the relevant RIMA report. Material risk types include financial and non-financial risks, indicatively credit risk, market risk, liquidity risk, interest rate risk and credit spread risk in the banking book, operational risk, climate risk, country risk, reputational risks, conduct risk, risks stemming from strategic projects.

It comprises the Group Credit, the Group Credit Control, the Group Credit Risk Capital Adequacy Control, the Group Market & Counterparty Risk, the Group Operational and Non-financial Risks, the Group Model Validation & Governance, the Group Risk Management Strategy Planning Operations & Climate Risk, the Risk Analytics and the Supervisory Relations & Resolution Planning²⁰ Units.

The GCRO serves as a pivotal point for the risk management functions. Centralization ensures that business targets and related growth are combined with a risk conscious perspective, thus ensuring that the approved risk appetite is adhered to.

The GCRO develops and formalises the Risk Appetite Framework (RAF), defines the Risk Appetite Statements (RAS), and submits them to the Board Risk Committee for approval. The GCRO oversees the implementation of the frameworks and policies for the identification, measurement and management of risks.

The GCRO reviews and approves the risk policies before their submission for approval to the BRC or to the BoD and oversees their implementation thereafter. The GCRO reports to the BRC deviations from the risk policies or potential conflict with the approved risk strategy and risk appetite.

The GCRO is responsible to provide to the BRC adequate information, so that the Committee can properly assess and advise the BoD on the Group's risk exposures / profile and risk strategy. The GCRO oversees compliance with approved Risk Appetite Limits and reports to the BRC the compliance status and any deviations, as stipulated in the Risk Appetite Framework (RAF).

Eurobank has a well-established strategy and clear risk management objectives that has to deliver through core risk management processes and methodologies. At a strategic level, the risk management objectives are to:

- Identify the new risks relevant to the Group and assess their materiality,
- Assess the current and emerging risks as an integral part of the strategic planning process,
- Provide opinion for the Group Business Plan regarding the risk perspective on the overall outcome and reliability of the Plan,
- Ensure that business plan is consistent with Eurobank's risk appetite,
- Participate actively in decision-making processes to ensure that risk considerations are considered appropriately,
- Optimize risk/return decisions by taking them as closely as possible to the business, while establishing strong and independent review,
- Ensure that business growth plans are properly supported by effective risk infrastructure,
- Manage risk profile to ensure that specific financial deliverables remain possible under a range of adverse business conditions,

²⁰ The Supervisory Relations & Resolution Planning Unit has a dual reporting line to both the GCRO & the Group Chief Financial Officer

- Assist senior executives to improve the control and co-ordination of risk taking across their businesses,
- Cultivate a robust risk culture throughout the Bank, encouraging a positive attitude towards risk management, regulatory compliance and the internal control framework, through strong risk awareness and ownership, where all staff members consider risk management as an integral part of their everyday responsibilities,
- Provide the framework, procedures and guidance to enable all employees to manage risk in their own areas and improve the control and co-ordination of risk taking across the Bank,
- Advise and support Eurobank Holdings in risk management according to the agreed Service Level Agreement (SLA) between Eurobank Holdings and Eurobank.

Risk Management along with Compliance and other Units are involved in the assessment of all products and services throughout their lifecycle.

The Group applies the elements of the Three Lines of Defence Model for the management of risk. The Three Lines of Defence Model enhances risk management and control by clarifying roles and responsibilities within the organization. Under the oversight and direction of the Management Body, three separate lines of defence are necessary for effective risk management. In particular:

Line 1 - Own and manage risk and controls. The front-line business and operations are accountable for this responsibility as they own the rewards and are the primary risk generators.

Line 2 - Monitor risk and controls in support of Executive Management, providing oversight, challenge, advice and group-wide direction. These include the Risk Management and Compliance Units, among others.

Line 3 - Provide independent assurance to the Board and Executive Management concerning the effectiveness of risk and control management. This refers to Internal Audit.

5.3 Compliance

Eurobank Holdings

Eurobank Holdings Compliance is established with the approval of the Board of Directors and the Audit Committee of Eurobank Holdings. It is a permanent function and independent from Eurobank Holdings' business activities so that conflicts of interests are avoided. In order to safeguard its independence, Eurobank Holdings Compliance reports functionally to the Audit Committee of Eurobank Holdings and for administrative purposes to the CEO. The Audit Committee in consultation with the NomCo, proposes to the Board for approval the appointment, replacement or dismissal of the Head of Eurobank Holdings Compliance. The performance of the Head of Eurobank Holdings Compliance is assessed on an annual basis by the AC. The Head of Compliance attends all AC meetings and submits quarterly and annually reports (per regulatory requirements) summarising Compliance's activity and highlighting the main compliance issues.

Its mission is to promote, within Eurobank Holdings, an organizational culture that encourages ethical conduct, and a commitment to compliance with laws and regulations as well as global governance standards.

The main objective of Eurobank Holdings Compliance is to ensure that Eurobank Holdings has established an adequate system of internal controls that allows it to operate in accordance with the ethical set of values contained in its "Code of Conduct and Ethics" and in compliance with applicable laws, regulations and internal policies. More specifically, for the regulatory topics within its scope of responsibilities, Eurobank Holdings Compliance is mandated to:

- raise compliance awareness in Eurobank Holdings,
- provide advice the Board of Directors and Senior Management on Eurobank Holdings compliance with applicable laws, rules and standards and keeping them informed of related developments,
- issue, as necessary, policies and other documents, in order to provide guidance to staff on the appropriate implementation of applicable laws, rules and standards as well as to assist the business to develop and implement regulatory compliant policies and procedures,
- review new activities and advise on potential compliance risks,
- ensure that staff is adequately trained about compliance issues,
- provide support and challenge, if required, the business line management regarding the effectiveness of the compliance risk management activities,
- monitor whether staff applies effectively the internal processes and procedures aimed at achieving regulatory compliance,
- monitor through appropriate procedures staff adherence to internal policies and the "Code of Conduct and Ethics" and identify fraudulent activity,
- monitor timely submission of reports to Competent Authorities and report any delays and fines for any alleged breaches of regulations to the AC,
- fulfil any statutory responsibilities and liaise with regulators and external bodies on compliance issues.

Eurobank

Group Compliance is established with the approval of the Board of Directors and the Audit Committee of Eurobank. It is a permanent function and independent from the Bank's business activities so that conflicts of interests are avoided. In order to safeguard its independence, Group Compliance reports functionally to the the Board of Directors through Audit Committee of the Bank and for administrative purposes²¹ to the CEO. The Audit Committee in consultation with the NomCo proposes to the Board for approval the appointment, replacement or dismissal of the Group Chief Compliance Officer (Group CCO). The performance of the Group CCO is assessed on an annual basis by the AC. The Group CCO attends all Audit Committee's meetings and submits quarterly and annual reports (per regulatory requirements) summarising Group Compliance's activity and highlighting the main compliance issues.

Its mission is to promote, within Eurobank and its subsidiaries (Eurobank group), an organizational culture that encourages ethical conduct through integrity and a commitment to compliance with laws and regulations as well as the application of international governance standards.

The main objective of Group Compliance is to ensure that the Eurobank group has established an adequate system of internal controls that allows it to operate in accordance with the ethical set of values contained in its "Code of Conduct and Ethics" and in compliance with applicable laws, regulations and internal policies, as well as international best practices. In brief, for the regulatory topics within its scope of responsibilities, Group Compliance is mandated to:

- raise compliance awareness throughout the Eurobank group,
- provide advice to the Board of Directors and Senior Management on compliance with applicable laws, rules and standards and keep them informed of related developments,
- issue policies, procedures and other documents such as compliance manuals, internal codes of conduct & ethics and practice guidelines in order to provide guidance to staff on the appropriate implementation of applicable laws, rules and standards as well as to assist the business to develop and implement regulatory compliant policies and procedures,
- review new activities and advise on potential compliance risks,
- ensure that staff is adequately trained and frequently updated about compliance issues by designing training programs and co-operating with HR for their implementation,
- ensure the development of a robust compliance risk identification and assessment framework, provide support and challenge, if required, the business line management regarding the effectiveness of the compliance risk management activities,
- coordinate compliance risk management actions performed by other business units,
- monitor and test whether staff applies effectively the internal processes and procedures aimed at achieving regulatory compliance and report to the relevant Business Units any potential breaches in order for the latter to proceed with the required improvements,
- monitor staff adherence to internal policies and the "Code of Conduct and Ethics" and identify potential breaches or fraudulent activity,
- monitor timely submission of reports to Competent Authorities and report any delays and fines for any alleged breaches of regulations to the AC,
- fulfill any statutory responsibilities and liaise with regulators and external bodies on compliance issues,
- supervise, monitor, coordinate and evaluate the activities of the Compliance Officers of the Bank's local and international subsidiaries in order to ensure compliance with Eurobank group standards.

The scope of activities of Group Compliance covers the following core regulatory topics:

- Financial Crime including laws and regulations on Anti Money Laundering (AML) and Countering the Financing of Terrorism (CFT) and legislation aimed at combatting Tax evasion such as FATCA and CRS (tax compliance). The scope includes the provision of timely and accurate responses to requests arising from regulatory and judicial authorities for the lifting of banking secrecy or freezing of assets and co-operation with them. Financial Crime also includes anti-bribery and anti-corruption legislation. The Eurobank Audit Committee in consultation with the Eurobank NomCo proposes to the Board for approval the appointment, replacement, or dismissal of the Anti-Money Laundering Reporting Officer of Eurobank, who may be the same person as the Group CCO, and his/her Deputy
- Conduct related regulations, including:
 - market Conduct related regulation regarding the provision of investment products and services to clients including laws and regulations on Market Manipulation, Insider Trading, Unlawful disclosure of inside information and other financial crimes,
 - internal conduct & Ethics rules including Conflict of interest regulatory provisions, internal codes of conduct, Insider Dealing,
 - consumer conduct laws and regulations (including, inter alia, dormant accounts legislation, BoG's Code of Conduct for loans, the Payment Services Directive and the Deposit Guarantee scheme).

Group Compliance has an overlay role over the regulatory framework concerning personal data protection, corporate governance, prudential regulation (credit market, liquidity and operational risk), information & IT security, cyber security risk, outsourcing and ESG. In this context Group Compliance performs a high-level monitoring through compliance risk assessments of the alignment of the Bank's activities with regulatory requirements.

²¹ The administrative reporting line to the CEO does not entail any form of oversight over GC. It is rather intended to facilitate the smooth day to day administrative processes.

The scope of activities can be expanded with the approval of the AC.

Personal Data Protection

Eurobank Holdings

In the context of Personal Data Protection, Eurobank Holdings has entrusted the following functions to the Bank's Personal Data Protection Unit with the support of Legal where needed:

- consultation and advice regarding the drafting of privacy notices for the customers, employees, shareholders of the HoldCo and/ or persons with voting rights and their representatives in the HoldCo meetings and committees,
- provision of drafts of privacy policies, cookies policies and cookies management tool for the HoldCo's website,
- provision of advice in handling requests and complaints of data subjects,
- provision of advice for incident and data breach management and notifications to the competent authority, if required,
- provision of advice on GDPR policies and related guidelines.

Eurobank

Personal Data Protection Unit assists the Data Protection Officer (DPO) in performing his duties in an independent manner. Key tasks include:

- issues relevant guidelines on GDPR requirements and provides relevant advice to involved Units,
- provides advice, where requested, for the appropriate technical and organizational measures to be implemented to ensure compliance with the principles of privacy by design and privacy by default,
- provides advice regarding the content of privacy notices,
- provides advice on the appropriate handling of the GDPR requests and/or complaints,
- upon request, provides advice regarding the categorization of the third parties, in accordance with the GDPR and any other applicable data protection legislation (controller/ joint controller/processor/ sub-processor), and the relevant privacy terms to be signed,
- provides advice to the Incident Management Team on whether the incident must be reported to the data protection authority,
- provides advice, where requested, as regards the performance of Data Protection Impact Assessments,
- provides advice where requested as regards the maintenance of the Register of Processing Activity.

6. System of Internal Controls

Principles of Internal Controls

The Group has established a robust System of Internal Controls that aligns with international best practices and utilizes COSO terminology. This system is designed to provide reasonable assurance regarding the achievement of objectives in key categories:

- **Efficient and Effective Operations:** The Group's internal controls ensure that operations are conducted efficiently and effectively, promoting productivity and optimal resource utilization.
- **Reliability and Completeness of Financial and Management Information:** Internal controls are in place to ensure that financial and management information is reliable, accurate, and complete. This helps in making informed decisions and maintaining transparency.
- **Compliance with Applicable Laws and Regulations:** The Group emphasizes compliance with all relevant laws, regulations, and industry standards. Internal controls are designed to ensure adherence to legal requirements and mitigate regulatory risks.

The key principles that underpin the Group's System of Internal Controls are as follows:

- **Control Environment:** The control environment serves as the foundation for all internal control components. It includes factors such as management's integrity and ethical values, recruitment and training policies, organizational structure, and delegation of authority. These elements contribute to a strong control consciousness among employees.
- **Risk Management:** The Group recognizes the importance of risk management in its operations. It implements mechanisms to identify, assess, and manage risks that may impact the achievement of objectives. The risk management framework is dynamic and evolves to address new and emerging risks.

- **Control Activities:** Internal control activities are documented in policies and procedures that ensure safe operations and accurate record-keeping. Segregation of duties is a crucial organizational measure to enhance control effectiveness, ensuring that key functions such as approval, dealing, administration, and controlling are separated.
- **Information and Communication:** Effective information and communication channels are established to ensure that relevant information is identified, captured, and communicated in a timely manner. This includes internal communication within the organization and external communication with stakeholders such as regulators, shareholders, and customers.
- **Monitoring:** The Group conducts ongoing monitoring of activities as part of its operations. This includes regular management and supervisory activities, internal audits, and independent evaluations of the internal control system. Internal control deficiencies are reported and escalated as necessary, with major issues reported to top management, the Audit Committee, and the Board.

Additionally, the efficiency of the internal control system is independently evaluated every three years by a third-party auditing firm, in accordance with regulatory requirements. The evaluation report is assessed by competent bodies within the Group and submitted to regulatory authorities for review and acknowledgment.

Characteristics of the System of Internal Controls (SIC)

HoldCo and Eurobank have established key characteristics of their System of Internal Controls (SIC), which are indicative and not restrictive. These characteristics include:

- **Code of Conduct:** There is a defined Code of Conduct along with processes for monitoring its implementation to ensure ethical conduct and adherence to standards.
- **Organizational Chart:** An approved organizational chart is in place, depicting the hierarchy and functions of each sector/department clearly defined to ensure effective management.
- **Audit Committee:** The composition and function of the Audit Committee are outlined to oversee financial reporting and compliance.
- **Strategic Planning:** A description of strategic planning processes is provided, including development, implementation, and periodic evaluation of strategic objectives.
- **Action Plans:** Long-term and short-term action plans for important activities are established, with periodic reports and identification of deviations along with justifications.
- **Articles of Association:** The Articles of Association are complete and up-to-date, reflecting the objectives and operations of the entity.
- **Directorates and Departments:** Tasks of directorates, departments, and job descriptions are defined to ensure clarity in roles and responsibilities.
- **Policies and Procedures:** Policies and procedures for important operations are documented, including internal controls for risk management.
- **Compliance Processes:** Processes for compliance with legal and regulatory frameworks are established to ensure adherence to laws and regulations.
- **Risk Assessment and Management:** Processes for risk assessment and management are in place to identify and mitigate risks effectively.
- **Financial Information Integrity:** Processes ensure the integrity and reliability of financial information through accurate reporting and controls.
- **Executive Performance Evaluation:** Processes for recruitment, training, delegation, targeting, and evaluation of executive performance are outlined.
- **Information Systems Security:** Processes for the security, adequacy, and reliability of information systems are established to safeguard data.
- **Personnel and Asset Protection:** Processes are in place to safeguard personnel and assets, ensuring security and protection.
- **Reporting and Communication:** Reporting lines and communication channels within and outside the organization are described for effective information flow.

- **Monitoring and Evaluation:** Mechanisms are established for monitoring and evaluating the efficiency and effectiveness of processes regularly.
- **Independent Evaluation:** There is a process for periodic evaluation of the adequacy and efficiency of the SIC by an independent auditor to ensure objectivity.
- **Environmental Policies:** Policies for environmental management and other ESG factors are recorded to address sustainability and social responsibility.

These policies and procedures are part of the corporate governance system's assessment and are regularly reviewed and updated to align with best practices and regulatory requirements.

Evaluation of the System of Internal Controls

The Bank's AC is responsible for annually reviewing and evaluating the adequacy of the Internal Control System (ICS) of both the Bank and its subsidiaries. This evaluation is based on data and information provided by the Internal Audit Group (IAG) of the Bank, external auditors' findings and remarks, as well as feedback from supervisory authorities. The AC utilizes oversight and reporting mechanisms established with the Audit Committees of the Bank's Subsidiaries to ensure a comprehensive assessment.

Similarly, the HoldCo's AC is tasked with reviewing and evaluating the adequacy of the Internal Control System (ICS) of the HoldCo itself. This evaluation is conducted based on relevant data and information from the Internal Audit (IA) of the HoldCo, findings and remarks from external auditors, and feedback from supervisory authorities. The AC ensures a thorough assessment of the HoldCo's ICS to uphold standards of governance and compliance.

Independent Evaluation of the HoldCo/Bank System of Internal Controls

In March 2024, Grant Thornton presented the scope, findings, and methodology of their Independent triennial Evaluation of the HoldCo/Bank System of Internal Controls (SIC) to the AC members, as per the Bank of Greece Act 2577/9.3.2006 (BoG Act).

Based on the procedures conducted and the evidence gathered, there were no indications that the SIC, at the time of assessment, was not compliant in all material aspects with the requirements of the BoG Act.

Grant Thornton identified 21 observations during their assessment, categorized as 16 low-risk observations and 5 medium-risk observation related to the IT issues in Eurobank Equities, and 7 recommendations for improvement. Management will take appropriate actions in response to these observations.

7. Sustainability

Sustainability Approach

Eurobank places more importance on sustainability than ever before. The Bank's approach to sustainability is attached to its ambitious vision to reimagine its business and its operations in a transformative journey to the next decade towards a lower carbon future, an innovative digital environment that enhances the potential of its clients, a diverse, inclusive and equitable society, and a governance environment that builds trust in the market. The Bank's ambition for sustainability is expressed through quantified objectives, such as its detailed action plan to align its operations, portfolio and investments to become Net Zero by 2050.

Eurobank has expressed the Environmental, Social, Governance (ESG) aspect of its business through the lens of Impact generation. The Sustainability Strategy has been defined in a holistic approach across two pillars of impact: the operational impact arising from its own activities and the financed impact resulting from the Bank's lending and investing activities to specific sectors and clients. These two pillars of impact aim to capture the essence of the Bank's business effect on the climate, the protection of the natural environment, its contribution to addressing societal challenges at large, the prosperity of its own people, its contribution to raising business capacity in the markets where the Bank operates, and the internal processes that build and secure the confidence of its stakeholders.

Eurobank has designed, approved and currently implements the Sustainability Strategy including targets and commitments along the two key pillars:

A. Operational Impact Strategy

The Operational Impact Strategy sets targets and commitments addressing the impact arising from the Bank's operational activities and footprint and are based on three strategic axes, each of which is supported by a specific objective, commitments and targets:

- **Environmental impact:** Operational net zero, paperless banking, circular economy.
- **Employer's impact:** Diversity and inclusion, wellbeing culture, innovative environment.
- **Social and business impact:** Sustainable procurement, socio-economic effect, transparency.

B. Financed Impact Strategy

The Bank's Financed Impact Strategy sets targets and commitments addressing the impact arising from the Bank's lending and investing activities to specific sectors and clients and focuses on:

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

Sustainability Policies & Frameworks

Eurobank has taken action towards updating its Sustainability Policy Framework, to outline the approach for adherence to applicable regulatory requirements and voluntary initiatives as well as adopted standards and guidelines, thus enabling a contemporary and continuously updated approach to Sustainability, in line with international best practices. The Sustainability Policy Framework sets the foundation towards integration of ESG into Eurobank's business model and operations.

Focusing on the social aspect of ESG, Eurobank has taken actions that outline its corporate values, principles and commitments by issuing the Human Rights Statement, the Diversity, Equity and Inclusion Policy as well as the Policy against Harassment and Violence in Workplace. In order to further enhance its efforts against Harassment and Violence in Workplace, the Bank has introduced a relevant focused training program to all employees. This approach outlines zero-tolerance for various types of violation and discrimination as well as for the equal opportunities with fairness and meritocracy and irrespective of gender, nationality, age or other traits throughout the entire employee life cycle (i.e recruitment and selection, learning, performance, talent and career development, reward management).

Moreover, Eurobank has developed and implements three guiding frameworks, defining the approach and criteria for classifying its financing and investing activities as sustainable:

- its Sustainable Finance Framework (SFF), which supports the identification of sustainable/green financing opportunities (finance the transition of Bank's clients),
- its Green Bond Framework. The Framework, which has been externally reviewed by an established second-party opinion provider, facilitates the financing of projects that will deliver environmental benefits to the economy and support Bank's business strategy and vision,
- its Sustainable Investment Framework, which specifies the respective criteria that are utilized in the Bank's banking books investment strategy, along with the selection process of eligible sustainable investments.

The above-mentioned frameworks enable Bank to pursue economic growth in line with ESG criteria.

These frameworks are complemented by the adopted Environmental Policy, Energy Management Policy and Water Management Policy, aiming to protect the environment in all aspects of its operations. In line with these policies, the Bank applies certified management systems, in accordance with international standards, such as an Environmental Management System (ISO 14001, EMAS) and an Energy Management System (ISO 50001).

Stakeholders engagement and materiality analysis

An integral part of Eurobank's approach to Sustainability is to foster strong relationships of trust, cooperation and mutual benefit with all stakeholders affected by its activities, directly or indirectly. Eurobank promotes two-way communication and develops ongoing dialogue with stakeholders, to be able to actively meet the expectations, concerns and issues raised by all its stakeholders. A more detailed presentation of the cooperation framework, expectations and means of communication and response for each stakeholder group is included in the Annual Report 2021 – Business & Sustainability.

Eurobank's materiality analysis is the key process used to define the Annual Report 2022 – Business & Sustainability contents. Adopting the new GRI Standards (2021) methodology, Eurobank identified, assessed, prioritised and validated the positive and negative impacts that the Bank creates or may create on the environment, people and the economy. Prioritising the identified impacts contributed to determining the Bank's sustainable development materiality topics. The methodology was carried out along 4 phases, namely i. Understanding the organization's context, ii. Identifying impacts, iii. Assessing impacts, and iv. Prioritising and validating impacts. As per the final stage of the materiality analysis process, a list of topics was prioritised as material, which formed the basis for determining the contents of the Annual Report 2022 – Business & Sustainability, as well as the disclosures of relevant key performance indicators. Further details regarding the aforementioned process and its results are embedded in the Annual Report 2022 – Business & Sustainability.

Furthermore, as part of the Financed Impact Strategy, in order to facilitate the green transition of its clients, Eurobank has developed a dedicated approach to increase clients' engagement and awareness regarding environmental risks.

Governance

Sustainability at Eurobank is deployed across an ESG governance structure that addresses both regulatory requirements and voluntary commitments. BoD oversight with respect to Sustainability Strategy is addressed through the inclusion of ESG items in the Board Meetings agenda, as per international best practice. The Group has updated its governance structure by introducing and defining the roles and responsibilities in relation to ESG and climate related and environmental (CR&E) risks, embedding regulatory guidelines and market practices involving various key stakeholders (i.e. Business functions, Units and Committees). The updated governance structure aims to further enhance effective oversight of ESG matters at Management / BoD level, support the roll out of its Sustainability Strategy and the integration of ESG and C&E risks. In that context, the Group Risk Management Strategy Planning Operations and Climate Risk (GRMSPO&CR) has the overall responsibility for overseeing, monitoring, and managing CR&E risks. Specifically, the Unit operates as the Project office

responsible for the implementation of the climate related and environmental risks roadmap (“Programme Field”), with a coordinating and supervisory role on all related project streams to ensure alignment with the Bank’s business strategy and the regulatory authorities’ expectations. Moreover, the HoldCo/Bank BoD has assigned an executive member as the responsible BoD member for climate-related and environmental risks, ensuring that material ESG issues are taken into account in the decision-making process. As part of his duties, the member responsible updates the Board Risk Committee (BRC) (in alignment with the BRC Terms of Reference) and the Board of Directors of HoldCo and Bank on climate change and environmental related risks at least on a semi - annually basis.

A dedicated ESG Management Committee complements the ESG governance model and is chaired by the BoD member responsible for climate-related and environmental risks. The purpose of the ESG Management Committee, established by the Bank CEO who appoints its members, is to provide strategic direction on ESG initiatives, review the Sustainability Strategy prior to approval, integrate the elements of the Sustainability Strategy into the Bank’s business model and operations, approve eligible assets of Green Bond Frameworks, regularly measure and analyze the progress of the ESG goals and performance targets, ensure the proper implementation of ESG related policies and procedures and to validate the prioritized ESG impacts / Material Issues reported in the Annual Report - Business & Sustainability, in accordance with supervisory requirements and voluntary commitments.

A dedicated ESG Unit is responsible for the design and monitoring of the implementation of the Operational Impact Strategy (OIS), the monitoring of the Operational ESG performance and coordination of ESG linked operational activities that enhance the Bank’s Impact. The Unit reports to Deputy CEO, Group COO and International Activities and acts as a custodian of ESG principles & culture and as a cross functional coordinator in order to ensure alignment in ESG issues. The Head of ESG acts as secretary to the ESG Management Committee.

Further details regarding the Bank’s ESG governance model are embedded in the Annual Report 2022 – Business & Sustainability.

Reporting and Transparency

HoldCo/Bank issues its Annual Report – Business & Sustainability with a view to fully inform its stakeholders about its performance in the sustainable development pillars (economy, society, environment). The publication is prepared in accordance with the Global Reporting Initiative (GRI) Standards (2021), applying the reporting principles (accuracy, balance, clarity, comparability, completeness, sustainability context, timeliness, verifiability). This reporting approach aims at providing comprehensive and transparent information to stakeholders, relates to Eurobank’s response to their expectations and interests, and invests in continuously promoting open dialogue with them. Through the Report, Euroban/HoldCo provide full disclosure on sustainability impacts such as environmental performance, energy and emissions, social impact and corporate governance, information regarding the Bank’s initiatives, while addressing all material stakeholder interests across the ESG spectrum. The Annual Report - Business & Sustainability is accessible to all interested parties through the corporate website. Additionally, besides the sustainability reporting frameworks of the GRI sectoral supplement on Financial Services, the SASB Commercial Banks Standard, as well as the Athens Stock Exchange (ATHEX) ESG Reporting Guide (2022) have been considered. This report also incorporates the 10 Principles of the United Nations Global Compact (UNGC), as well as the Accountability AA1000 2018 Principles. The sustainability-related disclosures in the report are assured by a competent assurance provider in accordance with the AA1000 Assurance Standard (version 3) and related Principles for inclusivity, materiality, responsiveness and impact, as per the independent auditor’s Limited Assurance Report which is disclosed as part of the Annual Report – Business & Sustainability. In addition, the Holdco/Bank reports disclosures as required by the EU Taxonomy (Regulation (EU) 2020/852 of the European Parliament and of the Council). Specifically, upon reviewing its business activities, to align taxonomy reporting with its core activities, provides the key performance indicators (KPIs) and other disclosure requirements related to its dominant financial undertakings as laid down in Article 10 of the Art. 8 Delegated Act. Furthermore, in the context of Pillar III disclosures on ESG risks, Holdco/Bank discloses ESG risk information on a semi-annual basis. Moreover, the first Task Force on Climate-related Financial Disclosures (TCFD) Climate - related & Environmental Risk Report as well as the first Climate - related & Environmental Risk Report were published. Also, the Bank’s GHG financed emissions for loans, bonds and shares positions, following the PCAF methodology, were disclosed. Furthermore, the Bank’s environmental and energy management performance, with respect to the improvement of its operational footprint, is monitored through specific indicators and associated targets disclosed also in the Environmental Report (EMAS). This constitutes an environment and energy monitoring and self-improvement tool, in line with commitments, regulated by applicable standards, audited & verified by independent third party. Within the EMAS Report framework, the Bank discloses the Green House Gas emissions record in line with the ISO14064 standard, as verified by external independent party and in line with the provisions of the national Climate Law.

Moreover, Holdco/Bank actively participates in internationally recognized ESG ratings to highlight the continuous improvement in its environmental, social and governance performance, upgrade the relevant disclosures, and further enhance investor confidence in its practices.

8. Shareholders’ General Meeting

The Shareholders’ General Meeting (General Meeting), serves as the highest authority within the HoldCo/Bank and is convened by the respective Board to address all matters concerning the entity. It holds exclusive jurisdiction over issues outlined in Article 117 of Company Law 4548/2018, such as amendments to the Articles of Association. Every shareholder has the right to participate and vote at the General Meeting either in person or through their legal representatives, following the prescribed legal procedures.

For the General Meeting to be considered in quorum and valid, shareholders present or represented must collectively represent at least 20% (1/5) of the paid-in share capital associated with voting shares. Resolutions are passed by an

absolute majority and are binding on both absent and dissenting shareholders. However, for certain significant decisions, such as those related to share capital changes or mergers, a higher quorum of at least 50.00% (1/2) of the paid-in share capital is required, and resolutions must be approved by a two-thirds (2/3) majority.

According to article 119 par. 1 of I. 4548/2018, the Annual General Meeting is held annually no later than the tenth (10th) calendar day of the ninth month after the end of the business year, while an Extraordinary General Meeting may be convened by the Board as deemed necessary or required by law.

Minutes of the General Meeting are authenticated by the Chairperson and the Secretary of the General Meeting, and standard minority rights outlined in Company Law 4548/2018 are applicable.

Information about the Eurobank Holdings General Meetings

Requirements for calling and convening the General Meetings

All persons appearing as shareholders of ordinary shares of the HoldCo in the registry of the Dematerialized Securities System (DSS) managed by Hellenic Central Securities Depository S.A. on the Record Date, namely at the start of the fifth day before the General Meeting, have the right to participate and vote in the HoldCo General Meeting. The aforementioned record date is applicable for the Repeat Meeting as well. The shareholders are informed on time about the agenda of each General Meeting and new technologies are used to help them participate.

At least 20 days before the General Meeting date, the shareholders are informed and given access to all necessary information, in compliance with the Greek Law. The Notice of General Meeting includes:

- Date, time and place of the Meeting
- Items on the agenda
- Participation and voting rights with the relevant procedures
- Minority shareholder rights
- Relevant documents available

All resolutions and information about each General Meeting are posted under Investor Relations on the Eurobank Holdings website.

Participation and proxies

Shareholders are assisted to participate in HoldCo General Meetings. All Eurobank Holdings shareholders have the right to participate in person or appoint a proxy. Proxies must be appointed at least 48 hours before the General Meeting date.

To the extent that shareholders' questions on items on the agenda are not answered during General Meeting, HoldCo has a process for submitting the relevant answers.

Annual General Meeting (AGM) of the shareholders

In the Annual General Meeting of the HoldCo's shareholders, held on July 20, 2023, remotely via teleconference in real time, participated shareholders representing 2,754,969,489 shares out of 3,710,677,508 shares, corresponding to 74.24% of the paid up share capital with voting rights on the items of the agenda. In respect of the items on the agenda, as referred to on the invitation dated 27.06.2023, the General Meeting:

1. Approved, with a majority exceeding the minimum required by the law, the Annual and Consolidated Financial Statements for the financial year 2022, as well as the Directors' and Auditors' Reports.
2. Approved, with a majority exceeding the minimum required by the law, the overall management for the financial year 2022 as well as the discharge of the Auditors for the financial year 2022.
3. Approved, with a majority exceeding the minimum required by the law: a) the appointment of the firm KPMG Certified Auditors S.A. (KPMG) as statutory auditor for the Annual and Consolidated Financial Statements of the Company for the financial year 2023; and b) KPMG's relevant fees for the audit of the Annual and Consolidated Financial Statements of the Company for the financial year 2023 to amount to €0.2 m.
4. Approved, with a majority exceeding the minimum required by the law, the acquisition of own shares in accordance with article 49 of Law 4548/2018, and in particular the acquisition of all of the Company's shares which the Hellenic Financial Stability Fund ("Fund") owns, under the following conditions: (α) Maximum number of shares to be acquired: According to article 49 of Law 4548/2018, the maximum number of shares that the Company may acquire, added together with the shares belonging to the Company from time to time, cannot exceed 10% of the Company's paid share capital. Specifically, in this transaction, the number of shares to be purchased will be the total of its issued shares held by the Fund, i.e. 52,080,673 shares, which correspond to approximately 1.4% of its share capital. (b) The duration for which the approval is granted is set at 6 months from the day of the General Meeting. (c) The maximum purchase price is set at €1.90 per share and the minimum purchase price is set at €1.10 per share. (d) To authorize the Board of Directors to determine the specific conditions and relevant details for the acquisition, taking into account the supervisory approvals.
5. Approved with a majority exceeding the minimum required by the law, the amendment of the Remuneration Policy for Directors of the Company.
6. Approved, with a majority exceeding the minimum required by the law, the remuneration paid for the financial year 2022 as well as the advance payment of remuneration for the financial year of 2023 to the non-executive Board members for the execution of their duties as Board Members and as members of the Board Committees.
7. Casted a positive vote on the Remuneration Report for the financial year 2022.
8. Approved, with a majority exceeding the minimum required by the law, pursuant to the provisions and following the procedure of article 86 of I. 4261/2014, a higher than 100% maximum level of the ratio between the fixed and variable

components of remuneration for the Chief Executive Officer (CEO), the three (3) Deputy CEOs, the Group Chief Risk Officer, Group Chief Financial Officer and the General Manager Group Strategy. Approved, with a majority exceeding the minimum required by the law, the amendment of the Nomination Policy of the Directors of the Board.

9. Approved, with a majority exceeding the minimum required by the law the appointment of Mr. Burkhard Eckes and Mr. John Arthur Hollows as new independent non-executive members of the Company's Board of Directors. The term of office of the aforementioned new members expires concurrently with the term of office of the other members of the Board (with a membership of fifteen from now onwards) and more specifically on 23.07.2024, prolonged until the end of the period the Annual General Meeting for the year 2024 will take place.
10. Approved, with a majority exceeding the minimum required by the law: a) The Audit Committee to function as Committee of the Board of Directors ("BoD") consisting of members of the BoD. b) The Audit Committee to consist of five (5) non-executive members of the BoD of which at least four (4) shall be independent. c) The term of office of the members of the Audit Committee that will be appointed by the BoD in accordance with article 44, par. 1c of L. 4449/2017, as in force, to coincide with their term of office as members of the BoD, i.e. the term of office of the Audit Committee members will expire on 23.07.2024, prolonged until the end of the period the Annual General Meeting for the year 2024 will take place.
12. Approved, with a majority exceeding the minimum required by the law, the amendment of Article 11 of the Company's Articles of Association by updating paragraph 1 aiming to the option the appointment and revocation of the representative and the relevant notification to the Company may take place via electronic means, and more specifically via electronic mail (email) at the email address referred to in the Invitation of the General Meeting and/or other electronic means referred to therein.
13. Was informed on the Annual Activity Report of the Audit Committee for the financial year 2022.
14. Was informed on the Independent Non-Executive Directors' Report.

All information on the AGM can be found at Eurobank Holding's website (<https://www.eurobankholdings.gr/en/investor-relations/shareholders/general-meetings-pages/annual-general-meeting-of-shareholders-on-20-07-23>).

Information about the Eurobank General Meetings

The HoldCo, following the demerger, constitutes the Eurobank's sole shareholder, who represents 100% of its share capital. According to article 121 par. 5 of Law 4548/2018, an invitation to convene a general meeting is not required in the event that the meeting is attended or represented by shareholders representing the entire capital and none of them objects to its holding and decision-making. In this context the following general meetings of Eurobank were held.

Annual General Meeting (AGM) of the shareholders

In the Annual General Meeting of Eurobank's shareholders, held on July 20, 2023 in Athens, at "Bodossakis Foundation Building" ("John S. Latsis" Hall), 20 Amalias Avenue, participated the sole shareholder Eurobank Holdings representing 3,683,244,830 shares, corresponding to 100% of the paid up share capital with voting rights on the items of the agenda. In respect of the items on the agenda, the General Meeting:

1. Approved the Annual and Consolidated Financial Statements for the financial year 2022 as well as the Directors' and Auditors' Reports. Profit sharing.
2. Approved the overall management for the financial year 2022 and discharge of the Auditors for the financial year 2022.
3. Appointed "KPMG Certified Auditors S.A." as Auditors for the financial year 2023.
4. Approved the remuneration for the financial year 2022 and of the advance payment of the remuneration for the non-executive Board Directors for the financial year 2023.
5. Approved, pursuant to the provisions and following the procedure of article 86 of Law 4261/2014, a higher than 100% maximum level of the ratio between the fixed and variable components of remuneration for seven (7) executives.
6. Approved the appointment of Messrs. Burkhard Eckes and John Arthur Hollows as new members of the Bank's BoD and their designation as Independent Non-Executive Directors, whose term of office expires concurrently with the term of office of the other members of the BoD (with a membership of fifteen from now onwards) and more specifically on 23.07.2024, prolonged until the end of the period the Annual General Meeting for the year 2024 will take place.
7. Approved the recomposition of the Audit Committee.
8. Approved the Amendment of article 11 of the Bank's Articles of Association aiming to its update.
6. Approved the Annual Activity Report of the Audit Committee for the financial year 2022.

Extraordinary General Meeting of the Shareholders

In the Extraordinary General Meeting of Eurobank's shareholders, held on July 31, 2023, in Athens, at "Bodossakis Foundation Building" ("John S. Latsis" Hall), 20 Amalias Avenue, participated the sole shareholder Eurobank Holdings representing 3,683,244,830 shares, corresponding to 100% of the paid up share capital with voting rights on the items of the agenda. In respect of the sole item on the agenda, the General Meeting resolved on the:

Approval of subscribing the bonds of the issuance of a common bond loan (the "Loan") which Eurobank Holdings will issue, for partially financing the buy back from the Hellenic Financial Stability Fund of 52,080,673 registered shares issued by Eurobank Holdings.

9. Other information required by Directive 2004/25/EU

The elements c), d), f), h), i) of paragraph 1 of article 10 of Directive 2004/25/EC of the European Parliament and of the Council, are incorporated into elements c), d), e), g), h) of article 4 par. 7 of Law 3556/2007, and are referred to the Report of the Directors, part of which is the present Corporate Governance Statement.

APPENDIX AUDIT COMMITTEE ACTIVITY REPORT FOR THE YEAR 2023

Purpose

1. In accordance with the Law 4449/2017 as amended, the Audit Committee (AC) of Eurobank Ergasias Services and Holdings S.A. (Eurobank Holdings or HoldCo or Company) should submit an annual report to the Shareholders' Annual General Meeting on the issues dealt with by the AC during the previous year, also including therein a description of the sustainability policy followed by the entity.
2. The current 2023 AC Activity Report of Eurobank Holdings which is also part of the 2023 Annual Financial Report, refers to the AC activity during 2023 and the issues addressed. In addition, it describes Eurobank Holdings' sustainability policy.
3. No deviations from the AC's Terms of Reference (ToR) have been identified.

AC Composition / Membership

4. It is noted that in line with the provisions of article 44 of law 4449/2017, as in force, and further to the decision of the HoldCo's Annual General Meeting of Shareholders as of 20.7.2023 regarding the repositioning of the Audit Committee and more specifically regarding its type, composition and term of office; and the BoD's decision of 23.06.2023 (in combination with 27.06.2023) and 20.07.2023 regarding the nomination and appointment of a new member to the AC respectively, and in particular of Mr. Burkhard Eckes, following relevant recommendations by the NomCos of 22.06.2023, the AC decided on its constitution and on the appointment of its Chairman.
5. In addition, following the Hellenic Financial Stability Fund's (HFSF) divestment from HoldCo, and taking into consideration that HoldCo is no longer subject to law 3864/2010 and to the special rights of the HFSF provided for in such law, including HFSF's right to appoint its representative in the HoldCo Board and Board Committees, the HFSF representative Mrs. Efthymia Deli in the HoldCo Board and Board Committees, submitted her resignation from HoldCo's BoD and HoldCo's Audit and Remuneration Committees (that was present at that time) on 26 October 2023, effective as of 7 November 2023.
6. Following the above, the AC consists exclusively of BoD members, four (4) in total, all of which are independent non-executive Directors, according to the provisions of article 9 of L. 4706/2020. In particular, the AC consists of the following members: **1. Jawaid Mirza (Chairperson of the Audit Committee, independent non-executive BoD member), 2. Burkhard Eckes (Vice-Chairperson of the Audit Committee, independent non-executive BoD member), 3. Irene Rouvitha-Panou (Audit Committee member, independent non-executive BoD member), and 4. Rajeev Kakar (Audit Committee member, independent non-executive BoD member).**
7. All AC members have sufficient knowledge in the field of HoldCo activities and the necessary skills and experience to carry out their duties and meet the requirement of established knowledge and experience in auditing and/or accounting.
8. Information regarding current AC composition and short biographical details of its members may be found at the HoldCo's website (www.eurobankholdings.gr).

Meetings Held During the Period & Attendance

9. During 2023, the Audit Committee held seventeen (17) meetings, including four (4) meetings by circulation, while during 2022, the Audit Committee held fourteen (14) meetings.
10. The average ratio of attendance at the meetings by the AC members stood at 100% (2022: 100%).
11. The quarterly meetings were attended in person and the rest were held via conference calls. This practice is allowed by the AC ToR and is consistent across all HoldCo's BoD Committees.
12. The submissions for the AC meetings have become available to all BoD members through the Diligent platform.
13. The BoD Chair has regularly attended the AC meetings. In addition, all meetings were attended by the Internal Audit (IA), while the General Manager of Group Compliance was attending the meetings depending on the subject under discussion.

14. The External Auditor of 2023 financial statements (i.e. KPMG) has been invited and attended meetings as required.
15. The AC Chair updated the Board members, at the quarterly meetings of the Board, on the material matters covered during the AC meetings.
16. In 2023, the members of the AC have been invited and participated in the Board Risk Committee (BRC) meetings and similarly the members of the BRC have been invited and participated in the Audit Committee meetings (joint Audit Committee and Board Risk Committee meetings) for the discussion / approval of items that fall under the responsibility of both Committees.

Highlights of Issues of Importance during 2023

Internal Controls System and Risk Management

17. The AC, in accordance with its Terms of Reference, reviews the adequacy of the Internal Control and Risk Management systems and the compliance with rules and regulations of the monitoring process.
18. Throughout the year 2023:
 - the AC Members received update by IA and Compliance, covering matters of the System of Internal Controls, Risk Management, Compliance with rules and regulations and legal issues.
 - significant weaknesses in internal controls and the progress of actions taken to address them, were presented in the Internal Audit Activity Report and several pending issues (including External Auditors' Management Letter) were discussed with Management and the AC ensured that the time plans and deadlines will be followed up.
 - the AC acknowledged the annual Internal Audit Evaluation Report of the System of Internal Controls, a requirement of the Bank of Greece Act 2577/9.3.2006. The said report along with the AC's own assessment of the evaluation was further submitted to the BoD and subsequently to BoG in June 2023.
 - in the context of the independent triennial Evaluation of the System of Internal Controls (SIC) per BoG Act 2577/9.3.2006, the AC approved the proposed scope of the assignment and the appointment of the firm.
 - in accordance with the provisions of Law 2533/1997, the AC reviewed reports on substantial stock transactions performed by the Company's Directors and General Managers in listed securities and notified the Board.

Internal Audit (IA)

19. The Internal Audit (IA) function of HoldCo is independent (Internal Audit has a functional reporting line to the AC and a dotted reporting line for administrative matters to the CEO), adequately organized, has unrestricted access to any pertinent information and operates efficiently and effectively in compliance with the Standards of the Institute of Internal Auditors.
20. During 2023, the AC:
 - approved the revised Internal Audit Mandate and Terms of Reference (ToR).
 - received confirmation from the Chief Internal Auditor (CIA) regarding IA's independence for 2022.
 - discussed the performance of the IA Annual Plan for 2022.
 - approved and further submitted to the BoD for information the IA Annual Plan for 2024.
 - monitored the progress of the IA Audit Plan for 2023 through the Activity Reports.
 - at the Quarterly AC meetings, discussed the key highlights of the IA Activity Reports (including the follow-up of the external auditors' Management Letter points).
 - discussed the progress of the actions for resolution of a Very High risk finding identified in the beginning of 2022 (doValue Suspense Accounts).
 - Carried out the assessment of the Internal Auditor's performance for 2022.

Compliance

21. The Compliance of HoldCo is a permanent and independent function (the Head of Compliance reports functionally to the AC and for administrative purposes to the CEO of Holdings) adequately organized, has unrestricted access to any pertinent information and operates efficiently and effectively.
22. During 2023, the AC:
- approved the revised Compliance Mandate.
 - approved and further submitted to the BoD for information the 2024 Compliance Annual Plan.
 - at the Quarterly AC meetings, discussed the key highlights of the Compliance Activity Reports.
 - reviewed and depending on the case, approved or approved and further submitted to the BoD for approval / information a) the revised Code of Conduct and Ethics, b) the revised Policy for Reporting Illegal or Unethical Conduct and the appointment of Report Receiving & Monitoring Officer in Greece, c) the revised Group Antitrust Compliance Policy, d) the revised Compliance Policy, e) the revised Conflict of Interest Group Policy, f) the revised Anti-bribery and Corruption Policy and g) the revised Insider Dealing Guideline.
 - In line with the BoG requirements, received the Annual Group Compliance Report as per BoG Act 2577/9.3.2006 (including MiFID report) for acknowledgement. The said report along with the AC's assessment was further submitted to the BoD and subsequently to the BoG in June 2022.
 - Carried out the assessment of the performance of the Head of Compliance for 2022.

Financial reporting

23. The AC, in accordance with its Terms of Reference, monitors the financial reporting process and submits recommendations and proposals to ensure its integrity. In addition, it supervises and assesses whether the internal controls related to financial reporting are adequate and effective and that these controls are adjusted to reflect any major changes in the risk profile of Holdings.
24. During the AC meetings in 2023:
- the AC, among others, reviewed and approved the quarterly results, semi-annual and annual Accounts and Financial Statements, Annual General Meeting (AGM) matters and matters of the External auditors. In addition, the AC reviewed and proposed to the BoD for approval the Consolidated Pillar III report.
 - Group Finance made presentations on issues such as accounting policies, critical accounting estimates, significant one-off items impacting the Financial Statements, major variations between periods, important disclosures, significant issues with tax authorities, as well as Group Control issues.
 - IA performed a high level review of material submitted to the AC for the clearance of the financial results and reported significant items to the AC Chairman for his attention.
 - with regards to the monitoring of the Actual vs Budget Report, the AC received quarterly updates by Group Finance which were subsequently presented to the BoD.

External Auditors

25. The AC, in accordance with its Terms of Reference, is responsible for the selection, performance and independence of the External Auditors, KPMG. In addition, the AC reviews the scope of audit work and audit approach and assesses the process for identifying and responding to key audit and internal control risks.

26. During the AC meetings in 2023:

- KPMG presented its 2023 Audit Plan to the AC. The AC has also, in line with its ToR, reviewed the Engagement letter for the 2023 Statutory Audit of the Company.
- KPMG presented and discussed with the AC members a summary of audit work done, major findings, including a summary of unadjusted differences, and other issues of importance.

27. The AC has received the 2022 KPMG Management Letter (ML) and has discussed the issues raised with KPMG and Management.

28. The annual assessment of the External Auditors for the 2022 audit was discussed by the AC members and Management. At the same AC meeting, the AC decided to propose to the BoD for approval and subsequent recommendation to the Annual General Meeting of shareholders for approval, the reappointment of KPMG as statutory auditors for the separate and consolidated Financial Statements of Eurobank Holdings for the financial year of 2023.

29. The AC has discussed and approved the Global Group Audit and assurance Fees of 2023.

30. The AC has received the External Auditors' Independence written confirmation, while it monitored the independence of the External Auditors through the Auditors independence monitoring tool submitted quarterly by Group Finance, depicting the value of non-audit services provided as compared to the limits set by the Group External Auditor's Independence Policy that was also updated during 2023. In line with the Group External Auditor's Independence Policy, the AC in 2023 reviewed and approved all non-audit services including the audit assurance related work re Fairfax Financial Holdings (FFH) annual requirement on the reconciliation of IFRS consolidated Total Equity and Profit & Loss to U.S. GAAP, for the year ending 31.12.2022, ensuring that the independence limits are complied with.

31. The AC met with the External Auditors (with and without Management present) to discuss issues related to the audit, in addition to any significant issues related to the External Auditors' audit plan.

32. The AC reviewed the External Auditor's Report and the Report on Key Audit Issues.

33. The AC approved the updated External Auditors Tendering Policy and Procedure, as well as the Key Audit Partner (KAP) selection/rotation policy as an addendum to it, based on market practices.

34. The AC discussed a 5-yr (2024-28) plan on the eligibility of audit firms for the statutory audit of the Group, including potential conflict of interest situations with eligible audit firms, based on Greek Law 4449/17 and EU Reg 537/14, and requirements of the International Code of Ethics for Professional Accountants of the International Ethics Standards Board for Accountants (IESBA)

AC's Evaluation

35. The AC's performance is evaluated annually according to the provisions of HoldCo's Board and Board Committees Evaluation Policy. According to the AC's 2023 self-evaluation, the AC members expressed satisfaction with the committee's effectiveness and leadership. They commented the AC's efficient use of time, well-planned meetings, and timely scheduling. The Chairperson of the AC was noted for being well-prepared and skilled in guiding discussions through the agenda, fostering critical dialogue, and ensuring all members could express their views freely. Participants were also acknowledged for their preparedness and active engagement in vital discussions, demonstrating a commendable level of challenge.

36. However, the evaluation identified areas for improvement, notably the need for enhanced oversight on critical audit and compliance issues within major subsidiaries. There was also a call for strengthening cybersecurity mechanisms and Anti-Money Laundering (AML) controls and measures. Additionally, the evaluation emphasized the importance of providing training in new areas to enhance the skills of the Internal Audit Team. These areas of improvement were highlighted to further enhance the effectiveness and capabilities of the AC in fulfilling its responsibilities.

Other AC Matters

37. The AC has approved and notified the Board for further submission to the Annual General Meeting, the annual Activity Report for 2022.
38. The AC has discussed its annual Plan for 2024.

Sustainability Overview

39. The Group supports the sustainable transition of the economy and considers sustainability and climate change as an opportunity. A key strategic objective is to adapt its business and operation in a way that addresses climate change challenges, accommodate social needs within its banking business model, and safeguard prudent governance for itself and its counterparties, in accordance with supervisory initiatives and following international standards/ best practices.
40. Committed to actively contributing to the achievement of the United Nations Sustainable Development Goals (SDGs) and the 2030 Agenda goals, Eurobank is a signatory of the UN Global Compact since 2008. In September 2019 Eurobank signed the UNEP FI Principles for Responsible Banking (PRB), affirming its commitment to play an active role in implementing the SDGs and the Paris Agreement on Climate Change. In full compliance with its obligations relating to implementing the Principles, Eurobank has issued its 3rd PRB Progress Report as part of the Annual Report 2022 – Business & Sustainability.
41. Eurobank has expressed the Environmental, Social, Governance (ESG) aspect of its business through the lens of Impact generation. The Sustainability Strategy has been defined across two pillars of impact: the operational impact arising from its own activities and the financed impact resulting from the Bank's lending and investing activities.
42. Eurobank has designed, approved and currently implements the Sustainability Strategy including targets and commitments along the two key pillars.
43. The Operational Impact Strategy comprises of 3 strategic pillars, namely:
- i. Environmental impact with the objective to minimize negative impact across the Bank's value chain to promote environmental stewardship. The aim is to minimize Scope 1 and 2 emissions, become a paperless banking network and extend circular economy practices.
 - ii. Employer's impact with the objective to empower people to perform at their best through an inclusive environment, promoting ethics and integrity. The aim is to embed a diverse and inclusive environment, encompass a wellbeing culture, along with stimulating an innovative environment.
 - iii. Social and business impact with the objective to drive positive change for entrepreneurs and wider communities to foster sustainable development and ensure social prosperity. The aim is to intensify sustainability in procurement practices, rationalize Socio-Economic Impact as well as boost transparency and ESG capacity.
44. The Financed Impact Strategy, applicable to lending and investment portfolios, leverages on the identified ESG and climate related opportunities and by assessing relevant risks aims to mitigate ESG & climate related risks for the Group's portfolios.
45. The Financed Impact Strategy is also directed on clients' engagement and awareness to adapt their business in a way to address climate change challenges, actions for supporting customers in their transition efforts towards a more ESG-friendly economic environment, enablers and tools such as frameworks and products to underpin Sustainable Financing, as well as the assessment and management of climate-related material exposures.
46. Climate Risk – The Group has recognized climate change as a material risk and based on its supervisory guidelines, is adapting its policies and methodologies for identifying and monitoring the relevant risks. In this context, a dedicated Climate-Related & Environmental Risks Materiality Assessment document was created, outlining the Climate-Related and Environmental (CR&E) Risks' Materiality Assessment of Eurobank Group.
47. Adopting a strategic approach for the management of risks and the identification of opportunities in relation to sustainability and climate change, the Bank follows, and accelerates where possible, a detailed roadmap prioritizing actions for the effective management of climate-related & environmental (CR&E) risk in

alignment with the supervisory expectations included at the ECB Guide on Climate-Related and Environmental Risks. Also, the IA is informed and follows up the Climate Risk Roadmap, which has been agreed with the supervisor. The respective developments are considered in IA risk-based audit approach. With regard to the banking activity of HoldCo (i.e. Eurobank S.A. or the Bank), the Internal Audit Group of the Bank issued in 2023 one consulting report in the area (Pillar III disclosures on ESG risk).

48. The Group has updated its governance structure by introducing and defining the roles and responsibilities in relation to ESG and climate related and environmental risks, embedding regulatory guidelines and market practices (both for transition risk and physical risk) within the 3 Lines of Defense. Moreover, the HoldCo/Bank BoD has assigned an executive member as the responsible BoD member for climate-related and environmental risks. The same member chairs the Eurobank ESG Management Committee, established by the Eurobank CEO. As part of his duties, the member responsible updates the Board Risk Committee (BRC) (in alignment with the BRC Terms of Reference) and the Board of Directors of HoldCo and Bank on climate change and environmental related risks at least on a semi-annually basis.
49. Committed to being transparent and further enhancing its ESG approach as well as to ensure that the decision-making is in line with environmental protection and sustainability, Eurobank has established a monitoring dashboard with appropriate CR&E risks KPIs/ KRIs that are reported to the Senior Management, Management Body, as well as at Board level on a periodic basis, in order to safeguard efficient oversight of CR&E risks. The Group also developed and approved its CR&E Risks Management Policy which aims at fostering a holistic understanding of the effects of CR&E risks on its business model, as well as support decision-making regarding these matters and provide a robust governance under its Risk Management Framework. Moreover, the ESG Risk Assessment supports Eurobank's business strategy and ESG risk awareness and ensures adherence to the Group's risk appetite and credit policies.

Jawaid Mirza
AC Chairman
March 20, 2024



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Independent Auditors' Report

To the Shareholders of
Eurobank Ergasias Services and Holdings S.A.

Report on the Audit of the Separate and Consolidated Financial Statements

Opinion

We have audited the accompanying Separate and Consolidated Financial Statements of Eurobank Ergasias Services and Holdings S.A. (the "Company") which comprise the Separate and Consolidated Balance Sheet as at 31 December 2023, the Consolidated Income Statement, the Separate and Consolidated Statements of Comprehensive Income, Changes in Equity and Cash Flow for the year then ended, and notes, comprising material accounting policies and other explanatory information.

In our opinion, the accompanying Separate and Consolidated Financial Statements present fairly, in all material respects, the separate and consolidated financial position of Eurobank Ergasias Services and Holdings S.A. and its subsidiaries (the "Group") as at 31 December 2023, its separate and consolidated financial performance and its separate and consolidated cash flows for the year then ended, in accordance with International Financial Reporting Standards as adopted by the European Union.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISA), as incorporated in Greek legislation. Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Separate and Consolidated Financial Statements section of our report. We are independent of the Company and the Group in accordance with the International Ethics Standards Board for Accountants International Code of Ethics for Professional Accountants, as incorporated in Greek legislation, and with the ethical requirements that are relevant to the audit of the separate and consolidated financial statements in Greece and we have fulfilled our other ethical responsibilities in accordance with the requirements of the applicable legislation. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.



Key Audit Matters

Key audit matters are those matters, that, in our professional judgment, were of most significance in our audit of the Separate and Consolidated Financial Statements of the current period. These matters and the relevant significant assessed risks of material misstatement were addressed in the context of our audit of the Separate and Consolidated Financial Statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

Impairment allowance on loans and advances at amortised cost

See [Notes 2.2.13, 3.1, 20 and 21](#) to the Consolidated Financial Statements.

The key audit matter	How the matter was addressed in our audit
<p>Loans and advances to customers at amortized cost for the Group amounted to EUR 42 773 million as at 31 December 2023 (2022: EUR 43 450 million) and impairment allowance for expected credit losses (“ECL”) for the Group amounted to EUR 1 258 million as at 31 December 2023 (2022: 1 626 million).</p> <p>The estimation of expected credit losses on loans and advances at amortised cost involves significant judgment and estimates. The key areas where we identified greater levels of management judgement and therefore, increased levels of audit focus in the Group’s estimation of ECL are:</p> <ul style="list-style-type: none"> • Significant Increase in Credit Risk (“SICR”) – The identification of qualitative indicators for identifying a significant increase in credit risk for staging classification is judgmental taking also into account the current macroeconomic and geopolitical uncertainty. • Model estimations – Inherently judgmental modelling and assumptions are used to estimate ECL which involves determining Probabilities of Default (“PD”), Loss Given Default (“LGD”), and Exposures at Default (“EAD”). ECL may be inappropriate if certain models or underlying assumptions, 	<p>Our audit procedures included, among others:</p> <p>Controls testing:</p> <p>We tested relevant manual, general IT and automated controls over key systems used in the ECL process.</p> <p>Main aspects of our controls testing involved evaluating the design and testing the operating effectiveness of the key controls over the:</p> <ul style="list-style-type: none"> • Completeness and accuracy of the key inputs into the IFRS 9 impairment models. • Application of the staging criteria. • Model validation. • Management adjustments. <p>Test of details:</p> <p>Key aspects of our testing included, among others:</p> <ul style="list-style-type: none"> • We performed substantive procedures on a sample basis in order to assess the SICR assessment for both corporate and retail portfolios. • We assessed the appropriateness of management adjustments to the model driven ECL results, by considering the assumptions, reviewing calculations and



their application or data used do not accurately predict defaults or recoveries over time or fail to reflect the estimated credit losses of loans and advances to customers. As a result, certain IFRS 9 models, model assumptions and data, are the key drivers of complexity and subjectivity in the Group's calculation of the ECL estimate.

- Management adjustments – Adjustments to the model-driven ECL results are raised by management to address any known limitations or emerging trends as well as risks not captured by models. These adjustments are inherently uncertain and significant management judgement is involved especially in relation to the current macroeconomic and geopolitical environment.
- Macroeconomic Forward Looking Information scenarios – IFRS 9 requires the Group to measure ECL on an unbiased forward-looking basis reflecting a range of future economic conditions. Significant management judgement is applied in determining the forward-looking economic scenarios used, the probability weightings associated with the scenarios and the complexity of models used to derive the probability weightings applied to them, especially when considering the current macroeconomic and geopolitical environment.
- Individually assessed loans –The estimation of future cash flows, valuation of collateral and probability weighting of scenarios constitute assumptions with high estimation uncertainty.

Disclosures in the Consolidated Financial Statements.

The disclosures regarding the Group's application of IFRS 9 are key for the understanding of the significant judgements and material inputs to the IFRS 9 ECL results, as well as, to provide transparency of the credit risk exposures of the Group.

data used and inspecting the governance around these adjustments.

- We assessed the reasonableness and appropriateness of the macroeconomic variables' forecasts, scenarios, weights, and models applied, with the support from our specialists. Our testing included benchmarking against external sources.
- We performed substantive procedures to assess the completeness and accuracy of critical data input used in the ECL models.
- We reperformed ECL calculations for lending exposures in all stages, with the support from our financial risk specialists and on a sample basis.
- We performed substantive procedures to assess the reasonableness of significant assumptions used in the measurement of impairment of individually assessed credit impaired exposures, including the assumptions used to estimate discounted future cash flows and the valuation of collaterals for which we have engaged our real estate valuation specialists.

Our financial risk specialists assisted with the:

- Assessment of the Group's impairment methodologies conceptual soundness.
- Assessment of the Group's impairment methodologies implementation by evaluating the risk parameter models used as well as, reperforming the calculation of certain risk parameters, on a sample basis.

Assessing disclosures:

- We evaluated the adequacy and appropriateness of the disclosures in the Financial Statements that address the uncertainty which exists when determining the ECL. In addition, we assessed whether the disclosure of the key judgements and assumptions was sufficiently clear and explanatory.



Recognition of deferred tax assets

See [Notes 2.2.16](#), [3.5](#) and [13](#) to the Consolidated Financial Statements.

The key audit matter	How the matter was addressed in our audit
<p>The Group has recognized deferred tax assets of EUR 3 991 million as at 31 December 2023 (2022: 4 161 million).</p> <p>The recognition and measurement of deferred tax assets is considered a key audit matter as it depends on estimates of future profitability, which requires significant judgement and includes the risk of management bias.</p> <p>Significant judgement and especially complex assumptions and method, due to inherent uncertainties relate to the following:</p> <ul style="list-style-type: none"> • The extent that there are probable future taxable profits that will allow the deferred tax asset amount to be recovered in the foreseeable future. • Forecast of future taxable profit, which is mainly impacted by macroeconomic forward-looking information. <p>Disclosures in the Consolidated Financial Statements</p> <p>The disclosures regarding the Group's application of the Standards in this area are key for the understanding of the key judgements surrounding the recoverability of deferred tax assets.</p>	<p>Our audit procedures, included, among others the following:</p> <ul style="list-style-type: none"> • We assessed the design and implementation of controls relevant to the recognition and recoverability of deferred tax assets including the approval of three-year business plan and monitoring of actual results against budgeted. • We evaluated the appropriateness of the assumptions used by management in the approved three-year business plan by comparing the revenue and growth projections to industry trends and ensuring consistency with strategic plans. We also evaluated the appropriateness of the assumptions used and the reasonableness of projections for the period that lies beyond the approved three-year business plan. • We assessed the accuracy of forecasted future taxable profits by evaluating the accuracy of management's projections of prior year by comparing them to actual results. • We tested the accuracy of the relevant underlying data of the estimate, including the conversion of future accounting profits to taxable profits. • Our tax specialists assisted to confirm the completeness and accuracy of the relevant tax adjustments that produce the taxable results. <p>Assessing disclosures:</p> <p>We evaluated the adequacy and appropriateness of the disclosures in the Consolidated Financial Statements that address the deferred tax asset recoverability. In addition, we assessed whether the disclosures of the key judgements and assumption were sufficiently clear and explanatory.</p>



Use of IT systems relevant to the financial information

The key audit matter	How the matter was addressed in our audit
<p>The Group's financial reporting processes are dependent to a large extent on information produced by the Group's Information Technology (IT) systems, and/or automated processes and controls (i.e. calculations, reconciliations) implemented in these systems.</p> <p>The above is a key audit matter as the Group's financial reporting systems rely heavily on complex information systems that process very large number of transactions. These IT systems function based on the operating effectiveness of internal controls in place to assure the completeness and accuracy as well as the security of the information of the Group that produce eventually the financial information to be included in the Consolidated Financial Statements.</p>	<p>We have evaluated in collaboration with our IT Audit specialists the general controls over the IT systems, databases and applications that support the financial reporting process of the Group.</p> <p>For this purpose, we performed procedures as follows:</p> <ul style="list-style-type: none"> • We evaluated the information security resilience of the Group by evaluating the design of key IT processes and controls over financial reporting. • We evaluated the design of the relevant preventative and detective general IT controls over administration of access to programs and data for the systems in scope of our audit and, we tested the operating effectiveness of these relevant controls. • We evaluated the design of the relevant general IT controls of the Group over program development, program change management and computer operations for the systems in scope of our audit and, we tested the operating effectiveness of these relevant controls.

Other Information

The Board of Directors is responsible for the other information. The other information comprises the information included in the Board of Directors' Report, for which reference is made in the "Report on Other Legal and Regulatory Requirements" and the Declarations of the Members of the Board of Directors but does not include the Separate and Consolidated Financial Statements and our Auditors' Report thereon.

Our opinion on the Separate and Consolidated 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 Separate and Consolidated Financial Statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the Separate and Consolidated 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.

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

The Board of Directors is responsible for the preparation and fair presentation of the Separate and Consolidated Financial Statements in accordance with International Financial Reporting Standards as adopted by the European Union, and for such internal control as the Board of Directors determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the Separate and Consolidated Financial Statements, the Board of Directors is responsible for assessing the Company's and 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 Company and the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee of the Company is responsible for overseeing the Company's and the Group's financial reporting process.

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

Our objectives are to obtain reasonable assurance about whether the Separate and Consolidated Financial Statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditors' 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 which have been incorporated in Greek legislation 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 Separate and Consolidated Financial Statements.

As part of an audit in accordance with ISAs, which have been incorporated in Greek legislation, we exercise professional judgment and maintain professional skepticism throughout the audit. We also:

- Identify and assess the risks of material misstatement of the separate and consolidated 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 Company'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 Company'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 auditors' report to the related disclosures in the Separate and Consolidated 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 auditors' report. However, future events or conditions may cause the Company or the Group to cease to continue as a going concern.
- Evaluate the overall presentation, structure, and content of the Separate and Consolidated Financial Statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on these Consolidated Financial Statements. We are responsible for the direction, supervision, and performance 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 communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the Separate and Consolidated Financial Statements of the current period and are therefore the key audit matters. We describe these matters in our auditors' report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

Report on Other Legal and Regulatory Requirements

1 Board of Directors' Report

The Board of Directors is responsible for the preparation of the Board of Directors' Report and the Corporate Governance Statement that is included in this report. Our opinion on the financial



statements does not cover the Board of Directors' Report and we do not express an audit opinion thereon. Our responsibility is to read the Board of Directors' Report and, in doing so, consider whether, based on our financial statements audit work, the information therein is materially misstated or inconsistent with the financial statements or our audit knowledge. Based solely on that work pursuant to the provisions of paragraph 5 of Article 2 of L. 4336/2015 (part B), we note that:

- a) The Board of Directors' Report includes a Corporate Governance Statement which provides the information set by Article 152 of L. 4548/2018.
- b) In our opinion, the Board of Directors' Report has been prepared in accordance with the applicable legal requirements of Articles 150-151 and 153-154 and of paragraph 1 (cases c and d) of article 152 of L. 4548/2018 and its contents correspond with the accompanying Separate and Consolidated Financial Statements for the year ended 31 December 2023.
- c) Based on the knowledge acquired during our audit, relating to Eurobank Ergasias Services and Holdings S.A. and its environment, we have not identified any material misstatements in the Board of Directors' Report.

2 Additional Report to the audit Committee

Our audit opinion on the Separate and Consolidated Financial Statements is consistent with the Additional Report to the Audit Committee of the Company dated 29 March 2024, pursuant to the requirements of article 11 of the Regulation 537/2014 of the European Union (EU).

3 Provision of non Audit Services

We have not provided to the Company and its subsidiaries any prohibited non-audit services referred to in article 5 of Regulation (EU) 537/2014.

The permissible non-audit services that we have provided to the Company and its subsidiaries during the year ended 31 December 2023 are disclosed in Notes 20 and 46 of the accompanying Separate and Consolidated Financial Statements, respectively.

4 Appointment of Auditors

We were appointed for the first time as Certified Auditors of the Company based on the decision of the Annual General Shareholders' Meeting dated 10 July 2018. From then onwards our appointment has been renewed uninterruptedly for a total period of six years based on the annual decisions of the General Shareholders' Meeting.

5 Operations Regulation



The Company has an Operations Regulation in accordance with the content provided by the provisions of the article 14 of L. 4706/2020.

6 Assurance Report on the European Single Electronic Reporting Format

We examined the digital files of the company Eurobank Ergasias Services and Holdings S.A. (the Company or/and Group), which were prepared in accordance with the European Single Electronic Format (ESEF) that is determined by the Commission Delegated Regulation (EU) 2019/815, as amended by the Regulation (EU) 2020/1989 (the ESEF Regulation) that include the Separate and Consolidated Financial Statements of the Company and the Group for the year ended as at 31 December 2023 in XHTML format (JEUVK5RWVJEN8W0C9M24-2023-12-31-en.xhtml), and also the file XBRL (JEUVK5RWVJEN8W0C9M24-2023-12-31-en.zip) with the appropriate mark-up of the those consolidated financial statements, including of the Notes to the Consolidated Financial Statements.

Regulatory framework

The digital files of the European Single Electronic Format are prepared in accordance with the ESEF Regulation and the 2020/C 379/01 Commission Interpretative Communication issued on 10 November 2020, as required by the L. 3556/2007 and the relevant announcements of the Hellenic Capital Markets Commission and the Athens Stock Exchange (the “ESEF Regulatory Framework”).

This Framework includes in summary, among others, the following requirements:

- All the annual financial reports must be prepared in XHTML format.
- With respects to the consolidated financial statements based on International Financial Reporting Standards (IFRS), the financial information that is included in the Consolidated Balance Sheet, Consolidated Statements of Income and Comprehensive Income, Changes in Equity and Cash Flow, as well as in the Notes to the Consolidated Financial Statements, must be marked up with XBRL tags, in accordance with the ESEF Taxonomy, as in force. The technical requirements for the ESEF, including the relevant taxonomy, are included in the ESEF Regulatory Technical Standards, including of the Notes to the Consolidated Financial Statements.

The requirements as defined in the ESEF Regulatory Framework as in force are appropriate criteria in order to express a reasonable assurance conclusion.

Responsibilities of the Board of Directors and those charged with governance

The Board of Directors is responsible for the preparation and filing of the Separate and Consolidated Financial Statements of the Company and the Group, for the year ended as at 31 December 2023, in accordance with the requirements determined by the ESEF Regulatory Framework, and for such internal control as the Board of Directors determines is necessary to enable the preparation of digital files that are free from material misstatement, whether due to fraud or error.

Auditors' Responsibilities

Our responsibility is the planning and the execution of this assurance engagement in



accordance with the 214/4/11-02-2022 Decision of the Hellenic Accounting and Auditing Standards Oversight Board and the Guidelines for the assurance engagement and report of Certified Auditors on the European Single Electronic Reporting Format (ESEF) of issuers with shares listed in a regulated market in Greece”, as these were issued by the Institute of Certified Public Accountants of Greece on 14 February 2022 (the “ESEF Guidelines”), in order to obtain reasonable assurance that the Separate and Consolidated Financial Statements of the Company and the Group that are prepared by the the Board of Directors of the Company in accordance with the ESEF comply in all material respects with the ESEF Regulatory Framework as in force.

Our work was performed in accordance with the International Ethics Standards Board for Accountants’ Code of Ethics for Professional Accountants, as it has been incorporated into Greek legislation and we have also fulfilled our independence requirements, in accordance with the L. 4449/2017 and the Regulation (EU) 537/2014.

The assurance work that we carried out refers exclusively to the ESEF Guidelines and was conducted in accordance with the International Standard on Assurance Engagements 3000, “Assurance Engagements other than Audits or Reviews of Historical Financial Information”. Reasonable assurance is a high level of assurance but is not a guarantee that such an assurance engagement will always detect a material misstatement regarding non-compliance with the requirements of the ESEF Regulation.

Conclusion

Based on the procedures performed and the evidence obtained, we express the conclusion that the Separate and Consolidated Financial Statements of the Company and the Group for the year ended as of 31 December 2023 in XHTML format (JEUVK5RWVJEN8W0C9M24-2023-12-31-en.xhtml), and the XBRL file (JEUVK5RWVJEN8W0C9M24-2023-12-31-en.zip) marked up with respects to the Consolidated Financial Statements, including the Notes to the Consolidated Financial Statements, have been prepared, in all material respects, in accordance with the requirements of the ESEF Regulatory Framework.

Athens, 29 March 2024

KPMG Certified Auditors S.A.
AM SOEL 114

Harry Sirounis, Certified Auditor
AM SOEL 19071

CONSOLIDATED FINANCIAL STATEMENTS

**FOR THE YEAR ENDED
31 DECEMBER 2023**

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Consolidated Balance Sheet

	<u>Note</u>	31 December	
		2023	2022
		€ million	Restated ⁽¹⁾
		€ million	€ million
ASSETS			
Cash and balances with central banks	15	10,943	14,994
Due from credit institutions	17	2,354	1,329
Securities held for trading	18	379	134
Derivative financial instruments	19	881	1,185
Loans and advances to customers	20	41,545	41,677
Investment securities	22	14,710	13,261
Investments in associates and joint ventures	24	541	187
Property and equipment	26	773	775
Investment property	27	1,357	1,410
Intangible assets	28	334	297
Deferred tax assets	13	3,991	4,161
Other assets	29	1,767	1,980
Assets of disposal groups classified as held for sale	30	206	84
Total assets		79,781	81,474
LIABILITIES			
Due to central banks	31	3,771	8,774
Due to credit institutions	32	3,078	1,814
Derivative financial instruments	19	1,450	1,661
Due to customers	33	57,442	57,239
Debt securities in issue	34	4,756	3,552
Other liabilities	35	1,385	1,702
Total liabilities		71,882	74,742
EQUITY			
Share capital	37	818	816
Share premium	37	1,161	1,161
Reserves and retained earnings	38	5,920	4,660
Equity attributable to shareholders of the Company		7,899	6,637
Non controlling interests		0	95
Total equity		7,899	6,732
Total equity and liabilities		79,781	81,474

⁽¹⁾ The comparative information has been restated due to the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. (note 2.3).

Notes on pages 6 to 162 form an integral part of these consolidated financial statements.

Consolidated Income Statement

	Note	Year ended 31 December	
		2023 € million	2022 Restated ⁽¹⁾ € million
Interest income		4,454	2,226
Interest expense		(2,280)	(746)
Net interest income	6	2,174	1,480
Banking fee and commission income		570	554
Banking fee and commission expense		(123)	(127)
Net banking fee and commission income	7	447	427
Income from non banking services	8	97	95
Net trading income/(loss)	9	71	725
Gains less losses from investment securities	9	57	(9)
Other income/(expenses)	10	68	323
Operating income		2,914	3,041
Operating expenses	11	(915)	(857)
Profit from operations before impairments, risk provisions and restructuring costs		1,999	2,184
Impairment losses relating to loans and advances to customers	21	(412)	(276)
Other impairments, risk provisions and related costs	12	(96)	(103)
Restructuring costs	12	(37)	(89)
Share of results of associates and joint ventures	24	88	35
Profit before tax from continuing operations		1,542	1,751
Income tax	13	(261)	(406)
Net profit from continuing operations		1,281	1,345
Net profit/(loss) from discontinued operations	30	(153)	2
Net profit		1,128	1,347
Net profit/(loss) attributable to non controlling interests		(12)	0
Net profit attributable to shareholders		1,140	1,347
		€	€
Earnings per share			
-Basic and diluted earnings per share	14	0.31	0.36
Earnings per share from continuing operations			
-Basic and diluted earnings per share	14	0.34	0.36

⁽¹⁾ The comparative information has been adjusted due to a) the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. (note 2.3) and b) the presentation of operations of Eurobank Direktna a.d. disposal group as discontinued (note 30).

Notes on pages 6 to 162 form an integral part of these consolidated financial statements.

Consolidated Statement of Comprehensive Income

	Year ended 31 December	
	2023	2022
	€ million	Restated⁽¹⁾
	€ million	€ million
Net profit	<u>1,128</u>	<u>1,347</u>
Other comprehensive income:		
Items that are or may be reclassified subsequently to profit or loss:		
Cash flow hedges		
- changes in fair value, net of tax	19	5
- transfer to net profit, net of tax	<u>(21)</u>	<u>(5)</u>
	(2)	(0)
Debt securities at FVOCI		
- changes in fair value, net of tax (note 22)	188	(547)
- transfer to net profit, net of tax (note 22)	<u>(104)</u>	<u>222</u>
	84	(325)
Foreign currency translation		
- foreign operations' translation differences	1	1
- transfer to net profit on the sale/liquidation of foreign subsidiaries (note 23.1)	<u>122</u>	<u>76</u>
	123	77
Associates and joint ventures		
- changes in the share of other comprehensive income, net of tax (note 24)	<u>(4)</u>	<u>(2)</u>
	(4)	(2)
	<u>201</u>	<u>(250)</u>
Items that will not be reclassified to profit or loss:		
- Gains/(losses) from equity securities at FVOCI, net of tax	18	24
- Actuarial gains/(losses) on post employment benefit obligations, net of tax	<u>(2)</u>	<u>4</u>
	16	28
Other comprehensive income	<u>217</u>	<u>(222)</u>
Total comprehensive income attributable to:		
Shareholders		
- from continuing operations	1,371	1,127
- from discontinued operations	<u>(15)</u>	<u>(1)</u>
	1,345	1,125
Non controlling interests		
- from continuing operations	0	0
- from discontinued operations	<u>(11)</u>	<u>(1)</u>
	<u>1,345</u>	<u>1,125</u>

⁽¹⁾ The comparative information has been adjusted due to a) the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. (note 2.3) and b) the presentation of operations of Eurobank Direktna a.d. disposal group as discontinued (note 30).

Notes on pages 6 to 162 form an integral part of these consolidated financial statements

Consolidated Statement of Changes in Equity

	Share capital € million	Share premium € million	Reserves and retained earnings € million	Non controlling interests € million	Total € million
Balance at 1 January 2022	816	8,056	(3,333)	96	5,635
Restatement due to adoption of IFRS 17 by a Group's associate (note 2.3)	-	-	(33)	-	(33)
Balance at 1 January 2022, as restated	816	8,056	(3,366)	96	5,602
Net profit (restated, note 2.3)	-	-	1,347	0	1,347
Other comprehensive income (restated note 2.3)	-	-	(221)	(1)	(222)
Total comprehensive income for the year ended 31 December 2022	-	-	1,126	(1)	1,125
Offsetting of equity accounts	-	(6,895)	6,895	-	-
Share options plan	0	0	4	-	4
Purchase/sale of treasury shares	-	-	1	-	1
	0	(6,895)	6,900	-	5
Balance at 31 December 2022 (as restated)	816	1,161	4,660	95	6,732
Balance at 1 January 2023	816	1,161	4,660	95	6,732
Net profit	-	-	1,140	(12)	1,128
Other comprehensive income	-	-	216	1	217
Total comprehensive income for the year ended 31 December 2023	-	-	1,356	(11)	1,345
Changes in participating interests in subsidiary undertakings	-	-	-	(83)	(83)
Share options plan (note 39)	1	0	7	-	8
Purchase/sale of treasury shares (notes 37 and 38)	-	-	(100)	-	(100)
Other	-	-	(3)	-	(3)
	1	0	(96)	(83)	(178)
Balance at 31 December 2023⁽¹⁾	818	1,161	5,920	0	7,899

Note 37 Note 37 Note 38

⁽¹⁾ The changes in equity for the year ended 31 December 2023 do not sum to the totals provided due to rounding.

Notes on pages 6 to 162 form an integral part of these consolidated financial statements.

Consolidated Cash Flow Statement

	Note	Year ended 31 December	
		2023 € million	2022 restated ⁽¹⁾ € million
Cash flows from continuing operating activities			
Profit before income tax from continuing operations		1,542	1,751
Adjustments for :			
Impairment losses relating to loans and advances to customers	21	412	276
Other impairments, risk provisions and restructuring costs	12	133	192
Depreciation and amortisation	11	120	117
Other (income)/losses on investment securities	16	(70)	(15)
Valuation of investment property	10	(6)	(34)
Other adjustments	16	(153)	(260)
		1,978	2,027
Changes in operating assets and liabilities			
Net (increase)/decrease in cash and balances with central banks		104	(246)
Net (increase)/decrease in securities held for trading		(260)	0
Net (increase)/decrease in due from credit institutions		(447)	1,048
Net (increase)/decrease in loans and advances to customers		(1,517)	(3,124)
Net (increase)/decrease in derivative financial instruments		(62)	868
Net (increase)/decrease in other assets		158	247
Net increase/(decrease) in due to central banks and credit institutions		(3,637)	(2,073)
Net increase/(decrease) in due to customers		1,730	3,925
Net increase/(decrease) in other liabilities		(313)	155
		(4,244)	800
Income tax paid		(64)	(45)
Net cash from/(used in) continuing operating activities		(2,330)	2,782
Cash flows from continuing investing activities			
Acquisition of fixed and intangible assets	26,27,28	(140)	(153)
Proceeds from sale of fixed and intangible assets	26,27	33	121
(Purchases)/sales and redemptions of investment securities		(1,287)	(2,950)
Acquisition of subsidiaries, net of cash acquired	23	(440)	-
Acquisition of holdings in associates and joint ventures, participations in capital increases	24	(73)	-
Disposal of subsidiaries and merchant acquiring business, net of cash disposed	10,23,30	(425)	281
Disposal/liquidation of holdings in associates and joint ventures	24	3	26
Dividends from investment securities, associates and joint ventures	16,24	15	21
Net cash from/(used in) continuing investing activities		(2,314)	(2,654)
Cash flows from continuing financing activities			
(Repayments)/proceeds from debt securities in issue	16	1,048	1,059
Repayment of lease liabilities	41	(40)	(37)
(Purchase)/sale of treasury shares and exercise of share options	37	(99)	1
Net cash from/(used in) continuing financing activities		909	1,023
Net increase/(decrease) in cash and cash equivalents from continuing operations		(3,735)	1,151
Net cash flows from discontinued operating activities		148	93
Net cash flows from discontinued investing activities		44	(3)
Net cash flows from discontinued financing activities		(1)	(3)
Effect of exchange rate changes on cash and cash equivalents		1	1
Net increase/(decrease) in cash and cash equivalents from discontinued operations		192	88
Cash and cash equivalents at beginning of year	16	14,388	13,149
Cash and cash equivalents at end of year	16	10,845	14,388

⁽¹⁾ The comparative information has been adjusted due to a) the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. (note 2.3) and b) the presentation of operations of Eurobank Direktna a.d. disposal group as discontinued (note 30).

Notes on pages 6 to 162 form an integral part of these consolidated financial statements.

Notes to the Consolidated Financial Statements

1. General information

Eurobank Ergasias Services and Holdings S.A. (the Company or Eurobank Holdings), which is the parent company of Eurobank S.A. (the Bank) and its subsidiaries (the Group), consisting mainly of Eurobank S.A. Group, are active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Group operates mainly in Greece and in Central and Southeastern Europe. The Company is incorporated in Greece, with its registered office at Othonos Street, Athens 105 57 and its shares are listed on the Athens Stock Exchange.

These consolidated financial statements, which include the Appendix, were approved by the Board of Directors on 28 March 2024. The Independent Auditor's Report of the Financial Statements is included in the section B.I of the Annual Financial Report.

The website address, where the annual financial statements of the consolidated non-listed Company's subsidiaries are uploaded, along with the independent Auditors' reports and the Board of Directors' Reports for these entities is: www.eurobankholdings.gr.

2. Basis of preparation and material accounting policies

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

2.1 Basis of preparation

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

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

The accounting policies for the preparation of the consolidated financial statements of the Group have been consistently applied to the years 2023 and 2022, after taking into account the amendments in IFRSs as described in section 2.1.1 (a) "New and amended standards adopted by the Group as of 1 January 2023". In addition, as presented in notes 2.1.1 (a) and 2.3, the comparative information has been restated due to the retrospective application of *IFRS 17- Insurance Contracts*. Where necessary, comparative figures have been adjusted to conform to changes in presentation in the current year.

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

The Group's presentation currency is the Euro (€) being the functional currency of the parent company. Except as indicated, financial information presented in Euro has been rounded to the nearest million. The figures presented in the notes may not sum precisely to the totals provided due to rounding.

Going concern considerations

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

Despite the fragile international environment, the economies of Greece, Bulgaria and Cyprus remained in expansionary territory in 2023, overperforming their European Union (EU) peers. More specifically, according to provisional data by the Hellenic Statistical Authority (ELSTAT), the Greek economy expanded by 2% on an annual basis in 2023 (2022: 5.6%), driven by increases in exports of goods and services, household consumption, and fixed investment. According to its Winter Economic Forecast (February 2024), the European Commission (EC) expects a GDP growth rate of 2.3% in 2024 and 2025. Amid strong base effects and easing energy prices, the inflation rate, as measured by the annual change in the Harmonized Index of Consumer Prices (HICP) decelerated to 4.2% in 2023 from 9.3% in 2022 according to ELSTAT, with the EC forecasting further de-escalation to 2.7% in 2024, and 2% in 2025. The average

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quarterly unemployment rate decreased to 11.1% from 12.4% in 2022, with the International Monetary Fund forecasts for 2024 and 2025 standing at 9.2% and 8.5% in 2024 and 2025 respectively, according to its January 2024 Art. IV Country Report. On the fiscal front, according to the 2024 State Budget, the general government primary balance is expected to post primary surpluses of 1.1% and 2.1% of GDP in 2023 and 2024 respectively, up from 0.1% of GDP in 2022. The gross public debt-to-GDP ratio, having declined significantly to 172.6% in 2022 due to the strong economic recovery and the effect of the high inflation on nominal GDP, is expected to decline further to 160.3% in 2023 and 152.3% in 2024.

According to EC's winter economic forecasts (February 2024), the real GDP in Bulgaria is expected to grow by 1.9% and 2.5% in 2024 and 2025, respectively (2023: 2%), while the HICP is forecast to decrease to 3.4% in 2024 and 2.9% in 2025 (2023: 8.6%). In Cyprus, the real GDP growth is forecast at 2.8% and 3% in 2024 and 2025, respectively (2023: 2.5%), while the HICP is estimated at 2.4% in 2024 and 2.1% in 2025 (2023: 3.9%).

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

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

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

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

Materialization of the above risks, would have potentially adverse effects on the fiscal planning of the Greek government, as it could decelerate the pace of expected growth and on the liquidity, asset quality, solvency and profitability of the Greek banking sector. In this context, the Group's Management and Board are continuously monitoring the developments on the macroeconomic, financial and geopolitical fronts as well as the evolution of the Group's asset quality and liquidity KPIs and have increased their level of readiness, so as to accommodate decisions, initiatives and policies to protect the Group's capital, asset quality and liquidity standing

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as well as the fulfilment, to the maximum possible degree, of its strategic and business goals in accordance with the business plan for 2024 - 2026.

For the year ended 31 December 2023, the net profit attributable to shareholders amounted to € 1,140 million (2022: € 1,347 million). The adjusted net profit, excluding the € 111 million gain arising from the acquisition of the 29.2% shareholding of Hellenic Bank, accounted for as an associate (note 24), € 141 million net loss from discontinued operations (note 30), € 48 million net loss on projects 'Solar' and 'Leon' related to the NPE reduction plan (note 20), € 10 million provision (after tax) for the Bank's contribution to the restoration initiatives after natural disasters (note 11), and € 29 million restructuring costs (after tax) (note 12) amounted to € 1,256 million (2022: € 1,178 million), of which € 468 million profit was related to the international operations (2022: € 211 million profit).

As at 31 December 2023, the Group's Total Adequacy Ratio (total CAD) and Common Equity Tier 1 (CET1) ratios stood at 19.4% (31 December 2022: 19.2%) and 16.9% (31 December 2022: 16%) respectively and carried the effect of the ending of the 5-year transition period for the recognition of the IFRS 9 impact on the regulatory capital and the reversion to the standardized approach as of 1 March 2023. Pro-forma with the completion of projects "Solar" and "Leon" and the issuance of Subordinated Tier II debt instruments in January 2024, the total CAD and CET1 ratios would be 20.2% and 17% respectively (note 4). The Group completed successfully the 2023 EU-wide stress test (ST), which was coordinated by the European Banking Authority (EBA) in cooperation with the ECB and the European Systemic Risk Board (ESRB (note 4). On 9 October 2023, the Company completed the buy back of all of its issued shares held by HFSF. Accordingly, the Company and the Bank are no longer subject to Law 3864/2010 and to the special rights of HFSF provided for in the law (note 37).

With regard to asset quality, the Group's NPE formation was positive by € 138 million during the year, out of which € 119 million referring to a single corporate customer, (fourth quarter 2023: € 29 million negative), (2022: € 40 million positive excluding Serbian operations). In total, the Group's NPE stock stood at € 1.5 billion, following the classification of the loan portfolio of project 'Leon' as held for sale, the sale of Eurobank Direktna a.d. disposal group, and the write-offs during the year (31 December 2022: € 2.3 billion), driving the NPE ratio to 3.5% (31 December 2022: 5.2%), while the NPE coverage ratio improved to 86.4% (31 December 2022: 74.6%). Net NPEs, i.e. gross NPEs minus accumulated stock of loan provisions, amounted to € 0.2 billion.

In terms of liquidity, as at 31 December 2023, following the completion of the sale of Eurobank Direktna a.d. disposal group, the Group deposits stood at € 57.4 billion (31 December 2022: € 57.2 billion), leading the Group's (net) loans to deposits (L/D) ratio to 72.3% (31 December 2022: 73.1%), while the funding from the ECB refinancing operations amounted to € 3.8 billion (31 December 2022: € 8.8 billion) (note 31). During the year, the Bank proceeded with the issuance of two preferred senior notes of € 500 million each (note 4). More recently, in January 2024, the Company completed the issuance of a € 300 million Subordinated Tier II debt instrument (note 34). As at 31 December 2023, the Bank's MREL ratio at consolidated level stands at 24.91% of RWAs, higher than the interim non-binding MREL target of 23.23% from 1 January 2024. The Group Liquidity Coverage ratio (LCR) has been maintained at high level reaching 178.6% (31 December 2022: 173%). In the context of the 2024 ILAAP (Internal Liquidity Adequacy Assessment Process), the liquidity stress tests results indicate that the Bank has adequate liquidity buffer to cover the potential outflows that could occur in all scenarios regarding the short term (1 month), the 3-month and the medium-term horizon (1 year). Information on the interest rate and liquidity risk exposures of the Group is included in notes 5.2.2 and 5.2.3.

Going concern assessment

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

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2.1.1 New and amended standards and interpretations

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

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

IFRS 17, Insurance Contracts

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

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

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

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

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

The Group has not issued contracts within the scope of IFRS 17; therefore, the adoption of the standard had no impact to the consolidated financial statements, other than through the Group’s share on the results of its associate “Eurolife FFH Insurance Group Holdings S.A.” (note2.3).

IAS 8, Amendments, Definition of Accounting Estimates

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Group has adopted the amendments and the temporary exception retrospectively, upon their endorsement by the EU in November 2023. The adoption of the amendments had no impact on the consolidated financial statements.

Detailed information in respect of the Group’s exposure to Pillar Two income taxes is provided in note 13.

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

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

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

The amendments, published in January 2020, introduce a definition of settlement of a liability, while they make clear that the classification of liabilities as current or non-current should be based on rights that are in existence at the end of the reporting period. In addition, it is clarified that the assessment for liabilities classification made at the end of the reporting period is not affected by the expectations about whether an entity will exercise its right to defer settlement of a liability. The Board also clarified that when classifying liabilities as current or non-current, an entity can ignore only those conversion options that are classified as equity.

In October 2022, the IASB issued *Non-current Liabilities with Covenants (Amendments to IAS 1)* with respect to liabilities for which an entity’s right to defer settlement for at least 12 months is subject to the entity complying with conditions after the reporting

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period. The amendments specify that covenants to be complied with after the reporting date do not affect the classification of debt as current or non-current at the reporting date. Instead, the amendments require a company to disclose information about these covenants in the notes to the financial statements.

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

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

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

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

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

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

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

2.2 Material accounting policies

2.2.1 Consolidation

(i) Subsidiaries

Subsidiaries are all entities controlled by the Group. The Group controls an entity when it is exposed, or has rights to, variable returns from its involvement with the entity, and has the ability to affect those returns through its power over the entity. The Group consolidates an entity only when all the above three elements of control are present.

Power over the entity may arise from voting rights granted by equity instruments such as shares or, in other cases, may result from contractual arrangements.

Where voting rights are relevant, the Group is deemed to have control where it holds, directly or indirectly, more than half of the voting rights over an entity, unless there is evidence that another investor has the practical ability to unilaterally direct the relevant activities.

The Group may have power, even when it holds less than a majority of the voting rights of the entity, through a contractual arrangement with other vote holders, rights arising from other contractual arrangements, substantive potential voting rights, ownership of the largest block of voting rights in a situation where the remaining rights are widely dispersed ('de facto power'), or a combination of the above. In assessing whether the Group has de facto power, it considers all relevant facts and circumstances including the relative size of the Group's holding of voting rights and dispersions of holdings of other vote holders to determine whether the Group has the practical ability to direct the relevant activities.

In assessing whether the Group has the ability to use its power to affect the amount of returns from its involvement with an entity, the Group determines whether in exercising its decision-making rights, it is acting as an agent or as a principal. The Group acts as an agent when it is engaged to act on behalf and for the benefit of another party, and as a result does not control an entity. Therefore, in such cases, the Group does not consolidate the entity. In making the above assessment, the Group considers the scope of its decision-making authority over the entity, the rights held by other parties, the remuneration to which the Group is entitled from its involvement, and its exposure to variability of returns from other interests in that entity.

The Group has interests in certain entities which are structured so that voting rights are not the dominant factor in deciding who controls the entity, such as when any voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual rights. In determining whether the Group has control over such structured entities, it considers the following factors:

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- The purpose and design of the entity;
- Whether the Group has certain rights that give it the ability to direct the relevant activities of the entity unilaterally, as a result of existing contractual arrangements that give it the power to govern the entity and direct its activities;
- In case another entity is granted decision making rights, the Group assesses whether this entity acts as an agent of the Group or another investor;
- The existence of any special relationships with the entity; and
- The extent of the Group's exposure to variability of returns from its involvement with the entity, including its exposure in the most subordinated securitized notes issued by the entity as well as subordinated loans or other credit enhancements that may be granted to the entity, and if the Group has the power to affect such variability.

Information about the Group's structured entities is set out in note 25.

The Group reassesses whether it controls an entity if facts and circumstances indicate that there are changes to one or more elements of control. This includes circumstances in which the rights held by the Group and intended to be protective in nature become substantive upon a breach of a covenant or default on payments in a borrowing arrangement, and lead to the Group having power over the investee.

Subsidiaries are fully consolidated from the date on which control is transferred to the Group and are no longer consolidated from the date that control ceases. Total comprehensive income is attributed to the owners of the parent and to the non-controlling interests even if this results in the non-controlling interests having a deficit balance.

In determining the proportion of profit or loss and changes in equity allocated to the Group and non-controlling interests, the Group takes into account current ownership interests, also including in-substance current ownership interests, after considering the eventual exercise of any potential voting rights and other derivatives that currently give the Group access to the returns associated with an ownership interest.

Changes in the Group's ownership interest in subsidiaries that do not result in a loss of control are recorded as equity transactions. Any difference between the consideration and the share of the new net assets acquired is recorded directly in equity. Gains or losses arising from disposals of ownership interests that do not result in a loss of control by the Group are also recorded directly in equity. For disposals of ownership interests that result in a loss of control, the Group derecognizes the assets and liabilities of the subsidiary and any related non-controlling interest and other components of equity and recognizes gains and losses in the income statement. When the Group ceases to have control, any retained interest in the former subsidiary is re-measured to its fair value, with any changes in the carrying amount recognized in the income statement. The Group considers the eventual exercise of any potential voting rights and other derivatives and whether they currently give the Group access to the returns associated with a retained ownership interest, in determining whether that ownership interest should be derecognised or not.

Intercompany transactions, balances and intragroup gains on transactions between Group entities are eliminated; intragroup losses are also eliminated unless the transaction provides evidence of impairment of the asset transferred.

(ii) Business combinations

The purchase method of accounting is used to account for the acquisition of subsidiaries by the Group. The consideration transferred for an acquisition is measured at the fair value of the assets given, equity instruments issued or exchanged and liabilities undertaken at the date of acquisition, including the fair value of assets or liabilities resulting from a contingent consideration arrangement. Acquisition related costs are expensed as incurred. Identifiable assets acquired and liabilities and contingent liabilities assumed in a business combination are measured initially at their fair values at the acquisition date irrespective of the extent of any non-controlling interest. Any previously held interest in the acquiree is remeasured to fair value at the acquisition date with any gain or loss recognized in the income statement. The Group recognizes on an acquisition-by-acquisition basis any non-controlling interest in the acquiree either at fair value or at the non-controlling interest's proportionate share of the acquiree's net assets.

The excess of the consideration transferred, the amount of any non-controlling interest in the acquiree and the acquisition-date fair value of any previous equity interest in the acquiree over the fair value of the identifiable net assets of the subsidiary acquired, is recorded as goodwill. If this is less than the fair value of the net assets of the acquiree, the difference is recognized directly in the income statement.

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If the initial accounting for a business combination is incomplete by the end of the reporting period in which it occurs, the Group reports provisional amounts for the items for which the accounting is incomplete. Those provisional amounts are adjusted retrospectively during the measurement period to reflect the new information obtained about the facts and circumstances that existed at the acquisition date that, if known, would have affected the amounts recognized at that date. The measurement period adjustments, as mentioned above, affect accordingly the amount of goodwill that was initially recognized, while the measurement period cannot exceed one year from the acquisition date.

Commitments to purchase non-controlling interests through derivative financial instruments with the non-controlling interests, as part of a business combination are accounted for as a financial liability, with no non-controlling interest recognized for reporting purposes. The financial liability is measured at fair value, using valuation techniques based on best estimates available to Management. Any difference between the fair value of the financial liability upon initial recognition and the nominal non-controlling interest's share of net assets is recognized as part of goodwill. Subsequent revisions to the valuation of the derivatives are recognized in the income statement.

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

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

A listing of the Bank's subsidiaries is set out in note 23.

(iii) Business combinations involving entities under common control

Pursuant to IAS 8 'Accounting Policies, Changes in Accounting Estimates and Errors', since business combinations between entities under common control are excluded from the scope of IFRS 3 'Business Combinations', such transactions are accounted for in the Group's financial statements by using the pooling of interests method (also known as merger accounting), with reference to the most recent pronouncements of other standard-setting bodies that use a similar conceptual framework and comply with the IFRSs general principles, as well as accepted industry practices.

Under the pooling of interests method, the Group incorporates the assets and liabilities of the acquiree at their pre-combination carrying amounts from the highest level of common control, without any fair value adjustments. Any difference between the cost of the transaction and the carrying amount of the net assets acquired is recorded in Group's equity.

The Group accounts for the cost of such business combinations at the fair value of the consideration given, being the amount of cash or shares issued or if that cannot be reliably measured, the consideration received.

Formation of a new Group entity to effect a business combination

Common control transactions that involve the formation of a new Group entity to effect a business combination by bringing together two or more previously uncombined businesses under the new Group entity are also accounted for by using the pooling of interests method.

Other common control transactions that involve the acquisition of a single existing Group entity or a single group of businesses by a new entity formed for this purpose are accounted for as capital reorganizations, on the basis that there is no business combination and no substantive economic change in the Group. Under a capital reorganization, the acquiring entity incorporates the assets and liabilities of the acquired entity at their carrying amounts, as presented in the books of that acquired entity, rather than those from the highest level of common control. Any difference between the cost of the transaction and the carrying amount of the net assets acquired is recognized in the equity of the new entity. Capital reorganization transactions do not have any impact on the Group's consolidated financial statements.

(iv) Associates

Investments in associates are accounted for using the equity method of accounting in the consolidated financial statements. These are undertakings over which the Group exercises significant influence but which are not controlled.

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Equity accounting involves recognizing in the income statement the Group's share of the associate's profit or loss for the year. The Group's interest in the associate is carried on the balance sheet at an amount that reflects its share of the net assets of the associate and any goodwill identified on acquisition net of any accumulated impairment losses. If the Group's share of losses of an associate equals or exceeds its interest in the associate, the Group discontinues recognizing its share of further losses, unless it has incurred obligations or made payments on behalf of the associate.

When the Group obtains or ceases to have significant influence, any previously held or retained interest in the entity is remeasured to its fair value, with any change in the carrying amount recognized in the income statement, except in cases where an investment in associate becomes an investment in a joint venture where no remeasurement of the interest retained is performed and use of the equity method continues to apply.

(v) Joint arrangements

A joint arrangement is an arrangement under which the Group has joint control with one or more parties. Joint control is the contractually agreed sharing of control and exists only when decisions about relevant activities require the unanimous consent of the parties sharing control. The Group evaluates the contractual terms of joint arrangements to determine whether a joint arrangement is a joint operation or a joint venture. All joint arrangements in which the Group has an interest are joint ventures.

As investments in associates, the Group's interest in joint ventures is accounted for by using the equity method of accounting. Therefore, the accounting policy described in note 2.2.1 (iv) applies also for joint ventures.

A listing of the Group's associates and joint ventures is set out in note 24.

2.2.2 Foreign currencies

(i) Translation of foreign subsidiaries

Assets and liabilities of foreign subsidiaries are translated into the Group's presentation currency at the exchange rates prevailing at each reporting date whereas income and expenses are translated at the average exchange rates for the period reported. Exchange differences arising from the translation of the net investment in a foreign subsidiary, including exchange differences of monetary items receivable or payable to the foreign subsidiary for which settlement is neither planned nor likely to occur that form part of the net investment in the foreign subsidiaries, are recognized in other comprehensive income.

Exchange differences from the Group's foreign subsidiaries are released to the income statement on the disposal of the foreign subsidiary while for monetary items that form part of the net investment in the foreign subsidiary, on repayment or when settlement is expected to occur.

(ii) Transactions in foreign currency

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

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

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

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2.2.3 Derivative financial instruments and hedging

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

The principles for the fair value measurement of financial instruments, including derivative financial instruments, are described in notes 3.2 and 5.3.

Embedded derivatives

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

Financial assets that contain embedded derivatives are recognised in the balance sheet in their entirety in the appropriate classification category, following the instruments' assessment of their contractual cash flows and their business model as described in note 2.2.9.

On the other hand, derivatives embedded in financial liabilities, such as bonds issued by the Group, are treated as separate derivatives when their risks and characteristics are assessed not to be closely related to those of the host contract and the host contract is not carried at fair value through profit or loss. These embedded derivatives are separated in the balance sheet and treated similarly to stand-alone derivatives measured at fair value with changes in fair value recognized in the income statement.

Derivatives held for hedge accounting

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

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

The objectives of hedging with derivative financial instruments include:

- Reduce interest rate exposure that is in excess of the Group's appetite;
- Manage efficiently interest rate risk and achieve optimization and normalization of the evolution of net interest margin and net interest income by tracking the evolution of interest rates and spreads and hedging the changes to movements of the benchmark interest rates represented by the prevailing reference rates;
- Reduce variability arising from the fair value changes of derivatives embedded in financial assets;
- Manage future variable cash flows;
- Reduce foreign currency risk or inflation risk;
- Reduce variability in the Group's equity arising from translating a foreign net investment at different exchange rates.

Hedge accounting

The Group has elected, as a policy choice permitted under IFRS 9, to continue to apply hedge accounting in accordance with IAS 39, as endorsed by the European Union (IAS 39 "carve out"). In 2023, the Group introduced a new risk management strategy which is the fair value hedging of the core deposits held in Greece and Cyprus from both retail and wholesale portfolios. Accordingly, the Group applied for the first time the provisions of IAS 39 carve-out that enables entities to designate core deposits as hedged items in a portfolio hedge of interest rate risk, as further described in the sections below. Under the EU carve-out version of IAS 39, certain requirements related to hedge accounting were removed, in order to facilitate (a) the application of fair value hedge accounting to the macro-hedges used for structural hedges including demand deposits and (b) the hedge effectiveness assessment by permitting the use of bottom layer approach for the determination of the fair value of hedged item, attributable to interest rate risk.

For hedge accounting purposes, the Group forms a hedging relationship between a hedging instrument or group of hedging instruments and a related item or group of items to be hedged. A hedging instrument is a designated derivative or group of derivatives, or a designated non-derivative financial asset or financial liability whose fair value or cash flows are expected to offset changes in the fair value or cash flows of a designated hedged item or group of items. Specifically, the Group designates certain derivatives as: (a) hedges of the exposure to changes in fair value of recognized assets or liabilities on a single or portfolio basis or unrecognized firm

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commitments (fair value hedging), (b) hedges of the exposure to variability in cash flows of recognized assets or liabilities or highly probable forecasted transactions (cash flow hedging) or, (c) hedges of the exposure to variability in the value of a net investment in a foreign operation which is associated with the translation of the investment's net assets in the Group's functional currency (net investment hedging).

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

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

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

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

(i) Fair value hedging

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

Hedged items

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

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

Hedge effectiveness assessment

The Group uses the dollar-offset method at inception (prospective measurement) and on an ongoing basis (retrospective measurement), in order to assess the effectiveness of fair value hedges on a single or portfolio basis. This is a quantitative method

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that involves the comparison of the change in the fair value of the hedging instrument with the change in the fair value of the hedged item attributable to the hedged risk. The above comparison constitutes the dollar-offset ratio and should be within the range of 80% -125% for the hedge to be highly effective.

The Group may also use the hypothetical derivative method, an approach to the dollar offset method, mainly applied in portfolio hedges that carry embedded derivatives, where the hedged risk is modelled through hypothetical derivatives, which replicate the embedded derivative. The fair value of the hypothetical derivative is used as a proxy for the net present value of the hedged future cash flows against which changes in value of the actual hedging instrument are compared to assess effectiveness and measure ineffectiveness. Hedge ineffectiveness may arise in case of potential differences in the critical terms between the hedged item and the hedging instrument such as maturity, interest rate reset frequency and discount curves as well as differences between expected and actual cash flows.

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

The Group has identified the following sources of ineffectiveness:

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

Fair value hedging adjustments and discontinuation of hedge accounting

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

The Group discontinues hedge accounting prospectively in case the hedging instrument expires or is sold, terminated or exercised, the hedge no longer meets the qualifying criteria for hedge accounting, or designation is revoked. In such cases, any adjustment to the carrying amount of the hedged item, for which the effective interest method is applied, is amortized to profit or loss in the income statement line “interest income” over the remaining period to maturity with amortization commencing no later than when the hedged item ceases to be adjusted for changes in its fair value attributable to the risk being hedged. If the hedged item is derecognised, the unamortised fair value adjustment is recognised immediately in the income statement.

Portfolio hedging of interest rate risk (macro-hedging)

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

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

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

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

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

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

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

(ii) Cash flow hedging

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

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

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

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

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

The effective portion of changes in the fair value of derivatives that are designated and qualify as cash flow hedges is recognized in other comprehensive income whereas the ineffective portion is recognized in the income statement line “net trading income/(loss)”.

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

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

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

(iii) Net investment hedging

The Group applies net investment hedging to hedge exposures to variability in the value of a net investment in foreign operation (including monetary items that form part of the net investment), such as foreign subsidiaries, associates or other foreign operations, associated with the translation of the net investment's carrying amount into the Group's presentation currency. Any exchange differences deriving from the translation are deferred in OCI until the net investment is disposed of or liquidated, at which time they are recognized in the profit or loss.

The foreign currency exposure that arises from the fluctuation in spot exchange rates between the net investment's functional currency and the Group's presentation currency may be hedged using currency swaps, currency forward contracts and their economic equivalents, as well as cash instruments.

The effectiveness of net investment hedges is assessed with the Dollar-Offset Method as described above for fair value hedge.

Hedges of net investments in foreign operations are accounted for similarly to cash flow hedges. Any gain or loss on the hedging instrument relating to the effective portion of the hedge is recognized in equity; the gain or loss relating to the ineffective portion is recognized in the income statement. Gains and losses accumulated in equity are included in the income statement when the foreign operation is disposed of as part of the gain or loss on the disposal.

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

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

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

2.2.4 Offsetting financial instruments

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

2.2.5 Income statement

(i) Interest income and expense

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

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

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

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

For financial assets that have become credit-impaired subsequent to initial recognition (exposures in Stage 3), the Group calculates interest income by applying the effective interest rate to the amortized cost of the financial asset (i.e. gross carrying amount adjusted for the expected credit loss allowance). If the asset is no longer credit-impaired, then the EIR is applied again to the gross carrying amount with the exception of POCL assets for which interest income does not revert to gross basis calculation.

For inflation-linked instruments the Group recognizes interest income and expense by adjusting the effective interest rate on each reporting period due to changes in expected future cash flows, incorporating changes in inflation expectations over the term of the instruments. The adjusted effective interest rate is applied in order to calculate the new gross carrying amount on each reporting period.

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

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

(ii) Fees and commissions

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

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

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

2.2.6 Property, equipment and Investment property

(i) Property and equipment

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

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

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

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(ii) Investment property

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

Investment property is measured initially at its cost, including related transaction costs, and subsequently at fair value with any change therein recognized in income statement line "other income / (expenses)". Subsequent expenditure is charged to the asset's carrying amount only when it is probable that future economic benefits associated with the item will flow to the Group and the cost of the item can be measured reliably. Such expenditure includes enhancements that increase the value of the asset and its future income-earning potential, as well as costs to comply with environmental and other legal requirements. Repairs and maintenance costs are recognized to the income statement during the financial period in which they are incurred.

Any gain or loss on disposal (calculated as the difference between the net proceeds from disposal and the carrying amount of the asset) is recognized in income statement.

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

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

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

2.2.7 Intangible assets

(i) Goodwill

Goodwill arising on business combinations is included in 'intangible assets' and is measured at cost less accumulated impairment losses.

Goodwill arising on acquisitions of associates and jointly controlled entities is neither disclosed nor tested separately for impairment, but instead is included in 'investments in associates' and 'investments in jointly controlled entities'.

(ii) Computer software

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

(iii) Other intangible assets

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

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

2.2.8 Impairment of non-financial assets

(i) Goodwill

Goodwill is tested for impairment annually or more frequently if there are any indications that impairment may have occurred. The Group considers external information such as prevailing economic conditions, persistent slowdown in financial markets, volatility in markets and changes in levels of market and exchange risk, an unexpected decline in an asset's market value or market capitalization

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being below the book value of equity, together with a deterioration in internal performance indicators, in assessing whether there is any indication of impairment.

For the purpose of impairment testing, goodwill acquired in a business combination is allocated to each Cash Generating Unit (CGU) or groups of CGUs that are expected to benefit from the synergies of the combination. The Group monitors goodwill either at the separate legal entity level or group of legal entities consistent with the internal monitoring of operating segments.

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

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

Goodwill arising in a business combination is not tested for impairment during the one-year period from the acquisition date allowed for the completion of the purchase accounting and allocation of goodwill, unless there has been a triggering event suggesting that the acquired goodwill might be impaired, even if the allocation process is not complete.

(ii) Other non-financial assets

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

Impairment losses arising from the Group's associates and joint ventures are determined in accordance with this accounting policy.

2.2.9 Financial assets

Financial assets - Classification and measurement

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

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

Financial Assets measured at Amortized Cost ('AC')

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

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

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

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

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

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

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

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

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

Equity Instruments designated at FVOCI

The Group may make an irrevocable election to designate an equity instrument at FVOCI. This designation, if elected, is made at initial recognition and on an instrument by instrument basis. Gains and losses on these instruments, including when derecognized, are recorded in OCI and are not subsequently reclassified to the income statement. Dividends received are recorded in the income statement.

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

The Group classifies and measures all other financial assets that are not classified at AC or FVOCI, at FVTPL. Derivative financial instruments are measured at FVTPL with changes in fair value recognized in the income statement, unless they are designated as effective hedging instruments, where hedge accounting requirements under IAS 39 apply (as described in note 2.2.3 above).

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

Financial assets measured at FVTPL are initially recorded at fair value and any unrealized gains or losses arising due to changes in fair value are included in the income statement.

Business model and contractual characteristics assessment

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

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

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

Types of business models

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

The hold-to-collect (HTC) business model has the objective to hold the financial assets in order to collect contractual cash flows. Financial assets classified within this business model include investment securities, due from banks and loans and advances to

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customers including securitized notes issued by special purpose entities established by the Group and recognized in its balance sheet, which are measured at amortized cost. Sales within this model are monitored per financial asset class and may be performed for reasons which are not inconsistent with this business model. More specifically, sales of financial assets due to credit deterioration, as well as sales close to the maturity are considered consistent with the objective of hold-to-collect contractual cash flows regardless of value and frequency. Sales for other reasons may be consistent with the HTC model such as liquidity needs in any stress case scenario or sales made to manage high concentration level of credit risk. Such sales are monitored and assessed depending on frequency and value to conclude whether they are consistent with the HTC model.

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

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

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

Cash flow characteristics assessment

For a financial asset to be measured at AC or FVOCI, its contractual terms must give rise on specified dates to cash flows that are solely payments of principal and interest (SPPI) on the principal amount outstanding. For the purpose of this assessment principal is defined as the fair value of the asset at initial recognition and interest as the consideration for the time value of money, credit risk, other basic lending risks and a profit margin.

More specifically, at initial recognition of a financial asset, an assessment is performed of whether the financial asset contains a contractual term that could change the amount or timing of contractual cash flows in a way that it would not be consistent with the above condition. The Group considers the existence of various features, including among others, contractually linked terms, prepayment terms, deferred interest-free payments, extension and equity conversion options, terms that introduce leverage including index linked payments, as well as environmental, social and governance linked features (ESG) where the contractual interest rate is adjusted if the borrower meets, or fail to meet specific sustainability performance targets. Where the contractual terms introduce exposure to risk or volatility that are inconsistent with a basic lending arrangement, the related financial asset is considered to have failed the SPPI assessment and will be measured at FVTPL.

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

Moreover, for the securitized notes issued by special purpose entities and held by the Group, the cash flow characteristics of the notes and the underlying pool of financial assets as well as the credit risk inherent in each securitization's tranche compared to the credit risk of all of the underlying pool of financial assets, are considered.

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

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

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

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

Derecognition of financial assets

The Group derecognizes a financial asset when its contractual cash flows expire, or the rights to receive those cash flows are transferred in an outright sale in which substantially all risks and rewards of ownership have been transferred. In addition, a financial asset is derecognized even if rights to receive cash flows are retained but at the same time the Group assumes an obligation to pay the received cash flows without a material delay (pass through agreement) or when substantially all the risks and rewards are neither transferred nor retained but the Group has transferred control of the asset. Control is transferred if, and only if, the transferee has the practical ability to sell the asset in its entirety to unrelated third party and is able to exercise that ability unilaterally and without imposing additional restrictions on the transfer.

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

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

Modification of financial assets that may result in derecognition

In addition, derecognition of financial asset arises when its contractual cash flows are modified and the modification is considered substantial enough so that the original asset is derecognized and a new one is recognised. Substantial modifications resulting in derecognition may include among others change in borrower, change in the asset’s denomination currency, debt consolidation of unsecured exposure into a single new secured asset. The Group records the modified asset as a ‘new’ financial asset at fair value plus any eligible transaction costs and the difference with the carrying amount of the existing one is recorded in the income statement as derecognition gain or loss.

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

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

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

2.2.10 Reclassifications of financial assets

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

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

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

2.2.11 Financial liabilities

Financial liabilities - Classification and measurement

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

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

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

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

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

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

Derecognition of financial liabilities

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

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

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

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

2.2.12 Fair value measurement of financial instruments

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

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

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

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

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

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

2.2.13 Impairment of financial assets

The Group recognizes allowance for expected credit losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at AC and FVOCI, including loans, securitized notes issued by special purpose entities established by the Group, lease receivables, debt securities, as well as financial guarantee contracts and loan commitments. ECL are a probability-weighted average estimate of credit losses that reflects the time value of money. Upon initial recognition of the financial instruments in scope of the impairment policy, the Group records a loss allowance equal to 12-month ECL, being the ECL that result from default events that are possible within the next twelve months. Subsequently, for those financial instruments that have experienced a significant increase in credit risk (SICR) since initial recognition, a loss allowance equal to lifetime ECL is recognized, arising from default events that are possible over the expected life of the instrument. If upon initial recognition, the financial asset meets the definition of purchased or originated credit impaired (POCI), the loss allowance is based on the change in the ECL over the life of the asset.

Loss allowances for trade receivables are always measured at an amount equal to lifetime ECL. For all other financial assets subject to impairment, the general three-stage approach applies.

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Accordingly, ECL are recognized using a three-stage approach based on the extent of credit deterioration since origination:

- Stage 1 – When there is no significant increase in credit risk since initial recognition of a financial instrument, an amount equal to 12-month ECL is recorded. The 12 – month ECL represent a portion of lifetime losses, that result from default events that are possible within the next 12 months after the reporting date and is equal to the expected cash shortfalls over the life of the instrument or group of instruments, due to loss events probable within the next 12 months. Not credit-impaired financial assets that are either newly originated or purchased, as well as assets recognized following a substantial modification accounted for as a derecognition, are classified initially in Stage 1.
- Stage 2 – When a financial instrument experiences a SICR subsequent to origination but is not considered to be in default, it is included in Stage 2. Lifetime ECL represent the expected credit losses that result from all possible default events over the expected life of the financial instrument.
- Stage 3 – Financial instruments that are considered to be in default are included in this stage. Similar to Stage 2, the allowance for credit losses captures the lifetime expected credit losses.
- POCI - Purchased or originated credit impaired (POCI) assets are financial assets that are credit impaired on initial recognition. They are not subject to stage allocation and are always measured on the basis of lifetime expected credit losses. Accordingly, ECL are only recognized to the extent that there is a subsequent change in the assets' lifetime expected credit losses. Any subsequent favorable change to their expected cash flows is recognized as impairment gain in the income statement even if the resulting expected cash flows exceed the estimated cash flows at initial recognition. Apart from purchased assets directly from the market or through a business combination, POCI assets may also include financial instruments that are considered new assets, following a substantial modification accounted for as a derecognition (see section 2.2.9).

Definition of default

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

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

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

For debt securities, the Group determines the risk of default using an internal credit rating scale. The Group considers debt securities as credit impaired if the internal rating of the issuer/counterparty corresponds to a rating equivalent to "C" (Moody's rating scale) or the external rating of the issuer/counterparty at the reporting date is equivalent to "C" (Moody's rating scale) and the internal rating is not available.

Significant increase in credit risk (SICR) and staging allocation

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

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

The assessment for SICR is performed using both qualitative and quantitative criteria based on reasonable and supportable information that is available without undue cost or effort including forward looking information and macroeconomic scenarios as

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well as historical experience. Furthermore, regardless of the outcome of the SICR assessment based on the above triggers, the credit risk of a financial asset is deemed to have increased significantly when contractual payments are more than 30 days past due.

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

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

Internal credit risk rating (on a borrower basis) is also used as a basis for the identification of SICR with regards to lending exposures of the Wholesale portfolio. Specifically, the Group takes into consideration the changes of internal ratings by a certain number of notches. In addition, a watchlist status is also considered by the Group as a trigger for SICR identification. Internal credit risk rating models include borrower specific information as well as, forward-looking information regarding the prospects of the industry in which it operates. For securitized notes issued by special purpose entities established by the Group, the SICR assessment is performed by considering the performance of the underlying assets, where the level of their expected cash flows is compared to the carrying amount of the securitized notes. In addition, the assessment of SICR for debt securities is performed on an individual basis based on the number of notches downgrade in the internal credit rating scale since the origination date.

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

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

Transfers from Stage 2 to Stage 1

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

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

Transfers from Stage 3 to Stage 2

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

Criteria for grouping of exposures based on shared credit risk characteristics

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

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

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

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

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

Measurement of Expected Credit Losses

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

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

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

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

ECL Key Inputs

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

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

The Group uses Point in Time (PiT) PDs in order to remove any bias towards historical data thus aiming to reflect management's view of the future as at the reporting date, incorporating relevant forward looking information including macroeconomic scenarios.

Two types of PD are used for calculating ECL:

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

Notes to the Consolidated Financial Statements

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

The Exposure at default (EAD) is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest and expected drawdowns on committed facilities. The EAD includes both on and off balance sheet exposures. The on balance sheet exposure corresponds to the total amount that has been withdrawn and is due to be paid, which includes the outstanding principal, accrued interest and any past due amounts. The off balance sheet exposure represents the credit that is available to be withdrawn, in excess of the on balance sheet exposure.

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

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

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

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

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

Forward-looking information

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

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

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

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

Notes to the Consolidated Financial Statements

Modified Financial Assets

In cases where the contractual cash flows of a financial asset have been modified and the modification is considered substantial enough (for the triggers of derecognition, refer to Derecognition of Financial assets in section 2.2.9 above), the modification date is considered to be the date of initial recognition for impairment calculation purposes, including for the purposes of determining whether a significant increase in credit risk has occurred. Such a modified asset is typically classified as Stage 1 for ECL measurement purposes. However, in some circumstances following a modification that results in derecognition of the original financial asset, there may be evidence that the new financial asset is credit-impaired at initial recognition, and thus, the financial asset is recognized as an originated credit-impaired financial asset (POCI).

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

Presentation of impairment allowance

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

Write-off of financial assets

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

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

2.2.14 Sale and repurchase agreements, securities lending and borrowing

(i) Sale and repurchase agreements

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

(ii) Securities lending and borrowing

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

2.2.15 Leases

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

Notes to the Consolidated Financial Statements

(i) Accounting for leases as lessee

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

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

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

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

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

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

(ii) Accounting for leases as lessor

At inception date of the lease, the Group, acting as a lessor, classifies each of its leases as either an operating lease or a finance lease based on whether the lease transfers substantially all of the risks and rewards incidental to the ownership of the underlying asset. If this is the case, then the lease is a finance lease; if not, then it is an operating lease. As part of this assessment, the Group considers certain indicators such as whether the lease is for the major part of the economic life of the asset.

Finance leases

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

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

Operating leases

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

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

Notes to the Consolidated Financial Statements

Subleases

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

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

2.2.16 Income tax

Income tax consists of current and deferred tax.

(i) Current income tax

Income tax payable on profits, based on the applicable tax law in each jurisdiction and the tax rate enacted at the reporting date, is recognized as an expense in the period in which profits arise.

(ii) Deferred tax

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

Deferred tax assets are recognized where it is probable that future taxable profit will be available against which the temporary differences can be utilized. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. Any such reduction is reversed to the extent that it becomes probable that sufficient taxable profit will be available. The Group recognises a previously unrecognised deferred tax asset to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered.

Deferred tax related to debt securities at FVOCI and cash flow hedges is recognized to other comprehensive income, and is subsequently recognized in the income statement together with the deferred gain or loss.

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

The Group has applied the mandatory temporary exception (relief) to the requirement of IAS 12 and does not recognise or disclose information about deferred taxes arising from the Pillar Two Income taxes.

(iii) Uncertain tax positions

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

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

Notes to the Consolidated Financial Statements

is expected to be paid to the tax authorities. The Group presents in its balance sheet all uncertain tax balances as current or deferred tax assets or liabilities.

The Group as a general rule has opted to obtain for the Group's Greek companies an 'Annual Tax Certificate', which is issued after a tax audit is performed by the same statutory auditor or audit firm that audits the annual financial statements. Further information in respect of the Annual Tax Certificate and the related tax legislation, as well as the unaudited tax years for the Group's companies is provided in note 13.

2.2.17 Employee benefits

(i) Short term benefits

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

(ii) Pension obligations

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

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

The Group operates unfunded defined benefit plans in Greece and Bulgaria, under broadly similar regulatory frameworks. In accordance with the local labor legislation, the Group provides for staff retirement indemnity obligation for employees which are entitled to a lump sum payment based on a) the number of years of service, as of the date when employee service first leads to benefits under the plan until the date when further employee service will lead to no material amount of further benefits, and b) the level of remuneration at the date of retirement, if they remain in the employment of the Group until normal retirement age. In addition, the Group provides termination benefits mainly in respect of the Voluntary Exit Schemes (VES), which have been implemented through either lump-sum payments or long-term leaves during which the employees will be receiving a percentage of a monthly salary, or a combination thereof. Provision has been made for the actuarial value of the lump sum payable on retirement (SLSRI) and termination benefits using the projected unit credit method. Under this method the cost of providing retirement indemnities and termination benefits is charged to the income statement so as to spread the cost over the period of service of the employees, in accordance with the respective actuarial valuations, which are performed every year.

The SLSRI and termination benefits obligation is calculated as the present value of the estimated future cash outflows using interest rates of high quality corporate bonds. In countries where there is no deep market in such bonds, the yields on government bonds are used. The currency and term to maturity of the bonds used are consistent with the currency and estimated term of the retirement and termination benefit obligations. Actuarial gains and losses that arise in calculating the Group's SLSRI and termination benefits obligations are recognized directly in other comprehensive income in the period in which they occur and are not reclassified to the income statement in subsequent periods.

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

Termination benefits are payable when employment is terminated by the Group before the normal retirement date, or whenever an employee accepts voluntary redundancy in exchange for these benefits (including those in the context of the VES implemented by the Group). The Group recognizes termination benefits at the earlier of the following dates: (a) when the Group can no longer withdraw the offer of those benefits; and (b) when the Group recognizes costs for a restructuring that involves the payment of termination benefits. Any reversals of the SLSRI obligation arising from employees that are included in the long-term leaves scheme are accounted for as a curtailment gain recognized in the income statement. In the case of an offer made to encourage voluntary redundancy, the termination benefits are measured based on the number of employees expected to accept the offer. Termination benefits falling due more than 12 months after the end of the reporting period are discounted to their present value.

(iv) Performance-based cash payments

The Group's Management awards high performing employees with bonuses in cash, from time to time, on a discretionary basis. Cash payments requiring only Management approval are recognized as employee benefit expenses on an accrual basis. Cash payments

Notes to the Consolidated Financial Statements

requiring General Meeting approval as distribution of profits to staff are recognized as employee benefit expense in the accounting period that they are approved by the Group's shareholders.

(v) Share-based payments

The Group's Management awards employees with bonuses in the form of shares and share options on a discretionary basis and after taking into account the current legal framework. Non-performance related shares vest in the period granted. Share based payments that are contingent upon the achievement of a performance and service condition, vest only if both conditions are satisfied.

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

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

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

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

2.2.18 Repossessed properties

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

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

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

2.2.19 Related party transactions

Related parties of the Group include:

- (a) an entity that has control over the Group and entities controlled, jointly controlled or significantly influenced by this entity, as well as members of its key management personnel and their close family members;
- (b) an entity that has significant influence over the Group and entities controlled by this entity,
- (c) members of key management personnel of the Group, their close family members and entities controlled or jointly controlled by the abovementioned persons;
- (d) associates and joint ventures of the Group;
- (e) fellow subsidiaries;
- (f) post-employment benefit plans established for the benefit of the Group's employees.

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

2.2.20 Provisions and contingent liabilities

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

Notes to the Consolidated Financial Statements

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

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

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

2.2.21 Operating segment

An operating segment is a component of the Group that engages in business activities from which it may earn revenue and incur expenses within a particular economic environment. Operating segments are identified on the basis of internal reports, regarding operating results, of components of the Group that are regularly reviewed by the chief operating decision maker in order to allocate resources to the segment and to assess its performance. The chief operating decision maker has been identified as the Strategic Planning Committee that is responsible for strategic decision making. Segment revenue, segment expenses and segment performance include transfers between business segments. Such transfers are accounted for at competitive prices in line with charges to unaffiliated customers for similar services.

2.2.22 Share capital

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

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

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

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

2.2.23 Preferred securities

Preferred securities issued by the Group are classified as equity when there is no contractual obligation to deliver to the holder cash or another financial asset.

Incremental costs directly attributable to the issue of new preferred securities are shown in equity as a deduction from the proceeds, net of tax.

Dividend distribution on preferred securities is recognized as a deduction in the Group's equity on the date it is due.

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

2.2.24 Financial guarantees and commitments to extend credit

Financial guarantees

Financial guarantee contracts are contracts that require the issuer to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payments when due, in accordance with the terms of a debt instrument. Financial guarantees granted by the Group to financial institutions and other bodies on behalf of customers to secure loans, overdrafts and other banking facilities, are initially recognized at fair value, being the premium received. Subsequent to initial recognition, such guarantees are measured at the higher of the amount of the ECL allowance, and the amount initially recognised less any cumulative amortization of the fee earned, where appropriate.

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

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

Commitments to extend credit

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

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

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

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

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

The Group presents discontinued operations in a separate line in the consolidated income statement. If a Group entity or a component of a Group 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.

Profit or loss from discontinued operations includes the profit or loss before tax from discontinued operations, the gain or loss on disposal before tax or measurement to fair value less costs to sell and discontinued operations tax expense. Intercompany transactions between continuing and discontinued operations are presented on a gross basis in the income statement. Upon classification of a Group entity as a discontinued operation, the Group restates prior periods in the consolidated income statement.

2.2.26 Cash and cash equivalents

Cash and cash equivalents include cash in hand, unrestricted deposits with central banks, due from credit institutions that are all carried at amortised cost and other short-term highly liquid investments with original maturities of three months or less that are held for trading.

2.2.27 Government grants

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

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2.2.28 Fiduciary activities

The Group provides custody, trustee, corporate administration, investment management and advisory services to third parties that result in the holding or investing of assets on behalf of its clients. Those assets that are held in a fiduciary capacity are not assets of the Group and are not recognized in the financial statements. In addition, the Group does not guarantee these investments and as a result it is not exposed to any credit risk in relation to them.

2.3 Impact of IFRS 17 adoption by a Group's associate

As of 1 January 2023, the Group's associate Eurolife FFH Insurance Group Holdings S.A. (Eurolife) has adopted IFRS 17 "Insurance Contracts" with retrospective application as of 1 January 2022. Following the finalization of Eurolife transition impact to IFRS 17 in the fourth quarter of 2023, the Group has adjusted the carrying amount of its investment in the associate accordingly. The comparative information as restated for the line items of the Group's balance sheet, income statement and the statement of comprehensive income that are affected, is set out below.

Consolidated Balance Sheet	31 December 2022			1 January 2022		
	As published € million	Restatement € million	Restated € million	As published € million	Restatement € million	Restated € million
ASSETS						
Investments in associates and joint ventures	173	14	187	267	(33)	234
Total assets	81,460	14	81,474	77,852	(33)	77,819
EQUITY						
Reserves and retained earnings	4,646	14	4,660	(3,333)	(33)	(3,366)
Equity attributable to shareholders of the Company	6,623	14	6,637	5,539	(33)	5,506
Total equity	6,718	14	6,732	5,635	(33)	5,602
Total equity and liabilities	81,460	14	81,474	77,852	(33)	77,819
Consolidated Income Statement						
	Year ended 31 December 2022					
	As published € million	Restatement € million	Restated € million			
Share of results of associates and joint ventures	18	17	35			
Profit before tax ⁽¹⁾	1,734	17	1,751			
Net profit	1,330	17	1,347			
Net profit attributable to shareholders	1,330	17	1,347			
	€	€	€			
Earnings per share						
-Basic and diluted earnings per share	0.36	0.00	0.36			

⁽¹⁾The amount of €1,735 million as published, was adjusted to €1,734 million, following the presentation in the year ended 31 December 2023 of operations of Eurobank Direktna a.d. disposal group as discontinued.

Notes to the Consolidated Financial Statements

Consolidated Statement of Comprehensive Income	Year ended 31 December 2022		
	As published	Restatement	Restated
	€ million	€ million	€ million
Net profit	1,330	17	1,347
Associates and joint ventures			
- changes in the share of other comprehensive income, net of tax	(32)	30	(2)
Other comprehensive income	(252)	30	(222)
Total comprehensive income	1,078	47	1,125
Total comprehensive income attributable to shareholders	1,079	47	1,126

Furthermore, following the above, the amount of “profit before tax from continuing operations” presented in the comparative information of the consolidated cash flow statement (CFS) has been adjusted accordingly against the line “other adjustments” that is also included within “cash flows from continuing operating activities”.

3. Critical accounting estimates and judgments in applying accounting policies

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

3.1 Impairment losses on loans and advances to customers

On the back of the international economic environment, that remains volatile, the economies in which the Group operates remained in expansionary territory in 2023. More specifically, Greek economy expansion is mainly driven by the increase in household consumption, export of goods and services, as well as its strong performance in tourism (note 2). Moreover, the Group’s asset quality continued to strengthen in 2023, as evidenced by the level of its credit quality indicators at year end 2023 that outperformed the expected levels in terms of NPE ratio and NPE coverage that maintained their improving trend, standing at 3.5% (2022: 5.2%) and 86.4% (2022: 75.5%), respectively.

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

Expected Credit Loss (ECL) measurement

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

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

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

Determination of a significant increase of credit risk

IFRS 9 does not include a definition of what constitutes a significant increase in credit risk (SICR). An assessment of whether credit risk has increased significantly since initial recognition is performed at each reporting period by considering primarily the change in

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the risk of default occurring over the remaining life of the financial instrument. The Group assesses whether a SICR has occurred since initial recognition based on qualitative and quantitative reasonable and supportable forward-looking information that includes significant management judgment (note 2.2.13). More stringent criteria could significantly increase the number of instruments migrating to stage 2.

Retail lending

For retail lending exposures the primary criterion is the change in the residual cumulative lifetime Probability of Default (PD) above specified thresholds. These thresholds are set and vary per portfolio, origination year, , product type as well as per origination PD level. In 2023, the Group, recalibrated its SICR thresholds, by segregating further its retail exposures based on their disbursement year, with a view to aligning the comparison between the origination and residual lifetime PD to the remaining maturity of the loans. Accordingly, performing lending exposures close to maturity exhibit lower origination PDs and therefore are associated with higher SICR thresholds, while higher origination PDs corresponding to exposures of longer maturity are associated with lower SICR thresholds. The impact in ECL and SICR assessment, resulting from the above recalibration of SICR thresholds, was insignificant.

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

Retail exposures	31 December 2023	31 December 2022
	Upper SICR threshold	
Mortgage	170%	50%
Home Equity	80%	80%
SBB	130%	65%
Consumer	100%	100%

Wholesale lending

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

As at 31 December 2023 and 2022, the credit rating deterioration thresholds per rating bands for Greece's wholesale lending exposures that trigger allocation to stage 2 are set out below. In particular, as per the Group's SICR policy, any downgrade to rating band 6 or high-risk rating bands (7,8 or 9) is considered as SICR event to all corporate lending portfolios:

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

Determination of scenarios, scenario weights and macroeconomic factors

To achieve the objective of measuring ECL, the Group evaluates a range of possible outcomes in line with the requirements of IFRS 9 through the application of three macroeconomic scenarios, i.e. baseline, adverse and optimistic, in a way that reflects an unbiased and probability weighted outcome. Each of the scenarios is based on Management's assumptions around future economic conditions in the form of macroeconomic, market and other factors. As at 31 December 2023 and 2022, the probability weights for the above mentioned scenarios applied by the Group in the ECL measurement calculations are 50% for the baseline scenario and 25% for the adverse and optimistic scenarios.

The baseline scenario assumes no escalation of the open war fronts, no change in EU sanctions against Russia, continuation of ECB's monetary policy trajectory as well as Greek government's fiscal support measures. Core inflation for Greece is assumed to gradually

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de-escalate suggesting a moderate economic growth path, employment is assumed to contribute to lower unemployment path given the capacity constraints stemming from demographic factors, real estate prices show signs of slowing down for 2023 and 2024 compared to 2022 but will remain on a positive range and inflation rate is forecasted to decrease slightly implying stable price levels. Additionally, the economies' short-term prospects are supported by the: (a) strong tourist season expected, (b) Recovery and Resilience Facility, Multiannual Financial Framework and European Investment Bank funds, (c) ample liquidity (deposits and state cash buffer) and (d) fiscal measures implemented to mitigate the impact of energy costs.

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

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

Forward-looking information

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

In terms of macroeconomic assumptions, the Group assesses a number of indicators in projecting the risk parameters, namely Residential and Commercial Property Price Indices, unemployment, Gross Domestic Product (GDP), Greek Government Bond (GGB) spread over Euribor and inflation as well as interest and FX rates. The arithmetic averages of the annual forecasts per macroeconomic scenario for the next four year period following the reporting date, used in the ECL measurement of Greek lending portfolios for the year ended 31 December 2023 and 2022, are set in the following table:

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

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

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

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

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Furthermore, the PDs are unbiased rather than conservative and incorporate relevant forward looking information including macroeconomic scenarios. The forecasting risk parameters models incorporate a number of macroeconomic variables, such as GDP, unemployment etc. and portfolio specific variables such as seasonal flag etc., which are used as independent variables for optimum predictive capability. Additionally, the PD models involve industry specific macro variables in corporate borrowers, as well as the application of interest rate and inflation scalars in the estimation of retail customers' debt to income ratio. More specifically, in the latter case, the borrowers' instalments are estimated with the use of the projected interest rates, while the income model, also takes into account the projected inflation on top of the projected GDP and unemployment ratio.

The ECL models are based on logistic regressions and run under the different macroeconomic scenarios and relevant changes and shocks in the macro environment reflected accordingly in a non-linear manner.

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

The Group segments its exposures on the basis of shared credit risk characteristics upon initial recognition for the purposes of both assessing significant increase in credit risk and measuring loan loss allowance on a collective basis. The different segments aim to capture differences in PDs and in the rates of recovery in the event of default. On subsequent periods, the Group re-evaluates the grouping of its exposures at least on an annual basis, in order to ensure that the groups remain homogeneous in terms of their response to the identified shared credit risk characteristics. Re-segmentation reflects management's perception in respect to the change of credit risk associated with the particular exposures compared to initial recognition.

Modeling and Management overlays / adjustments

A number of sophisticated models have been developed or modified to calculate ECL, while temporary management adjustments may be required to capture new developments and information available, which are not yet reflected in the ECL calculation through the risk models. Such adjustments are governed by the Group's IFRS9 ECL Model Adjustments' framework which aims to ensure timely identification of non-modeled risks, if any, that may have an impact on lending portfolios, as well as sufficient quantification of such risks based on sound methodologies and processes. For 2023, the Group reassessed the need for overlay, considering the current geopolitical developments and taking into account the macroeconomic uncertainty resulting this time mainly from persistent inflationary pressures, high interest rates and open war fronts, Management incorporated in the ECL calculations as a post model adjustment, an estimation for potentially non modeled risks of € 31 million (2022: € 66 million), focusing now on both corporate and retail borrowers that are considered more sensitive to any negative macro environment developments in the foreseeable future.

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

Sensitivity analysis on lending portfolios

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

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

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The tables below present the estimated effect in the Group's ECL measurement (including off-balance sheet items) per stage, upon potential reasonable combined changes of forecasts in key macroeconomic indicators over the next 5 years (2024-2028 and 2023-2027, respectively):

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

	Estimated effect per stage as at 31 December 2023							
	Positive change				Adverse change			
	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2023	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2023
Impact in € million	(16)	(27)	(21)	(64)	16	33	21	70
Impact in % allowance	-8.53	-8.27	-2.63	-4.92	8.26	9.81	2.74	5.34

	Estimated effect per stage as at 31 December 2022							
	Positive change				Adverse change			
	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2022	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL credit-impaired	31 December 2022
Impact in € million	(12)	(36)	(34)	(82)	10	43	35	88
Impact in % allowance	-7.08	-9.96	-2.93	-4.86	5.73	11.99	3.03	5.24

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

3.2 Fair value of financial instruments

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

The fair value of financial instruments that are not quoted in an active market are determined by using other valuation techniques that include the use of valuation models. In addition, for financial instruments that trade infrequently and have little price transparency, fair value is less objective and requires varying degrees of judgment depending on liquidity, concentration, uncertainty

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of market factors, pricing assumptions and other risks affecting the specific instrument. In these cases, the fair values are estimated from observable data in respect of similar financial instruments or using other valuation techniques.

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

Where valuation techniques are used to determine the fair values of financial instruments that are not quoted in an active market, they are validated and periodically reviewed by qualified personnel independent of the personnel that created them. All models are certified before they are used, and are calibrated to ensure that outputs reflect actual data and comparative market prices. The main assumptions and estimates, considered by management when applying a valuation model include:

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

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

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

3.3 Classification of financial instruments

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

Business model assessment

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

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

Contractual cash flow characteristics test (SPPI test)

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

Accordingly, for non-recourse financial assets, the Group assesses jointly criteria such as the adequacy of equity, LTV (Loan-to-Value) and DSCR (Debt-Service-Coverage-Ratio) ratios as well as the existence of corporate and personal guarantees. For the securitized notes issued by special purpose entities, either established by the Group or third parties, and held by the Group, the cash flow characteristics of the notes and the underlying pool of financial assets as well as the credit risk inherent in each securitization's tranche compared to the credit risk of all of the underlying pool of financial assets, are assessed. Furthermore, in order to assess whether any variability in the cash flows is introduced by the modified time value of money element, the Group performs a quantitative assessment (as described in note 2.2.9). For the SPPI assessment of sustainability linked instruments that include features that may change the contractual cash flows, by reducing or increasing the interest rate depending on whether the borrower meets or fails to meet predetermined ESG targets, the Group considers whether such targets are specific to the borrower, as well as whether the

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related contractual cash flows' change introduces compensation for non-basic lending risks (information about the Group's exposure in sustainability linked instruments is provided in note 20). Moreover, the Group evaluates certain cases on whether the existence of performance-related terms exposes the Group to asset risk rather to the borrower's credit risk.

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

3.4 Assess control over investees

Management exercises judgment in order to assess if the Group has control over another entity based on the control elements set out in note 2.2.1 (i).

In particular, as part of its funding activity and non-performing loans' management strategy, the Group sponsors certain securitization vehicles, the relevant activities of which have been predetermined as part of their initial design by the Group. The Group is exposed to variability of returns from these vehicles through the holding of debt securities issued by them or by providing credit enhancements in accordance with the respective contractual terms. In assessing whether it has control, the Group considers whether it manages the substantive decisions that could affect these vehicles' returns. Accordingly, the Group assesses on a case-by-case basis the structure of securitization transaction, including the respective contractual arrangements, in order to conclude if it controls these vehicles.

In addition, the Group is involved in the initial design of various mutual funds in order to provide customers with investment opportunities. The Group primarily acts as an agent in exercising its decision making authority as it is predefined by the applicable regulated framework. As a result, the Group has concluded that it does not control these funds.

Further information in respect of the structured entities the Group is involved, either consolidated or not, is provided in note 25.

3.5 Income tax

The Group is subject to income taxes in various jurisdictions and estimates are required in determining the liability for income taxes. The Group recognizes liabilities for anticipated tax audit issues based on estimates of whether additional taxes will be due or for anticipated tax disputes. Where the final tax outcome of these matters is different from the amounts that were initially recorded, such differences will impact the income tax and deferred tax in the period in which such determination is made. Further information in relation to the above is provided in note 13.

In addition, the Group recognizes deferred tax assets to the extent that it is probable that sufficient taxable profit will be available against which unused tax losses and deductible temporary differences can be utilized. Recognition therefore involves judgment regarding the future financial performance of the particular Group legal entity in which the deferred tax asset has been recognized. Particularly, in order to determine the amount of deferred tax assets that can be recognized, significant management judgments are required regarding the likely timing and level of future taxable profits. In making this evaluation, the Group has considered all available evidence, including management's projections of future taxable income and the tax legislation in each jurisdiction.

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

Further information in respect of the deferred tax assets recognized by the Group and the assessment for their recoverability is provided in note 13.

3.6 Retirement benefit obligations

The present value of the retirement benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions, such as the discount rate and future salary increases. Any change in these assumptions impacts the carrying amount of the pension obligations.

The Group determines the appropriate discount rate used to calculate the present value of the estimated retirement obligations, at the end of each year based on interest rates of high-quality corporate bonds. In countries where there is no deep market in such bonds, the yields on government bonds are used. The currency and term to maturity of the bonds used are consistent with the currency and estimated average term to maturity of the retirement benefit obligations. The salary rate increase assumption is based on future inflation estimates reflecting also the Group's reward structure and expected market conditions.

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

For information in respect of the sensitivity analysis of the Group's retirement benefit obligations to reasonably possible, at the time of preparation of these financial statements, changes in the abovementioned key actuarial assumptions, refer to note 36.

3.7 Investment properties

Investment property is carried at fair value, as determined by external, independent and certified valuers on an annual basis, or more frequently if deemed appropriate upon assessment of any relevant circumstances. The primary valuation method applied in determining the fair value of the Group's investment properties is the Discounted Cash Flow (DCF) method which is considered the most appropriate in cases of income generating assets. This method is based on discounting the net future cash flows generated by a property over the assumed holding period, by using an appropriate market derived discount rate.

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

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

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

Further information in respect of the fair valuation of the Group's investment properties is provided in note 27.

3.8 Provisions and contingent liabilities

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

Further information in relation to the Group's provisions and contingent liabilities is provided in notes 35 and 42.

3.9 Share-based payments

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

The valuation method and the inputs used to measure the share options granted to employees of the Group are presented in note 39.

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3.10 Leases

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

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

In measuring lease liabilities, the Group uses the lessees' incremental borrowing rate ('IBR') when it cannot readily determine the interest rate implicit in the lease. The IBR is the rate of interest that the 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.

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

3.11 Other accounting estimates and judgments

Information in respect of other estimates and judgments that are made by the Group is provided in notes 20, 24 and 30.

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4. Capital Management

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

	2023 € million	2022 ⁽²⁾ € million
Equity attributable to shareholders of the Company	7,899	6,623
Add: Adjustment due to IFRS 9 transitional arrangements	-	279
Add: Regulatory non-controlling interests	-	68
Less: Goodwill	(44)	(2)
Less: Other regulatory adjustments	(507)	(253)
Common Equity Tier 1 Capital	7,348	6,715
Total Tier 1 Capital	7,348	6,715
Tier 2 capital-subordinated debt	1,074	1,250
Add: Other regulatory adjustments	-	61
Total Regulatory Capital	8,422	8,026
Risk Weighted Assets	43,395	41,899
Ratios:	%	%
Common Equity Tier 1	16.9	16.0
Pro-forma Common Equity Tier 1 ⁽¹⁾	17.0	16.0
Total Capital Adequacy Ratio	19.4	19.2
Pro-forma Total Capital Adequacy Ratio ⁽¹⁾	20.2	19.0

⁽¹⁾ Pro-forma with the completion of the projects "Solar" (for 31/12/2022 and 31/12/2023 ratios) and "Leon" (for 31/12/2023) (note 30), as well as accounting for the impact from the completion of the issuance of Subordinated Tier 2 debt instruments in January 2024 (see below).

⁽²⁾ The capital adequacy ratios for the year ended 31 December 2022 have not been adjusted with: a) the restatement due to the retrospective application of IFRS 17 by the Group's associate Eurolife FFH Insurance Group Holdings S.A. (note 2.3) and b) the presentation of operations of Eurobank Direktna a.d. disposal group as discontinued (note 30).

Notes:

a) The profit of € 1,140 million attributable to the shareholders of the Company for the year ended 31 December 2023 (31 December 2022: profit of € 1,330 million) has been included in the calculation of the above capital ratios.

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

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

The Group has sought to maintain an actively managed capital base to cover risks inherent in the business. The adequacy of the Group's capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision (BIS rules/ratios) which have been incorporated in the European Union (EU) legislation through the Directive 2013/36/EU (known as CRD IV) along with the Regulation No 575/2013/EU (known as CRR), as they are in force. The above Directive has been transposed into Greek legislation by Law 4261/2014, as in force. Furthermore, the CRR as amended by the Regulation 2020/873 (CRR quick fix) provides, among others, for the extension by two years of the ability of the banks to add back to their regulatory capital any increase in provisions for (stage 1 and stage 2) expected losses compared to those that they have recognized on 1 January 2020 for their financial assets, which have not been defaulted. The relief which is applicable for 2023 and for 2024 is 50% and 25%, respectively.

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Supplementary to the above, in the context of Internal Capital Adequacy Assessment Process (ICAAP), the Group considers a broader range of risk types and the Group's risk management capabilities. ICAAP aims ultimately to ensure that the Group has sufficient capital to cover all material risks that it is exposed to, over a three-year horizon.

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

According to the 2022 SREP decision, from January 2023 the P2R for the Group stands at 2.75% in terms of total capital (or at 1.55% in terms of CET1 capital), reflecting the improved Group's financial position particularly in terms of asset quality. Thus, as of 31 December 2023, the Group was required to meet a Common Equity Tier 1 Ratio of at least 12.20% (including AT1 and Tier 2 capital shortfall) and a Total Capital Adequacy Ratio of at least 14.68% (Overall Capital Requirement or OCR) including Combined Buffer Requirement of 3.93%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

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

	31 December 2023	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.55%	2.75%
Total SREP Capital Requirement (TSCR)	6.05%	10.75%
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCoB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.43%	0.43%
Other systemic institutions buffer (O-SII)	1.00%	1.00%
Overall Capital Requirement (OCR), excluding shortfall	9.98%	14.68%
AT1 and Tier 2 capital shortfall	2.22%	-
Overall Capital Requirement (OCR), including shortfall	12.20%	14.68%

The above CET1 capital requirement of 12.20% takes into account that the Group had no AT1 capital, while the Tier 2 capital stood at 2.48% as at 31 December 2023, compared to the portion of 2.02% for AT1 and 2.69% for Tier 2 capital allowed by the legislation to cover part of Total SREP Capital Requirement (TSCR). Assuming that the Group had fully utilized the AT1 and Tier 2 capital capacity as at 31 December 2023, the CET1 requirement would stand at 9.98%.

From 1 January 2024, the O-SII buffer for the Group increased to 1.25% (from 1% in 2023), in accordance with the Executive Committee Act 221/1/17.10.2023 of the Bank of Greece, following a change in the methodology applied for the determination of the O-SII buffer rate. The countercyclical capital buffer is updated on a quarterly basis in accordance with the countercyclical capital buffer rates applicable in each country to which the Group has exposures.

Further disclosures regarding capital adequacy in accordance with the Regulation 575/2013 are provided in the Consolidated Pillar 3 Report on the Company's website.

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

Under the Directive 2014/59 (Bank Recovery and Resolution Directive) as in force, which was transposed into the Greek legislation pursuant to Law 4335/2015 as in force, European banks are required to meet the minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board (SRB) has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes. Based on the latest SRB's communication, the fully calibrated MREL (final target) to be met by Eurobank S.A. on a consolidated basis until the end of 2025 is set at 27.82% of its total risk weighted assets (RWAs), including a fully-loaded combined buffer requirement (CBR) of 4.25%. The final MREL target is updated by the SRB on an annual basis. The 2024 interim non-binding MREL target, applicable from January 2024, stands at 23.23% of RWAs, including a CBR of 4.18%.

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In the year ended 31 December 2023, in the context of the implementation of its strategy to ensure ongoing compliance with its MREL requirements, the Bank successfully completed the issue of two €500 million MREL-eligible senior preferred notes in January and in November 2023, respectively (note 34). As at 31 December 2023, the Bank's MREL ratio at consolidated level stands at 24.91% of RWAs including profit for the year ended 31 December 2023 (31 December 2022: 23.07%), which is higher than the aforementioned interim non-binding MREL target of 23.23%.

Post balance sheet event

On 19 January 2024, Eurobank Holdings announced that it successfully completed the issuance of €300 million Subordinated Tier 2 debt instruments. The proceeds from the issue will support the Group's strategy to ensure ongoing compliance with its total capital adequacy and MREL requirements, while it will be used also for the Bank's general funding purposes (note 34).

2023 EU – wide EBA Stress Test

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

This exercise was coordinated by the EBA in cooperation with the ECB and national supervisory authorities and was conducted according to the EBA's methodology and scenarios provided by the European Systemic Risk Board (ESRB). It was carried out on the basis of year-end 2022 figures and assessed the performance of EU banks under a baseline and adverse macroeconomic scenario, covering a three-year period from 2023 to 2025. The baseline scenario for EU countries was based on the projections from the EU national central banks of December 2022. The adverse scenario, although unlikely to unfold, was used to assess the resilience of banks to a hypothetical severe scenario of a significant deterioration in the overall outlook for the economy and financial markets in the next three years. The narrative depicted an adverse scenario related to a hypothetical worsening of geopolitical developments leading to a severe decline in GDP with persistent inflation and high interest rates. In terms of GDP decline, the 2023 adverse scenario was the most severe used in the EU wide stress up to now. Eurobank Holdings Group participated in the EBA-led stress test. In parallel, the ECB conducted its own stress test for a number of medium sized- banks that it supervises directly and that were not included in the EBA-led stress test sample.

2023 Stress Test Results

On 28 July 2023, the Company announced that Eurobank Holdings Group successfully completed the 2023 EU-wide Stress Test (ST), which was coordinated by the European Banking Authority (EBA) in cooperation with the European Central Bank (ECB) and the European Systemic Risk Board (ESRB). The Group significantly improved its results and resilience to stress under the adverse scenario compared to the ST 2021 exercise.

The starting point of the exercise is the financial and capital position of the Group as at 31 December 2022, as calculated based on the Standardised Approach (STD). On that date, the Fully Loaded (FL) CET 1 ratio (based on the full implementation of Basel III rules) amounted to 14.4%. Under the Baseline scenario, the FL CET1 ratio increases by 360bps over the 3-year ST horizon, reaching the level of 18% at the end of 2025. Under the Adverse scenario, the FL CET1 ratio decreases by 220bps at the end of 2025 and it stands at 12.2%, while at the end of the first year (2023) the Group registered its highest FL CET 1 ratio depletion, at 316bps.

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5. Financial risk management and fair value

5.1 Use of financial instruments

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

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

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

5.2 Financial risk factors

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

Risk Management objectives and policies

The Group acknowledges that taking risks is an integral part of its operations in order to achieve its business objectives. Therefore, the Group's management sets adequate mechanisms to identify those risks at an early stage and assesses their potential impact on the achievement of these objectives.

Due to the fact that economic, industry, regulatory and operating conditions will continue to change, risk management mechanisms are set in a manner that enable the Group to identify and deal with the risks associated with those changes. The Bank's structure, internal processes and existing control mechanisms ensure both the independence principle and the exercise of sufficient supervision.

The Group's Management considers effective risk management as a top priority, as well as a major competitive advantage, for the organization. As such, the Group has allocated significant resources for upgrading its policies, methods and infrastructure, in order to ensure compliance with the requirements of the European Central Bank (ECB) and of the Single Resolution Board (SRB), the guidelines of the European Banking Authority (EBA) and the Basel Committee for Banking Supervision and the best international banking practices. The Group implements a well-structured credit approval process, independent credit reviews and effective risk management policies for all material risks it is exposed to, both in Greece and in each country of its international operations. The risk management policies implemented by the Group are reviewed mainly annually.

The maximum amount of risk which the Group is willing to assume in the pursuit of its strategic objectives is articulated via a set of quantitative and qualitative statements for specific risk types, including specific tolerance levels as described in the Group's Risk Appetite Framework. The objectives are to support the Group's business growth, balance a strong capital position with higher returns on equity and to ensure the Group's adherence to regulatory requirements.

The risk appetite that is clearly communicated throughout the Group, determines risk culture and forms the basis on which risk policies and risk limits are established at Group and regional level. Aiming to identify its material risks, the Bank maintains a well-defined Risk Identification and Materiality Assessment (RIMA) Framework.

The identification and the assessment of all risks is the cornerstone for the effective Risk Management. The Group aiming to ensure a collective view on the risks linked to the execution of its strategy, acknowledges the new developments at an early stage and assesses the potential impact.

Board Risk Committee (BRC)

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

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The BRC assesses the Group's risk profile, monitors compliance with the approved risk appetite and risk tolerance levels and ensures that the Group has developed a risk management framework with appropriate methodologies, modelling tools, and data sources, as well as sufficient and competent staff to identify, assess, monitor and mitigate risks. Moreover, BRC is conferred with certain approval authorities.

The BRC consists of five (5) non-executive directors, meets at least on a monthly basis and reports to the BoD on a quarterly basis and on ad hoc instances if it is needed.

Management Risk Committee

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

Group Risk Management

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

Non-Performing Exposures (NPEs) management

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

Troubled Assets Committee

The Troubled Assets Committee (TAC) is established according to the regulatory provisions and its main purpose is to act as an independent body, closely monitoring the Bank's troubled assets portfolio and the execution of its NPE Management Strategy.

Remedial and Servicing Strategy (RSS)

Eurobank established Remedial Servicing & Strategy Sector (RSS) with the mandate to devise the NPE reduction plan, to closely monitor the overall performance of the NPE portfolio as well as the relationship of the Bank with doValue Greece. Furthermore, following Eurobank's commitments against the significant risk transfer (SRT) monitoring regulatory requirements pertaining to Bank's concluded transactions, RSS has a pivotal role in ensuring that relevant process is performed smoothly and in a timely manner and that any shortcomings are appropriately resolved, while providing any required clarifications or additional material required by the regulatory authorities.

The Head of RSS reports to the General Manager of Group Strategy. In this context, RSS has been assigned inter alia with the following responsibilities:

- Develop and actively monitor the NPE targets and reduction plan
- Set the strategic principles, priorities, policy framework and KPIs under which doValue Greece is servicing the portfolio
- Closely monitor the execution of the approved strategies, as well as all contractual provisions under the relevant contractual agreements for Eurobank's portfolio assigned to doValue Greece including the securitized portfolio of ERB Recovery DAC
- Monitoring of the performance of the senior notes of the securitizations in collaboration with Group Risk so as to ensure compliance to significant risk transfer (SRT) and to the Hellenic Asset Protection Scheme (HAPS)
- Budget and monitor the Bank's expenses and revenues associated with the assigned portfolio
- Cooperate closely with doValue Greece on a daily basis in achieving the Group's objectives
- Maintain supervisory dialogue

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NPE Operational targets

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

5.2.1 Credit Risk

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

- a) Country risk is the risk of losses arising from cross-border lending and investment activities and refers to the uncertainty associated with exposure in a particular country. This uncertainty may relate to a number of factors including the risk of losses following nationalization, expropriation, debt restructuring and foreign exchange rates' movement.
- b) Settlement risk is the risk arising when payments are settled, for example for trades in financial instruments, including derivatives and currency transactions. The risk arises when the Group remits payments before it can ascertain that the counterparties' payments have been received.

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

(a) Credit approval process

The credit approval and credit review processes are centralized both in Greece and in the International operations. The segregation of duties ensures independence among executives responsible for the customer relationship, the approval process and the loan disbursement, as well as monitoring of the loan during its lifecycle.

Credit Committees

The credit approval process in Corporate Banking is centralized through establishment of Credit Committees with escalating Credit Approval Levels. Main Committees of the Bank are considered to be the following:

- Credit Committees (Central and Local) authorized to approve new financing, renewals or amendments mainly for domestic groups in the existing credit limits, in accordance with their credit approval authority, depending on total limit amount of the customer/group and risk category (i.e. high, medium or low), as well as the value and type of security;
- Special Handling Credit Committees authorized to approve credit requests and take actions for distressed clients;
- International Credit Committees (Regional and Country) established for the wholesale borrowers of the Group's international bank subsidiaries, authorized to approve new limits, renewals or amendments to existing limits, in accordance with their credit approval authority, depending on total customer exposure and risk category (i.e. high, medium or low), as well as the value and type of security; and
- International Special Handling Committees established for handling distressed wholesale borrowers of the Group's international bank subsidiaries.

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

Group Credit (GC)

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

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

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1. **Corporate Credit**

(a) Domestic and Greek related portfolio: the underwriting function includes the review of credit requests originating from Corporate Units handling large and medium scale corporate entities of every risk category and specialised lending units such as Shipping and Structured Finance (Commercial Real Estate, Hotels & Leisure, Project Finance, M&A Financing) and Private Banking. Major tasks of the respective workstream and involved credit units pertain to the following:

- Evaluation of credit applications and issuance of an independent Risk Opinion when required according to internal procedures, which includes:
 - (i) assessment of the customer credit profile based on the qualitative and quantitative risk factors identified (market, operational, structural and financial)
 - (ii) recommendations for the formulation of bankable, well-secured and well-controlled transactions (credit facility), as well as
 - (iii) review and confirmation of the ratings of each separate borrower to reflect the risks acknowledged.
- Participation with voting right in all credit committees as per the Credit Approval procedures.
- Active participation in the regulatory audits and major internal projects of the Bank, providing at the same time credit related knowledge, expertise and support to other Units.
- Preparation of specialised reports to Management on a regular basis, with regards to the Top 25 largest, in terms of total exposure, borrower Groups, statistics on the new approved financings and leveraged transactions.

(b) International Subsidiaries' portfolio: The GC through its specialized International Corporate Credit Unit (IC) is responsible to actively participate in the design, implementation and review of the credit underwriting function for the wholesale portfolio of the International Subsidiaries covering Bulgaria, Cyprus, and portion of the loan portfolio of Luxemburg (and London). Moreover, the respective unit's tasks and responsibilities are highlighted below:

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

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

2. **Retail Credit**

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

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

(b) Credit risk monitoring

Group Credit Control

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

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The main responsibilities of the GCC are to:

- supervise, support and maintain the credit rating and impairment systems used to assess the wholesale lending customers;
- monitor and review the performance of all of the Group's loan portfolios;
- supervise and control the foreign subsidiaries' credit risk management units;
- monitor on a regular basis and report on a quarterly basis to the Board of Directors and the BRC of risk exposures, along with accompanying analyses;
- monitor and evaluate the efficiency of adopted strategies and proposed solutions in terms of dealing with Non-Performing Exposures (NPEs) and the achievement of targets for NPEs reduction, as communicated and agreed with the Supervisory Authorities;
- conduct field reviews and prepare written reports to the Management on the quality of all of the Group's loan portfolios and adherence with EBA prevailing regulations;
- monitor the proper EBA classifications in accordance with the relevant provisions and guidelines;
- participate in the approval of new credit policies and new loan products;
- participate in the Troubled Asset Committee;
- attend meetings of Credit Committees and Special Handling Committees, without voting right;
- formulate the Group's credit impairment policy and measure the provisions of the Greek loan portfolios along with the relevant reporting to Management;
- regularly review the adequacy of provisions of all of the Group's loan portfolios;
- formulate, in collaboration with the responsible lending Units the credit policy manuals for performing borrowers;
- provide guidance and monitor the process of designing and reviewing credit policies before approved by Management.
- Through field / thematic reviews on a sample basis monitor the proper application of Real Estate collaterals' valuation, as per the Banks' Collateral Valuation policy and procedures;
- monitor the supervisory, regulatory developments, emerging trends and best practices within its purview in order to keep Management abreast and propose required actions;

Group Credit Risk Capital Adequacy Control

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

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

- control, measure and monitor the capital requirements arising from the Group's loan portfolio along with the relevant reporting to Management and regulators (ECB/SSM);
- manage the models development, implementation, monitoring of the internal risk based models and IFRS9 models of Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) for evaluating credit risk
- measure and monitor the risk parameters (PD, LGD, EAD) for the purposes of internal capital adequacy assessment, as well as, the estimation of risk related parameters (such as forecast 12-m PD, forecast lifetime PD) for IFRS 9 impairment calculation purposes;
- review the grouping of lending exposures and ensuring their homogeneity in accordance with the Group's IFRS accounting policies
- re-development and monitoring of the significant increase in credit risk (SICR) thresholds under IFRS9 standard;
- prepare monthly capital adequacy calculations (Pillar 1) and relevant management, as well as, regulatory reports (COREPs, SREP) on a quarterly basis;
- projection of asset quality and capital requirements for the loan book (projected impairments and RWAs), in the context of the business plan, ICAAP and recovery plan and participation in the relevant committees;
- perform stress tests, both internal and external (EBA/SSM), and maintain the credit risk stress testing infrastructure;

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- coordinate the stress testing exercises for the loan portfolios at Group Level;
- prepare the credit risk analyses for Internal Capital Adequacy Assessment (ICAAP)/ Pillar 2 purposes;
- prepare the Basel Pillar 3 disclosures for credit risk;
- regularly report to the GCRO, to the Management Risk Committee and to the Board Risk Committee on: risk models performance, risk parameters (PD, LGD, EAD), forbearance reporting, vintage analysis and default / redefault statistics portfolios forward looking analysis and new disbursements quality.
- guide, monitor and supervise the Credit Risk divisions of the subsidiaries on modelling, credit stress testing and other credit risk related regulatory issues.
- monitor and guide Group's international subsidiaries on credit risk related ICAAP, stress testing and other regulatory credit risk related issues, based on Group standards. Review of local credit risk stress test exercises;
- support the business units in the use of credit risk models in business decisions, for funding purposes, in the capital impact assessment of strategic initiatives and the development and usage of risk related metrics such as risk adjusted pricing, Risk Adjusted Return on Capital (RAROC) etc.; and
- assist Remedial Servicing Strategy in the risk assessment and risk impact of various programs and products.

Group Model Validation and Governance

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

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

In more detail, the tasks of the Unit are outlined as follows:

- Prepare and update the Group's Models Framework (to include model definition, roles involved per model, model classification principles and methodology, model validation principles, materiality classifications and thresholds, models' registry governance, etc.);
- Establish and update the Group's Models Registry;
- Review models' classification, in accordance with the methodology provided in the Group Models Framework;
- Prepare and update the Group Models Validation Framework, while providing support to Group's subsidiaries in its implementation;
- Monitor changes in ECB guidelines on models' validation;
- Propose and escalate for approval the quantitative thresholds, in order to assess the results of the validation tests;
- Conduct model validation tests in alignment with the Group Model Validation Framework and regulatory requirements;
- Prepare detailed reports of the model valuation results according to the specific requirements of the model validated, if any, which are communicated to BRC on an annual basis along with any related proposed remediation plan;
- Disseminate models' validation test results within the Group's BRC or MRC following reporting to Group CRO, as appropriate;
- Prepare action plan for remediation actions, if any, as a result of the model validation tests implemented, and escalate the plan for its approval by the appropriate Management Authority;
- Participate in the approval process of new models for assessing ratings' system accuracy and suitability; and
- Monitor industry practices on the development and use of models as well as related ECB guidelines and restrictions.

Group Market and Counterparty Risk

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

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

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

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

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

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

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

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

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

(c) Credit related commitments

The primary purpose of credit related commitments is to ensure that funds are available to a customer as agreed. Financial guarantee contracts carry the same credit risk as loans since they represent irrevocable assurances that the Group will make payments in the event that a customer cannot meet its obligations to third parties. Documentary and commercial letters of credit, which are written undertakings by the Group on behalf of a customer authorizing a third party to draw drafts on the Group up to a stipulated amount under specific terms and conditions, are secured by the underlying shipment of goods to which they relate and therefore carry less risk than a loan. Commitments to extend credit represent contractual commitments to provide credit under pre-specified terms and conditions (note 42) in the form of loans, guarantees or letters of credit for which the Group usually receives a commitment fee. Such commitments are irrevocable over the life of the facility or revocable only in response to a material adverse effect.

(d) Concentration risk

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

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

(e) Rating systems

Rating of wholesale lending exposures

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

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

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

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

The MRA is not employed for certain types of entities that use different accounting methods to prepare their financial statements, such as Insurance companies and brokerage firms. Moreover, entities such as start-ups that have not produced financial information for at least two annual accounting periods are not rated with MRA. In such cases, the Internal Credit Rating ("ICR") is utilized, which is a scorecard consisting of a set of factors grouped into 3 main sections corresponding to particular areas of analysis: Financial Information, Qualitative Criteria, and Behavior Analysis. In addition, the Group performs an overall assessment of wholesale customers, based both on their rating (MRA or ICR) and the collaterals and guarantees regularly at every credit assessment. In 2021, in combination with the application of the new Definition of Default, the Bank calibrated its MRA and ICR models, which were approved by the regulatory authorities.

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

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

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

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

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

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

Rating of retail lending exposures

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

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

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

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

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

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

(f) Credit risk mitigation

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

Types of collateral commonly accepted by the Group

The Group has internal policies in place which set out the following types of collateral that are usually accepted in a credit relationship:

- residential real estate, commercial real estate (offices, shopping malls, etc.), industrial buildings and land;
- receivables (trade debtors) and post dated cheques;
- securities, including listed shares and bonds;
- deposits;
- guarantees and letters of support;
- insurance policies; and
- equipment, mainly, vehicles and vessels.

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

For exposures, other than loans to customers (i.e. reverse repos, derivatives), the Group accepts as collateral only cash or liquid bonds.

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Valuation principles of collaterals

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

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

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

In order to monitor the valuation of residential property held as collateral, the Group uses the Residential Property Index of the Bank of Greece. The index has been created by the Real Estate Market Analysis Section of BoG using detailed information collected from all Credit Institutions and Real Estate Investment Companies (REIC) operating in Greece. The Residential Property Index is used in combination with physical inspection and desktop valuation, depending on the EBA status and the balance of the loan.

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

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

Collateral policy and documentation

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

Guarantees

The guarantees used as credit risk mitigation by the Group are largely issued by central and regional governments in the countries in which it operates. The Hellenic Development Bank (HDB) and similar funds, banks and insurance companies are also significant guarantors of credit risk.

Management of repossessed properties

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

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

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

Counterparty risk

The Group mitigates counterparty risk arising from treasury activities by entering into master netting arrangements and similar agreements, as well as collateral agreements with counterparties with which it undertakes a significant volume of transactions. The respective credit risk is reduced through a master netting agreement to the extent that if an event of default occurs, all amounts with the counterparty are terminated and settled on a net basis.

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

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

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

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

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

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5.2.1.1 Maximum exposure to credit risk before collateral held

	2023 € million	2022 € million	
Credit risk exposures relating to on-balance sheet assets are as follows:			
Due from credit institutions	2,355	1,330	
Less: Impairment allowance	<u>(1)</u>	<u>(1)</u>	1,329
Debt securities held for trading	245		87
Derivative financial instruments	881		1,185
Loans and advances to customers at amortised cost:			
- Wholesale lending ⁽¹⁾	25,912	26,054	
- Mortgage lending	9,942	10,201	
- Consumer lending	3,436	3,353	
- Small business lending	3,484	3,842	
Less: Impairment allowance	<u>(1,258)</u>	<u>(1,626)</u>	41,824
Fair value changes of loans in portfolio hedging of interest rate risk		15	(163)
Loans and advances to customers measured at FVTPL		15	16
Investment securities:			
- Debt securities measured at amortised cost	10,974	9,214	
Less: Impairment allowance	<u>(18)</u>	<u>(22)</u>	9,192
Debt securities measured at FVOCI		3,492	3,828
Investment securities at FVTPL		263	241
Other financial assets ⁽²⁾	218	202	
Less: Impairment allowance	<u>(22)</u>	<u>(23)</u>	179
Credit risk exposures relating to off-balance sheet items (note 42):			
- Loan commitments		8,068	7,611
- Financial guarantee contracts and other commitments		<u>3,348</u>	<u>2,860</u>
Total		<u>71,348</u>	<u>68,189</u>

⁽¹⁾ Includes loans to public sector.

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

The above table represents the Group's maximum credit risk exposure as at 31 December 2023 and 31 December 2022 respectively, without taking account of any collateral held or other credit enhancements that do not qualify for offset in the Group's financial statements.

For on-balance sheet assets, the exposures set out above are based on the carrying amounts as reported in the balance sheet. For off-balance sheet items, the maximum exposure is the nominal amount that the Group may be required to pay if the financial guarantee contracts and other commitments are called upon and the loan commitments are drawn down. Off-balance sheet credit risk exposures presented above, include revocable loan commitments to extend credit of € 3.5 billion (2022: € 3.7 billion) that are subject to ECL measurement.

Notes to the Consolidated Financial Statements

5.2.1.2 Loans and advances to customers

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

(a) Credit quality of loans and advances to customers

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

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

Credit impaired loans category includes loans that are considered to be in default, for which a loss allowance equal to a 'Lifetime ECL' is recognized, and loans classified as 'Purchased or originated credit impaired' (POCI) which are always measured on the basis of a 'Lifetime ECL'. The Group applies a default definition for accounting purposes, which is consistent with the European Banking Authority (EBA) definition for non-performing exposure and regulatory definition of default.

Loans and advances to customers carried at FVTPL are not subject to ECL measurement and therefore are not included in the quantitative information provided in the below sections for loans and advances measured at amortised cost, except where indicated. The Group's accounting policy for impairment of financial assets is set out in note 2.2.13.

Quantitative information

The following quantitative analysis presents information about the total gross carrying amount of loans and advances including securitization notes issued by special purpose entities established by the Group, and the nominal amount of credit related commitments, that are classified as non-impaired (stage 1 and stage 2) and those classified as credit-impaired (stage 3 and POCI). It also presents the impairment allowance recognized in respect of all loans and advances and credit related commitments, analyzed into individually or collectively assessed, based on how the respective impairment allowance has been calculated, the carrying amount of loans and advances, as well as the value of collateral held to mitigate credit risk which is capped to the respective gross loan amount. In particular, the following four tables for 2023 and 2022 provide:

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

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

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

	31 December 2023										
						Impairment allowance				Carrying amount € million	Value of collateral € million
	12-month ECL - Stage 1 € million	Lifetime ECL - Stage 2 € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾		Total gross carrying amount/nominal exposure € million	12-month ECL - Stage 1 € million	Lifetime ECL - Stage 2 € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾			
		Individually assessed € million	Collectively assessed € million				Individually assessed € million	Collectively assessed € million			
Retail Lending	12,331	3,716	85	730	16,861	(99)	(272)	(60)	(381)	16,050	11,385
- Mortgage	6,909	2,618	39	376	9,942	(20)	(154)	(33)	(175)	9,560	9,289
Value of collateral	6,726	2,237	16	310							
- Consumer	2,242	297	1	102	2,642	(45)	(48)	(1)	(84)	2,463	
Value of collateral	132	1	1	0							133
- Credit card	701	73	0	20	794	(8)	(4)	(0)	(19)	762	
Value of collateral	0	0	0	0							0
- Small business	2,480	728	45	231	3,484	(25)	(65)	(26)	(102)	3,265	
Value of collateral	1,246	547	23	147							1,962
Wholesale Lending	23,987	1,198	539	169	25,893	(71)	(58)	(219)	(99)	25,447	16,621
- Large corporate	15,791	544	232	27	16,593	(47)	(30)	(85)	(12)	16,420	
Value of collateral	8,370	395	150	10							8,926
- SMEs	3,752	654	307	142	4,856	(25)	(28)	(134)	(86)	4,584	
Value of collateral	2,429	517	220	86							3,252
- Securitized notes ⁽²⁾	4,444	-	-	-	4,444	(0)	-	-	-	4,444	
Value of collateral	4,444	-	-	-							4,444
Public Sector	18	0	-	0	19	(0)	(0)	-	(0)	18	1
- Greece	18	-	-	0	18	(0)	-	-	(0)	18	
Value of collateral	1	-	-	0							1
- Other countries	0	0	-	-	0	(0)	(0)	-	-	0	
Value of collateral	-	-	-	-							-
Fair value changes of loans in portfolio hedging of interest rate risk										15	
Loans and advances to customers at FVTPL										15	15
Total	36,336	4,914	624	899	42,773	(170)	(329)	(279)	(480)	41,545	28,022
Total value of collateral	23,348	3,697	409	553							
Credit related commitments	11,049	311	36	20	11,416	(18)	(4)	(20)	(6)		
Loan commitments	7,801	259	6	2	8,068	(11)	(3)	-	-		
Financial guarantee contracts and other commitments	3,247	51	31	19	3,348	(7)	(1)	(20)	(6)		
Value of collateral	1,193	101	14	7							

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	31 December 2022										
						Impairment allowance				Carrying amount € million	Value of collateral € million
	Lifetime ECL - Stage 3 and POCI ⁽¹⁾				Total gross carrying amount/nominal exposure € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾					
12-month ECL - Stage 1 € million	Lifetime ECL - Stage 2 € million	Individually assessed € million	Collectively assessed € million			12-month ECL - Stage 1 € million	Lifetime ECL - Stage 2 € million	Individually assessed € million	Collectively assessed € million		
Retail Lending	12,169	3,992	105	1,131	17,396	(81)	(280)	(73)	(571)	16,392	11,598
- Mortgage	6,832	2,825	50	495	10,201	(21)	(160)	(41)	(188)	9,792	
Value of collateral	6,563	2,378	22	385							9,348
- Consumer	2,028	357	0	214	2,599	(31)	(42)	(0)	(149)	2,376	
Value of collateral	125	2	0	3							130
- Credit card	642	70	0	42	755	(6)	(6)	(0)	(37)	705	
Value of collateral	0	0	0	0							0
- Small business	2,668	740	54	380	3,842	(23)	(72)	(32)	(197)	3,518	
Value of collateral	1,347	550	25	198							2,120
Wholesale Lending	23,424	1,581	841	182	26,028	(68)	(75)	(368)	(109)	25,408	16,836
- Large corporate	14,865	794	284	19	15,961	(40)	(27)	(139)	(11)	15,744	
Value of collateral	7,890	551	165	11							8,618
- SMEs	3,658	787	557	163	5,166	(28)	(48)	(228)	(99)	4,763	
Value of collateral	2,238	601	387	91							3,317
- Securitized notes ⁽²⁾	4,901	-	-	-	4,901	(0)	-	-	-	4,901	
Value of collateral	4,901	-	-	-							4,901
Public Sector	25	0	1	0	26	(0)	(0)	(1)	(0)	25	0
- Greece	25	-	-	0	25	(0)	-	-	(0)	24	
Value of collateral	0	-	-	0							0
- Other countries	0	0	1	-	1	(0)	(0)	(1)	-	1	
Value of collateral	0	-	-	-							0
Fair value changes of loans in portfolio hedging of interest rate risk										(163)	
Loans and advances to customers at FVTPL										16	16
Total	35,618	5,573	946	1,313	43,450	(149)	(355)	(441)	(680)	41,677	28,450
Total value of collateral	23,065	4,082	599	688							
Credit related commitments	10,129	289	36	17	10,471	(20)	(6)	(24)	(7)		
Loan commitments	7,429	178	3	1	7,611	(12)	(5)	(1)	(0)		
Financial guarantee contracts and other commitments	2,701	110	33	16	2,860	(8)	(2)	(23)	(7)		
Value of collateral	1,113	56	9	5							

⁽¹⁾ As at 31 December 2023, total gross carrying amount of credit impaired loans includes POCI loans of € 29 million and carry an impairment allowance of € 8.1 million (2022: € 43 million gross carrying amount and € 6.5 million impairment allowance).

⁽²⁾ It refers to the senior notes of the Pillar, Cairo and Mexico securitizations that are collateralized by the underlying pool of loans held by the respective securitization vehicles (note 20). The amount of the securitized loan portfolios has been capped to the gross carrying amount of the senior notes. In addition, the senior notes of the Cairo and Mexico securitizations are guaranteed by the Hellenic Republic in the context of Hellenic Asset Protection Scheme (note 20).

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

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

Internal credit rating	31 December 2023				31 December 2022			
	12-month ECL - Stage 1 € million	Lifetime ECL - Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	Total gross carrying amount € million	12-month ECL - Stage 1 € million	Lifetime ECL - Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	Total gross carrying amount € million
Retail Lending								
- Mortgage								
PD<2.5%	6,587	1,282	0	7,869	6,460	1,167	-	7,627
2.5%<=PD<4%	196	69	0	265	265	284	-	549
4%<=PD<10%	105	874	0	980	66	437	-	502
10%<=PD<16%	14	192	0	206	20	553	-	573
16%<=PD<99.99%	7	201	1	209	21	384	-	405
100%	-	-	414	414	-	-	545	545
- Consumer								
PD<2.5%	512	0	-	512	287	8	-	294
2.5%<=PD<4%	700	21	-	721	707	34	-	742
4%<=PD<10%	945	29	0	975	964	133	-	1,097
10%<=PD<16%	54	74	-	129	46	11	-	57
16%<=PD<99.99%	30	172	0	202	23	172	-	194
100%	-	-	103	103	-	-	214	214
- Credit card								
PD<2.5%	335	1	-	337	372	5	-	377
2.5%<=PD<4%	338	26	0	364	263	41	-	304
4%<=PD<10%	27	15	-	42	6	4	-	11
10%<=PD<16%	-	3	0	3	0	5	-	5
16%<=PD<99.99%	-	27	-	27	0	15	-	15
100%	-	-	20	20	-	-	42	42
- Small business								
PD<2.5%	912	26	-	938	1,328	48	-	1,376
2.5%<=PD<4%	715	161	-	876	498	63	-	561
4%<=PD<10%	825	381	-	1,206	652	47	-	699
10%<=PD<16%	1	67	-	68	47	165	-	213
16%<=PD<99.99%	26	93	-	119	143	417	-	559
100%	-	-	276	276	-	-	434	434
Wholesale Lending								
- Large corporate								
Strong	11,391	1	-	11,392	10,572	0	-	10,572
Satisfactory	4,197	377	10	4,583	4,127	432	-	4,559
Watch list	204	166	-	369	165	362	-	527
Impaired (Defaulted)	-	-	249	249	-	-	303	303
- SMEs								
Strong	1,194	19	-	1,213	1,090	9	-	1,098
Satisfactory	2,401	334	0	2,735	2,318	321	-	2,639
Watch list	157	301	-	458	250	458	-	708
Impaired (Defaulted)	-	-	450	450	-	-	720	720
- Securitized notes								
Strong	4,444	-	-	4,444	4,901	-	-	4,901
Public Sector								
All countries								
Strong	18	-	-	18	25	-	-	25
Satisfactory	1	-	-	1	-	-	-	-
Watch list	-	0	-	0	-	0	-	0
Impaired (Defaulted)	-	-	0	0	-	-	1	1
Total	36,336	4,914	1,523	42,773	35,618	5,573	2,259	43,450

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Internal credit rating	31 December 2023				31 December 2022			
	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	Total nominal amount € million	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	Total nominal amount € million
Credit Related Commitments								
Retail Lending								
Loan commitments								
PD<2.5%	1,084	6	-	1,090	1,455	14	-	1,469
2.5%<=PD<4%	1,356	46	-	1,401	1,025	62	-	1,088
4%<=PD<10%	574	97	-	671	541	30	-	571
10%<=PD<16%	47	18	-	64	33	3	-	37
16%<=PD<99.99%	0	30	-	30	1	13	-	14
100%	-	-	2	2	-	-	1	1
Financial guarantee contracts and other commitments								
PD<2.5%	14	-	-	14	81	0	-	81
2.5%<=PD<4%	136	0	-	136	77	1	-	78
4%<=PD<10%	29	1	-	30	22	0	-	22
10%<=PD<16%	5	0	-	6	-	0	-	0
16%<=PD<99.99%	1	-	-	1	0	2	-	2
100%	-	-	2	2	-	-	1	1
Wholesale Lending								
Loan commitments								
Strong	3,738	1	-	3,739	3,126	0	-	3,126
Satisfactory	978	56	-	1,034	1,241	37	-	1,278
Watch list	25	7	-	31	6	18	-	24
Impaired (Defaulted)	-	-	6	6	-	-	3	3
Financial guarantee contracts and other commitments								
Strong	2,017	1	-	2,018	1,940	10	-	1,950
Satisfactory	987	31	-	1,018	552	36	-	588
Watch list	57	19	-	77	28	62	-	90
Impaired (Defaulted)	-	-	48	48	-	-	48	48
Total	11,049	311	57	11,416	10,129	289	53	10,471

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

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

Notes to the Consolidated Financial Statements

The following tables present the movement of the gross carrying amounts for loans and advances to customers by product line and stage and is calculated by reference to the opening and closing balances for the reporting years from 1 January 2023 to 31 December 2023 and 1 January 2022 to 31 December 2022:

	31 December 2023												Total € million
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	
Gross carrying amount at 1 January	23,448	1,581	1,024	6,832	2,825	545	2,669	427	257	2,668	740	434	43,450
New loans and advances originated or purchased	5,930	-	-	756	-	-	859	-	-	536	-	-	8,081
Arising from acquisition (note 23.2)	-	-	-	-	-	-	443	-	6	-	-	-	450
Transfers between stages													
-to 12-month ECL	451	(443)	(8)	532	(520)	(12)	74	(65)	(9)	123	(116)	(7)	-
-to lifetime ECL	(363)	498	(135)	(392)	487	(95)	(84)	103	(18)	(186)	235	(49)	-
-to lifetime ECL credit-impaired loans	(55)	(173)	228	(54)	(163)	217	(36)	(38)	74	(53)	(77)	130	-
Loans and advances derecognised/ reclassified as held for sale during the year	(696)	(53)	(29)	(180)	(11)	(174)	(465)	(91)	(129)	(104)	(23)	(155)	(2,109)
Amounts written-off ⁽¹⁾	-	-	(216)	-	-	(46)	-	-	(62)	-	-	(62)	(387)
Repayments	(4,654)	(240)	(135)	(858)	(185)	(49)	(484)	(59)	(44)	(578)	(75)	(36)	(7,396)
Foreign exchange differences and other movements	(55)	27	(21)	274	185	30	(33)	92	48	73	44	21	685
Gross Carrying amount at 31 December	24,005	1,198	709	6,909	2,618	415	2,942	369	124	2,480	728	276	42,773
Impairment allowance	(72)	(58)	(318)	(20)	(154)	(208)	(53)	(53)	(105)	(25)	(65)	(128)	(1,258)
Carrying amount at 31 December	23,934	1,140	391	6,888	2,464	207	2,890	317	19	2,454	663	148	41,515

Notes to the Consolidated Financial Statements

	31 December 2022												Total € million
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI € million	
Gross carrying amount at 1 January	20,594	1,670	1,452	6,871	2,735	498	2,572	311	358	2,540	744	469	40,815
New loans and advances originated or purchased	6,986	-	8	809	-	-	840	-	-	725	-	-	9,368
Transfers between stages													
-to 12-month ECL	576	(575)	(1)	333	(318)	(15)	92	(82)	(10)	154	(143)	(12)	-
-to lifetime ECL	(802)	819	(17)	(506)	611	(105)	(272)	303	(31)	(183)	235	(52)	-
-to lifetime ECL credit-impaired loans	(41)	(85)	125	(60)	(151)	210	(71)	(44)	115	(38)	(75)	113	-
Loans and advances derecognised/ reclassified as held for sale during the year	(2)	(2)	(276)	(2)	-	(0)	(0)	-	-	-	-	(1)	(282)
Amounts written-off ⁽¹⁾	-	-	(87)	-	-	(10)	-	-	(141)	-	-	(53)	(290)
Repayments	(4,060)	(293)	(184)	(820)	(179)	(45)	(507)	(87)	(61)	(615)	(70)	(38)	(6,959)
Foreign exchange differences and other movements	198	46	2	204	127	11	15	26	26	84	49	8	798
Gross Carrying amount at 31 December	23,448	1,581	1,024	6,832	2,825	545	2,669	427	257	2,668	740	434	43,450
Impairment allowance	(68)	(75)	(478)	(21)	(160)	(229)	(37)	(48)	(186)	(23)	(72)	(229)	(1,626)
Carrying amount at 31 December	23,380	1,506	546	6,810	2,665	316	2,633	379	70	2,645	668	205	41,824

⁽¹⁾ The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2023 and that are still subject to enforcement activity is € 338 million (2022: € 111 million).

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

Note 2: "Loans and advances derecognised/ reclassified as held for sale during the year" presents loans derecognized due to a) substantial modifications of the loans' contractual terms, b) sale transactions, c) debt to equity transactions and those that have been reclassified as held for sale during the year (notes 20 and 30).

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Credit impaired loans and advances to customers

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

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

	31 December 2023							
	Retail lending				Wholesale lending		Public sector	Lifetime ECL credit-impaired € million
	Mortgage € million	Consumer € million	Credit card € million	Small business € million	Large corporate € million	SMEs € million	Greece and other countries € million	
up to 90 days	174	42	6	132	191	189	0	734
90 to 179 days	32	18	6	20	33	14	-	123
180 to 360 days	73	22	5	33	1	45	-	179
more than 360 days	136	21	3	91	33	202	0	487
Total gross carrying amount	415	104	20	276	259	450	0	1,523
Impairment allowance	(208)	(86)	(19)	(128)	(98)	(220)	(0)	(759)
Carrying amount	207	18	1	148	161	230	0	764
Value of Collateral	326	1	0	169	160	306	0	962
	31 December 2022							
	Retail lending				Wholesale lending		Public sector	Lifetime ECL credit-impaired € million
	Mortgage € million	Consumer € million	Credit card € million	Small business € million	Large corporate € million	SMEs € million	Greece and other countries € million	
up to 90 days	192	68	7	120	138	308	0	832
90 to 179 days	38	23	7	19	16	31	-	133
180 to 360 days	82	38	9	47	1	52	-	228
more than 360 days	233	86	20	248	149	329	1	1,066
Total gross carrying amount	545	214	42	434	303	720	1	2,259
Impairment allowance	(229)	(149)	(37)	(229)	(150)	(327)	(1)	(1,121)
Carrying amount	316	65	5	205	153	393	0	1,138
Value of Collateral	407	3	0	223	177	478	0	1,287

Note: As at 31 December 2023, total gross carrying amount of credit impaired loans includes POCI loans of € 29 million (2022: € 43 million).

Notes to the Consolidated Financial Statements

(b) Collaterals and repossessed assets

Collaterals

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

The LTV ratio of the mortgage portfolio is presented below:

	2023 € million	2022 € million
Mortgages		
Less than 50%	2,852	2,881
50%-70%	2,456	2,373
71%-80%	1,621	1,524
81%-90%	979	1,042
91%-100%	659	825
101%-120%	557	604
121%-150%	402	437
Greater than 150%	415	516
Total exposure	9,942	10,201
Average LTV	55.18%	57.30%

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

	31 December 2023				
	Value of collateral received				Guarantees received ⁽¹⁾
	Real Estate € million	Financial € million	Other € million	Total € million	
Retail Lending	10,618	304	463	11,385	554
Wholesale Lending	5,300	877	10,444	16,621	632
Public sector	-	1	0	1	-
Total	15,919	1,181	10,907	28,007	1,186

	31 December 2022				
	Value of collateral received				Guarantees Received ⁽¹⁾
	Real Estate € million	Financial € million	Other € million	Total € million	
Retail Lending	10,760	443	396	11,598	721
Wholesale Lending	5,544	923	10,368	16,836	744
Public sector	0	0	0	0	-
Total	16,304	1,366	10,764	28,434	1,465

⁽¹⁾ In addition to the above presented guarantees, (i) from December 2021, the Group has entered into two financial guarantees contracts 'Wave I' and 'Wave II' related to the portfolios of performing SMEs and large corporate loans of € 1.1 billion as at 31 December 2023 (31 December 2022: € 1.4 billion) (ii) from December 2022, into the financial guarantees contract 'Wave III' related to the portfolio of performing shipping loans of € 1.4 billion as at 31 December 2023 (31 December 2022: € 1.6 billion) and (iii) from December 2023, into the financial guarantees contract 'Wave IV' related to the portfolios of performing SBB and large corporate loans of € 1.5 billion as at 31 December 2023 (note 20).

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

Notes to the Consolidated Financial Statements

Reposessed assets

The Group recognizes collateral assets on the balance sheet by taking possession usually through legal processes or by calling upon other credit enhancements. As at 31 December 2023, the carrying amount of reposessed assets which are included in “Other assets” amounted to € 495 million (31 December 2022: € 559 million), note 29. These assets are carried at the lower of cost and net realizable value (note 2.2.18).

The main type of collateral that the Group repossesses against repayment or reduction of the outstanding loan is real estate. The below table presents the movement of reposessed real estate assets during the year, including a) those transferred to the appropriate category based on their use by the Group as part of its operations i.e. investment property or own-used (notes 2.2.6, 26, and 27) and b) those reclassified to “held for sale” category (notes 30).

	2023			2022		
	Real estate			Real estate		
	Residential	Commercial	Total	Residential	Commercial	Total
	€ million	€ million	€ million	€ million	€ million	€ million
Balance at 1 January	212	345	557	209	362	571
Additions ⁽¹⁾	11	17	28	14	22	36
Transfers to investment property	(2)	-	(2)	(3)	(8)	(11)
Disposals	(12)	(27)	(39)	(4)	(22)	(26)
Valuation losses	(4)	(14)	(18)	(4)	(9)	(13)
Held for Sale (note 30)	(8)	(24)	(32)	-	-	-
Other	(2)	1	(1)	0	(0)	0
Balance at 31 December	195	298	493	212	345	557

⁽¹⁾ The carrying amount of the real estate properties obtained during the year and held at the year ended 31 December 2023 amounted to € 24 million (31 December 2022: € 32 million).

In addition, the Group repossesses other types of collaterals mainly referring to equity positions due to the participation in debt for equity transactions as part of forbearance measures (see below “Debt for equity swaps”).

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

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

Notes to the Consolidated Financial Statements

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

	31 December 2023											
	Greece				Rest of Europe				Other Countries			
	Gross carrying/nominal amount				Gross carrying/nominal amount				Gross carrying/nominal amount			
	12-month ECL -Stage 1	Lifetime ECL -Stage 2	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	Impairment allowance	12-month ECL -Stage 1	Lifetime ECL -Stage 2	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	Impairment allowance	12-month ECL -Stage 1	Lifetime ECL -Stage 2	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	Impairment allowance
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
Retail Lending	8,338	3,374	687	(638)	3,983	341	127	(173)	10	0	0	(0)
-Mortgage	4,821	2,531	361	(331)	2,080	87	53	(51)	7	0	0	(0)
-Consumer	936	131	53	(89)	1,303	166	50	(89)	3	0	0	(0)
-Credit card	546	43	16	(25)	154	30	5	(7)	0	0	0	(0)
-Small business	2,035	670	258	(193)	445	59	18	(26)	0	-	-	(0)
Wholesale Lending	11,601	668	573	(348)	9,038	527	133	(96)	3,348	3	3	(3)
-Commerce and services ⁽²⁾	4,443	284	270	(168)	5,411	69	70	(45)	427	3	1	(1)
-Manufacturing	2,614	131	189	(110)	780	42	21	(14)	5	-	-	(0)
-Shipping	14	-	0	(0)	210	-	-	(0)	2,725	-	1	(2)
-Construction	1,329	30	42	(36)	784	80	4	(4)	83	-	0	(0)
-Tourism	1,045	215	67	(22)	357	98	9	(8)	-	-	-	-
-Energy	2,098	0	4	(7)	244	21	3	(4)	-	-	-	-
-Other	58	9	1	(4)	1,253	217	25	(20)	107	-	-	(0)
Public Sector	18	-	0	(0)	0	0	-	-	-	-	-	-
Total	19,957	4,042	1,260	(986)	13,021	868	260	(269)	3,358	3	3	(3)
Credit related												
Commitments	8,066	199	49	(44)	2,634	109	8	(4)	349	3	0	(0)
-Loan commitments	5,778	163	0	(11)	1,687	94	7	(3)	336	3	0	(0)
-Financial guarantee contracts and other commitments	2,287	36	49	(33)	947	15	1	(1)	13	-	0	(0)

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	31 December 2022											
	Greece				Rest of Europe				Other Countries			
	Gross carrying/nominal amount				Gross carrying/nominal amount				Gross carrying/nominal amount			
	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	Impairment allowance	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	Impairment allowance	12-month ECL - Stage 1	Lifetime ECL - Stage 2	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	Impairment allowance
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
Retail Lending	8,547	3,571	1,024	(807)	3,614	420	210	(197)	7	0	1	(1)
-Mortgage	4,978	2,677	463	(337)	1,848	147	81	(72)	6	0	1	(1)
-Consumer	835	177	126	(141)	1,191	180	88	(82)	1	0	0	(0)
-Credit card	543	51	36	(43)	98	19	6	(6)	0	0	0	(0)
-Small business	2,191	665	399	(286)	477	74	35	(38)	0	-	-	(0)
Wholesale Lending	10,579	1,001	804	(479)	9,676	572	207	(131)	3,169	8	12	(11)
-Commerce and services ⁽²⁾	4,135	331	393	(242)	6,215	106	62	(47)	535	0	6	(6)
-Manufacturing	2,658	292	130	(96)	969	39	26	(16)	5	-	-	(0)
-Shipping	8	2	44	(44)	241	-	15	(16)	2,455	-	6	(5)
-Construction	1,279	51	57	(45)	616	62	17	(14)	65	8	-	(0)
-Tourism	962	308	176	(48)	228	118	44	(2)	-	-	-	-
-Energy	1,474	1	2	(3)	234	31	16	(8)	-	-	-	-
-Other	64	17	1	(0)	1,174	215	28	(28)	109	-	-	(0)
Public Sector	25	-	0	(0)	0	0	1	(1)	-	-	-	-
Total	19,151	4,572	1,829	(1,286)	13,291	992	418	(328)	3,176	9	13	(11)
Credit related Commitments	7,352	175	48	(47)	2,489	114	4	(10)	288	0	0	(0)
-Loan commitments	5,493	109	2	(12)	1,654	70	2	(6)	281	0	0	(0)
-Financial guarantee contracts and other commitments	1,859	66	46	(35)	835	44	2	(4)	7	-	0	(0)

⁽¹⁾ Includes POCI loans of € 12.7 million held by operations in Greece, € 16.1 million held by operations in Rest of Europe and € 0.1 million held by operations in Other Countries (2022: € 8.3 million in Greece, € 34.3 million in Rest of Europe and € 0.1 million in Other Countries).

⁽²⁾ The operations in Rest of Europe include € 4,444 million related to the notes of the Pillar, Cairo and Mexico securitizations (2022: € 4,901 million).

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

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(d) Forbearance practices on lending activities

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

Forbearance practices' classification

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

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

Forbearance solutions

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

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

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

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

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

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

Debt for equity swaps

For wholesale portfolios, the Group on occasion participates in debt for equity transactions as part of forbearance measures, as described in note 2.2.9. In 2023, there were no equity positions acquired by the Group and held as of 31 December 2023. In 2022, equity positions acquired by the Group and held as of 31 December 2022, related to the participation of 3% in Kalogirou S.A. for trade of footwear, apparel and leather goods for a nil consideration.

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i. Classification of Forborne loans

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

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

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

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

ii. Impairment assessment

Where forbearance measures are extended, the Group performs an assessment of the borrower's financial condition and its ability to repay, under the Group's impairment policies, as described in notes 2.2.13 and 5.2.1. Accordingly, forborne loans to wholesale customers, retail individually significant exposures and financial institutions are assessed on an individual basis. Forborne retail lending portfolios are generally assessed for impairment separately from other retail loan portfolios on a collective basis as they consist of large homogenous portfolio.

iii. Loan restructurings

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

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

As at 31 December 2023, the carrying amount of Group's forborne loans measured at FVTPL was nil (2022: nil).

The following tables present an analysis of Group's forborne activities for loans measured at amortised cost. In order to align with the quantitative information provided in section (a) based on revised IFRS 7 requirements, the relevant tables below are presented on a gross carrying amount basis, while cumulative impairment allowance is presented separately, in line with the Group's internal credit risk monitoring and reporting.

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

	2023 € million	2022 € million
Forbearance measures:		
Split balance	147	234
Loan term extension	787	1,044
Arrears capitalisation	72	137
Reduced payment below interest owed	36	71
Interest rate reduction	117	136
Reduced payment above interest owed	81	111
Arrears repayment plan	96	109
Interest only	57	35
Grace period	68	55
Debt/equity swaps	-	8
Partial debt forgiveness/Write-down	1	1
Operational restructuring	13	14
Other	34	54
Total gross carrying amount	1,509	2,012
Less: cumulative impairment allowance	(307)	(401)
Total carrying amount	1,202	1,611

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

	31 December 2023		
	Total loans & advances at amortised cost € million	Forborne loans & advances € million	% of Forborne loans & advances
Gross carrying amounts:			
12-month ECL-Stage 1	36,336	-	-
Lifetime ECL-Stage 2	4,914	889	18.1
Lifetime ECL-Stage 3 and POCI	1,523	620	40.7
Total Gross Amount	42,773	1,509	3.5
Cumulative ECL Loss allowance:			
12-month ECL-Stage 1	(170)	-	
Lifetime ECL-Stage 2	(329)	(49)	
Lifetime ECL-Stage 3 and POCI of which:	(759)	(257)	
- Individually assessed	(279)	(112)	
- Collectively assessed	(480)	(145)	
Total carrying amount	41,515	1,202	2.9
Collateral received	28,007	1,184	

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	31 December 2022		
	Total loans & advances at amortised cost € million	Forborne loans & advances € million	% of Forborne loans & advances
<i>Gross carrying amounts:</i>			
12-month ECL-Stage 1	35,618	-	-
Lifetime ECL-Stage 2	5,573	1,138	20.4
Lifetime ECL-Stage 3 and POCI	2,259	874	38.7
Total Gross Amount	43,450	2,012	4.6
<i>Cumulative ECL Loss allowance:</i>			
12-month ECL-Stage 1	(149)	-	
Lifetime ECL-Stage 2	(355)	(80)	
Lifetime ECL-Stage 3 and POCI of which:	(1,121)	(321)	
- Individually assessed	(441)	(165)	
- Collectively assessed	(680)	(156)	
Total carrying amount	41,824	1,611	3.9
Collateral received	28,434	1,527	

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

	2023 € million	2022 € million
Gross carrying amount at 1 January	2,012	2,946
Forbearance measures in the year	322	299
Forborne loans derecognised/ reclassified as held for sale during the year ⁽¹⁾	(85)	(56)
Write-offs of forborne loans	(47)	(22)
Repayment of loans	(221)	(233)
Loans & advances that exited forbearance status ⁽²⁾	(582)	(965)
Other	110	42
Less: cumulative impairment allowance	(307)	(401)
Carrying amount at 31 December	1,202	1,611

⁽¹⁾ "Forborne loans derecognised/ reclassified as held for sale during the year" presents loans derecognized during the year due to a) sale transactions and b) substantial modifications of the loans' contractual terms and those that have been reclassified as held for sale during the year (notes 20 and 30).

⁽²⁾ In 2023, an amount of € 73 million loans and advances that exited forbearance status refers to loans that were denounced (2022: € 88 million).

Notes to the Consolidated Financial Statements

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

	2023	2022
	€ million	€ million
Retail Lending	762	1,153
- Mortgage	457	751
- Consumer	78	106
- Credit card	6	16
- Small business	220	280
Wholesale Lending	747	859
- Large corporate	237	277
- SMEs	510	582
Total gross carrying amount	1,509	2,012
Less: cumulative impairment allowance	(307)	(401)
Total carrying amount	1,202	1,611

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

	2023	2022
	€ million	€ million
Greece	1,116	1,638
Rest of Europe	388	374
Other countries	5	0
Total gross carrying amount	1,509	2,012
Less: cumulative impairment allowance	(307)	(401)
Total carrying amount	1,202	1,611

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

Modified lending exposures	2023	2022
	€ million	€ million
Loans modified during the year with loss allowance measured at an amount equal to lifetime ECL		
Gross carrying amount at 31 December	401	449
Modification gain / (loss)	8	2
Loans modified since initial recognition at a time when loss allowance was based on lifetime ECL		
Gross carrying amount at 31 December for which loss allowance has changed to 12-month ECL measurement	410	370

In the year ended 31 December 2023, the gross carrying amount of loans previously modified for which the loan allowance has reverted to being measured at an amount equal to lifetime ECL amounted to € 284 million (2022: € 371 million).

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5.2.1.3 Debt Securities

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

	31 December 2023			
	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	Total € million
Debt securities at amortised cost				
Aaa	2,789	-	-	2,789
Aa1 to Aa3	132	-	-	132
A1 to A3	231	4	-	235
Lower than A3	7,602	3	-	7,605
Unrated	180	-	32	212
Gross Carrying Amount	10,935	7	32	10,974
Impairment Allowance	(11)	(0)	(7)	(18)
Carrying Amount	10,924	7	25	10,955
Debt securities at FVOCI				
Aaa	316	-	-	316
Aa1 to Aa3	202	-	-	202
A1 to A3	436	8	-	444
Lower than A3	2,411	40	-	2,451
Unrated	63	-	-	63
Carrying Amount	3,427	48	-	3,475
31 December 2022				
	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	Total € million
Debt securities at amortised cost				
Aaa	2,617	-	-	2,617
Aa1 to Aa3	140	-	-	140
A1 to A3	133	-	-	133
Lower than A3	6,211	6	7	6,224
Unrated	74	-	26	100
Gross Carrying Amount	9,175	6	33	9,214
Impairment Allowance	(12)	(0)	(10)	(22)
Carrying Amount	9,163	6	23	9,192
Debt securities at FVOCI				
Aaa	339	-	-	339
Aa1 to Aa3	212	-	-	212
A1 to A3	398	-	-	398
Lower than A3	2,605	121	-	2,726
Unrated	58	-	-	58
Carrying Amount	3,612	121	-	3,733

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	31 December 2023	
	Debt securities held for trading € million	Debt securities measured at FVTPL € million
Debt securities at FVTPL		
Aaa	55	-
A1 to A3	14	-
Lower than A3	176	0
Unrated	0	25
Carrying Amount	245	26

	31 December 2022	
	Debt securities held for trading € million	Debt securities measured at FVTPL € million
Debt securities at FVTPL		
Lower than A3	86	0
Unrated	1	-
Carrying Amount	87	0

The carrying amount of debt securities rated lower than A3, amounting to € 10,222 million (2022: € 9,022 million), is analyzed as follows:

	2023		2022	
	Sovereign € million	Banks and Corporate € million	Sovereign € million	Banks and Corporate € million
Debt securities				
Greece	6,015	1,248	5,413	959
Other Eurozone members	967	604	922	520
Other EU members ⁽¹⁾	765	67	541	26
Other countries ⁽¹⁾	194	362	300	341
Carrying Amount	7,941	2,281	7,176	1,846

⁽¹⁾ It includes debt securities issued by non-Eurozone members European countries of the Group's presence. As at 31 December 2023, it includes debt securities issued by Bulgaria with carrying value of € 527 million (2022: securities issued by Bulgaria and Serbia with carrying value of € 517 million)

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

The carrying amount of unrated debt securities of € 293 million (2022: € 152 million) mainly comprise € 181 million Greek corporate bonds (2022: € 133 million), and € 90 million Cyprus corporate bonds (2022: € nil).

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

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

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GGBs swap transaction

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

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

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

	31 December 2023							
	Greece		Other European countries			Other countries		Total € million
	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	
Debt securities at amortised cost								
Sovereign	4,966	-	1,358	-	-	1,164	-	7,488
Banks	923	-	572	-	-	-	-	1,495
Corporate	326	4	1,012	3	27	614	4	1,991
Gross Carrying Amount	6,215	4	2,942	3	27	1,778	4	10,974
Impairment Allowance	(7)	(2)	(3)	(0)	(5)	(1)	(0)	(18)
Net Carrying Amount	6,208	3	2,939	3	22	1,777	4	10,955
Debt securities at FVOCI								
Sovereign	909	-	887	-	-	426	-	2,221
Banks	14	-	210	-	-	-	-	224
Corporate	172	-	528	40	-	281	8	1,029
Carrying Amount	1,095	-	1,625	40	-	707	8	3,475
	31 December 2022							
	Greece		Other European countries			Other countries		Total € million
	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL- Stage 3 € million	12-month ECL-Stage 1 € million	Lifetime ECL- Stage 2 € million	
Debt securities at amortised cost								
Sovereign	4,379	-	756	-	-	1,165	-	6,300
Banks	736	-	276	-	-	-	-	1,012
Corporate	241	7	989	3	26	633	3	1,902
Gross Carrying Amount	5,356	7	2,021	3	26	1,798	3	9,214
Impairment Allowance	(9)	(3)	(3)	(0)	(7)	(0)	(0)	(22)
Net Carrying Amount	5,347	4	2,018	3	19	1,798	3	9,192
Debt securities at FVOCI								
Sovereign	976	-	1,046	94	-	451	-	2,567
Banks	12	-	209	7	-	-	-	228
Corporate	163	-	475	15	-	280	5	938
Carrying Amount	1,151	-	1,730	116	-	731	5	3,733

Notes to the Consolidated Financial Statements

	31 December 2023			Total € million
	Greece € million	Other European countries € million	Other countries € million	
Debt securities at FVTPL				
Banks	-	25	-	25
Corporate	0	-	-	0
Carrying Amount	0	25	-	26
Debt securities held for trading				
Sovereign	142	18	55	216
Corporate	0	27	3	30
Carrying Amount	142	45	58	245
	31 December 2022			Total € million
	Greece € million	Other European countries € million	Other countries € million	
Debt securities at FVTPL				
Corporate	0	-	-	0
Carrying Amount	0	-	-	0
Debt securities held for trading				
Sovereign	63	23	-	86
Corporate	1	-	-	1
Carrying Amount	64	23	-	87

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5.2.1.4 Offsetting of financial assets and financial liabilities

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

Financial instruments that meet the offsetting criteria include the eligible repos and reverse repos under global master repurchase agreements (GMRAs) and the CCP (Central Counterparty) cleared OTC derivative financial instruments. Regarding the latter, the Group has assessed the terms of the clearing agreements for the derivatives entered into with Clearing Members and has concluded that the offsetting criteria are met, in respect of the cash accounts used for variation margin purposes for such derivatives, which are also used for the settlement of all payments thereunder. Accordingly, derivative assets of € 752 million (2022: € 1,376 million) and derivative liabilities of € 492 million (2022: € 444 million) (note 19) were offset against € 317 million (2022: € 932 million) cash collateral received (note 32) and € 57 million (2022: nil) cash collateral pledged (note 17).

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

The following tables present financial assets and financial liabilities that meet the criteria for offsetting and thus are presented on a net basis in the balance sheet, as well as amounts that are subject to enforceable master netting arrangements and similar agreements for which the offsetting criteria mentioned above are not satisfied. In respect of the latter, the Group may receive and provide collateral in the form of marketable securities and cash that are included in the tables below under columns 'financial instruments' and 'cash collateral'.

	31 December 2023					
	Gross amounts of recognised financial assets	Gross amounts of recognised financial liabilities offset in the balance sheet	Net amounts of financial assets presented in the balance sheet	Related amounts not offset in the BS		
				Financial instruments (incl. non-cash collateral)	Cash collateral received	Net amount
€ million	€ million	€ million	€ million	€ million	€ million	
Financial Assets						
Reverse repos with banks	1,249	(1,210)	39	(39)	-	-
Derivative financial instruments	1,612	(752)	860	(672)	(56)	132
Other financial assets	4	(4)	-	-	-	-
Deposits to banks pledged as collateral	1,093	(57)	1,036	(340)	-	696
Total	3,958	(2,023)	1,935	(1,051)	(56)	828

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	31 December 2023					
	Gross amounts of recognised financial liabilities € million	Gross amounts of recognised financial assets offset in the balance sheet € million	Net amounts of financial liabilities presented in the balance sheet € million	Related amounts not offset in the BS		
Financial instruments (incl. non-cash collateral) € million				Cash collateral pledged € million	Net amount € million	
Financial Liabilities						
Derivative financial instruments	1,906	(492)	1,414	(930)	(340)	144
Repurchase agreements with banks	3,638	(1,210)	2,428	(2,428)	-	-
Other financial liabilities	4	(4)	-	-	-	-
Deposits from banks received as collateral	404	(317)	87	(56)	-	31
Total	5,952	(2,023)	3,929	(3,414)	(340)	175

	31 December 2022					
	Gross amounts of recognised financial assets € million	Gross amounts of recognised financial liabilities offset in the balance sheet € million	Net amounts of financial assets presented in the balance sheet € million	Related amounts not offset in the BS		
Financial instruments (incl. non-cash collateral) € million				Cash collateral received € million	Net amount € million	
Financial Assets						
Reverse repos with banks	116	(114)	2	(2)	-	-
Derivative financial instruments	2,540	(1,376)	1,164	(685)	(232)	247
Other financial assets	9	(9)	-	-	-	-
Total	2,665	(1,499)	1,166	(687)	(232)	247

	31 December 2022					
	Gross amounts of recognised financial liabilities € million	Gross amounts of recognised financial assets offset in the balance sheet € million	Net amounts of financial liabilities presented in the balance sheet € million	Related amounts not offset in the BS		
Financial instruments (incl. non-cash collateral) € million				Cash collateral pledged € million	Net amount € million	
Financial Liabilities						
Derivative financial instruments	2,043	(444)	1,599	(685)	(237)	677
Repurchase agreements with banks	877	(114)	763	(763)	-	-
Other financial liabilities	9	(9)	-	-	-	-
Deposits from banks received as collateral	1,226	(932)	294	(232)	-	62
Total	4,155	(1,499)	2,656	(1,680)	(237)	739

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Derivative financial assets and liabilities not under master netting arrangements and similar agreements of carrying value of € 21 million and € 36 million, respectively, (2022: € 21 million and € 62 million, respectively) are not presented in the above tables.

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

5.2.2 Market risk

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

GMCRU is responsible for the measurement, monitoring, control and reporting of all market risks, including the interest rate risk in the Banking Book (IRRBB) and the credit spread risk in the Banking Book (CSRBB) of the Group. In particular, the Bank in response to the regulatory developments and requirements (EBA/GL/2022/14), has further enhanced its infrastructure, governance and limit structure accordingly, so as to measure and monitor its CSRBB, via a dedicated stress testing framework. The Unit reports to the GCRO and its main responsibilities include:

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

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

(a) Interest rate risk

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

(b) Currency risk

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

(c) Equity risk

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

(d) Implied volatilities

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

The BoD and Board Risk Committee set limits on the level of exposure to market risks, which are monitored on a daily basis.

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

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(i) VaR summary for 2023 and 2022

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

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

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

The perimeter of the VaR analysis includes Eurobank Ergasias Services and Holdings S.A., Eurobank S.A. and its banking subsidiaries, taking into account the FVTPL, including trading and FVOCI portfolios. Consequently, the potential impact as it is depicted in the VaR figures would directly affect Group's Capital (income statement or equity).

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

VaR by risk type - Greece and International Subsidiaries ⁽¹⁾

	2023 (Average) € million	2023 € million	2022 (Average) € million	2022 € million
Interest Rate Risk	7	9	22	9
Foreign Exchange Risk	0	1	0	0
Equities Risk	2	1	2	4
Total VaR	8	9	23	11

⁽¹⁾ Includes all portfolios measured at fair value.

The aggregate VaR of the interest rate, foreign exchange and equities VaR benefits from diversification effects. The largest portion of the Group's Interest Rate VaR figures is attributable to the risk associated with interest rate and credit spread sensitive debt securities and derivatives. The average VaR of 2023 is materially decreased, as compared to the average VaR of 2022, following the reduced volatility observed in the markets, after the initial turmoil mainly caused by the geopolitical tension (war in Ukraine) in 2022.

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(ii) Interest rate gap and sensitivity

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

	31 December 2023 ⁽²⁾				
	less than 1 month € million	1-3 months € million	3-12 months € million	1-5 years € million	More than 5 years € million
Balances with central banks	10,438	-	-	-	-
Due from credit institutions	2,208	1,125	7	-	60
Debt securities ⁽¹⁾	758	481	928	5,333	6,446
Loans and advances to customers	16,453	8,026	8,084	5,133	4,675
	29,857	9,632	9,018	10,467	11,182
Due to central banks	(3,665)	-	-	-	-
Due to credit institutions	(1,148)	(3,260)	-	(251)	-
Due to customers	(44,418)	(4,859)	(6,655)	(1,406)	-
Debt securities in issue	-	-	(96)	(3,872)	(711)
	(49,231)	(8,118)	(6,751)	(5,529)	(711)
Derivative financial instruments	1,891	2,397	60	1,146	(5,584)
Interest rate gap	(17,483)	3,910	2,327	6,084	4,886

	31 December 2022 ⁽²⁾				
	less than 1 month € million	1-3 months € million	3-12 months € million	1-5 years € million	More than 5 years € million
Balances with central banks	14,481	-	-	-	-
Due from credit institutions	1,012	64	27	-	-
Debt securities ⁽¹⁾	390	215	371	5,513	5,797
Loans and advances to customers	18,658	10,244	8,034	2,536	2,538
	34,541	10,523	8,432	8,049	8,335
Due to central banks	(8,872)	-	-	-	-
Due to credit institutions	(575)	(968)	(299)	(1)	(14)
Due to customers	(48,934)	(3,754)	(3,991)	(336)	(2)
Debt securities in issue	(2)	-	(5)	(1,916)	(1,700)
	(58,383)	(4,721)	(4,295)	(2,253)	(1,716)
Derivative financial instruments	4,844	(155)	(471)	69	(4,360)
Interest rate gap	(18,998)	5,647	3,666	5,865	2,259

⁽¹⁾ Including short positions in debt securities (note 35).

⁽²⁾ Amounts are before offsetting (note 5.2.1.4).

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

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The impact on NII is calculated under the scenario of an instantaneous parallel shift of all interest rates by +/- 100bps, for a 1-year period, assuming a static balance sheet approach. As at 31 December 2023 the impact on NII, under the scenario of a parallel shift in the yield curves, stands at € 194 million (+100bps) and € -171 million (-100bps) (31 December 2022: € 232 million and € -279 million, respectively).

The impact on OCI is calculated as the fair value movement of all financial assets measured at FVOCI, net of hedging and of any hedging instruments designated in qualifying cash flow hedge relationships. As at 31 December 2023 the impact on OCI, under the scenario of a parallel shift in the yield curves, stands at € -68 million (+100bps) and € 72 million (-100bps) (31 December 2022: € -49 million and € 51 million, respectively).

(iii) Foreign exchange risk

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

	31 December 2023						Total € million
	USD € million	CHF € million	RON € million	BGN € million	OTHER € million	EUR € million	
ASSETS							
Cash and balances with central banks	13	2	0	867	7	10,054	10,943
Due from credit institutions	380	31	33	2	72	1,836	2,354
Securities held for trading	55	-	-	19	0	305	379
Derivative financial instruments	19	0	-	0	1	861	881
Loans and advances to customers	3,210	1,886	7	5,129	714	30,599	41,545
Investment securities	1,668	-	-	75	288	12,679	14,710
Other assets ⁽¹⁾	13	4	4	288	2	8,452	8,763
Assets of disposal groups classified as held for sale (note 30)	0	59	-	-	-	147	206
Total Assets	5,358	1,982	44	6,380	1,084	64,933	79,781
LIABILITIES							
Due to central banks and credit institutions	188	0	0	5	11	6,645	6,849
Derivative financial instruments	18	2	0	0	1	1,429	1,450
Due to customers	5,822	61	2	5,035	593	45,929	57,442
Debt securities in issue	76	-	-	-	0	4,680	4,756
Other liabilities ⁽²⁾	43	1	21	80	7	1,233	1,385
Total Liabilities	6,147	64	23	5,120	612	59,916	71,882
Net on balance sheet position	(789)	1,918	21	1,260	472	5,017	7,899
Derivative forward foreign exchange position	668	(1,921)	(10)	(329)	(502)	1,781	(313)
Total Foreign Exchange Position	(121)	(3)	11	931	(30)	6,798	7,586

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	31 December 2022							Total € million
	USD € million	CHF € million	RON € million	RSD € million	BGN € million	OTHER € million	EUR € million	
ASSETS								
Cash and balances with central banks	29	4	0	375	472	9	14,105	14,994
Due from credit institutions	330	20	33	0	0	63	883	1,329
Securities held for trading	0	-	-	-	18	0	116	134
Derivative financial instruments	23	0	0	0	0	0	1,162	1,185
Loans and advances to customers	3,068	1,999	8	616	3,975	555	31,456	41,677
Investment securities	1,743	-	-	99	81	264	11,074	13,261
Other assets ⁽¹⁾	16	75	5	99	213	6	8,396	8,810
Assets of disposal groups classified as held for sale (note 30)	-	-	-	-	-	-	84	84
Total Assets	5,209	2,098	46	1,189	4,759	897	67,276	81,474
LIABILITIES								
Due to central banks and credit institutions	200	0	0	45	8	9	10,326	10,588
Derivative financial instruments	21	1	0	129	0	1	1,509	1,661
Due to customers	5,929	95	1	666	4,313	604	45,631	57,239
Debt securities in issue	73	73	-	-	-	5	3,401	3,552
Other liabilities ⁽²⁾	25	1	18	20	51	3	1,584	1,702
Total Liabilities	6,248	170	19	860	4,372	622	62,451	74,742
Net on balance sheet position	(1,039)	1,928	27	329	387	275	4,825	6,732
Derivative forward foreign exchange position	778	(1,927)	(15)	(54)	(0)	(281)	819	(680)
Total Foreign Exchange Position	(261)	1	12	275	387	(6)	5,644	6,052

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

⁽²⁾ Other liabilities include liabilities of disposal group classified as held for sale (note 30).

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5.2.3 Liquidity risk

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

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

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

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

Liquidity Risk Management Framework

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

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

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

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

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Maturity analysis of assets and assets held for managing liquidity risk

The following tables present maturity analysis of Group assets as at 31 December 2023 and 2022, based on their carrying values. The Group has established credit risk mitigation contracts with its interbank counterparties (ISDA/CSA). Under these contracts the Group has posted or received collateral, which covers the corresponding net liabilities or net assets from derivative transactions. The collateral posted is not presented in the below tables. For derivative assets not covered by ISDA/CSA agreements the positive valuation is presented at fair value in the 'over 1 year' time bucket.

	31 December 2023				
	Less than 1 month	1 - 3 months	3 months to 1 year	Over 1 year	Total
	€ million	€ million	€ million	€ million	€ million
- Cash and balances with central banks	10,943	-	-	-	10,943
- Due from credit institutions	841	128	-	330	1,299
- Loans and advances to customers	2,841	1,348	3,817	33,539	41,545
- Debt Securities	72	93	617	13,919	14,701
- Equity securities	-	-	-	388	388
- Derivative financial instruments	-	-	-	13	13
- Other assets ⁽¹⁾	62	16	8	8,677	8,763
- Assets of disposal groups classified as held for sale (note 30)	-	-	206	-	206
Total	14,759	1,585	4,648	56,866	77,858

	31 December 2022				
	Less than 1 month	1 - 3 months	3 months to 1 year	Over 1 year	Total
	€ million	€ million	€ million	€ million	€ million
- Cash and balances with central banks	14,994	-	-	-	14,994
- Due from credit institutions	398	28	-	167	593
- Loans and advances to customers	3,164	1,271	3,549	33,693	41,677
- Debt Securities	115	137	349	12,411	13,012
- Equity securities	-	-	-	383	383
- Derivative financial instruments	-	-	-	9	9
- Other assets ⁽¹⁾	62	16	8	8,724	8,810
- Assets of disposal groups classified as held for sale	-	-	84	-	84
Total	18,733	1,452	3,990	55,387	79,562

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

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

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

The unutilized assets, containing highly liquid and central banks eligible assets, provide a contingent liquidity reserve of € 22.3 billion as of 31 December 2023 (2022: € 20.1 billion). This increase is attributed mainly to: i) inflows due to customer deposits (annual increase from continuing operations by € 1.8 billion) and ii) two new senior bond issuances equal to € 500 million each. In addition, the Group holds other types of liquid assets, as defined by the regulator, amounting to € 7.0 billion (cash value) (2022: € 7.5 billion). It should be noted that a part of the ECB available collateral of € 1.8 billion (cash value) (2022: € 3.8 billion) is held by Group's subsidiaries for which temporary local regulatory restrictions are applied and currently limit the level of its transferability between group entities.

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Maturity analysis of liabilities

The amounts disclosed in the tables below are the contractual undiscounted cash flows for the years 2023 and 2022. Liabilities without contractual maturities (sight and saving deposits) are presented in the 'less than 1 month' time bucket. The Group has established credit risk mitigation contracts with its interbank counterparties (ISDA/CSA). Due to these contracts the Group has already posted collateral which covers the valuation of its net liabilities from interbank derivatives. For derivative liabilities not covered by ISDA/CSA agreements the negative valuation is presented at fair value in the 'less than 1 month' time bucket.

It should be noted that this table represents the worst case scenario since it is based on the assumption that all liabilities will be paid at maturity and they will not be rolled over (e.g. all term deposits are withdrawn at their contractual maturity). The recent experience shows that even in a period of a systemic financial crisis the likelihood of such an event is remote.

	31 December 2023				
	Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Gross nominal (inflow)/ outflow € million
Non-derivative liabilities:					
- Due to central banks and credit institutions	713	2,889	3,079	396	7,077
- Due to customers	44,691	5,775	6,682	424	57,572
- Debt securities in issue	75	593	245	4,986	5,899
- Lease liabilities	4	16	55	143	218
- Other liabilities	501	460	234	-	1,195
	45,984	9,733	10,295	5,949	71,961
Derivative financial instruments	11	-	-	-	11

Off-balance sheet items

	Less than 1 year € million	Over 1 year € million
Credit related commitments	2,429	8,989
Contractual commitments ⁽¹⁾	37	-
Total	2,466	8,989

	31 December 2022				
	Less than 1 month € million	1 - 3 months € million	3 months to 1 year € million	Over 1 year € million	Gross nominal (inflow)/ outflow € million
Non-derivative liabilities:					
- Due to central banks and credit institutions	996	812	4,815	4,379	11,002
- Due to customers	49,755	3,220	4,038	250	57,263
- Debt securities in issue	37	7	141	4,395	4,580
- Lease liabilities	3	6	28	192	229
- Other liabilities	863	416	218	-	1,497
	51,654	4,461	9,240	9,216	74,571
Derivative financial instruments	25	-	-	-	25

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Off-balance sheet items

	Less than 1 year € million	Over 1 year € million
Credit related commitments	4,898	5,573
Contractual commitments ⁽¹⁾	46	-
Total	4,944	5,573

⁽¹⁾ It refers to contractual commitments for the purchase of own used and investment property and intangible assets (note 42).

Note: Credit related and contractual commitments of discontinued operations (note 30) amounting to € 461 million and 5 million respectively, are included in the table above for 31 December 2022.

5.2.4 Interest Rate Benchmark reform – IBOR reform

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

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

5.2.5 Climate-related and environmental risks

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

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

Climate-related and environmental risks include the following :

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

The Group is adopting a strategic approach towards sustainability, climate change risk identification and risk management, signifying the great importance that is given in the risks and opportunities arising from the transitioning to a low-carbon and more circular economy. In this context, the Bank has approved and implements its Financed Impact Strategy, which focuses on:

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

To facilitate the classification of sustainable/green financing opportunities in a structural manner, the Bank has developed its Sustainable Finance Framework (SFF). Through its SFF, the Bank is able to classify sustainable lending solutions offered to its clients,

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specifying the applied classification approach and the activities defined as eligible to access sustainable financing (eligible green and social assets).

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

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

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

Furthermore, the Group is in the process of successfully completing the European Central Bank's (ECB) supervisory one-off Fit-for-55 climate risk scenario analysis, which was launched in December 2023 and aims to gain insights into the capacity of the financial system to support the transition to lower carbon economy under conditions of stress.

5.3 Fair value of financial assets and liabilities

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

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

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

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providers and iv) other unobservable inputs which are insignificant to the entire fair value measurement. Level 2 financial instruments include over the counter (OTC) derivatives, less liquid debt instruments held or issued by the Group and equity instruments.

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

Financial instruments carried at fair value

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

	31 December 2023			
	Level 1 € million	Level 2 € million	Level 3 € million	Total € million
Securities held for trading	379	0	-	379
Investment securities at FVTPL	137	21	105	263
Derivative financial instruments ⁽¹⁾	0	881	0	881
Investment securities at FVOCI	3,209	271	12	3,492
Loans and advances to customers mandatorily at FVTPL	-	-	15	15
Financial assets measured at fair value	3,725	1,173	132	5,030
Derivative financial instruments ⁽¹⁾	2	1,448	-	1,450
Trading liabilities	121	-	-	121
Financial liabilities measured at fair value	123	1,448	-	1,571

	31 December 2022			
	Level 1 € million	Level 2 € million	Level 3 € million	Total € million
Securities held for trading	134	-	-	134
Investment securities at FVTPL	93	15	133	241
Derivative financial instruments ⁽¹⁾	1	1,178	6	1,185
Investment securities at FVOCI	3,600	228	-	3,828
Loans and advances to customers mandatorily at FVTPL	-	-	16	16
Financial assets measured at fair value	3,828	1,421	155	5,404
Derivative financial instruments ⁽¹⁾	1	1,660	-	1,661
Trading liabilities	419	-	-	419
Financial liabilities measured at fair value	420	1,660	-	2,080

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

The Group recognizes transfers into and out of the fair value hierarchy levels at the beginning of the quarter in which a financial instrument's transfer was effected. During the year ended 31 December 2023, the Group transferred OTC derivative instruments of € 7 million from Level 3 to Level 2 following the assessment on the significance of the CVA adjustment to their entire fair value measurement, calculated based on internal rating models. In addition, certain Greek and Cypriot government bonds measured at AC and FVOCI, respectively and fair value at the beginning of the fourth quarter of € 849 million and € 89 million, were transferred from level 1 to level 2 as their market was not considered active.

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Reconciliation of Level 3 fair value measurements

	2023 € million	2022 € million
Balance at 1 January	155	70
Transfers into Level 3	1	9
Transfers out of Level 3	(7)	(0)
Additions, net of disposals and redemptions (note 45) ⁽¹⁾	(20)	87
Total gain/(loss) for the year included in profit or loss	3	(11)
Foreign exchange differences and other	0	0
Balance at 31 December	132	155

⁽¹⁾ Including capital returns on equity instruments.

Group's valuation processes and techniques

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

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

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

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

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

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Unquoted equity instruments at FVTPL, included in Level 3, are estimated using mainly (i) third parties' valuation reports based on investees' net assets, where management does not perform any further significant adjustments, and (ii) net assets' valuations, adjusted where considered necessary.

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

Financial instruments not measured at fair value

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

	31 December 2023				
	Level 1	Level 2	Level 3	Fair value	Carrying amount
	€ million	€ million	€ million	€ million	€ million
Loans and advances to customers	-	-	41,888	41,888	41,530
Investment securities at amortised cost	7,191	1,948	1,323	10,462	10,955
Financial assets not measured at fair value	7,191	1,948	43,211	52,350	52,485
Debt securities in issue	2,540	1,626	554	4,720	4,756
Financial liabilities not measured at fair value	2,540	1,626	554	4,720	4,756

	31 December 2022				
	Level 1	Level 2	Level 3	Fair value	Carrying amount
	€ million	€ million	€ million	€ million	€ million
Loans and advances to customers	-	-	41,767	41,767	41,661
Investment securities at amortised cost	6,185	699	1,271	8,155	9,192
Financial assets not measured at fair value	6,185	699	43,038	49,922	50,853
Debt securities in issue	1,343	1,503	553	3,399	3,552
Financial liabilities not measured at fair value	1,343	1,503	553	3,399	3,552

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

- (a) Loans and advances to customers including securitized notes of loan portfolios originated by the Group: quoted market prices are not available as there are no active markets where these instruments are traded. The fair values are estimated by discounting future expected cash flows over the time period they are expected to be recovered, using appropriate risk-adjusted rates (i.e., discounted expected cash flows technique). More specifically, loans to customers are grouped into homogenous assets with similar characteristics, as monitored by Management, such as lending business unit, products' characteristics, and performing/nonperforming status, in order to improve the accuracy of the estimated valuation outputs. In estimating the future cash flows of lending portfolios, the Group makes assumptions on expected prepayments, products' spreads over risk-free interest rates, where applicable. The discount rates applied for the discounting of loans' expected cash flows incorporate inputs that would be taken into account by independent market participants, such as risk-free interest rates, expected credit losses, cost of equity requirements and funding. For credit impaired-loans, the timing of collateral realization is taken into account for the estimation of the future cash flows which are discounted by non-credit risk adjusted rates. In addition, the fair value of securitized senior

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notes of loan portfolios originated by the Group is estimated by discounting the expected cash flows using appropriate market interest rates of other comparable assets with similar quality and duration;

(b) Investment securities measured at amortized cost: the fair values are determined using prices quoted in an active market when these are available. In other cases, fair values are determined using quoted market prices for securities with similar credit risk, maturity and yield, quoted market prices in non active markets for identical or similar financial instruments, or by using the discounted cash flows method. In addition, for certain high quality corporate bonds for which quoted prices are not available, fair value is determined using prices that are derived from reliable data management platforms while part of them is verified by market participants (e.g. brokers). In certain cases, prices are implied by liquidity agreements (e.g. repos, pledges) with other financial institutions; and

(c) Debt securities in issue: the fair values are determined using quoted market prices, if available. If quoted prices are not available, fair values are determined based on third party valuations, quotes for similar debt securities or by discounting the expected cash flows at a risk-adjusted rate, where the Group's own credit risk is determined using inputs indirectly observable, i.e. quoted prices of similar securities issued by the Group or other Greek issuers.

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

6. Net interest income

	2023 € million	2022 € million
Interest income		
Customers	2,122	1,302
- measured at amortised cost	2,121	1,301
- measured at FVTPL	1	1
Banks and other assets ⁽¹⁾⁽³⁾	460	80
Securities	429	255
- measured at amortised cost	309	141
- measured at FVOCI	107	103
- measured at FVTPL	13	10
Derivatives (hedge accounting)	527	94
Derivatives (no hedge accounting)	916	495
	4,454	2,226
Interest expense		
Customers ⁽¹⁾	(435)	(77)
Banks ⁽¹⁾⁽²⁾⁽³⁾	(317)	1
Debt securities in issue ⁽¹⁾	(222)	(118)
Derivatives (hedge accounting)	(430)	(89)
Derivatives (no hedge accounting)	(873)	(461)
Lease liabilities - IFRS 16	(3)	(2)
	(2,280)	(746)
Total from continuing operations	2,174	1,480

⁽¹⁾ Measured at amortized cost.

⁽²⁾ For the year 2023, it includes interest expense of € 177 million relating to the funding from the European Central Bank (ECB). In the comparative year, it includes net income of € 53 million that is attributable to the targeted longer-term refinancing operations (TLTRO III) of ECB. (note 31).

⁽³⁾ Interest from financial assets with negative rates, which were applied until June of 2022, was recorded in interest expense.

In 2023, the increase of 46.9% in the interest income from continuing operations against the comparative year was mainly driven by higher interest rates, the organic loans' growth and the increased positions in investment bonds, partly offset by higher debt issued and deposits cost.

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

	31 December 2023		
	Interest income on non-impaired loans and advances € million	Interest income on impaired loans and advances € million	Total € million
Retail lending	854	33	888
Wholesale lending ⁽¹⁾	1,193	41	1,234
Total interest income from customers	2,048	74	2,122

	31 December 2022		
	Interest income on non-impaired loans and advances € million	Interest income on impaired loans and advances € million	Total € million
Retail lending	573	23	596
Wholesale lending ⁽¹⁾	673	33	706
Total interest income from customers	1,246	56	1,302

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

7. Net banking fee and commission income

The following tables include net banking fees and commission income from contracts with customers in the scope of IFRS 15, disaggregated by major type of services and operating segments (note 43).

	31 December 2023					
	Retail € million	Corporate € million	Global Markets & Asset Mngt € million	International € million	Other ⁽²⁾ € million	Total € million
Lending related activities	8	111	16	15	2	152
Mutual funds and assets under management	17	2	39	11	6	75
Network activities and other ⁽¹⁾	62	7	31	90	3	193
Capital markets	-	7	16	6	(2)	27
Total from continuing operations	87	127	102	122	9	447

	31 December 2022					
	Retail € million	Corporate € million	Global Markets & Asset Mngt € million	International € million	Other ⁽²⁾ € million	Total € million
Lending related activities	8	97	14	11	1	132
Mutual funds and assets under management	13	1	41	9	5	69
Network activities and other ⁽¹⁾	68	7	31	93	2	201
Capital markets	-	9	13	6	(3)	26
Total from continuing operations	90	114	99	119	5	427

⁽¹⁾ Including income from credit cards related services

⁽²⁾ Includes "Remedial and Servicing Strategy" and "Other and elimination center" segments.

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8. Income from non banking services

Income from non banking services from continuing operations includes rental income of € 95.5 million (2022: € 92.8 million) from real estate properties and other income of € 1.0 million (2022: € 2.2 million) from IT services provided by the Group entities.

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

	2023 € million	2022 € million
Net trading income/(loss)		
Debt securities, including short positions	(24)	98
Derivative financial instruments	86	625
Equity securities ⁽¹⁾	4	1
Revaluation on foreign exchange positions	5	1
Total	71	725
Gains less losses from investment securities		
Debt securities	38	(26)
- measured at FVOCI ⁽²⁾	57	(26)
- measured at AC ⁽³⁾	(18)	(0)
- measured at FVTPL	(1)	(0)
Equity securities	19	17
Total from continuing operations	57	(9)

⁽¹⁾ In 2023, € 22 million loss relating to derivatives on equity instruments is presented along with equity securities that hedge economically. Comparative figure has been adjusted accordingly and includes € 2 million gain.

⁽²⁾ It includes termination fees from related derivatives in single hedging relationships amounting to € 6 million income (2022: € 4 million income)

⁽³⁾ Mainly refers to the swap transaction of Greek government bonds (note 5.2.1.3).

Trading results of € 24 million loss related to debt securities, include € 1 million loss (2022: € 9 million loss) from trading securities and € 23 million loss (2022: € 107 million gain) on short positions on debt instruments entered into the context of the Group's economic hedging strategies (note 35).

Gains from derivative financial instruments of € 86 million comprise mainly a) € 33 million loss resulting from fair value changes of derivatives not designated in hedge accounting relationships and b) € 124 million gains from portfolio hedging of interest rate risk (macro hedging), of which € 4 million gains arise from hedge ineffectiveness and € 120 million gains from fair value changes of the hedging derivatives that occur as part of the dynamic management of the pool of hedging instruments on a monthly basis, and include fair value changes before initial designation or after de-designation as well as realized gains of the liquidated positions following de-designation (notes 2.2.3i and 19).

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10. Other income/ (expenses)

	2023 € million	2022 € million
Gain/(loss) from change in fair value of investment property (note 27)	6	34
Gain on initial application of equity accounting for Hellenic Bank (note 24)	111	-
Sale of merchant acquiring business - Project Triangle	-	325
Derecognition gain/(loss) on loans measured at amortised cost (note 20)	3	2
Loss on loans' modifications and related adjustments	(49)	(1)
Fee expense related to the deferred tax credits (note 13)	(6)	(6)
Gain/ (loss) on the disposal/liquidation of subsidiaries and associates (notes 23 and 24)	0	(34)
Dividend income	3	2
Gains/(losses) on loans at FVTPL	(0)	3
Other	0	(2)
Total from continuing operations	68	323

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

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

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

Eurobank merchant acquiring business -Project 'Triangle'

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

11. Operating expenses

	2023 € million	2022 € million
Staff costs	(473)	(419)
Administrative expenses	(275)	(252)
Contributions to resolution and deposit guarantee funds	(33)	(69)
Depreciation of real estate properties and equipment	(42)	(43)
Depreciation of right of use assets	(37)	(37)
Amortisation of intangible assets	(41)	(37)
Contribution to restoration initiatives after natural disasters	(14)	-
Total from continuing operations	(915)	(857)

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

Contributions to resolution and deposit guarantee funds

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

In 2016, the Single Resolution Mechanism (SRM), which is one of the pillars of the Banking Union in the euro area alongside the Single Supervisory Mechanism (SSM), became fully operational. The Single Resolution Fund (SRF) was established by the SRM Regulation (EU) No 806/2014 (SRMR) in order to ensure uniform practice in the financing of resolutions within the SRM and it is owned by the Single Resolution Board (SRB). The SRMR provided that the SRF would be built up over a period of eight years with 'ex-ante' contributions from the banking industry, which could include irrevocable payment commitments (IPC) as a part of the total amount of contributions (for further information on the IPC of the Bank, refer to note 42).

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

For the year ended 31 December 2023, the amount of operating expenses (excluding any contribution to a deposit guarantee or resolution fund) for the Group's Greek activities was € 641 million (2022: € 590 million).

Staff costs

	2023	2022
	€ million	€ million
Wages, salaries and performance remuneration	(355)	(309)
Social security costs	(52)	(50)
Additional pension and other post employment costs	(21)	(17)
Other	(45)	(43)
Total from continuing operations	(473)	(419)

The average number of employees of the Group's continuing operations during the year was 10,323 (2022: 10,076). As at 31 December 2023, the number of branches and business/private banking centers of the Group amounted to 540 (2022: 515 for the Group's continuing operations).

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12. Other impairments, risk provisions and restructuring costs

	2023 € million	2022 € million
Impairment and valuation losses on real estate properties ⁽¹⁾	(49)	(15)
Impairment losses on computer hardware and software (notes 26, 28)	(17)	(23)
Impairment (losses)/reversal on bonds (note 5.2.1.3)	4	(20)
Other impairments, litigation and conduct-related provisions and costs	(34)	(45)
Other impairments, risk provisions and related costs	(96)	(103)
Voluntary exit schemes and other related costs	(7)	(60)
Other restructuring costs	(30)	(29)
Restructuring costs	(37)	(89)
Total from continuing operations	(133)	(192)

⁽¹⁾ For 2023, it includes € 23 million remeasurement/impairment loss on real estate properties of IMO Property Investments Sofia E.A.D, which was disposed of during the year (note 23.1).

In the year ended 31 December 2023, the Group recognized € 30 million other restructuring costs of which € 10.6 million refers to the acquisition of BNP Paribas Personal Finance Bulgaria by Eurobank Bulgaria A.D. (note 23.2), while the remaining costs mainly relate to the Group's transformation projects and initiatives (2022: € 29 million, mainly relate to the Group's transformation projects and initiatives).

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

13. Income tax

	2023 € million	2022 € million
Current tax	(83)	(46)
Deferred tax	(178)	(360)
Total income tax from continuing operations	(261)	(406)

According to Law 4172/2013 currently in force, the nominal Greek corporate tax rate for credit institutions that fall under the requirements of article 27A of Law 4172/2013 regarding eligible deferred tax assets (DTAs)/deferred tax credits (DTCs) against the Greek State is 29%. The Greek corporate tax rate for legal entities other than the aforementioned credit institutions is 22%. In addition, the withholding tax rate for dividends distributed, other than intragroup dividends, is 5%. In particular, the intragroup dividends under certain preconditions are relieved from both income and withholding tax.

The nominal corporate tax rates applicable in the banking subsidiaries incorporated in the international segment of the Group (note 43) are as follows: Bulgaria 10%, Serbia 15%, Cyprus 12.5% and Luxembourg 24.94%.

Pillar Two income taxes

The Pillar Two legislation that introduces a minimum global tax rate at 15% on multinational entities with consolidated revenues over €750 million (top up tax), effective as of 1 January 2024, has been enacted or substantively enacted in certain jurisdictions that the Group operates.

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In particular, the Group, considering the most recent country-by-country reporting data, as well as the reporting packages available for the Group entities, has identified potential exposure to Pillar Two income taxes in respect of profits earned in Bulgaria and Cyprus. The Pillar Two effective tax rate is lower than 15% in the above jurisdictions mainly due to their nominal corporate tax rates (CIT) applying on their profits (i.e. the current CIT in Bulgaria and Cyprus is 10% and 12.5% respectively). In addition, there is also a number of jurisdictions where the transitional safe harbor relief applies, or the Pillar Two effective tax rate is close to 15%. The Group does not expect a material exposure to Pillar Two income taxes in those jurisdictions.

The proportion of the Group's profit before tax from continuing operations for the year ended 31 December 2023 that would have been subject to Pillar Two income taxes, as adjusted with the relevant top-up tax reliefs, is approximately 26% (based on the relevant group entities' profits before any intercompany eliminations). The Pillar two effective tax rate (weighted average) applicable to those profits is 11.7% (10.2% and 12.8% applicable to Bulgaria and Cyprus respectively).

Furthermore, the proportion of profit before tax and the effective tax rates in financial year beginning 1 January 2024 will depend on factors such as revenues/expenses per country and the provisions of the Corporate Income Tax Code applying in each country.

Tax certificate and open tax years

The Company and its subsidiaries, associates and joint ventures, which operate in Greece (notes 23 and 24) have in principle up to 6 open tax years. For fiscal years starting from 1 January 2016 onwards, pursuant to the Tax Procedure Code, an 'Annual Tax Certificate' on an optional basis, is provided for the Greek entities, with annual financial statements audited compulsorily, which is issued after a tax audit is performed by the same statutory auditor or audit firm that audits the annual financial statements. The Company and, as a general rule, the Group's Greek companies have opted to obtain such certificate.

Following the completion in 2023, of the tax audit of the Company by the tax authorities for the tax year 2019, and of the Bank for the tax years 2020 and 2021, the Company's open tax years are 2018 and 2020-2023, while the Bank's open tax years are 2022-2023. The tax certificates of the Company, the Bank and the other Group's entities, which operate in Greece, are unqualified for their open tax years until 2022. In addition, for the year ended 31 December 2023, the tax audits from external auditors are in progress.

In accordance with the Greek tax legislation and the respective Ministerial Decisions issued, additional taxes and penalties may be imposed by the Greek tax authorities following a tax audit within the applicable statute of limitations (i.e. in principle five years as from the end of the fiscal year within which the relevant tax return should have been submitted), irrespective of whether an unqualified tax certificate has been obtained from the tax paying company. In light of the above, as a general rule, the right of the Greek State to impose taxes up to tax year 2017 (included) has been time-barred for the Group's Greek entities as at 31 December 2023.

The open tax years of the foreign banking entities of the Group are as follows: (a) Eurobank Cyprus Ltd, 2018-2023 (a tax audit for tax years 2018-2020 is in progress), (b) Eurobank Bulgaria A.D., 2018-2023 (a tax audit of limited scope for tax years 2020-2023 was completed) and (c) Eurobank Private Bank Luxembourg S.A., 2019-2023. The remaining foreign entities of the Group (notes 23 and 24), which operate in countries where a statutory tax audit is explicitly stipulated by law, have in principle up to 6 open tax years, subject to certain preconditions of the applicable tax legislation of each jurisdiction.

In reference to its total uncertain tax positions, the Group assesses all relevant developments (e.g. legislative changes, case law, ad hoc tax/legal opinions, administrative practices) and raises adequate provisions.

Deferred tax

Deferred tax is calculated on all deductible temporary differences under the liability method as well as for unused tax losses at the rate in effect at the time the reversal is expected to take place.

The net deferred tax is analyzed as follows:

	2023 € million	2022 € million
Deferred tax assets	3,991	4,161
Deferred tax liabilities	(28)	(31)
Net deferred tax	3,963	4,130

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The movement on deferred tax is as follows:

	2023 € million	2022 € million
Balance at 1 January	4,130	4,396
Income statement credit/(charge) from continuing operations	(178)	(360)
Investment securities at FVOCI ⁽¹⁾	(8)	96
Cash flow hedges	1	(0)
Actuarial gains/(losses)	1	(1)
Discontinued operations (note 30)	17	-
Other	(0)	(1)
Balance at 31 December	3,963	4,130

⁽¹⁾ As of the second quarter of 2023, the Group's investment in Hellenic Bank was accounted for as an associate (note 24), therefore an amount of € 13 million deferred tax liability for the fair value gains, during the period it was designated at FVOCI, was reversed.

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

	2023 € million	2022 € million
Impairment/ valuation relating to loans, disposals and write-offs	(213)	(128)
Tax deductible PSI+ losses	(50)	(50)
Carried forward debit difference of law 4831/2021	39	(73)
Change in fair value and other temporary differences	46	(109)
Deferred income tax (charge)/credit from continuing operations	(178)	(360)

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

	2023 € million	2022 € million
Impairment/ valuation relating to loans and accounting write-offs	940	1,030
PSI+ tax related losses	901	951
Losses from disposals and crystallized write-offs of loans	2,120	2,242
Carried forward debit difference of law 4831/2021	39	-
Other impairments/ valuations through the income statement	(49)	(120)
Cash flow hedges	6	5
Defined benefit obligations	7	5
Real estate properties, equipment and intangible assets	(97)	(78)
Investment securities at FVOCI	(23)	(15)
Other ⁽¹⁾	119	110
Net deferred tax	3,963	4,130

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

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

- (a) € 940 million refer to deductible temporary differences arising from impairment/valuation relating to loans including the accounting debt write-offs according to the Greek tax law 4172/2013, as in force. These temporary differences can be utilized in future periods with no specified time limit and according to current tax legislation of each jurisdiction;
- (b) € 901 million refer to losses resulted from the Group's participation in PSI+ and the Greek's state debt buyback program which are subject to amortization for tax purposes over a thirty-year period, i.e. 1/30 of losses per year starting from year 2012 onwards (see below – DTCs section);
- (c) € 2,120 million refer to the unamortized part of the crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period;

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Assessment of the recoverability of deferred tax assets

The recognition of the deferred tax assets is based on management's assessment that the Group's legal entities will have sufficient future taxable profits, against which the deductible temporary differences and the unused tax losses can be utilized. The deferred tax assets are determined on the basis of the tax treatment of each deferred tax asset category, as provided by the applicable tax legislation of each jurisdiction and the eligibility of carried forward losses for offsetting with future taxable profits. Additionally, the Group's assessment on the recoverability of recognized deferred tax assets is based on (a) the future performance expectations (projections of operating results) and growth opportunities relevant for determining the expected future taxable profits, (b) the expected timing of reversal of the deductible and taxable temporary differences, (c) the probability that the Group entities will have sufficient taxable profits in the future, in the same period as the reversal of the deductible and taxable temporary differences or in the years into which the tax losses can be carried forward, and (d) the historical levels of Group entities' performance in combination with the previous years' tax losses caused by one off or non-recurring events.

In particular, for the year ended 31 December 2023, the deferred tax asset (DTA) recoverability assessment has been based on the three-year Business Plan that was approved by the Board of Directors in February 2024, for the period up to the end of 2026 (also submitted to the Single Supervisory Mechanism -SSM-). For the years beyond 2026, the forecast of operating results was based on the management projections considering the growth opportunities of the Greek and European economy, the banking sector and the Group itself. Specifically, the management projections for the Group's future profitability adopted in the Business Plan, have considered, among others, (a) the gradual decrease of interest rates in 2024 onwards, (b) the sustainable increase in loan volumes with pressure in business lending spreads and the growth, at a relatively lower pace, of customer deposits with gradually higher betas, (c) the increase in fee and commission income mostly driven by assets under management, bancassurance, network and lending related activities, cards' issuing and investment property rentals, (d) the discipline to operating expenses' targets taking into account the sustained - albeit easing inflationary pressures, (e) the further decrease of NPE ratio, (f) the resilient asset quality with lower cost of risk, which is expected to carry the effect from the improved macroeconomic outlook driven by the resilient growth of Greek economy, above European average, as well as the unemployment rate at single digit levels, close to historical lows and (g) the fulfilment of interim MREL targets throughout the plan period. The major initiatives introduced in the context of the Group's transformation plan "Eurobank 2030", will contribute to meeting its financial objectives.

The Group closely monitors and constantly assesses the developments on the macroeconomic and geopolitical front (note 2) including the inflationary pressures and their potential effect on the achievement of its Business Plan targets in terms of asset quality and profitability and will continue to update its estimates accordingly.

Deferred tax credit against the Greek State and tax regime for loan losses

As at 31 December 2023, pursuant to the Law 4172/2013, as in force, the Bank's eligible DTAs/deferred tax credits (DTCs) against the Greek State amounted to € 3,212 million (31 December 2022: € 3,402 million). The DTCs are accounted for on: (a) the unamortised losses from the Private Sector Involvement (PSI) and the Greek State Debt Buyback Program, which are subject to amortisation over a thirty-year period and (b) on the sum of (i) the unamortized part of the DTC eligible crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015. The DTCs will be converted into directly enforceable claims (tax credit) against the Greek State provided that the Bank's after tax accounting result for the year is a loss.

According to the Law 4831/2021 (article 125), which amended Law 4172/2013, the amortization of the PSI tax related losses is deducted from the taxable income at a priority over that of the crystallized tax losses (debit difference) arising from write-offs and disposals of loans. In addition, the amount of the annual tax amortization of the above crystallized tax losses is limited to the amount of the annual taxable profits, calculated before the deduction of such losses and following the annual tax deduction of the PSI tax related losses. The unutilized part of the annual tax amortization of the crystallized loan losses can be carried forward for offsetting over a period of 20 years. If at the end of the 20-year utilization period, there are balances that have not been offset, these will qualify as a tax loss, which is subject to the 5-year statute of limitation. The above provisions apply as of 1 January 2021 and cover the crystallized tax losses that have arisen from write-offs and disposals of loans as of 1 January 2016 onwards.

Taking into account the tax regime in force, the recovery of the Bank's deferred tax asset recorded on loans and advances to customers and the regulatory capital structure are further safeguarded, contributing substantially to the achievement of NPE management targets through write-offs and disposals, in line with the regulatory framework and SSM requirements.

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According to tax Law 4172/2013 as in force, an annual fee of 1.5% is imposed on the excess amount of deferred tax assets guaranteed by the Greek State, stemming from the difference between the current tax rate for the eligible credit institutions (i.e. 29%) and the tax rate applicable on 30 June 2015 (i.e. 26%). For the year ended 31 December 2023, an amount of € 5.6 million has been recognized in "Other income/(expenses) (31 December 2022: € 5.9 million).

Income tax reconciliation and unused tax losses

The tax on the Group's profit before tax differs from the theoretical amount that would arise using the Bank's applicable tax rate of 29% as follows:

	2023 € million	2022 € million
Profit before tax	1,542	1,751
Tax at the applicable tax rate	(447)	(508)
Tax effect of:		
- income not subject to tax and non deductible expenses	5	1
- effect of different tax rates in different countries	70	44
- Share of results of associates/joint ventures and related income	58	10
- Tax deductible losses for which DTA had not been recognised	63	66
- other	(10)	(19)
Total income tax from continuing operations	(261)	(406)

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

As at 31 December 2023, the Company and the Bank have not recognised deferred tax asset (DTA) on unused tax losses amounting to € 421 million (2022: € 470 million). The analysis of unrecognized DTA on unused tax losses of the Company and the Bank per year of maturity of related tax losses is presented in the table below:

	Unrecognized DTA € million
Year of maturity of unused tax losses	
2024	61
2025	345
2026	12
2027	1
2028	2
Total	421

14. Earnings per share

Basic earnings per share, in principle, is calculated by dividing the net profit attributable to ordinary shareholders by the weighted average number of ordinary shares in issue during the year, excluding the average number of ordinary shares purchased by the Group and held as treasury shares.

The diluted earnings per share, in principle, is calculated by adjusting the weighted average number of ordinary shares outstanding to assume conversion of all dilutive potential ordinary shares during the period. As at 31 December 2023, the Group's dilutive potential ordinary shares relate to the share options that were allocated to executives of Eurobank Holdings and its affiliated companies (note 39). The weighted average number of shares is adjusted for the share options by calculating the weighted average number of shares that could have been acquired at fair value (determined as the average market price of the Company's shares for the period). The number of shares resulting from the above calculation is added to the weighted average number of ordinary shares

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in issue in order to determine the weighted average number of ordinary shares used for the calculation of the diluted earnings per share.

		Year ended 31 December	
		2023	2022
Net profit for the year attributable to ordinary shareholders (note 2.3)	€ million	1,140	1,347
Net profit for the year from continuing operations attributable to ordinary shareholders	€ million	1,281	1,345
Weighted average number of ordinary shares used for basic earnings per share	Number of shares	3,698,802,084	3,708,988,032
Weighted average number of ordinary shares used for diluted earnings per share	Number of shares	3,713,688,124	3,714,564,870
Earnings per share			
- Basic and diluted earnings per share	€	0.31	0.36
Earnings per share from continuing operations			
- Basic and diluted earnings per share	€	0.34	0.36

The effect on the basic and diluted EPS from the share buyback agreement with HFSF at a price of €1.80 per share that was higher than the market price of the Company's shares at the transaction date, is immaterial; therefore it has not been included in the above EPS calculation.

Basic and diluted losses per share from discontinued operations for the year ended 31 December 2023 amounted to € 0.04.

15. Cash and balances with central banks

	2023	2022
	€ million	€ million
Cash in hand	502	504
Balances with central banks	10,441	14,490
Total	10,943	14,994

The Bank and its banking subsidiaries in Eurozone (Cyprus and Luxemburg), are required to hold a minimum level of deposits (minimum reserve requirement - MRR) with their national central bank on an average basis over maintenance periods (i.e. six week periods); these deposits are calculated as 1% of certain liabilities, mainly customers' deposits, and can be withdrawn at any time provided that the MRR is met over the determined period of time. Similar obligations for the maintenance of minimum reserves with its national central bank are also applied to the banking subsidiary in Bulgaria (2022: Bulgaria and Serbia). As at 31 December 2023, the mandatory reserves (i.e. those that the Group entities maintain in order to meet the MRR) with central banks amounted to € 1,096 million (2022: € 1,040 million). MRR deposits placed to the European Central Bank (ECB) were remunerated at the ECB's deposit facility rate (DFR) until September 2023 and at zero (0%) thereafter.

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16. Cash and cash equivalents and other information on cash flow statement

For the purpose of the cash flow statement, cash and cash equivalents comprise the following balances with original maturities of three months or less:

	2023 € million	2022 € million
Cash and balances with central banks (excluding mandatory and collateral deposits with central banks) (note 15)	9,847	13,954
Due from credit institutions	998	418
Securities held for trading	0	16
Total	10,845	14,388

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

	2023 € million	2022 € million
Amortisation of premiums/discounts and accrued interest	(10)	(22)
(Gains)/losses from investment securities	(57)	9
Dividends	(3)	(2)
Total	(70)	(15)

In the year ended 31 December 2023, other adjustments of € 153 million mainly include a) € 111 million gain on investment in Hellenic Bank accounted for as an associate and b) € 88 million income from share of results in associates and joint ventures (note 24), (31 December 2022: € 244 million mainly include € 325 million gain resulting from the sale of Eurobank's merchant acquiring business to Worldline B.V. , note 10).

Changes in liabilities arising from financing activities

During the year ended 31 December 2023, changes in the Group's liabilities arising from financing activities, other than lease liabilities (note 41), are attributable to: a) debt issuance amounting to € 1,078 million (2022: € 1,070 million) (net of issuance costs), b) debt repayment amounting to € 30 million (2022: € 11 million) and c) accrued interest and amortisation of debt issuance costs amounting to € 51.3 million (2022: € 57.1 million).

17. Due from credit institutions

	2023 € million	2022 € million
Pledged deposits with banks ⁽¹⁾	1,036	911
Placements and other receivables from banks ⁽¹⁾	970	196
Current accounts and settlement balances with banks	348	222
Total	2,354	1,329

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

As at 31 December 2023, the Group's pledged deposits with banks include: a) € 999 million mainly cash collaterals on risk mitigation contracts for derivative transactions and repurchase agreements (CSAs, GMRAs) and b) € 37 million cash collateral relating to the sale of former Romanian subsidiaries.

The Group's exposure arising from credit institutions, as categorized by counterparty's geographical region, is presented in the following table:

	2023 € million	2022 € million
Greece	59	42
Other European countries	2,139	1,217
Other countries	156	70
Total	2,354	1,329

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18. Securities held for trading

	2023 € million	2022 € million
Debt securities (note 5.2.1.3)	245	87
Equity securities	134	47
Total	379	134

19. Derivative financial instruments and hedge accounting

The Group uses derivative financial instruments both for hedging and non-hedging purposes.

The table below presents the fair values of the Group's derivative financial instruments by product type and hedge relationship along with their notional amounts. The notional amounts of derivative instruments provide a basis for comparison with instruments recognized on the balance sheet but do not necessarily indicate the amounts of future cash flows involved or the current fair value of the instruments and, therefore, are not indicative of the Group's exposure at the reporting date.

	31 December 2023			31 December 2022		
	Contract / notional amount € million	Fair values		Contract / notional amount € million	Fair values	
		Assets € million	Liabilities € million		Assets € million	Liabilities € million
Derivatives for which hedge accounting is not applied/ held for trading						
- Interest rate swaps	33,909	1,215	1,059	35,481	1,778	1,372
- Interest rate options ⁽¹⁾	9,268	69	71	3,616	74	96
- Foreign exchange contracts ⁽²⁾	3,468	21	26	3,686	62	71
- Other ⁽³⁾	462	5	40	154	2	2
		1,310	1,196		1,916	1,541
Derivatives designated as fair value hedges						
- Interest rate swaps	8,221	308	452	7,277	463	431
- Interest rate swaps/portfolio hedging	6,642	15	94	4,792	180	-
- Interest rate floors	6,447	-	53	7,791	-	55
		323	599		643	486
Derivatives designated as cash flow hedges						
- Cross currency interest rate swaps	1,579	-	147	1,646	2	78
		-	147		2	78
Offsetting (note 5.2.1.4)						
- Interest rate swaps		(752)	(492)		(1,376)	(444)
Total derivatives assets/liabilities		881	1,450		1,185	1,661

⁽¹⁾ Interest rate options include interest rate caps and floors and swaptions.

⁽²⁾ It includes currency swaps, forwards and options

⁽³⁾ It includes credit default swaps, warrants, commodity derivatives, futures and exchange traded equity options.

Information on the fair value measurement and offsetting of derivatives is provided in notes 5.3 and 5.2.1.4, respectively.

Notes to the Consolidated Financial Statements

The Group uses certain derivatives and other financial instruments, designated in a qualifying hedge relationship, to reduce its exposure to market risks. The hedging practices applied by the Group, as well as the relevant accounting treatment are disclosed in note 2.2.3. In particular:

(a) Fair value hedges

The Group hedges a portion of its existing interest rate risk resulting from any potential change in the fair value of fixed rate debt securities, held or issued, or fixed rate loans, denominated both in local and foreign currencies, using interest rate swaps whereby the fixed legs represent the economic risks of the hedged items. The Group uses pay fixed/receive floating interest rate swaps to hedge its fixed rate debt securities held and loans and pay floating/receive fixed interest rate swaps to hedge its fixed rate liabilities. In 2023, the Group recognized a loss of € 175 million (2022: € 886 million gain) from changes in the carrying amount of the hedging instruments and € 173 million gain (2022: € 862 million loss) from changes in the fair value of the hedged items attributable to the hedged risk. The amount of hedge ineffectiveness recognized for 2023 in “Net trading income/(loss)” was € 2 million loss (2022: € 24 million gain).

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

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

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

Finally, similar to portfolio hedging of interest rate risk for assets, the Group hedges part of its interest rate exposure of demand deposit portfolios attributable to changes in the benchmark interest rates (macro-hedging). Despite their contractual terms and due to their nature, part of the demand deposits are interest rate-insensitive and hence behave similarly to fixed interest rate liabilities. Accordingly, the Group enters into a group of interest rate swaps that receives fixed interest rate and pays floating interest rate based on the benchmark rate and its volume is re-assessed on a monthly basis. In 2023, the Group recognized a loss of € 7 million from changes in the carrying amount of the hedging instruments and € 5 million gain from changes in the fair value of the designated hedged items attributable to the hedged risk. Accordingly, the amount of hedge ineffectiveness recognized for 2023 in “Net trading income/(loss)” was € 2 million loss.

(c) Cash flow hedges

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

In addition, the Group uses other derivatives, not designated in a qualifying hedge relationship, to manage its exposure primarily to interest rate and foreign currency risks. Non qualifying hedges are derivatives entered into as economic hedges of assets and liabilities for which hedge accounting was not applied. The said derivative instruments are monitored and have been classified for accounting purposes along with those held for trading.

The Group's exposure in derivative financial assets, as categorized by counterparty's geographical region and industry sector, is presented in the following tables:

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	31 December 2023			
	Greece € million	Other European countries € million	Other countries € million	Total € million
Sovereign	227	-	-	227
Banks	12	228	335	575
Corporate	72	7	-	79
Total	311	235	335	881

	31 December 2022			
	Greece € million	Other European countries € million	Other countries € million	Total € million
Sovereign	249	-	-	249
Banks	12	291	570	873
Corporate	51	12	-	63
Total	312	303	570	1,185

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

At 31 December 2023 and 2022, the maturity profile of the nominal amount of the financial instruments designated by the Group in hedging relationships is presented in the tables below:

	31 December 2023									
	Fair Value Hedges					Cash Flow Hedges				
	1 - 3 months € million	3 - 12 months € million	1-5 years € million	Over 5 years € million	Total € million	1 - 3 months € million	3 - 12 months € million	1-5 years € million	Over 5 years € million	Total € million
Interest rate swaps ⁽¹⁾	500	16	4,285	3,420	8,221	-	-	-	-	-
Interest rate options	-	-	800	5,647	6,447	-	-	-	-	-
Cross currency interest rate swaps	-	-	-	-	-	175	602	802	-	1,579
Total	500	16	5,085	9,067	14,668	175	602	802	-	1,579

	31 December 2022									
	Fair Value Hedges					Cash Flow Hedges				
	1 - 3 months € million	3 - 12 months € million	1-5 years € million	Over 5 years € million	Total € million	3 - 12 months € million	1-5 years € million	Over 5 years € million	Over 5 years € million	Total € million
Interest rate swaps ⁽¹⁾	255	24	2,884	4,114	7,277	-	-	-	-	-
Interest rate options	-	-	800	6,991	7,791	-	-	-	-	-
Cross currency interest rate swaps	-	-	-	-	-	101	1,545	-	-	1,646
Total	255	24	3,684	11,105	15,068	101	1,545	-	-	1,646

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

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(a) Fair value hedges

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

	2023		
	Carrying amount/Exposure designated as hedged € million	Accumulated amount of FV hedge adjustments related to the hedged item € million	Change in value as the basis for recognising hedge ineffectiveness € million
Assets			
Loans and advances to customers ⁽¹⁾	9,184	69	172
Debt securities AC ⁽¹⁾	4,474	154	163
Debt securities FVOCI	1,027	(54)	88
Liabilities			
Debt securities in issue	3,812	(15)	105
Due to customers ⁽¹⁾	1,628	20	(5)

	2022		
	Carrying amount/Exposure designated as hedged € million	Accumulated amount of FV hedge adjustments related to the hedged item € million	Change in value as the basis for recognising hedge ineffectiveness € million
Assets			
Loans and advances to customers ⁽¹⁾	12,693	(216)	(225)
Debt securities AC ⁽¹⁾	3,978	(17)	(431)
Debt securities FVOCI	1,336	(157)	(266)
Liabilities			
Debt securities in issue	2,373	(120)	(120)

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

At 31 December 2023, the accumulated amounts of fair value hedge adjustments remaining in the balance sheet for any items that have ceased to be adjusted for hedging gains and losses were € 253 million assets for debt securities held at AC, € 3 million liabilities for debt issued and € 44 million liabilities for adjustments related to debt securities held at FVOCI (2022: € 279 million assets for debt securities held at AC, € 4 million liabilities for debt issued and € 19 million liabilities for adjustments related to debt securities at FVOCI). The respective fair value hedge adjustments relating to macro-hedging, amounted to € 57 million loss for loans (including securitized notes) and € 25 million gain for deposits.

(b) Cash flow hedges

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

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

The reconciliation of the components of Group's special reserves including cash flow hedges is provided in note 38.

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20. Loans and advances to customers

	2023 € million	2022 € million
Loans and advances to customers at amortised cost		
- Gross carrying amount	42,773	43,450
- Impairment allowance	(1,258)	(1,626)
Carrying Amount	41,515	41,824
Fair value changes of loans in portfolio hedging of interest rate risk	15	(163)
Loans and advances to customers at FVTPL	15	16
Total	41,545	41,677

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

	31 December 2023				31 December 2022⁽⁵⁾
	12-month ECL- Stage 1 € million	Lifetime ECL- Stage 2 € million	Lifetime ECL - Stage 3 and POCI⁽¹⁾ € million	Total amount € million	Total amount € million
Loans and advances to customers at amortised cost					
Mortgage lending:					
- Gross carrying amount	6,909	2,618	415	9,942	10,201
- Impairment allowance	(20)	(154)	(208)	(382)	(409)
Carrying Amount	6,888	2,464	207	9,560	9,792
Consumer lending:					
- Gross carrying amount	2,942	369	124	3,436	3,353
- Impairment allowance	(53)	(53)	(105)	(210)	(271)
Carrying Amount	2,890	317	19	3,225	3,082
Small Business lending:					
- Gross carrying amount	2,480	728	276	3,484	3,842
- Impairment allowance	(25)	(65)	(128)	(219)	(324)
Carrying Amount	2,454	663	148	3,265	3,518
Wholesale lending:⁽²⁾⁽³⁾					
- Gross carrying amount	24,005	1,198	709	25,912	26,054
- Impairment allowance	(72)	(58)	(318)	(447)	(621)
Carrying Amount	23,934	1,140	391	25,465	25,432
Total loans and advances to customers at AC					
- Gross carrying amount , of which:	36,336	4,914	1,523	42,773	43,450
<i>Non Performing exposures (NPE)</i>			1,512	1,512	2,257
- Impairment allowance	(170)	(329)	(759)	(1,258)	(1,626)
Carrying Amount	36,166	4,584	764	41,515	41,824
Fair value changes of loans in portfolio hedging of interest rate risk				15	(163)
Loans and advances to customers at FVTPL					
Carrying Amount ⁽⁴⁾				15	16
Total				41,545	41,677

⁽¹⁾ As at 31 December 2023, POCI loans of € 29 million gross carrying amount (€ 11 million included in performing exposures and € 18 million in non performing exposures), which carried € 8 million impairment allowance, are presented in 'Lifetime ECL – Stage 3 and POCI' (31 December 2022: € 43 million gross carrying amount, which carried € 6.5 million impairment allowance).

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⁽²⁾ Includes € 4,444 million related to the senior notes of Pillar, Cairo and Mexico securitizations, which have been categorized in Stage 1.

⁽³⁾ Includes loans to public sector.

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

⁽⁵⁾ As at 31 December 2022, gross loans and advances to customers and impairment allowance relating to Eurobank Direktna a.d. disposal group (note 30) amounted to € 1,639 million and € 53 million, respectively.

Sustainability linked loans

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

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

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

Project "Solar"

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

Since June 2022, the Group classified the underlying corporate loan portfolio as held for sale and remeasured the portfolio's expected credit losses, in accordance with the Group's accounting policy for the impairment of financial assets, which resulted in the recognition of impairment loss of € 12 million in the fourth quarter of 2023 (note 21). The aforementioned impairment loss was calculated by reference to the currently estimated fair value of the notes to be retained by the Group, upon the completion of transaction, and the consideration expected to be received by the sale of mezzanine and junior notes. As at 31 December 2023, the carrying amount of the aforementioned loan portfolio reached € 48 million, comprising loans with gross carrying amount of € 246 million, which carried an impairment allowance of € 198 million. Furthermore, the impairment allowance of the letters of guarantee included in the underlying portfolio reached € 1 million (note 35).

Project "Leon"

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

Accordingly, as at 31 December 2023, the Bank classified the above loan portfolio as held for sale, remeasured the portfolio's expected credit losses, in accordance with the Bank's accounting policy for the impairment of financial assets and recognized an impairment loss of € 55 million (note 21), which was calculated by reference to the consideration expected to be received from its sale. As at 31 December 2023, the carrying amount of the aforementioned loan portfolio reached € 121 million, comprising loans with gross carrying amount of € 398 million, which carried an impairment allowance of € 277 million (note 30).

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Project Wave

In December 2023, the Bank proceeded with the execution of another synthetic risk transfer transaction (project “Wave IV”) in the form of a financial guarantee, providing credit protection over the mezzanine loss of a portfolio of performing SME and Large Corporate loans amounting to € 1.5 billion (the reference portfolio). Similarly to the previous synthetic risk transfer transactions of similar characteristics (‘Wave’ projects), the Wave IV transaction was accounted for as a purchased financial guarantee contract that is not integral to the contractual terms of the reference portfolio, where a compensation right resulting from the expected credit losses of the protected loans is recognized, to the extent that it is virtually certain that the Group will be reimbursed for the credit losses incurred. The reference portfolios of Wave projects continued to be recognised on the Group’s Balance Sheet.

As at 31 December 2023, the Wave IV transaction, that was performed in the context of the Group’s initiatives for the optimization of its regulatory capital, resulted in a capital benefit of 41 bps.

Support measures to customers

In April 2023, the Bank announced the launch of a reward initiative for housing loan clients under floating rate loans, disbursed until 31 December 2022, who had no delinquencies and met their financial obligations in a consistent manner. The reward program introduced “a cap” in the loans’ applicable base rates for a period of 12 months, with a view to protect borrowers against reference rates’ increase (note 10)

Post balance sheet event

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

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

Securizations of loan portfolios originated by the Group

The Group in the context of the achievement of its NPE reduction targets has entered into the securitization of various classes of primarily NPE through the issue of senior, mezzanine and junior notes, which resulted, as described below, in the derecognition of the underlying loan portfolios and the recognition of the retained notes.

‘Mexico’ securitization

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

In December 2021, the sale of 95% of the mezzanine and junior notes of Mexico securitization to doValue S.p.A. was completed and, as a result, the Group ceased to control the SPV and derecognized the underlying loan portfolio from its balance sheet, on the basis that it transferred substantially all risks and rewards of the portfolio’s ownership and ceased to have control over the securitized loans. In addition, the Group recognized the retained notes on its balance sheet i.e. 100% of the senior and 5% of the mezzanine and junior notes, with carrying amount € 1,415 million at 31 December 2023 (31 December 2022: € 1,539 million).

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'Cairo' securitization

In June 2019, the Group, through the special purpose financing vehicles (SPVs) 'Cairo No. 1 Finance Designated Activity Company', 'Cairo No. 2 Finance Designated Activity Company' and 'Cairo No. 3 Finance Designated Activity Company', issued senior, mezzanine and junior notes of total face value of ca. € 7.5 billion, via a securitization of a mixed portfolio consisting primarily of non-performing loans (NPE) ("Cairo" securitization). In December 2019, the Group announced that it has entered into a binding agreement with doValue S.p.A. for the sale of 20% of the mezzanine and 50.1% of the junior notes of "Cairo" securitization. The Group included "Cairo" securitization under the Hellenic Asset Protection Scheme (HAPS) thus the senior note of the securitization became entitled to the Greek State's guarantee.

In June 2020, the sale of the aforementioned notes was completed and, as a result, the Group ceased to control the Cairo SPVs on the basis that it does not have the power to direct their relevant activities. Furthermore, in June 2020, Eurobank Holdings, following a decision of the Board of Directors (BoD), proceeded to the contribution of the retained Cairo notes, i.e. 75% of the mezzanine and 44.9% of the junior notes, along with an amount of € 1.5 million in cash to its Cyprus-based subsidiary Mairanus Ltd, renamed to 'Cairo Mezz Plc', in exchange for the newly-issued shares of the aforementioned subsidiary. In July 2020, the General Shareholders' Meeting of the Company approved the distribution of Cairo Mezz Plc shares to Eurobank Holding's shareholders through the decrease in kind of its share capital.

In September 2020, following the completion of the distribution of the Cairo Mezz Plc shares, the underlying loan portfolio and the related assets and liabilities were derecognized from the Group's balance sheet, on the basis that at that time the Group transferred substantially all risks and rewards of the portfolio's ownership and ceased to have control over the securitized portfolio. In addition, the Group recognized the retained notes on its balance sheet, i.e. 100% of the senior notes, 5% of mezzanine and junior notes with carrying amount € 2,019 million at 31 December 2023 (31 December 2022: € 2,332 million).

'Pillar' securitization

In June 2019, the Group, through the special purpose financing vehicle (SPV) 'Pillar Finance Designated Activity Company' issued senior, mezzanine and junior notes of total value of ca. € 2 billion, via a securitization of residential mortgage primarily NPE. In September 2019, the Group sold 95% of the above-mentioned mezzanine and junior notes to Celidoria S.A R.L. Upon the completion of the sale, the Group ceased to control the SPV and derecognized the underlying loan portfolio in its entirety, on the basis that it transferred substantially all the risks and rewards of the underlying loan portfolio's ownership. In addition, the Group recognized the retained notes, i.e. 100% of the senior, 5% of the mezzanine and junior notes, on its balance sheet with carrying amount € 1,020 million at 31 December 2023 (31 December 2022: € 1,039 million).

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21. Impairment allowance for loans and advances to customers

The following tables present the movement of the impairment allowance on loans and advances to customers (expected credit losses – ECL):

	31 December 2023												Total € million
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL	Lifetime ECL	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	12-month ECL	Lifetime ECL	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	12-month ECL	Lifetime ECL	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	12-month ECL	Lifetime ECL	Lifetime ECL - Stage 3 and POCI ⁽¹⁾	
	-Stage 1 € million	-Stage 2 € million	€ million	-Stage 1 € million	-Stage 2 € million	€ million	-Stage 1 € million	-Stage 2 € million	€ million	-Stage 1 € million	-Stage 2 € million	€ million	
Impairment allowance as at 1 January	68	75	478	21	160	229	37	48	186	23	72	229	1,626
New loans and advances originated or purchased	23	-	-	0	-	-	20	-	-	4	-	-	47
Transfers between stages													
- to 12-month ECL	23	(20)	(3)	10	(8)	(1)	15	(7)	(7)	11	(8)	(2)	-
- to lifetime ECL	(6)	28	(22)	(3)	27	(23)	(2)	15	(13)	(2)	13	(11)	-
- to lifetime ECL credit-impaired loans	(5)	(21)	27	(0)	(12)	12	(1)	(6)	6	(1)	(10)	11	-
Impact of ECL net remeasurement	(31)	(3)	72	(7)	(16)	148	4	10	84	(7)	(1)	89	342
Recoveries from written - off loans	-	-	18	-	-	8	-	-	18	-	-	6	49
Loans and advances derecognised/ reclassified as held for sale during the year ⁽²⁾	(4)	(1)	(17)	(0)	(0)	(92)	(4)	(7)	(95)	(1)	(1)	(115)	(337)
Amounts written off ⁽³⁾	-	-	(216)	-	-	(46)	-	-	(62)	-	-	(62)	(387)
Unwinding of Discount	-	-	(8)	-	-	(3)	-	-	(2)	-	-	(3)	(16)
Foreign exchange and other movements	3	(0)	(10)	0	4	(24)	(16)	(1)	(11)	(1)	0	(13)	(67)
Impairment allowance as at 31 December	72	58	318	20	154	208	53	53	105	25	65	128	1,258

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	31 December 2022												Total € million
	Wholesale			Mortgage			Consumer			Small business			
	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾ € million	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾ € million	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾ € million	12-month ECL -Stage 1 € million	Lifetime ECL -Stage 2 € million	Lifetime ECL - Stage 3 and POCI ⁽¹⁾ € million	
Impairment allowance as at 1 January	69	76	737	17	138	170	44	39	257	41	58	227	1,872
New loans and advances originated or purchased	29	-	-	2	-	-	21	-	-	6	-	-	58
Transfers between stages													
- to 12-month ECL	20	(20)	(0)	10	(9)	(1)	14	(8)	(5)	13	(10)	(3)	-
- to lifetime ECL	(12)	13	(1)	(4)	24	(20)	(8)	24	(15)	(7)	19	(12)	-
- to lifetime ECL credit-impaired loans	(6)	(8)	14	(1)	(9)	10	(5)	(7)	11	(2)	(7)	9	-
Impact of ECL net remeasurement ⁽⁴⁾	(35)	13	(1)	(3)	12	100	(25)	(0)	91	(30)	12	69	202
Recoveries from written - off loans	-	-	23	-	-	9	-	-	12	-	-	9	53
Loans and advances derecognised/reclassified as held for sale during the year ⁽²⁾	-	(0)	(202)	-	-	(0)	-	-	-	-	-	(1)	(203)
Amounts written off ⁽³⁾	-	-	(87)	-	-	(10)	-	-	(141)	-	-	(53)	(290)
Unwinding of Discount	-	-	(11)	-	-	(1)	-	-	(3)	-	-	(2)	(18)
Foreign exchange and other movements	4	1	5	(0)	3	(27)	(4)	1	(21)	2	1	(14)	(49)
Impairment allowance as at 31 December	68	75	478	21	160	229	37	48	186	23	72	229	1,626

⁽¹⁾ The impairment allowance for POCI loans of € 8.1 million is included in 'Lifetime ECL – stage 3 and POCI' (2022: € 6.5 million).

⁽²⁾ It represents the impairment allowance of loans derecognized due to a) substantial modifications of the loans' contractual terms, b) sale transactions, c) debt to equity transactions and those that have been reclassified as held for sale during the year (notes 20 and 30).

⁽³⁾ The contractual amount outstanding on lending exposures that were written off during the year ended 31 December 2023 and that are still subject to enforcement activity is € 338 million (2022: € 111 million).

⁽⁴⁾ It includes € 14 million impairment loss on loans and advances relating to discontinued operations (note 30).

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The impairment losses relating to loans and advances to customers from continuing operations recognized in the Group's income statement for the year ended 31 December 2023 amounted to € 412 million, including € 67 million loss relating to the projects Solar and Leon (note 20) (2022: € 276 million) and are analyzed as follows:

	2023 € million	2022 € million
Impairment loss on loans and advances to customers	(390)	(246)
Net income / (loss) from financial guarantee contracts ⁽¹⁾	(37)	(22)
Modification gain / (loss) on loans and advances to customers	8	2
Impairment (loss)/ reversal for credit related commitments	7	(10)
Total from continuing operations	(412)	(276)

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

22. Investment securities

	2023 € million	2022 € million
Investment securities at FVOCI	3,492	3,828
Investment securities at amortised cost	10,955	9,192
Investment securities at FVTPL	263	241
Total	14,710	13,261

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

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

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

In October 2023, Eurobank Asset Management, a fully owned subsidiary of Eurobank, acquired a minority stake in Mintus Group Limited ("Mintus"), a UK based company providing access to alternative investment categories globally. The investment in Mintus was designated at FVOCI and its fair value at 31 December 2023 stood at € 2 million.

Sustainability linked bonds

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

Notes to the Consolidated Financial Statements

22.1 Movement of investment securities

The tables below present the movement of the carrying amount of investment securities per measurement category and per stage:

	31 December 2023									
	Debt securities at FVOCI			Investment securities at amortised cost			Investment securities at FVTPL	Equity securities at FVOCI	Total	
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		
Gross carrying amount at 1 January	3,612	121	-	9,175	6	33	241	95		13,283
Additions, net of disposals and redemptions	(394)	-	-	1,621	-	(2)	3	18	1,246	
Transfers between stages	76	(76)	-	(1)	1	-	-	-	-	
Net gains/(losses) from changes in fair value for the year	244	4	-	-	-	-	19	7	273	
Amortisation of premiums/discounts and interest	(19)	0	-	28	(0)	2	(0)	-	10	
Changes in fair value due to hedging ⁽¹⁾	-	-	-	146	0	-	-	-	146	
Exchange adjustments and other movements ⁽²⁾	(11)	(1)	-	(34)	(0)	(1)	0	(103)	(150)	
Discontinued operations ⁽³⁾	(81)	-	-	-	-	-	-	-	(81)	
Gross carrying amount at 31 December	3,427	48	-	10,935	7	32	263	17	14,729	
Impairment allowance	-	-	-	(11)	(0)	(7)	-	-	(18)	
Net carrying amount at 31 December	3,427	48	-	10,924	7	25	263	17	14,710	

	31 December 2022									
	Debt securities at FVOCI			Investment securities at amortised cost			Investment securities at FVTPL	Equity securities at FVOCI	Total	
	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3	12-month ECL- Stage 1	Lifetime ECL- Stage 2	Lifetime ECL- Stage 3				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million		
Gross carrying amount at 1 January	6,456	9	-	4,672	-	-	141	44		11,322
Additions, net of disposals and redemptions	(1,979)	(6)	(14)	4,904	-	-	80	17	3,002	
Transfers between stages	(131)	117	14	(40)	6	34	-	-	-	
Net gains/(losses) from changes in fair value for the year	(740)	3	-	-	-	-	16	34	(687)	
Amortisation of premiums/discounts and interest	(42)	(2)	-	64	-	2	0	-	22	
Changes in fair value due to hedging ⁽¹⁾	-	-	-	(449)	-	(4)	-	-	(453)	
Exchange adjustments and other movements	48	(0)	-	24	-	1	4	-	77	
Gross carrying amount at 31 December	3,612	121	-	9,175	6	33	241	95	13,283	
Impairment allowance	-	-	-	(12)	(0)	(10)	-	-	(22)	
Net carrying amount at 31 December	3,612	121	-	9,163	6	23	241	95	13,261	

⁽¹⁾ Changes in fair value due to continued hedging relationships amount to € 172 million gain (2022: € 548 million loss)

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

⁽³⁾ Refers to ERB Direktna (note 30).

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22.2 Movement of ECL

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

	31 December 2023			31 December 2022		
	Measured at amortised cost € million	Measured at FVOCI € million	Total € million	Measured at amortised cost € million	Measured at FVOCI € million	Total € million
Balance at 1 January	22	12	34	6	12	18
New financial assets purchased	4	2	6	16	2	18
- of which 12-month ECL-Stage 1	4	2	6	16	2	18
Transfers between stages						
- (from)/to 12-month ECL-Stage 1	0	1	1	(6)	(11)	(17)
- (from)/to lifetime ECL-Stage 2	(0)	(1)	(1)	0	0	0
- (from)/to lifetime ECL-Stage 3	-	-	-	6	11	17
Remeasurement due to change in ECL risk parameters	(8)	(5)	(13)	3	13	16
- of which 12-month ECL-Stage 1	(5)	(4)	(9)	(2)	9	7
- of which lifetime ECL-Stage 2	(0)	(1)	(1)	1	4	5
- of which lifetime ECL-Stage 3	(3)	-	(3)	4	-	4
Financial assets disposed during the year	(1)	(1)	(2)	(3)	(4)	(7)
- of which 12-month ECL-Stage 1	(1)	(1)	(2)	(3)	(4)	(7)
Financial assets redeemed during the year	(0)	(0)	(0)	-	(10)	(10)
- of which lifetime ECL-Stage 3	-	-	-	-	(10)	(10)
Foreign exchange and other movements	1	(0)	1	(0)	(1)	(1)
Balance as at 31 December	18	8	26	22	12	34

22.3 Equity reserve: revaluation of the investment securities at FVOCI

Gains and losses arising from the changes in the fair value of investment securities at FVOCI are recognized in a corresponding revaluation reserve in equity. The movement of the reserve is as follows:

	2023 € million	2022 € million
Balance at 1 January	(10)	322
Net gains/(losses) from changes in fair value	255	(702)
Tax (expense)/benefit (note 13)	(49)	180
	206	(522)
Net (gains)/losses transferred to net profit on disposal	(50)	29
ECL transferred to net profit	(3)	4
Tax (expense)/benefit on net (gains)/losses transferred to net profit on disposal	15	(7)
Tax (expense)/benefit on ECL transferred to net profit	1	(1)
	(37)	25
Net (gains)/losses transferred to net profit from fair value hedges	(91)	270
Tax (expense)/benefit	24	(73)
	(67)	197
Revaluation reserve from associated undertakings, net of tax ⁽¹⁾	1	(33)
Revaluation reserve for the investment in Hellenic Bank transferred to R/E (note 24)	(45)	-
Balance at 31 December	48	(10)

⁽¹⁾ In 2023, it also includes € 7 million negative impact on fair value reserve, due to IFRS 9 adoption by the Group's associate Eurolife FFH Insurance Group Holdings S.A. (note 38).

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23. Group composition

23.1 Shares in subsidiaries

The following is a listing of the Company's subsidiaries as at 31 December 2023, included in the consolidated financial statements for the year ended 31 December 2023:

<u>Name</u>	<u>Note</u>	<u>Percentage holding</u>	<u>Country of incorporation</u>	<u>Line of business</u>
Eurobank S.A.		100.00	Greece	Banking
Be Business Exchanges S.A. of Business Exchanges Networks and Accounting and Tax Services		98.01	Greece	Business-to-business e-commerce, accounting, tax and sundry services
Eurobank Asset Management Mutual Fund Mngt Company Single Member S.A.		100.00	Greece	Mutual fund and asset management
Eurobank Equities Investment Firm Single Member S.A.		100.00	Greece	Capital markets and advisory services
Eurobank Leasing Single Member S.A.		100.00	Greece	Leasing
Eurobank Factors Single Member S.A.		100.00	Greece	Factoring
Herald Greece Single Member Real Estate development and services S.A. 1		100.00	Greece	Real estate
Herald Greece Single Member Real Estate development and services S.A. 2		100.00	Greece	Real estate
Piraeus Port Plaza 1 Single Member Development S.A.		100.00	Greece	Real estate
(Under liquidation) Anchor Hellenic Investment Holding Single Member S.A.		100.00	Greece	Real estate
Athinaiki Estate Investments Single Member S.A.		100.00	Greece	Real estate
Piraeus Port Plaza 2 Single Member Development S.A.		100.00	Greece	Real estate
Piraeus Port Plaza 3 Single Member Development S.A.		100.00	Greece	Real estate
Tenberco Real Estate Single Member S.A.		100.00	Greece	Real estate
Value Touristiki Single Member Development S.A.		100.00	Greece	Real estate
ADEXA Real Estate Single Member S.A.	i	100.00	Greece	Real estate
Eurobank Ananeosimes Single Member S.A.	m	100.00	Greece	Production and distribution of solar generated electric energy
Eurobank Bulgaria A.D.	d	99.99	Bulgaria	Banking
PB Personal Finance E.A.D.	h	99.99	Bulgaria	Pension assurance intermediary business
Berberis Investments Ltd		100.00	Channel Islands	Holding company
Eurobank Cyprus Ltd		100.00	Cyprus	Banking
Foramónio Ltd		100.00	Cyprus	Real estate
Lenevino Holdings Ltd		100.00	Cyprus	Real estate
Rano Investments Ltd		100.00	Cyprus	Real estate
Neviko Ventures Ltd		100.00	Cyprus	Real estate
Zivar Investments Ltd		100.00	Cyprus	Real estate
Amvanero Ltd		100.00	Cyprus	Real estate
Revasono Holdings Ltd		100.00	Cyprus	Real estate
Volki Investments Ltd		100.00	Cyprus	Real estate
Adariano Investments Ltd		100.00	Cyprus	Real estate
Elerovio Holdings Ltd		100.00	Cyprus	Real estate
Afinopio Investments Ltd	l	100.00	Cyprus	Real estate
Ovedrio Holdings Ltd	l	100.00	Cyprus	Real estate
Primoxia Holdings Ltd	l	100.00	Cyprus	Real estate
Eurobank Private Bank Luxembourg S.A.	n	100.00	Luxembourg	Banking
Eurobank Fund Management Company (Luxembourg) S.A.		100.00	Luxembourg	Fund management
ERB Lux Immo S.A.		100.00	Luxembourg	Real estate

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<u>Name</u>	<u>Note</u>	<u>Percentage holding</u>	<u>Country of incorporation</u>	<u>Line of business</u>
ERB New Europe Funding B.V.		100.00	Netherlands	Finance company
ERB New Europe Funding II B.V.		100.00	Netherlands	Finance company
ERB New Europe Holding B.V.		100.00	Netherlands	Holding company
ERB IT Shared Services S.A.		100.00	Romania	Informatics data processing
IMO Property Investments Bucuresti S.A.		100.00	Romania	Real estate services
Seferco Development S.A.		99.99	Romania	Real estate
ERB Leasing A.D. Beograd-in Liquidation	f	100.00	Serbia	Leasing
IMO Property Investments A.D. Beograd		100.00	Serbia	Real estate services
Reco Real Property A.D. Beograd		100.00	Serbia	Real estate
Karta II Plc		-	United Kingdom	Special purpose financing vehicle
Astarti Designated Activity Company		-	Ireland	Special purpose financing vehicle
ERB Recovery Designated Activity Company		-	Ireland	Special purpose financing vehicle

The following entities are not included in the consolidated financial statements due to immateriality:

(i) the Group's special purpose financing vehicles and the related holding entities, which are dormant and/or are under liquidation: Themeleion III Holdings Ltd, Themeleion IV Holdings Ltd, Themeleion Mortgage Finance Plc, Themeleion II Mortgage Finance Plc, Themeleion III Mortgage Finance Plc, Themeleion IV Mortgage Finance Plc, Themeleion V Mortgage Finance Plc, Themeleion VI Mortgage Finance Plc, Anaptyxi APC Ltd and Byzantium II Finance Plc.

(ii) the holding entity of Karta II Plc: Karta II Holdings Ltd.

(iii) dormant entity: Enalios Real Estate Development S.A.

(iv) entities controlled by the Group pursuant to the terms of the relevant share pledge agreements: Finas S.A., Rovinvest S.A. and Promivet S.A.

In 2023, the changes in the Group structure due to: a) acquisitions, mergers and establishment of companies, b) sales and other corporate actions, which resulted in loss of control, c) transactions with the non-controlling interests, which did not result in loss of control and d) liquidations, are as follows:

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

In December 2022, the liquidation of the company was decided. In February 2023, the return of the company's share capital to the Bank, through the repurchase of its own shares, was completed.

(b) Retail Development S.A., Romania

In February 2023, the Bank signed an agreement for the sale of its participation interest of 99.99% in Retail Development S.A., along with the loan receivable from the company, to a third party for a cash consideration of € 8.1 million. The resulting loss on disposal amounted to € 1.1 million and was recognized in "Other income/(expenses)".

(c) Eurobank Direktna a.d., Serbia

On 2 November 2023, the Bank announced that the sale of its 70% shareholding in Eurobank Direktna a.d. to AIK Banka a.d. Beograd was completed (note 30).

(d) Acquisition of BNP Paribas Personal Finance Bulgaria by Eurobank Bulgaria A.D.

On 9 December 2022, Eurobank Holdings announced that it had reached an agreement for the acquisition of BNP Paribas Personal Finance Bulgaria (the "Business") by Eurobank's subsidiary in Bulgaria, Eurobank Bulgaria A.D. ("Postbank"). The completion of the transaction took place in May 2023, following the receipt of the approvals by all competent regulatory authorities (note 23.2).

(e) ERB Hellas Plc, United Kingdom

In April 2023, the liquidation of the company was completed.

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

In May 2023, the Bank's subsidiary Eurobank Direktna a.d. transferred the shares held in ERB Leasing A.D. Beograd to the Bank and thus, the Group's participation in the company increased from 85.15% to 100%.

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

During the second quarter of 2023, the sale of IMO Property Investments Sofia E.A.D. was considered highly probable, therefore the company was classified as held for sale and measured by reference to the pre-agreed consideration with the third party, being the lower of its carrying amount and fair value less costs to sell, in accordance with IFRS 5. Accordingly, a remeasurement/impairment loss of € 23 million on real estate properties was recognised in the income statement. In May 2023, the sale of the Bank's participation interest of 100% in the company, along with the loan receivable from the company, was completed with a total cash consideration of € 15.5 million.

(h) PB Personal Finance EAD, Bulgaria

In May 2023, the Bank's subsidiary Eurobank Bulgaria A.D. established the wholly owned subsidiary PB Personal Finance EAD.

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

In June 2023, the Bank acquired 100% of the shares and voting rights of ADEXA Real Estate Single Member S.A. for a cash consideration of € 50.8 million. In line with IFRS 3 requirements, the acquisition was accounted for as an asset acquisition rather than a business combination, since substantially all of the fair value of the gross assets acquired was concentrated in a single identifiable asset and no substantive business processes were acquired. Accordingly, no goodwill was recognized, whereas the acquired property, along with other assets/other liabilities, were recognized in the Group's balance sheet by allocating the purchase price to the individual identifiable assets and liabilities on the basis of their relative fair values. Following the above treatment, at the acquisition date the total assets of the company amounted to € 52.3 million, of which € 33.4 million refer to own used property and € 18.7 million refer to investment property, while total liabilities amounted to € 1.5 million.

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

In May 2023, the liquidation of the company was decided. In December 2023, the distribution of the company's surplus assets to the shareholders was completed with an immaterial effect for the Group.

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

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

(l) Afinopio Investments Ltd, Ovedrio Holdings Ltd and Primoxia Holdings Ltd, Cyprus

In June 2023, in the context of the management of its NPE, the Bank's subsidiary Eurobank Cyprus Ltd established the wholly owned subsidiaries, Afinopio Investments Ltd, Ovedrio Holdings Ltd and Primoxia Holdings Ltd to operate as real estate companies in Cyprus.

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

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

(n) Eurobank Private Bank Luxembourg S.A., Luxembourg

In July 2023, the Greek branch of the Bank's subsidiary Eurobank Private Bank Luxembourg S.A. was established.

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

In the third quarter of 2023, the liquidation of the companies was decided and the distribution of their surplus assets to the Bank (their sole shareholder) was completed. The effect of the aforementioned liquidations was immaterial for the Group.

(p) Standard Single Member Real Estate S.A. and Cloud Hellas Single Member Ktimatiki S.A., Greece

In December 2023, the merger of the Bank and its wholly owned subsidiaries Standard Single Member Real Estate S.A. and Cloud Hellas Single Member Ktimatiki S.A. was completed, by absorption of the latter by the former.

Notes to the Consolidated Financial Statements

In 2022, the changes in the Group structure due to: a) acquisitions, mergers and establishment of companies, b) sales and other corporate actions, which resulted in loss of control, c) transactions with the non-controlling interests, which did not result in loss of control and d) liquidations, are as follows:

(i) IMO 03 E.A.D., Bulgaria

In February 2022, the Bank disposed of its participation interest of 100% in IMO 03 E.A.D. (which as of 31 December 2021 was classified as held for sale) to a third party for a cash consideration of € 5.8 million. The resulting loss on the disposal was immaterial.

(ii) (Under liquidation) Real Estate Management Single Member S.A., Greece

In February 2022, the liquidation of the company was completed.

(iii) Hellenic Post Credit S.A., Greece

In February 2022, the Bank reached an agreement for the acquisition of the remaining 50% of the share capital of Hellenic Post Credit S.A., settled by offsetting receivables it held from the other shareholder of the entity. In November 2022, after receiving the required approvals from the competent authorities, the merger of the Bank and Hellenic Post Credit S.A. was completed, by absorption of the latter by the former. The merger had no impact in the Group's financial statements.

(iv) Staynia Holdings Limited, Cyprus

In February 2022, the liquidation of the company was decided. In June 2022, the distribution of the company's surplus assets to the Bank (its sole shareholder) was completed with an immaterial effect on the Group's income statement.

(v) ERB Istanbul Holding A.S. in liquidation, Turkey

In June 2022, the liquidation of the company was completed. The Group recognized a) € 76.3 million loss in "Other income/(expenses)", arising mainly from the recycling of foreign currency losses of € 75.9 million, previously recorded in other comprehensive income, to the income statement and b) € 2.5 million tax expense on the liquidation proceeds.

(vi) Vouliagmeni Residence Single Member S.A., Greece

In March 2022, the Bank signed an agreement for the sale of its participation interest of 100% in Vouliagmeni Residence Single Member S.A. to a third party. On the basis of the said agreement, the company was classified as held for sale since 31 March 2022 and an impairment loss of € 0.7 million was recognised in the income statement line "Other impairments, risk provisions and related costs". In July 2022, the sale of the company was completed for a cash consideration of € 9.7 million with no effect on the Group's income statement.

(vii) Eliade Tower S.A., Romania

In September 2022, the Group decided to proceed with the sale of its participation interest of 99.99% in Eliade Tower S.A. On this basis, as at 30 September 2022 the company was classified as held for sale and an impairment loss of € 1.5 million was recognized in the income statement line "Other impairments, risk provisions and related costs". In October 2022, the sale of Eliade Tower S.A. was completed for a cash consideration of € 4.4 million with an immaterial effect on the Group's income statement.

(viii) Village Roadshow Operations Hellas S.A., Greece

The Bank had acquired "Village Roadshow Operations Hellas S.A." in the third quarter of 2021, following the enforcement of collateral on the company's shares under a lending arrangement. The company since its acquisition had been classified as held for sale. On 2 August 2022, in the context of the Group's loan restructuring activities, the Bank signed an agreement with a third party for the sale of its participation interest of 100% in the company and the restructuring of its existing loan facilities subject to certain preconditions, which were fulfilled in November 2022. Following the completion of the agreement, the Group recognized a) € 21.5 million benefit due to the reversal of loan provisions in the Bank's accounts, in the income statement line "Impairment losses relating to loans and advances to customers" and b) € 2 million loss from the disposal of the company's shares, including costs directly attributable to the agreement, in the income statement line "Other income/(expenses)".

(ix) Sagiol Ltd, Macoliq Holdings Ltd and Senseco Trading Limited, Cyprus

In October 2022, the liquidation of the companies was decided.

Notes to the Consolidated Financial Statements

Post balance sheet event

Reco Real Property A.D. Beograd, Serbia

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

Significant restrictions on the Group's ability to access or use the assets and settle the liabilities of the Group

The Group does not have any significant restrictions on its ability to access or use its assets and settle its liabilities other than those resulting from regulatory, statutory and contractual requirements, set out below:

- Banking and other financial institution subsidiaries are subject to regulatory restrictions and central bank requirements in the countries in which the subsidiaries operate. Such supervisory framework requires the subsidiaries to maintain minimum capital buffers and certain capital adequacy and liquidity ratios, including restrictions to limit exposures and/or the transfer of funds to the Company and other subsidiaries within the Group. Accordingly, even if the subsidiaries' financial assets are not pledged at an individual entity level, their transfer within the Group may be restricted under the existing supervisory framework. As at 31 December 2023, the carrying amount of the Group financial institution subsidiaries' assets and liabilities, before intercompany eliminations, amounted to € 85.6 billion and € 76.2 billion, respectively, including Eurobank S.A. (2022: € 89.7 billion and € 80.3 billion).
- Subsidiaries are subject to statutory requirements mainly relating with the level of capital and total equity that they should maintain, restrictions on the distribution of capital and special reserves, as well as dividend payments to their ordinary shareholders.
- The Group uses its financial assets as collateral for repo and derivative transactions, secured borrowing from central and other banks, issuances of covered bonds, as well as securitizations. As a result of financial assets' pledge, their transfer within the Group is not permitted. Information relating to the Group's pledged financial assets is provided in notes 17, 29 and 40.
- The Group is required to maintain mandatory and collateral deposits with central banks. Information for these deposits is provided in note 15.

23.2. Acquisition of BNP Paribas Personal Finance Bulgaria by Eurobank Bulgaria A.D.

On 9 December 2022, Eurobank Holdings announced that it had reached an agreement for the acquisition of BNP Paribas Personal Finance Bulgaria (the Business) by Eurobank's subsidiary in Bulgaria, Eurobank Bulgaria A.D. ("Postbank"). Specifically, Postbank had signed a put option letter for the benefit of BNP Paribas Personal Finance providing for the sale of its Bulgarian branch, based on the agreed terms. Pursuant to the above agreement, a consultation process with the French Labour Council had taken place, the conclusion of which led to the signing of a Business Transfer Agreement ("the Agreement") in January 2023. The transaction was completed on 31 May 2023, following the receipt of the approvals by all competent regulatory authorities.

The acquisition was accounted for as a business combination using the purchase method of accounting. In accordance with the terms of the Agreement, the funding arrangements of the branch were excluded from the liabilities assumed by Postbank. Accordingly, the consideration transferred for the acquisition of the Business amounted to € 392 million.

Notes to the Consolidated Financial Statements

The provisional fair values of the identifiable assets and liabilities of the Business as at the date of the acquisition and the resulting goodwill are presented in the table below:

	Fair value € million
ASSETS	
Cash and balances with central banks	3
Net loans and advances to customers	450
<i>Gross contractual amount: € 500 million</i>	
Other assets ⁽¹⁾	9
Total assets	461
LIABILITIES	
Due to customers	103
Other liabilities	9
Total liabilities	111
Net assets acquired	350
Goodwill arising on acquisition	42
Purchase consideration transferred⁽²⁾	392

⁽¹⁾ Other assets include right-of-use assets, tangible, intangible assets and other receivables.

⁽²⁾ Net cash flow on acquisition after cash and cash equivalents acquired amounted to € 389 million.

The results of the Business were incorporated in the Group's financial statements prospectively, as of 1 June 2023. If the acquisition had occurred on 1 January 2023, the Business would have contributed net profit of € 12 million to the Group for the period from 1 January 2023 up to 31 May 2023.

The transaction is in line with the Group's strategy to further strengthen Postbank's position in the Bulgarian retail sector, while it also provides significant opportunities for cross-selling, given BNP Paribas Personal Finance Bulgaria's clientele of more than 300 thousand clients.

24. Investments in associates and joint ventures

As at 31 December 2023, the carrying amount of the Group's investments in associates and joint ventures amounted to € 541 million (2022: € 187 million). The following is the listing of the Group's associates and joint ventures as at 31 December 2023:

<u>Name</u>	<u>Country of incorporation</u>	<u>Line of business</u>	<u>Group's share</u>
Femion Ltd	Cyprus	Special purpose investment vehicle	66.45
Global Finance S.A. ⁽¹⁾	Greece	Investment financing	33.82
Odyssey GP S.a.r.l.	Luxembourg	Special purpose investment vehicle	20.00
Eurolife FFH Insurance Group Holdings S.A. ⁽¹⁾	Greece	Holding company	20.00
Alpha Investment Property Commercial Stores S.A.	Greece	Real estate	30.00
Peirga Kythnou P.C.	Greece	Real estate	50.00
doValue Greece Loans and Credits Claim Management S.A.	Greece	Loans and Credits Claim Management	20.00
Perigenis Business Properties S.A.	Greece	Real estate	18.90
Hellenic Bank Public Company Ltd ⁽¹⁾	Cyprus	Banking	29.20

⁽¹⁾ Hellenic Bank group (Hellenic Bank Public Company Ltd and its subsidiaries), Eurolife Insurance group (Eurolife FFH Insurance Group Holdings S.A. and its subsidiaries) and Global Finance group (Global Finance S.A. and its subsidiaries) are considered as the Group's associates.

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

Omega Insurance and Reinsurance Brokers S.A. in which the Group holds 26.05% is not accounted under the equity method in the consolidated financial statements. The Group is not represented in the Board of Directors of the company, therefore does not exercise significant influence over it.

Notes to the Consolidated Financial Statements

Femion Ltd. is accounted for as a joint venture of the Group based on the substance and the purpose of the arrangement and the terms of the shareholder's agreement which require the unanimous consent of the shareholders for significant decisions and establish shared control through the equal representation of the shareholders in the management bodies of the company.

Perigenis Business Properties S.A. is accounted for as an associate of the Group based on the Bank's representation in the Board of Directors and the decision-making process as prescribed in the company's articles of association.

Hellenic Bank Public Company Ltd, Cyprus

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

In the context of the initial application of the equity accounting, the difference between: (a) the share of the fair value of the Hellenic Bank group's net identifiable assets at the acquisition date, amounting to € 287 million and (b) the deemed cost of the Bank's holding in the entity amounting € 173 million, resulted in a gain of € 111 million, net of ca. € 3 million acquisition-related costs, that was recognized in the income statement line "Other income/(expenses)". The aforementioned gain on acquisition reflects the trading price levels of the Hellenic Bank shares in the local stock exchange at the time of the agreement.

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

Post balance sheet event

On 5 February 2024, the Bank announced that the Commission for the Protection of Competition of the Republic of Cyprus ("Commission") in its meeting on 2 February 2024, approved the concentration arising from the increase of the Bank's holding in Hellenic Bank share capital. Following the approval of the Commission, the acquisition of the additional total holding of 26.1% in Hellenic Bank, as per the aforementioned signed agreements with certain of its shareholders, is subject to the approvals of the Central Bank of Cyprus/European Central Bank and the Superintendent of Insurance of Cyprus.

Notes to the Consolidated Financial Statements

Tefin S.A., Greece

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

Associates and joint ventures material to the Group

With regards to the Group's associates and joint ventures, Hellenic Bank Public Company Ltd, Eurolife FFH Insurance Group Holdings S.A. and doValue Greece Loans and Credits Claim Management S.A. are considered individually material for the Group. Financial information regarding those entities is provided in the tables below:

Hellenic Bank Public Company Ltd

The financial data for Hellenic Bank set out below have been based on the available published consolidated information by the end of the third quarter of 2023.

	2023
	€ million
Total assets	20,039
Total liabilities	18,669
Equity	1,370
Group's share in equity	400
Fair value adjustments ⁽¹⁾	(55)
Group's carrying amount of the investment	345
Operating income	465
Net profit from continuing operations	222
Net profit from discontinued operations	19
Net profit⁽²⁾	241
Total comprehensive income	241

⁽¹⁾ it includes the effect from fair value adjustments (Group's share) made upon the initial application of the equity method for Hellenic Bank and the subsequent accounting.

⁽²⁾ The Group's share of the associate's net profit for the six month period ended 30 September 2023, including the effect of the subsequent accounting for the aforementioned fair value adjustments, amounts to € 58 million.

As at 31 December 2023, the fair value of the investment in Hellenic bank based on its quoted market price in the local stock exchange amounted to € 268,8 million.

Notes to the Consolidated Financial Statements

Eurolife FFH Insurance Group Holdings S.A.

As of 1 January 2023, Eurolife FFH Insurance Group Holdings S.A. (Eurolife) has adopted IFRS 17 “Insurance Contracts” with retrospective application as of 1 January 2022 (note 2.3). The comparative information presented below has been adjusted accordingly. In addition, on the same date Eurolife has adopted IFRS 9 “Financial instruments” (note 38).

	2023	2022
	€ million	Restated € million
Current assets	3,387	3,148
Non-current assets	353	226
Total assets	3,740	3,374
Current liabilities	380	403
Non-current liabilities	2,683	2,342
Total liabilities	3,063	2,745
Equity	677	629
Group’s carrying amount of the investment	135	126
Operating income	152	255
Net profit	112	180
Other comprehensive income	(18)	(15)
Total comprehensive income	94	165
Dividends paid to the Group	7	14

doValue Greece Loans and Credits Claim Management S.A.

	2023	2022
	€ million	€ million
Current assets	153	90
Non-current assets	323	347
Total assets	476	437
Current liabilities	157	95
Non-current liabilities	60	121
Total liabilities	217	216
Equity	259	221
Group's share in equity	52	44
Goodwill and other adjustments	(4)	1
Group’s carrying amount of the investment	48	45
Operating income	79	72
Net profit	57	53
Total comprehensive income	57	53
Dividends paid to the Group	5	5

Note: Goodwill and other adjustments comprise a) € 6 million Goodwill included in the carrying amount of the investment, after an impairment loss of € 6 million that was recognised in 2023 and b) € -10 million adjustment from the elimination of the Group's share of the associate's income relating to upstream transactions with the Bank, of which € 1 million (income) was recognised in 2023. The Group's share of the associate's results after the above adjustments, amounts to € 6 million income (2022: € 0.5 million loss).

Notes to the Consolidated Financial Statements

The carrying amount, in aggregate, of the Group's joint ventures as at 31 December 2023 amounted to € 4 million (2022: € 6 million). The Group's share of profit and loss and total comprehensive income of the above entities was immaterial (2022: immaterial).

The carrying amount, in aggregate, of the Group's associates excluding Hellenic Bank Public Company Ltd, Eurolife FFH Insurance Group Holdings S.A. and doValue Greece Loans and Credits Claim Management S.A. which is presented above (i.e. Global Finance S.A., Odyssey GP S.a.r.l., and Perigenis Business Properties S.A.) as at 31 December 2023 amounted to € 9 million (2022: € 9 million). The Group's share of profit and loss and total comprehensive income of the above entities was immaterial (2022: immaterial).

The Group has not recognized losses in relation to its interest in its joint ventures, as its share of losses exceeded its interest in them and no incurred obligations exist or any payments were performed on behalf of them. For the year ended 31 December 2023, the unrecognized share of losses for the Group's joint ventures amounted to € 0.1 million (2022: € 2 million). The cumulative amount of unrecognized share of losses for the joint ventures amounted to € 4 million (2022: € 4 million).

As at 31 December 2023, the Group has no unrecognized commitments in relation to its participation in joint ventures nor any contingent liabilities regarding its participation in associates or joint ventures, which could result to a future outflow of cash or other resources.

The Group's associate Hellenic Bank is subject to regulatory and statutory restrictions and is required to maintain sufficient capital to meet the prudential requirements based on the Supervisory Review and Evaluation Process (SREP) that is conducted annually by the European Central Bank (ECB). Based on the published information for the period ended 30 September 2023, the Hellenic Bank group's regulatory capital ratios were above the minimum regulatory requirements, while the ECB's approval shall be obtained prior to making any distribution to its shareholders.

The Group's associate Eurolife FFH Insurance Group Holdings S.A is subject to regulatory and statutory restrictions and is required to maintain sufficient capital to satisfy its insurance obligations.

Except as described above, no significant restrictions exist (e.g. resulting from loan agreements, regulatory requirements or other contractual arrangements) on the ability of associates or joint ventures to transfer funds to the Group either as dividends or to repay loans that have been financed by the Group.

25. Structured Entities

The Group is involved in various types of structured entities, such as securitization vehicles, mutual funds and private equity funds.

A structured entity is an entity that has been designed so that voting or similar rights are not the dominant factor in deciding who controls the entity, such as when any voting rights relate to administrative tasks only and the relevant activities are directed by means of contractual arrangements. A structured entity often has restricted activities, a narrow well-defined objective, insufficient equity to permit it to finance its activities without subordinated financial support and financing in the form of multiple contractually linked instruments to investors that create concentrations of credit or other risks.

An interest in a structured entity refers to contractual and non-contractual involvement that exposes the Group to variability of returns from the performance of the structured entity. Examples of interest in structured entities include the holding of debt and equity instruments, contractual arrangements, liquidity support, credit enhancement, residual value.

Structured entities may be established by the Group or by a third party and are consolidated when the substance of the relationship is such that the structured entities are controlled by the Group, as set out in note 2.2.1(i). As a result of the consolidation assessment performed, the Group has involvement with both consolidated and unconsolidated structured entities, as described below.

Consolidated structured entities

The Group, as part of its funding activity, enters into securitization transactions of various classes of loans (corporate, small and medium enterprise, mortgage, consumer loans, credit card and bond loans), which generally result in the transfer of the above assets to structured entities (securitization vehicles), which, in turn issue debt securities held by investors and the Group's entities. The Group monitors the credit quality of the securitizations' underlying loans, as well as the credit ratings of the debt instruments issued, when applicable, and provides either credit enhancements to the securitization vehicles and/or transfers new loans to the pool of their underlying assets, whenever necessary, in accordance with the terms of the relevant contractual arrangements in force.

A listing of the Group's consolidated structured entities is set out in note 23.

Notes to the Consolidated Financial Statements

As at 31 December 2023, the face value of debt securities issued by the securitizations sponsored by the Group amounted to € 3,959 million, of which € 3,406 million were held by the Bank (2022: € 5,258 million, of which € 4,705 million were held by the Bank) (notes 20 and 34).

The Group did not provide any non contractual financial or other support to these structured entities, where applicable, and currently has no intention to do so in the foreseeable future.

Unconsolidated structured entities

The Group enters into transactions with unconsolidated structured entities, which are those not controlled by the Group, in the normal course of business, in order to provide fund management services or take advantage of specific investment opportunities.

Moreover, the Group in the context of its NPE reduction acceleration plan entered into the securitization of various classes of NPE through the issue of senior, mezzanine and junior notes (Cairo, Pillar and Mexico, note 20).

Group managed funds

The Group establishes and manages structured entities in order to provide customers, either retail or institutional, with investment opportunities. Accordingly, through its subsidiaries Eurobank Asset Management Mutual Fund Mngt Company S.A. and Eurobank Fund Management Company (Luxembourg) S.A., it is engaged with the management of different types of mutual funds, including fixed income, equities, funds of funds and money market.

Additionally, the Group is entitled to receive management and other fees and may hold investments in such mutual funds for own investment purposes as well as for the benefit of its customers.

The Group is involved in the initial design of the mutual funds and, in its capacity as fund manager, takes investment decisions on the selection of their investments, nevertheless within a predefined, by relevant laws and regulations, decision making framework. Therefore, the Group has determined that it has no power over these funds.

Furthermore, in its capacity as fund manager, the Group primary acts as an agent in exercising its decision making authority over them. Based on the above, the Group has assessed that it has no control over these mutual funds and as a result does not consolidate them. The Group does not have any contractual obligation to provide financial support to the managed funds and does not guarantee their rate of return.

Non-Group managed funds

The Group purchases and holds units of third party managed funds including mutual funds, private equity and other investment funds.

Securitizations

The Group has interests in unconsolidated securitization vehicles by investing in residential mortgage backed and other asset-backed securities issued by these entities.

Notes to the Consolidated Financial Statements

The table below sets out the carrying amount of the Group's interests in unconsolidated structured entities, recognized in the consolidated balance sheet as at 31 December 2023, representing its maximum exposure to loss in relation to these interests. Information relating to the total income derived from interests in unconsolidated structured entities, recognized either in profit or loss or other comprehensive income during 2023 is also provided (i.e. fees, interest income, net gains or losses on revaluation and derecognition):

	31 December 2023			
	<u>Unconsolidated structured entity type</u>			
	<u>Securizations</u>	<u>Group</u>	<u>Non- Group</u>	<u>Total</u>
<u>€ million</u>	<u>managed funds</u>	<u>managed funds</u>	<u>€ million</u>	
	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
Group's interest- assets				
Loans and advances to customers ⁽¹⁾	4,454	-	-	4,454
Investment securities	4,929	85	28	5,042
Other Assets	-	2	-	2
Total	9,383	87	28	9,498
Total income from Group interests	300	62	0	362
	31 December 2022			
	<u>Unconsolidated structured entity type</u>			
	<u>Securizations</u>	<u>Group</u>	<u>Non- Group</u>	<u>Total</u>
	<u>€ million</u>	<u>managed funds</u>	<u>managed funds</u>	<u>€ million</u>
	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
Group's interest- assets				
Loans and advances to customers ⁽¹⁾	4,911	-	-	4,911
Investment securities	1,486	71	17	1,574
Other Assets	-	2	-	2
Total	6,397	73	17	6,487
Total income from Group interests	77	48	2	127

⁽¹⁾ Includes the senior and mezzanine notes of the Pillar, Cairo and Mexico securitizations (note 20).

For the year ended 31 December 2023, total income related to the Group's interests from securitizations mainly includes: (i) € 289.8 million, € 6.8 million and € 0.1 million interest income of debt securities retained by the Group measured at amortized cost, at FVOCI and FVTPL respectively and (ii) €3.4 million from gains or losses on revaluation recognized in other comprehensive income. Total income from Group interests in relation to Group managed funds consists of: (i) € 52.8 million income relating to management fees and other commissions for the management of funds and (ii) € 8.9 million gains or losses on revaluation or from sale of the Group's holding in funds recognized in profit or loss. In addition, total income in relation to non-Group managed funds consists mainly of gains or losses on revaluation or from sale of the Group's holding in funds and has been recognized in profit or loss.

As at 31 December 2023, the total assets of funds under the Group's management as well as the notional amount of notes in issue by unconsolidated securitization vehicles amounted to € 4,283 million (2022: € 3,163 million) and € 35,228 million (2022: € 33,227 million), respectively.

Notes to the Consolidated Financial Statements
26. Property and equipment

	31 December 2023				
	Land, buildings, leasehold improvements	Furniture, equipment, motor vehicles	Computer hardware, software	Right of use assets (RoU) ⁽¹⁾	Total
	€ million	€ million	€ million	€ million	€ million
Cost:					
Balance at 1 January	676	206	526	328	1,736
Arising from acquisitions (note 23)	33	1	1	2	37
Transfers	3	-	14	-	17
Additions	28	15	11	11	65
Disposals, write-offs and adjustment to RoU ⁽¹⁾	(6)	(21)	(217)	20	(224)
Impairment	(1)	-	(9)	-	(10)
Discontinued operations ⁽²⁾	(36)	(10)	(10)	(23)	(79)
Balance at 31 December	697	191	316	338	1,542
Accumulated depreciation:					
Balance at 1 January	(221)	(156)	(443)	(141)	(961)
Arising from acquisitions (note 23)	-	(1)	-	-	(1)
Transfers	1	0	(1)	-	0
Disposals, write-offs and adjustment to RoU ⁽¹⁾	4	20	217	2	243
Charge for the year	(13)	(8)	(20)	(37)	(78)
Discontinued operations ⁽²⁾	9	5	6	8	28
Balance at 31 December	(220)	(140)	(241)	(168)	(769)
Net book value at 31 December	477	51	75	170	773

	31 December 2022				
	Land, buildings, leasehold improvements	Furniture, equipment, motor vehicles	Computer hardware, software	Right of use assets (RoU) ⁽¹⁾	Total
	€ million	€ million	€ million	€ million	€ million
Cost:					
Balance at 1 January	675	198	507	336	1,716
Transfers	(10)	0	6	-	(4)
Transfers from/to repossessed assets	1	(2)	-	-	(1)
Additions	24	18	29	18	89
Disposals, write-offs and adjustment to RoU ⁽¹⁾	(9)	(8)	(5)	(26)	(48)
Impairment	(6)	(0)	(11)	-	(17)
Held for sale (note 30)	1	-	-	-	1
Balance at 31 December	676	206	526	328	1,736
Accumulated depreciation:					
Balance at 1 January	(217)	(155)	(423)	(106)	(901)
Transfers	1	0	-	-	1
Disposals, write-offs and adjustment to RoU ⁽¹⁾	8	8	4	6	26
Charge for the year	(13)	(9)	(24)	(41)	(87)
Balance at 31 December	(221)	(156)	(443)	(141)	(961)
Net book value at 31 December	455	50	83	187	775

Notes to the Consolidated Financial Statements

⁽¹⁾ The respective lease liabilities are presented in "other liabilities" (note 35). Adjustment to RoU refers to termination, modifications and remeasurements of RoU. It includes the remeasurement from revised estimates of the lease term during the year, considering all facts and circumstances that affect the Group's housing needs.

⁽²⁾ Refers to Eurobank Direktna, which was disposed on 2 November 2023.

As at 31 December 2023, the RoU assets amounting to € 170 million (31 December 2022: € 187 million) refer to leased office and branch premises, ATM locations, residential properties of € 165 million (31 December 2022: € 180 million) and motor vehicles of € 5 million (31 December 2022: € 7 million).

Leasehold improvements relate to premises occupied by the Group for its own activities.

27. Investment property

The Group applies the fair value model regarding the measurement of Investment Property according to IAS 40 "Investment property".

The movement of investment property is as follows:

	2023	2022
	€ million	€ million
Balance at 1 January	1,410	1,492
Additions	4	4
Arising from acquisition	19	-
Transfers from/to repossessed assets	2	13
Other transfers	(3)	9
Disposals ⁽¹⁾	(80)	(119)
Net gain/(loss) from fair values adjustments	6	32
Held for sale/Discontinued operations (note 30)	(3)	(21)
Additions and adjustment to RoU	2	-
Balance at 31 December	1,357	1,410

⁽¹⁾ For 2023, it includes € 48 million referring to investment property of disposed of subsidiaries.

As at 31 December 2023, RoU assets that meet the definition of investment property amount to € 16 million (31 December 2022: € 14 million). The respective lease liabilities are presented in "other liabilities" (note 35).

Changes in fair values of investment property are recognized as gains/(losses) in profit or loss and included in the "Other Income/(expense)" (note 10). All gains/(losses) are unrealized.

During the year ended 31 December 2023, an amount of € 89 million (2022: € 88 million) was recognized as rental income from investment property in income from non banking services (note 8). As at 31 December 2023, the contractual obligations in relation to investment property amounted to approximately € 3.5 million, and are mainly associated with property enhancements.

The main classes of investment property have been determined based on the nature, the characteristics and the risks of the Group's properties. The fair value measurements of the Group's investment property, which are categorized within level 3 of the fair value hierarchy, are presented in the below table.

	2023	2022
	€ million	€ million
Residential	6	11
Commercial	1,320	1,358
Land Plots	30	32
Industrial	1	9
Total	1,357	1,410

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The basic methods used for estimating the fair value of the Group's investment property are the income approach (income capitalization/discounted cash flow method), the comparative method and the cost approach, which are also used in combination depending on the class of property being valued.

The discounted cash flow (DCF) method is the primary method used for estimating the fair value of the Group's investment property and is used mainly for the commercial class of investment property but also for other classes of investment property to a large extent, in conjunction with other methods. Under DCF method, the fair value is calculated through the projection of a series of cash flows using explicit assumptions regarding the benefits and liabilities of ownership (income and operating costs, vacancy rates, income growth), including the residual value anticipated at the end of the projection period. To this projected cash flows series, an appropriate, market-derived discount rate is applied to establish its present value.

Under the income capitalization method, also used for the commercial class of investment property, a property's fair value is estimated based on the normalized net operating income generated by the property, which is divided by the capitalization rate (the investor's rate of return).

The comparative method is used for the residential, commercial and land plot classes of investment property. Fair value is estimated based on data for comparable transactions, by analyzing either real transaction prices of similar properties, or by asking prices after performing the necessary adjustments.

The cost approach is used for estimating the fair value of the residential and the industrial classes of the Group's investment property. This approach refers to the calculation of the fair value based on the cost of reproduction/replacement (estimated construction costs), which is then reduced by an appropriate rate to reflect depreciation.

The Group's investment property valuations are performed taking into consideration the highest and best use of each asset that is physically possible, legally permissible and financially feasible.

The main method used to estimate the fair value of Group's Investment property portfolio as at 31 December 2023, is the discounted cash flow method. Significant unobservable inputs used in the fair value measurement of the relevant portfolio are the rental income growth and the discount rate. Increase in rental income growth would result in increase in the carrying amount while an increase in the discount rate would have the opposite result. The discount rate used ranges from 7% to 13%. As at 31 December 2023, an increase or decrease of 5% in the discount rate used in the DCF analysis, would result in a downward or upward adjustment of the carrying value of the respective investment properties by € 31 and € 34 million, respectively.

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

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

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28. Intangible assets

As at 31 December 2023, the carrying amount of intangible assets was € 334 million (31 December 2022: € 297 million), comprising € 290 million computer software, which refer to purchased and developed software, and € 44 million goodwill.

The table below presents the movement of computer software:

	2023 € million	2022 € million
Cost:		
Balance at 1 January	658	587
Arising from acquisitions	1	-
Transfers	(14)	(6)
Additions	83	94
Disposals and write-offs	(142)	(7)
Impairment	(8)	(10)
Discontinued operations	(63)	-
Balance at 31 December	515	658
Accumulated amortisation:		
Balance at 1 January	(362)	(320)
Transfers	1	-
Amortisation charge for the year	(42)	(49)
Disposals and write-offs	142	7
Discontinued operations	36	-
Balance at 31 December	(225)	(362)
Net book value at 31 December	290	296

Goodwill

As at 31 December 2023, the carrying amount of goodwill of € 44 million mainly comprises € 42 million, attributed to the acquisition of BNP Paribas Personal Finance Bulgaria by Eurobank Bulgaria A.D, in May 2023, based on the provisional fair values of its identifiable assets and liabilities, note 23.2 (31 December 2022: € 1.6 million of which € 0.9 million relates to ERB Lux Immo S.A.).

29. Other assets

	2023 € million	2022 € million
Receivable from Deposit Guarantee and Investment Fund	286	495
Reposessed properties and relative prepayments	509	577
Pledged amount for a Greek sovereign risk financial guarantee	236	234
Balances under settlement ⁽¹⁾	53	51
Deferred costs and accrued income	85	92
Other guarantees	215	215
Income tax receivable ⁽²⁾	58	30
Other assets	325	286
Total	1,767	1,980

⁽¹⁾ Includes settlement balances with customers and brokerage activity.

⁽²⁾ Includes withholding taxes, net of provisions.

Pursuant to Law 4370/2016 as in force, the receivable from the Hellenic Deposit and Investment Guarantee Fund (HDIGF) referring to the "Supplementary Deposit Cover Fund" is refundable to the Greek credit institutions in three equal instalments, starting from

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2022 and each year thereafter, subject to the provisions of the article 25a of the law. Following that, in December 2023, the second instalment of € 211 million was refunded to the Bank by HDIGF.

As at 31 December 2023, other assets net of provisions, amounting to € 325 million include, among others, receivables related to (a) prepayments to suppliers, (b) public entities, (c) property management activities (d) legal cases and e) the sale of the Bank's Merchant Acquiring Business in 2022.

30. Disposal groups classified as held for sale and discontinued operations

	2023 € million	2022 € million
Assets of disposal groups		
Real estate properties	37	15
Loans portfolios (note 20)	169	69
Total	206	84
Liabilities of disposal groups		
Other liabilities related to loans portfolios (notes 20 and 35)	1	1
Total	1	1

Real estate properties

Starting from the end of 2019, the Group, in the context of its strategy for the active management of its real estate portfolio (repossessed, investment properties and own used properties), has gradually classified as held for sale (HFS) certain pools of real estate assets of total remaining carrying amount ca. € 9 million as at 31 December 2023 (31 December 2022: € 15 million), after their remeasurement in accordance with the IFRS 5 requirements.

In addition, in the third quarter of 2023, the Group initiated negotiations with potential investors for the disposal of a mixed portfolio of repossessed real estate assets of carrying amount ca. € 33 million and classified it as held for sale. Since the disposal group's fair value less cost to sell, based on the estimated selling price, was lower than its carrying amount, an impairment loss of ca. € 5 million was recognised in income statement line "Other impairments, risk provisions and related costs".

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

The above non-recurring fair value measurements were categorized as Level 3 of the fair value hierarchy due to the significance of the unobservable inputs used, with no change occurring up to 31 December 2023.

Eurobank Direktna a.d. disposal group

On 2 March 2023, the Bank announced that it has signed a binding agreement (share purchase agreement) with AIK Banka a.d. Beograd ("AIK") for the sale of its 70% shareholding in its subsidiary in Serbia, Eurobank Direktna a.d. (the "Transaction"). The sale was considered highly probable, therefore, as of 31 March 2023 the assets of Eurobank Direktna a.d. and the associated liabilities ("disposal group"), which formed part of the share purchase agreement, were classified as held for sale and presented as a discontinued operation, representing a separate geographical area of Group's operations. The subsidiary was the major part of the Group's operations in Serbia, which are presented in the International segment (note 43).

On 2 November 2023, following the receipt of the approvals by all competent regulatory authorities, the sale of the Bank's shareholding in Eurobank Direktna to AIK Banka a.d. Beograd was completed for a cash consideration of € 188.7 million, net of related costs. Following the remeasurement losses of € 63.5 million recognized until 31 October 2023, in accordance with IFRS 5 requirements the resulting loss from the sale amounted to € 123 million before tax, including the recyclement to the income statement of € 124 million cumulative losses (mainly currency translation differences), previously recognized in other comprehensive income.

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The transaction had a positive impact on Eurobank Holdings Group's CET 1 ratio (ca. 45 bps based on 30 September 2023 ratio), reflecting the release of related RWAs (Risk weighted assets), and is consistent with Eurobank's strategy to redirect capital to opportunities with more compelling RoTBV (Return on Tangible Book Value) and to further enhance its presence in its core markets.

The income statement, statement of total comprehensive income and cash flow statement distinguish discontinued operations from continuing operations. Comparative information has been adjusted accordingly.

The results of Eurobank Direktna a.d. disposal group, including the loss from the IFRS 5 remeasurement and its disposal, are set out below.

	2023 € million	2022 € million
Net interest income	82	70
Net banking fee and commission income	17	22
Other income/(expenses)	2	3
Operating Expenses	(57)	(61)
Profit before impairments, remeasurement losses, risk provisions and restructuring costs from discontinued operations	44	34
Impairment losses relating to loans and advances to customers	(8)	(14)
Remeasurement losses on non current and other assets	(64)	-
Other impairment, risk provisions and restructuring costs	(19)	(18)
Profit/(loss) before tax from discontinued operations before loss on disposal	(47)	2
Loss on disposal	(123)	-
Income tax	17	0
Net profit/(loss) from discontinued operations	(153)	2
Net profit/(loss) from discontinued operations attributable to non controlling interest	(12)	0
Net profit/(loss) from discontinued operations attributable to shareholders	(141)	2

The major classes of assets and liabilities of Eurobank Direktna a.d. disposal group are set out below.

	31 October 2023 € million
Loans and advances to customers	1,546
Cash and balances with central banks ⁽¹⁾	713
Investment securities	81
Due from credit institutions ⁽¹⁾	74
Other assets	29
Total assets of disposal group	2,443
Due to customers	1,809
Due to credit institutions	209
Other liabilities	31
Total liabilities of disposal group	2,049
Net intragroup liabilities associated with the disposal group	123
Net assets of disposal group	271
Net assets of disposal group attributable to non controlling interests	84
Net assets of disposal group attributable to shareholders	187

⁽¹⁾ As at 31 October 2023, the cash and cash equivalents included above amounted to € 636 million.

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31. Due to central banks

	2023	2022
	€ million	€ million
Secured borrowing from ECB	3,771	8,774

As at 31 December 2023, the Group's outstanding principal under the TLTRO III refinancing program of the European Central Bank (ECB) amounted to € 3.7 billion (31 December 2022: € 8.9 billion outstanding principal under TLTRO III program).

32. Due to credit institutions

	2023	2022⁽²⁾
	€ million	€ million
Secured borrowing from credit institutions ⁽¹⁾	2,428	764
Borrowings from international financial and similar institutions	379	663
Deposits from banks received as collateral ⁽¹⁾	87	294
Current accounts and settlement balances with banks	79	76
Interbank takings	105	17
Total	3,078	1,814

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

⁽²⁾ As at 31 December 2022, due to credit institutions relating to Eurobank Direktna a.d. disposal group (note 30) amounted to € 218 million.

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

33. Due to customers

	2023	2022⁽¹⁾
	€ million	€ million
Savings and current accounts	37,238	42,840
Term deposits	20,209	14,198
Repurchase agreements	-	201
Carrying amount	57,447	57,239
Fair value changes of deposits in portfolio hedging of interest rate risk	(5)	-
Total	57,442	57,239

⁽¹⁾ As at 31 December 2022, due to customers relating to Eurobank Direktna a.d. disposal group (note 30) amounted to € 1,630 million.

For the year ended 31 December 2023, due to customers for the Greek and International operations amounted to € 39,955 million and € 17,492 million, respectively (2022: € 39,575 million and € 17,664 million, respectively).

34. Debt securities in issue

	2023	2022
	€ million	€ million
Securitisations	555	553
Subordinated notes (Tier 2)	1,296	1,259
Medium-term notes (EMTN)	2,905	1,740
Total	4,756	3,552

Securitisations

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

Tier 2 Capital instruments

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On 30 November 2022, the Company announced the issuance of a € 300 million subordinated Tier II debt instrument which matures in December 2032, is callable in December 2027 offering a coupon of 10% per annum and is listed on the Luxembourg Stock Exchange's Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Company.

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

Covered bonds

Financial disclosures required by the Act 2620/28.08.2009 of the Bank of Greece in relation to the covered bonds issued, are available at the Bank's website (Investor Report for Covered Bonds Programs).

Medium-term notes (EMTN)

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

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

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

During the year ended 31 December 2023, the Bank proceeded with the issue of medium term notes of face value of € 91 million, which were designated for Group's customers.

Post balance sheet event

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

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35. Other liabilities

	2023	2022
	€ million	€ million
Lease liabilities	190	205
Balances under settlement ⁽¹⁾	380	444
Deferred income and accrued expenses ⁽²⁾	194	156
Other provisions ⁽²⁾	116	80
ECL allowance for credit related commitments (note 5.2.1.2)	48	57
Standard legal staff retirement indemnity obligations and employee termination benefits (note 36)	59	80
Sovereign risk financial guarantee	31	33
Income taxes payable	30	14
Deferred tax liabilities (note 13)	28	31
Trading liabilities	121	419
Other liabilities ⁽³⁾	188	183
Total	1,385	1,702

⁽¹⁾ Includes settlement balances relating to bank cheques and remittances, credit card transactions, other banking and brokerage activities.

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

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

As at 31 December 2023, other liabilities amounting to € 188 million mainly consist of payables relating with (a) suppliers and creditors, (b) contributions to insurance organizations, and (c) duties and other taxes.

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

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

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

As at 31 December 2023, other provisions amounting to € 116 million (2022: € 80 million) mainly include: (a) € 38 million for claims in dispute and outstanding litigations against the Group (note 42), (b) € 22 million relating to the sale of Bank's former subsidiaries, (c) € 12 million for R&Ws provided to investors in the context of the NPE securitization transactions, d) € 15 million for other operational risk events and e) € 13.3 million relating to contribution to restoration initiatives after natural disasters (note 11).

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

	31 December 2023		
	Litigations and claims in dispute € million	Other € million	Total € million
Balance at 1 January	28	52	80
Amounts charged during the year	21	34	55
Amounts used during the year	(5)	(7)	(12)
Amounts reversed during the year	(1)		(1)
Foreign exchange and other movements	(1)	(0)	(1)
Discontinued operations	(4)	(1)	(5)
Balance at 31 December	38	78	116

	31 December 2022		
	Litigations and claims in dispute € million	Other € million	Total € million
Balance at 1 January	64	31	95
Amounts charged during the year	13	21	34
Amounts used during the year	(46)	(1)	(47)
Amounts reversed during the year	(3)	(2)	(5)
Foreign exchange and other movements	-	3	3
Balance at 31 December	28	52	80

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

The Group provides for staff retirement indemnity obligation for its employees in Greece and abroad, who are entitled to a lump sum payment based on the number of years of service and the level of remuneration at the date of retirement, if they remain in the employment of the Group until normal retirement age, in accordance with the local labor legislation. The above retirement indemnity obligations typically expose the Group to actuarial risks such as interest rate risk and salary risk. Therefore, a decrease in the discount rate used to calculate the present value of the estimated future cash outflows or an increase in future salaries will increase the staff retirement indemnity obligations of the Group.

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

The table below presents the breakdown of defined benefit obligations.

	31 December 2023 € million	31 December 2022 € million	1 January 2022 € million
SLSRI obligation	22	19	23
Employee termination benefits	37	61	64
Total	59	80	87

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

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	2023	2022
	€ million	€ million
Balance at 1 January	80	87
Arising from acquisition (note 23.2)	1	-
Current service cost	3	3
Interest cost	2	0
Past service cost and (gains)/losses on settlements	6	49
Remeasurements:		
Actuarial (gains)/losses arising from changes in financial assumptions	(1)	(2)
Actuarial (gains)/losses arising from changes in demographic assumptions	(0)	(0)
Actuarial (gains)/losses arising from experience and other adjustments	3	(2)
Benefits paid	(34)	(55)
Exchange adjustments	0	0
Discontinued operations (note 30)	(1)	-
Balance at 31 December	59	80

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

	2023	2022
	%	%
Discount rate	3.6	3.4
Future salary increases	3.2	2.9

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

As at 31 December 2023, the average duration of the standard legal staff retirement indemnity obligation was 7 years (2022: 8 years).

A quantitative sensitivity analysis based on reasonable changes to significant actuarial assumptions as at 31 December 2023 is as follows:

An increase/(decrease) of the discount rate assumed, by 50 bps/(50 bps), would result in a (decrease)/increase of the standard legal staff retirement obligations by (€ 0.7 million)/ € 0.7 million.

An increase/(decrease) of the future salary growth assumed, by 0.5%/(0.5%) would result in an increase/(decrease) of the standard legal staff retirement obligations by € 0.7 million/(€ 0.7 million).

The above sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. In practice, this is unlikely to occur, and changes in some of the assumptions may be correlated.

The methods and assumptions used in preparing the above sensitivity analysis were consistent with those used to estimate the retirement benefit obligation and did not change compared to the previous year.

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

Post balance sheet event

In February 2024, Eurobank decided to launch a new VES for eligible units in Greece, which will be offered mainly to employees over a specific age limit. The estimated cost of the new VES, which will be implemented through either lump-sum payments or long term leaves during which they will be receiving a percentage of a monthly salary, or a combination thereof, amounts to ca. € 129 million, pre-tax. The estimated saving in personnel expenses amounts to € 30 million on an annual basis.

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37. Share capital, share premium and treasury shares

As at 31 December 2023, the par value of the Company's shares is € 0.22 per share (2022: € 0.22). All shares are fully paid. The movement of share capital and share premium is as follows:

	Share capital € million	Share premium € million
Balance at 1 January 2022	816.0	8,055.7
Offsetting of equity accounts	-	(6,894.4)
Share capital increase following the exercise of share options	0.3	0.0
Balance at 31 December 2022	<u>816.3</u>	<u>1,161.3</u>
Balance at 1 January 2023	816.3	1,161.3
Share capital increase following the exercise of share options	1.3	0.1
Balance at 31 December 2023	<u>817.6</u>	<u>1,161.4</u>

Share capital increase

Following the exercise of share options granted to executives of the Group under the current share options' plan (see below), and by virtue of the decision of the Board of Directors of the Company on 31 August 2023, the Company's share capital increased by € 1,276,499.18 through the issue of 5,802,269 new common voting shares, of a nominal value of € 0.22 per share and exercise price of € 0.23 per share. The difference between the exercise price of the new shares and their nominal value, net of the expenses directly attributable to the equity transaction, amounted to € 39,286 and was recorded in the account "Share premium". Following the above increase, as at 31 December 2023, the share capital of the Company amounts to € 817,625,550.94 divided into 3,716,479,777 common shares with a nominal value of € 0.22 each. The new shares were listed on the Athens Exchange on 14 September 2023.

The following is an analysis of the movement in the number of the Company's shares outstanding:

	Number of shares		
	Issued Shares	Treasury Shares	Net
Balance at 1 January 2022	3,709,161,852	(784,540)	3,708,377,312
Share capital increase following the exercise of share options	1,515,656	-	1,515,656
Purchase of treasury shares	-	(1,745,293)	(1,745,293)
Sale of treasury shares	-	2,269,797	2,269,797
Balance at 31 December 2022	<u>3,710,677,508</u>	<u>(260,036)</u>	<u>3,710,417,472</u>
Balance at 1 January 2023	3,710,677,508	(260,036)	3,710,417,472
Share capital increase following the exercise of share options	5,802,269	-	5,802,269
Buyback of shares held by HFSF	-	(52,080,673)	(52,080,673)
Other purchases of treasury shares	-	(5,740,696)	(5,740,696)
Sale of treasury shares	-	1,654,166	1,654,166
Balance at 31 December 2023	<u>3,716,479,777</u>	<u>(56,427,239)</u>	<u>3,660,052,538</u>

Treasury shares - Buyback of shares held by HFSF

Following the receipt of the required approval from the regulator in May 2023, the General Meeting of the Company's Shareholders (AGM), which was held on 20 July 2023, approved the acquisition of all the 52,080,673 Company's shares held by the HFSF, corresponding to approximately 1.4% of the Company's share capital and voting rights, and authorized the Board of Directors to determine the specific conditions and relevant details for the acquisition.

On 9 October 2023, the acquisition of all the shares held by the HFSF was completed for a total consideration of € 93.8 million, including related third party fees. Following the above, the Company and the Bank are no longer subject to Law 3864/2010 and to the special rights of Hellenic Financial Stability Fund (HFSF) provided for in such law.

In addition, as at 31 December 2023, the number of the Company's shares held by its subsidiary Eurobank Equities Investment Firm Single Member S.A. in the ordinary course of its business, was 4,346,566 (31 December 2022: 260,036). On the same date, the number

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of the Company's shares held by the Group's associates in the ordinary course of their insurance and investing activities was 64,163,790 in total (31 December 2022: 64,163,790).

38. Reserves and retained earnings/losses

	Statutory reserves € million	Non-taxed reserves € million	Fair value reserve € million	Other reserves € million	Retained earnings/(losses) € million	Total € million
Balance at 1 January 2022	411	830	322	8,479	(13,374)	(3,333)
Restatement due to adoption of IFRS 17 by a Group's associate (note 2.3)	-	-	-	-	(33)	(33)
Balance at 1 January 2022, as restated	411	830	322	8,479	(13,407)	(3,366)
Net profit (restated, note 2.3)	-	-	-	-	1,347	1,347
Transfers between reserves	73	(1)	-	195	(267)	-
Offsetting of equity accounts	(214)	-	-	(6,705)	13,814	6,895
Debt securities at FVOCI	-	-	(323)	-	-	(323)
Cash flow hedges	-	-	-	(0)	-	(0)
Foreign currency translation (note 23.1)	-	-	-	77	-	77
Gains/(losses) from equity securities at FVOCI	-	-	24	-	-	24
Associates and joint ventures						
-changes in the share of other comprehensive income, net of tax (restated, note 2.3)	-	-	(33)	31	(0)	(2)
Actuarial gains/(losses) on post employment benefit obligations, net of tax	-	-	-	-	4	4
Share options plan	-	-	-	-	4	4
Purchase/sale of treasury shares	-	-	-	1	0	1
Other	-	-	-	(1)	-	(1)
Balance at 31 December 2022	270	829	(10)	2,077	1,495	4,660
Balance at 1 January 2023	270	829	(10)	2,077	1,495	4,660
Net profit	-	-	-	-	1,140	1,140
Transfers between reserves	(42)	(0)	(45)	64	24	-
Debt securities at FVOCI	-	-	83	-	-	83
Cash flow hedges	-	-	-	(2)	-	(2)
Foreign currency translation (note 30)	-	-	-	123	-	123
Gains/(losses) from equity securities at FVOCI	-	-	18	-	-	18
Associates and joint ventures						
-Adoption of IFRS 9 "Financial Instruments" by a Group's associate (see below)	-	-	(7)	-	7	-
-changes in the share of other comprehensive income, net of tax	-	-	9	(12)	0	(4)
Actuarial gains/(losses) on post employment benefit obligations, net of tax	-	-	-	-	(2)	(2)
Share options plan (note 39)	-	-	-	-	7	7
Purchase/sale of treasury shares (note 37)	-	-	-	(100)	-	(100)
Other	(1)	-	(0)	(1)	(1)	(3)
Balance at 31 December 2023	227	829	48	2,147	2,670	5,920

Adoption of IFRS 9 "Financial Instruments" by a Group's associate

As of 1 January 2023, Eurolife FFH Insurance Group Holdings S.A. has adopted IFRS 9 "Financial instruments". This resulted in € 7 million decrease of the Group's fair value reserve against retained earnings, mainly due to the designation of equity securities at FVTPL, previously classified as available for sale under IAS 39.

As at 31 December 2023, other reserves comprise, among others, a) € 1,713 million reserves relating to dividends and gains from the sale of participations (2022: € 1,568 million), b) corporate law reserves of € 8 million, pursuant to the provisions of the Greek company law in force (2022: € 8 million), c) € 101 million (debit balance) relating to the carrying amount of the treasury shares held by the

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Company and its subsidiary Eurobank Equities Investment Firm Single Member S.A. (2022: € 0.3 million) (note 37), d) € 14 million accumulated loss from cash flow hedging (2022: € 12 million accumulated loss) and e) € 2 million accumulated loss relating to foreign operations' translation differences (2022: € 125 million accumulated loss).

Dividends/Distribution of Profits

In December 2023, the Bank proceeded with the distribution of non-mandatory reserves totalling €410 million to its sole shareholder, Eurobank Holdings, in order to enable the latter to distribute dividend out of the profits of the financial year 2023 to its shareholders in accordance with the provisions of article 159 of Company Law 4548/2018.

Based on the Group's financial performance for the financial year 2023, Eurobank Holdings aims to distribute to its shareholders a cash dividend equivalent to at least 25% of the Group's adjusted net profit for financial year 2023, subject to the approval of the Annual General Meeting of its shareholders and the regulatory authorities.

In addition, Eurobank Holdings intends to proceed also with the distribution of profits to the employees in accordance with its remuneration policy, subject to the approval of the Annual General Meeting of its shareholders.

39. Share options

The Annual General Meeting of the shareholders of Eurobank Holdings held on 28 July 2020 approved the establishment of a five year shares award plan, starting from 2021, in the form of share options rights by issuing new shares with a corresponding share capital increase, in accordance with the provisions of article 113 of law 4548/2018, awarded to executives and personnel of Eurobank Holdings and its affiliated companies according to article 32 of law 4308/2014. The maximum number of rights that can be approved was set at 55,637,000 rights, each of which would correspond to one new share. The exercise price of each new share would be equal to € 0.23. The Annual General Meeting authorized the Board of Directors of Eurobank Holdings to define the eligible staff and determine the remaining terms and conditions of the plan.

The final terms and the implementation of the share options plan, which is a forward-looking long-term incentive aiming at the retention of key executives, are defined and approved annually by the Board of Directors in accordance with the applicable legal and regulatory framework, as well as the policies of the Group.

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

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

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

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

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

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

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

⁽¹⁾ Based on the earliest contractual exercise date.

In accordance with the Group's accounting policy on employees' share based payments, the grant date fair value of the options is recognized as an expense with a corresponding increase in equity over the vesting period.

The fair value at grant date is determined using an adjusted form of the Black-Scholes model for Bermudan equity options which takes into account the exercise price, the exercise dates, the term of the option, the share price at grant date and expected price volatility of the underlying share, the expected dividend yield and the risk-free interest rate for the term of the options.

The weighted average fair value of the share options granted in July 2023 was € 1.13 (2022: € 0.63). The significant inputs into the model were a share price of € 1.442 (2022: € 1.021) at the grant date, exercise price of € 0.23, annualized dividend yield of 3% (2022: 3%), expected average volatility of 41% (2022: 38%), expected option life of 1-5 years, and a risk-free interest rate corresponding to the options' maturities, based on the Euro swap yield curve. The expected volatility is measured at the grant date of the options and is based on the average historical volatility of the share price over the last one and a half year.

40. Transfers of financial assets

The Group enters into transactions by which it transfers recognized financial assets directly to third parties or to Special Purpose Entities (SPEs).

(a) The Group sells, in exchange for cash, securities under an agreement to repurchase them (repos) and assumes a liability to repay to the counterparty the cash received. In addition, the Group pledges, in exchange for cash, securities, covered bonds, as well as loans and receivables and assumes a liability to repay to the counterparty the cash received. The Group may also transfer securities under securities lending agreements with no exchange of cash or pledging of other financial assets as collateral. For all the aforementioned transactions, the Group has determined that it retains substantially all the risks, including associated credit and interest rate risks, and rewards of these financial assets and therefore has not derecognized them. As a result, the Group is unable to use, sell or pledge the transferred assets for the duration of the transaction. The related liability, where applicable, is recognized in Due to central banks and credit institutions (notes 31 and 32), Due to customers (note 33) and Debt securities in issue (note 34), as appropriate.

The Group enters into securitizations of various classes of loans (corporate, small and medium enterprise, consumer and various classes of non-performing loans), under which it assumes an obligation to pass on the cash flows from the loans to the holders of the notes. The Group has determined that it retains substantially all risks, including associated credit and interest rate risks, and rewards of these loans and therefore has not derecognized them. As a result of the above transactions, the Group is unable to use, sell or pledge the transferred assets for the duration of their retention by the SPE. Moreover, the note holders' recourse is limited to the transferred loans. As at 31 December 2023, the carrying value of the securitizations' issues held by third parties amounted to € 555 million (2022: € 553 million) (note 34).

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The table below sets out the details of Group's financial assets that have been sold or otherwise transferred, but which do not qualify for derecognition:

	Carrying amount	
	2023	2022
	€ million	€ million
Securities held for trading	14	44
Loans and advances to customers ⁽¹⁾	12,889	14,186
- <i>securitized loans</i> ⁽²⁾	2,164	3,411
- <i>pledged loans under covered bond program</i>	4,083	4,261
- <i>pledged loans with central banks</i>	6,310	6,309
- <i>other pledged loans</i>	332	205
Investment securities	2,255	3,027
Total	15,158	17,257

⁽¹⁾ Including loans classified as held for sale (note 30)

⁽²⁾ It includes securitized loans of issues held by the Bank, not used for funding.

(b) The Group may sell or re-pledge any securities borrowed or obtained through reverse repos and has an obligation to return the securities. The counterparty retains substantially all the risks and rewards of ownership and therefore the securities are not recognized by the Group. As at 31 December 2023, the Group had obtained through reverse repos securities of face value of € 1,413 million (2022: € 134 million face value of which € 15 million sold under repurchase agreements and € 67 million pledged with central banks).

As at 31 December 2023, the cash value of the assets transferred or borrowed by the Group through securities lending, reverse repo and other agreements (points a and b) amounted to € 8,956 million, while the associated liability from the above transactions amounted to € 7,969 million, of which € 1,210 million repo agreements offset in the balance sheet against reverse repo deals (notes 31, 32, 33, 34 and 5.2.1.4) (2022: cash value € 10,512 million and liability € 10,412 million, of which € 114 million repo agreements offset in the balance sheet). In addition, the Group's financial assets pledged as collaterals for repos, derivatives, securitizations and other transactions other than the financial assets presented in the table above are provided in notes 17 and 29.

41. Leases

Group as a lessee

The Group leases office and branch premises, ATM locations, residential properties for the Group's personnel, and motor vehicles.

The majority of the Group's property leases are under long term agreements (for a term of 12 years or more in the case of leased real estate assets), with options to extend or terminate the lease according to the terms of each contract and the usual terms and conditions of commercial leases applicable in each jurisdiction, while motor vehicles generally have lease terms of up to 4 years. Extension options held by the Group are included in the lease term when it is reasonably certain that they will be exercised based on its assessment. For contracts having an indefinite remaining life, the lease term has been determined at an average of 7 years for the Bank, after considering all relevant facts and circumstances. For new or modified lease contracts with an indefinite life, that are effective from the fourth quarter of 2023 onwards, the estimated lease term has been revised to 5 years. Where applicable, depending on the terms of each lease contract, lease payments are adjusted annually in line with the consumer Price Index, as published by the Greek Statistical Authority, plus an agreed fixed percentage.

Information about the leases for which the Group is a lessee is presented below:

Right-of-Use Assets

As at 31 December 2023, the right-of-use assets included in property plant and equipment amounted to € 170 million (31 December 2022: € 187 million) (note 26), while those that meet the definition of investment property amounted to € 16 million (31 December 2022: € 14 million) (note 27).

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Lease Liabilities

The lease liability included under other liabilities amounted to € 190 million as at 31 December 2023 (31 December 2022: € 205 million) (note 35). The maturity analysis of lease liabilities as at 31 December 2023, based on the contractual undiscounted cash flows, is presented in note 5.2.3.

Amounts recognised in profit or loss

Interest on lease liabilities is presented in note 6 and the lease expense relating to short term leases is ca. € 1.2 million (31 December 2022: € 3 million).

The Group had total cash outflows for leases of € 44 million in 2023 (2022: € 39 million).

Group as a lessor

Finance lease

The Group leases out certain real estate properties and equipment under finance leases, in its capacity as a lessor.

The maturity analysis of finance lease receivables, based on the undiscounted lease payments to be received after the reporting date, is provided below:

	2023	2022
	€ million	€ million
Not later than one year	230	303
1-2 years	89	83
2-3 years	95	65
3-4 years	53	53
4-5 years	34	36
Later than 5 years	154	164
Lease Payments:	656	704
Gross investment in finance leases	656	704
Less: unearned finance income	(83)	(66)
Net investment in finance leases	573	638
Less: impairment allowance	(93)	(139)
Total	480	499

Operating Leases

The Group leases out its investment property under the usual terms and conditions of commercial leases applicable in each jurisdiction. When such leases do not transfer substantially all of the risks and rewards incidental to the ownership of the leased assets, the Group classifies these lease as operating leases. Information relating to operating leases of investment property, including the rental income recognised by the Group during the year, is provided in note 27. The maturity analysis of operating lease receivables, based on the undiscounted lease payments to be received after the reporting date, is provided below:

	2023	2022
	€ million	€ million
Not later than one year	94	92
One to two years	83	85
Two to three years	76	78
Three to four years	68	70
Four to five years	64	64
More than five years	209	250
Total	594	639

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42. Contingent liabilities and other commitments

The Group presents the credit related commitments it has undertaken within the context of its lending related activities into the following three categories: a) financial guarantee contracts, which refer to guarantees and standby letters of credit that carry the same credit risk as loans (credit substitutes), b) commitments to extend credit, which comprise firm commitments that are irrevocable over the life of the facility or revocable only in response to a material adverse effect and c) other credit related commitments, which refer to documentary and commercial letters and other guarantees of medium and low risk according to the Regulation No 575/2013/EU.

Credit related commitments are analyzed as follows:

	2023	2022
	€ million	€ million
Financial guarantee contracts	2,082	1,807
Commitments to extend credit	4,521	3,898
Other credit related commitments	1,268	1,053
Total	7,871	6,758

Note: Credit related commitments of discontinued operations (note 30) amounting to € 259 million are included in the table above for 31 December 2022.

The credit related commitments within the scope of IFRS 9 impairment requirements of continuing operations amount to € 11.4 billion (31 December 2022: € 10.5 billion), including revocable loan commitments of € 3.5 billion (31 December 2022: € 3.7 billion), while the corresponding allowance for impairment losses amounts to € 48 million (31 December 2022: € 57 million).

In addition, the Group has issued a sovereign risk financial guarantee of € 0.24 billion (31 December 2022: € 0.23 billion) for which an equivalent amount has been deposited under the relevant pledge agreement (note 29).

Other commitments

(a) The Bank has signed irrevocable payment commitment and collateral arrangement agreements with the Single Resolution Board (SRB) amounting in total to € 29 million as at 31 December 2023 (2022: € 24 million), representing 15% of its resolution contribution payment obligation to the Single Resolution Fund (SRF) for the years 2016-2022 and 22.5% for year 2023, whereas no annual resolution contributions will be required in 2024 (note 11). According to the agreements, which are backed by cash collateral of an equal amount, the Bank undertook to pay to the SRB an amount up to the above IPC, in case of a call and demand for payment made by it, in relation to a resolution action taken for another European bank. The IPC has been accounted for as a contingent liability and the said cash collateral has been recognized as a financial asset measured at amortized cost in the Group's balance sheet line "Other assets" (note 29).

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

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

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

(b) As at 31 December 2023, the contractual commitments for the acquisition of own used property, equipment and intangible assets amounted to € 37 million (2022: € 46 million).

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

Legal proceedings

As at 31 December 2023, the provisions for legal proceedings outstanding against the Group amounted to € 38 million, including an amount of € 8 million provided for the below mentioned claim (note 35) (31 December 2022: € 28 million).

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

Furthermore, in the normal course of its business, the Group has been involved in a number of legal proceedings, which are either at still a premature or at an advanced trial instance. The final settlement of these cases may require the lapse of a certain time so that the litigants exhaust the legal remedies provided for by the law. Management, is closely monitoring the developments to the relevant cases and having considered the advice of Legal Services, does not expect that there will be an outflow of resources and therefore does not acknowledge the need for a provision.

43. Operating segment information

Management has determined the operating segments based on the internal reports reviewed by the Strategic Planning Committee that are used to allocate resources and to assess their performance in order to make strategic decisions. The Strategic Planning Committee considers the business both from a business unit and geographic perspective. Geographically, management considers the performance of its business activities originated from Greece and other countries in Europe (International).

Greece is further segregated into retail, corporate, global markets & asset management, investment property and as of the first quarter of 2023, Remedial and Servicing Strategy, in order to be aligned with its separate internal reporting to Management. International is monitored and reviewed on a country basis. The Group aggregates segments when they exhibit similar economic characteristics and profile and are expected to have similar long-term economic development.

In more detail, the Group is organized in the following reportable segments:

- Retail: incorporating customer current accounts, savings, deposits and investment savings products, credit and debit cards, consumer loans, small business banking and mortgages.
- Corporate: incorporating current accounts, deposits, overdrafts, loan and other credit facilities, foreign currency and derivative products to corporate entities, custody and clearing services, cash management and trade services and investment banking services including corporate finance, merger and acquisitions advice.
- Global Markets & Asset Management: incorporating financial instruments trading, services to institutional investors, as well as, specialized financial advice and intermediation. In addition, this segment incorporates mutual fund products, institutional asset management and equity brokerage.
- International: incorporating operations in Bulgaria, Serbia (the operations of Eurobank Direktna a.d. disposal group are included until 31 October 2023 (note 30)), Cyprus, Luxembourg and Romania.
- Investment Property: incorporating investment property activities relating to a diversified portfolio of commercial real estate assets.

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- Remedial and Servicing Strategy (RSS): incorporating (a) the management of non - performing assets, that were previously reported in the “Retail” and “Corporate” segments, and (b) the property management (repossessed assets), the notes of Cairo, Pillar and Mexico securitizations, which were retained by the Group, and the Group’s share of results of doValue Greece Loans and Credits Claim Management S.A, that were previously reported in the “Other” segment.

Other segment of the Group refers mainly to (a) property management (own used property & equipment), (b) other investing activities (including equities’ positions), (c) private banking services to medium and high net worth individuals, (d) the Group’s share of results of Eurolife Insurance group and (e) the results related to the Group’s transformation projects and initiatives. In the year ended 31 December 2022, it also included the effect of the liquidation of “ERB Istanbul Holding A.S.”.

Comparative information has been adjusted to include the aforementioned changes affecting the reportable operating segments.

The Group's management reporting is based on International Financial Reporting Standards (IFRS) as adopted by the EU. The accounting policies of the Group's operating segments are the same with those described in the principal accounting policies.

Revenues from transactions between business segments are allocated on a mutually agreed basis at rates that approximate market prices.

43.1 Operating segments

	31 December 2023							
	Retail	Corporate	Global Markets & Asset Mngt	Investment Property	RSS	International	Other and Elimination center	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Net interest income	1,118	437	59	(12)	(8)	657	(77)	2,174
Net commission income	87	127	102	-	5	122	4	447
Other net revenue	(48)	3	108	103	15	(1)	113	293
Total external revenue	1,157	567	269	91	12	778	40	2,914
Inter-segment revenue	41	39	(40)	2	-	(8)	(34)	-
Total revenue	1,198	606	229	93	12	770	6	2,914
Operating expenses	(379)	(118)	(55)	(35)	(62)	(263)	(3)	(915)
Impairment losses relating to loans and advances to customers	(126)	(31)	-	-	(159)	(57)	(39)	(412)
Other impairments, risk provisions and related costs (note 12)	(20)	(1)	3	(1)	(25)	(36)	(16)	(96)
Share of results of associates and joint ventures	-	-	-	-	8	58	22	88
Profit/(loss) before tax from continuing operations before restructuring costs	673	456	177	57	(226)	472	(30)	1,579
Restructuring costs (note 12)	(4)	(4)	(1)	-	(1)	(11)	(16)	(37)
Profit/(loss) before tax from continuing operations	669	452	176	57	(227)	461	(46)	1,542
Loss before tax from discontinued operations (note 30)	-	-	-	-	-	(170)	-	(170)
Profit/(loss) before tax attributable to non controlling interests	-	-	-	-	-	(12)	-	(12)
Profit/(loss) before tax attributable to shareholders	669	452	176	57	(227)	303	(46)	1,384

	31 December 2023							
	Retail	Corporate	Global Markets & Asset Mngt	Investment Property	RSS	International	Other and Elimination center ⁽¹⁾	Total
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Segment assets	12,344	15,897	14,627	1,453	8,259	21,336	5,865	79,781
Segment liabilities	31,264	11,558	4,942	280	1,767	18,740	3,331	71,882

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The International segment is further analyzed as follows:

	31 December 2023					
	Bulgaria	Serbia	Cyprus	Luxembourg	Romania	Total
	€ million	€ million	€ million	€ million	€ million	€ million
Net interest income	322	1	273	58	3	657
Net commission income	76	-	39	8	(1)	122
Other net revenue	6	(4)	-	(2)	(1)	(1)
Total external revenue	404	(3)	312	64	1	778
Inter-segment revenue	-	-	-	(8)	-	(8)
Total revenue	404	(3)	312	56	1	770
Operating expenses	(169)	(2)	(59)	(28)	(5)	(263)
Impairment losses relating to loans and advances to customers	(52)	-	(16)	-	11	(57)
Other impairments, risk provisions and related costs	(31)	-	(1)	-	(4)	(36)
Share of results of associates and joint ventures	-	-	58	-	-	58
Profit/(loss) before tax from continuing operations before restructuring costs	152	(5)	294	28	3	472
Restructuring costs (note 12)	(11)	-	-	-	-	(11)
Profit/(loss) before tax from continuing operations	141	(5)	294	28	3	461
Loss before tax from discontinued operations	-	(170)	-	-	-	(170)
Profit/(loss) before tax attributable to non controlling interests	-	(12)	-	-	-	(12)
Profit/(loss) before tax attributable to shareholders	141	(163)	294	28	3	303

	31 December 2023					
	Bulgaria	Serbia	Cyprus	Luxembourg	Romania	International
	€ million	€ million	€ million	€ million	€ million	€ million
Segment assets ⁽²⁾	9,832	91	8,625	2,644	143	21,336
Segment liabilities ⁽²⁾	8,714	86	7,300	2,426	214	18,740

	31 December 2022								
	Retail		Corporate		Global Markets & Investment		Other and Elimination		Total
	€ million	€ million	Asset Mngt	Property	RSS	International	center	€ million	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
Net interest income	422	350	284	(12)	62	386	(13)	1,480	
Net commission income	90	114	99	0	4	119	1	427	
Other net revenue	324	5	703	183	(9)	(8)	(63)	1,135	
Total external revenue	836	470	1,087	171	57	497	(75)	3,041	
Inter-segment revenue	22	39	(35)	2	(1)	(2)	(25)	-	
Total revenue	858	508	1,052	173	56	494	(99)	3,041	
Operating expenses	(375)	(116)	(68)	(39)	(64)	(216)	21	(857)	
Impairment losses relating to loans and advances to customers	(105)	(1)	-	-	(135)	(18)	(17)	(276)	
Other impairment losses, risk provisions and related costs (note 12)	(4)	(2)	(18)	(3)	(15)	(13)	(49)	(103)	
Share of results of associates and joint ventures	(0)	0	(0)	-	(0)	-	35	35	
Profit/(loss) before tax from continuing operations before restructuring costs	374	388	966	132	(159)	247	(110)	1,839	
Restructuring costs (note 12)	(24)	(1)	(1)	-	(1)	0	(61)	(89)	
Profit/(loss) before tax from continuing operations	350	387	966	132	(160)	247	(171)	1,751	
Profit before tax from discontinued operations	-	-	-	-	-	1	-	1	
Profit/(loss) before tax attributable to non controlling interests	-	-	-	-	-	(0)	(0)	(0)	
Profit/(loss) before tax attributable to shareholders	350	387	966	132	(160)	248	(171)	1,752	

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	31 December 2022							
	Global Markets & Investment					Other and Elimination center ⁽¹⁾		Total
	Retail € million	Corporate € million	Asset Mngt € million	Property € million	RSS € million	International € million	€ million	
Segment assets	12,541	14,871	13,096	1,445	9,041	21,704	8,776	81,474
Segment liabilities	30,097	12,082	5,572	307	2,009	19,736	4,939	74,742

	31 December 2022					
	Bulgaria € million	Serbia € million	Cyprus € million	Luxembourg € million	Romania € million	Total € million
Net interest income	215	(0)	136	34	2	386
Net commission income	73	(0)	40	8	(1)	119
Other net revenue	(5)	(2)	1	0	(2)	(8)
Total external revenue	282	(2)	177	42	(2)	497
Inter-segment revenue	0	(0)	0	(3)	-	(2)
Total revenue	283	(2)	177	39	(2)	494
Operating expenses	(136)	(2)	(50)	(23)	(5)	(217)
Impairment losses relating to loans and advances to customers	(37)	0	(1)	(0)	20	(18)
Other impairments, risk provisions and related costs	(5)	(0)	(1)	(0)	(7)	(13)
Share of results of associates and joint ventures	-	-	-	-	0	0
Profit/(loss) before tax from continuing operations before restructuring costs	105	(4)	125	15	6	247
Restructuring costs	-	-	-	-	-	-
Profit/(loss) before tax from continuing operations	105	(4)	125	15	6	247
Profit before tax from discontinued operations	-	2	-	-	-	2
Profit/(loss) before tax attributable to non controlling interests	(0)	(0)	-	-	-	(0)
Profit/(loss) before tax attributable to shareholders	105	(3)	125	15	6	248

	31 December 2022					
	Bulgaria € million	Serbia € million	Cyprus € million	Luxembourg € million	Romania € million	International € million
Segment assets ⁽²⁾	7,944	2,504	8,793	2,304	159	21,704
Segment liabilities ⁽²⁾	7,146	2,217	8,031	2,112	230	19,736

⁽¹⁾ Interbank eliminations between International and the other Group's segments are included.

⁽²⁾ Intercompany balances among the Countries have been excluded from the reported assets and liabilities of International segment.

43.2 Entity wide disclosures

Breakdown of the Group's revenue for each group of similar products and services is as follows:

	2023 € million	2022 € million
Lending related activities	1,117	1,364
Deposits, network and asset management activities	1,671	310
Capital markets	(36)	951
Non banking and other services	162	416
Total from continuing operations	2,914	3,041

Information on the Country by Country Reporting based on Law 4261/2014 is provided in the Appendix.

Notes to the Consolidated Financial Statements

44. Post balance sheet events

Details of post balance sheet events are provided in the following notes:

- Note 2.1 – Basis of preparation
- Note 4 – Capital Management
- Note 5.2.1.3 – Debt Securities
- Note 11 – Operating expenses
- Note 13 – Income tax
- Note 20 – Loans and advances to customers
- Note 23.1 – Shares in subsidiaries
- Note 24 – Investments in associates and joint ventures
- Note 34 – Debt securities in issue
- Note 36 – Standard legal staff retirement indemnity obligations (SLSRI) and termination benefits
- Note 42 – Contingent liabilities and other commitments

45. Related parties

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

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

Fairfax Group, which holds 32.93% of Eurobank Holdings' share capital as of 31 December 2023 (31 December 2022: 32.99%), is considered to have significant influence over the Company. In addition, following the completion of the acquisition of all of Eurobank Holdings' shares held by the HFSF, on 9 October 2023 (note 37), the HFSF is no longer considered to have significant influence over the Company.

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

A number of banking transactions are entered into with related parties in the normal course of business and are conducted on an arm's length basis. These include loans, deposits and guarantees. In addition, as part of its normal course of business in investment banking activities, the Group at times may hold positions in debt and equity instruments of related parties.

Notes to the Consolidated Financial Statements

The outstanding balances of the transactions with (a) Fairfax group, (b) the key management personnel (KMP) and the entities controlled or jointly controlled by KMP and (c) other related parties, as well as the relating income and expenses are as follows:

	31 December 2023			31 December 2022		
	Fairfax Group ^{(2) (4)} € million	KMP and Entities controlled or jointly controlled by KMP ⁽¹⁾ € million	Other Related Parties ⁽³⁾ € million	Fairfax Group ⁽²⁾ € million	KMP and Entities controlled or jointly controlled by KMP ⁽¹⁾ € million	Other Related Parties ⁽³⁾ € million
Investment securities	-	-	60.95	-	-	-
Loans and advances to customers	119.64	5.25	25.55	73.45	5.69	0.14
Other assets	12.89	0.54	85.19	0.39	-	87.07
Due to credit institutions	-	-	0.04	-	-	-
Due to customers	46.57	16.33	93.24	34.22	20.98	97.50
Debt securities in issue	82.85	2.01	103.56	81.98	1.27	102.47
Other liabilities	0.01	0.11	6.02	0.13	0.20	10.35
Net interest income	3.20	(0.05)	(0.98)	(0.69)	0.01	(4.68)
Net banking fee and commission income	0.04	0.07	10.57	0.02	0.11	10.89
Net trading income	-	-	-	-	-	0.01
Gains less losses from investment securities	-	-	0.57	-	-	-
Impairment losses relating to loans and securities including relative fees	(2.60)	-	(77.26)	(0.55)	-	(62.75)
Other operating income/(expenses)	5.71	(13.97)	(9.06)	9.56	(15.18)	(10.17)
Guarantees issued	2.47	-	-	1.97	-	-
Guarantees received	-	-	-	-	0.01	-

⁽¹⁾ Includes the key management personnel of the Group and their close family members.

⁽²⁾ The balances with the Group's associate Eurolife FFH Insurance Group Holdings S.A., which is also a member of Fairfax Group are presented in the column other related parties.

⁽³⁾ Other related parties include associates (Hellenic Bank is included as of the second quarter of 2023, note 24), joint ventures and the Eurobank Group's personnel occupational insurance fund. In particular, as at 31 December 2023 the outstanding balances of transactions with the Fund refer mainly to deposits of € 1 million received from the Fund (31 December 2022: € 1 million).

⁽⁴⁾ In January 2023, the Bank disposed of a 10.8% holding in Fairfax Group's subsidiary "Grivalia Hospitality S.A." to Eurolife FFH Insurance Group Holdings S.A for a cash consideration of € 48.3 million. Furthermore, in March and November 2023, the Bank participated in the share capital increase of "Grivalia Hospitality S.A." with an amount of € 8.6 and € 6.05 million respectively. As at 31 December 2023, the Bank's retained holding in the entity was 9.2%.

For the year ended 31 December 2023, an impairment of € 0.01 million (2022: € 0.8 million) has been recorded against loan balances with Group's associates and joint ventures, while the respective impairment allowance amounted to € 0.02 million (31 December 2022: € 0.02 million).

Key management compensation (directors and other key management personnel of the Group)

Key management personnel are entitled to compensation in the form of short-term employee benefits of € 8.32 million (2022: € 7.52 million) and long-term employee benefits of € 1.36 million (2022: € 1.24 million). Additionally, the Group has recognised € 3.98 million expense relating with equity settled share based payments (2022: € 1.94 million) (note 39). Furthermore, as at 31 December 2023, the defined benefit obligation for the KMP amounts to € 1.77 million (31 December 2022: € 1.58 million), while the respective cost for the year through the income statement amounts to € 0.14 million (2022: € 0.12 million) and the other comprehensive income (actuarial loss) amounts to € 0.05 million (2022: € 0.07 million actuarial gain).

Notes to the Consolidated Financial Statements

46. External Auditors

The Group has adopted a Policy on External Auditors' Independence which provides amongst others, for the definition of the permitted and non-permitted services the Group auditors may provide further to the statutory audit. For any such services to be assigned to the Group's auditors there are specific controlling mechanisms in order for the Company's Audit Committee to ensure that a) the non-audit services assigned to "KPMG Certified Auditors S.A.", along with the KPMG network (KPMG), have been reviewed and approved as required and b) there is proper balance between audit and permitted non-audit work.

The total fees of the Group's principal independent auditor KPMG, for audit and other services provided are analyzed as follows:

	2023	2022
	€ million	€ million
Statutory audit ⁽¹⁾	(2.9)	(2.9)
Tax certificate	(0.4)	(0.4)
Other audit related assignments	(1.4)	(1.1)
Non audit assignments	(0.2)	(0.1)
Total from continuing operations	(4.9)	(4.5)

⁽¹⁾ Includes fees for statutory audit of the annual separate and consolidated financial statements.

It is noted that the non-audit assignment fees of "KPMG Certified Auditors S.A." Greece, statutory auditor of the Group, amounted to € 0.08 million.

Notes to the Consolidated Financial Statements

47. Board of Directors

The Board of Directors (BoD) was elected by the Annual General Meeting of the Shareholders (AGM) held on 23 July 2021 for a three-year term of office that will expire on 23 July 2024, prolonged until the end of the period the AGM for the year 2024 will take place.

Further to that:

- The AGM held on 20 July 2023 approved the appointment of Mr. Burkhard Eckes and Mr. John Arthur Hollows as new independent non-executive members of Eurobank Holdings BoD, whose term of office will expire concurrently with the term of office of the other members of the BoD. On the same day the BoD decided its constitution.
- On 9 October 2023, Eurobank Holdings announced the acquisition of all of its issued shares held by the HFSF, namely 52,080,673 common registered shares (note 37). On the same day, the HFSF notified Eurobank Holdings that effective as of 11 October 2023, the HFSF will no longer have the special rights provided in law 3864/2010, including the right to appoint a representative in the Board of Directors and the Board Committees. Following these developments, the HFSF representative Mrs. Efthymia Deli, member of the Boards of Directors and of the Committees of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 26 October 2023 her resignation from the abovementioned positions, effective as of 7 November 2023.
- Mr. Andreas Athanasopoulos, Deputy CEO and Executive Member of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 31 October 2023 his resignation from the abovementioned positions, effective as of 31 December 2023.

Following the above, the BoD is as follows:

G. Zanias	Chairman, Non-Executive Member
G. Chryssikos	Vice Chairman, Non-Executive Member
F. Karavias	Chief Executive Officer
S. Ioannou	Deputy Chief Executive Officer
K. Vassiliou	Deputy Chief Executive Officer
B.P. Martin	Non-Executive Member
A. Gregoriadi	Non-Executive Independent Member
I. Rouvitha Panou	Non-Executive Independent Member
R. Kakar	Non-Executive Independent Member
J. Mirza	Non-Executive Independent Member
C. Basile	Non-Executive Independent Member
B. Eckes	Non-Executive Independent Member
J. A. Hollows	Non-Executive Independent Member

Athens, 28 March 2024

Georgios P. Zanias
 I.D. No AI - 414343
 CHAIRMAN
 OF THE BOARD OF DIRECTORS

Fokion C. Karavias
 I.D. No AI - 677962
 CHIEF EXECUTIVE OFFICER

Harris V. Kokologiannis
 I.D. No AN - 582334
 GENERAL MANAGER OF GROUP FINANCE
 CHIEF FINANCIAL OFFICER

Notes to the Consolidated Financial Statements

APPENDIX – Disclosures under Law 4261/2014

Country by Country Reporting

Pursuant to article 81 of Law 4261/2014, which incorporated article 89 of Directive 2013/36/EC into the Greek legislation, the Group provides the following information for each country in which it has an establishment:

- (i) Names, nature of activities and geographical location.
- (ii) The operating income (turnover), the profit/(loss) before tax, the tax on profit/ (loss) and the current tax on a consolidated basis for each country; intercompany transactions among countries are eliminated through the line 'Intra-Group amounts'. The amounts disclosed are prepared on the same basis as the Group's financial statements for the year ended 31 December 2023.
- (iii) The number of employees on a full time equivalent basis.
- (iv) The public subsidies received.

For the listing of the Bank's subsidiaries at 31 December 2023, the country of their incorporation and the line of their business refer to note 23.1.

The information per country is set out below:

	Year ended 31 December 2023				Number of employees at 31 December
	Operating income	Profit/(loss) before tax	Tax on profit/(loss)	Current tax	
	€ million	€ million	€ million	€ million	
Greece	2,124	1,044	(192)	(14)	6,320
Bulgaria	406	150	(18)	(17)	3,794
Romania	(5)	(8)	(1)	(1)	13
Cyprus	314	223	(39)	(39)	472
Serbia	(5)	(6)	(0)	(0)	6
Luxembourg ⁽¹⁾	78	47	(11)	(12)	123
Netherlands	5	5	-	-	-
Other countries	(1)	(1)	(0)	(0)	-
Intra-Group amounts	(2)				
Total from continuing operations	2,914	1,454	(261)	(83)	10,728
Eurobank Direktna a.d. disposal group	100	(47)	17	(0)	
Total from discontinued operations	100	(47)	17	(0)	
Total	3,014	1,407	(244)	(83)	10,728

⁽¹⁾ The operations of Eurobank Private Bank Luxembourg S.A.'s branch in London are included within Luxembourg.

Article 82 of Law 4261/2014

For 2023, the Group's return on assets (RoA) was 1.39 %. RoA is calculated by dividing the net profit for the year ended 31 December 2023 by the Group's average total assets for the year.

FINANCIAL STATEMENTS

FOR THE YEAR ENDED
31 DECEMBER 2023

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Balance Sheet

	<u>Note</u>	31 December	
		2023	2022
		€ million	€ million
ASSETS			
Due from credit institutions	4.1	399	57
Investment securities	9	1,277	1,275
Shares in subsidiaries	10	4,104	4,097
Other assets	11	4	5
Total assets		5,784	5,434
LIABILITIES			
Due to credit institutions	4.1	31	-
Debt securities in issue	12	1,277	1,275
Other liabilities	13	2	3
Total liabilities		1,310	1,278
EQUITY			
Share capital	14	818	816
Share premium	14	1,161	1,161
Treasury shares	14	(94)	-
Corporate law reserves	15	20	-
Special reserves	15	1,414	1,004
Other reserves	15	1,178	1,178
Retained earnings/(losses)	15	(23)	(3)
Total equity		4,474	4,156
Total equity and liabilities		5,784	5,434

Notes on pages 5 to 30 form an integral part of these financial statements.

Statement of Comprehensive Income

	Note	Year ended 31 December	
		2023	2022
		€ million	€ million
Interest income		92	63
Interest expense		(93)	(63)
Net interest income/(expense)	5	(1)	(0)
Dividend income	15	410	-
Other income/(expenses)	6	4	3
Operating income		413	3
Operating expenses	7	(11)	(10)
Profit/(Loss) from operations before impairments		402	(7)
Impairment losses	9	1	(1)
Profit/(Loss) before tax		403	(8)
Income tax	8	(0)	(0)
Total comprehensive income		403	(8)

Notes on pages 5 to 30 form an integral part of these financial statements

Statement of Changes in Equity

	Share capital € million	Share premium € million	Reserves and Retained earnings € million	Total € million
Balance at 1 January 2022	816	8,056	(4,712)	4,160
Net profit/(loss)	-	-	(8)	(8)
Total comprehensive income for the year ended 31 December 2022	-	-	(8)	(8)
Offsetting of equity accounts	-	(6,895)	6,895	-
Share options plan	0	0	4	4
	0	(6,895)	6,899	4
Balance at 31 December 2022	816	1,161	2,179	4,156
Balance at 1 January 2023	816	1,161	2,179	4,156
Net profit/(loss)	-	-	403	403
Total comprehensive income for the year ended 31 December 2023	-	-	403	403
Share options plan (note 16)	1	0	7	8
Purchase/sale of treasury shares (note 14)			(94)	(94)
	1	0	(87)	(85)
Balance at 31 December 2023 ⁽¹⁾	818	1,161	2,495	4,474
	Note 14	Note 14	Note 15	

⁽¹⁾ The changes in equity for the year ended 31 December 2023 do not sum to the totals provided due to rounding

Notes on pages 5 to 30 form an integral part of these financial statements.

Cash Flow Statement

	Note	Year ended 31 December	
		2023 € million	2022 € million
Cash flows from operating activities			
Profit/(loss) before income tax		403	(8)
Adjustments for :			
Impairment losses	9	(1)	1
Depreciation and amortisation		0	0
(Income)/losses on debt securities in issue	17	1	33
Dividends from subsidiaries	15	(410)	-
(Income)/losses relating to investing activities	17	(1)	(33)
Other adjustments		1	1
		<u>(7)</u>	<u>(6)</u>
Changes in operating assets and liabilities			
Net (increase)/decrease in other assets		1	0
Net increase/(decrease) in due to credit institutions		31	-
Net increase/(decrease) in other liabilities		0	1
		<u>32</u>	<u>1</u>
Net cash from/(used in) operating activities		<u>25</u>	<u>(5)</u>
Cash flows from investing activities			
Acquisition of fixed and intangible assets		(0)	(0)
(Purchases)/sales and redemptions of investment securities		-	(295)
Dividends from subsidiaries	15	410	-
Net cash from/(used in) investing activities		<u>410</u>	<u>(295)</u>
Cash flows from financing activities			
(Repayments)/proceeds from debt securities in issue		-	295
Proceeds from exercise of share options	14	1	0
(Purchase)/sale of treasury shares	14	(94)	-
Net cash from/(used in) financing activities		<u>(93)</u>	<u>295</u>
Net increase/(decrease) in cash and cash equivalents		<u>342</u>	<u>(5)</u>
Cash and cash equivalents at beginning of year		57	62
Cash and cash equivalents at end of year	17	<u>399</u>	<u>57</u>

Notes on pages 5 to 30 form an integral part of these financial statements.

Notes to the Financial Statements

1. General information

Eurobank Ergasias Services and Holdings S.A. (the Company or Eurobank Holdings) is the parent company of Eurobank S.A. (the Bank) which along with its subsidiaries (Eurobank S.A. Group), comprise the major part of Eurobank Holdings Group (the Group) (note 10). The Company operates mainly in Greece and through the Bank's subsidiaries in Central and Southeastern Europe. Its main activities relate to the strategic planning of the administration of non-performing loans and the provision of services to its subsidiaries and third parties, while the Eurobank S.A. Group is active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Company is incorporated in Greece, with its registered office at Othonos Street, Athens 105 57 and its shares are listed on the Athens Stock Exchange.

These financial statements were approved by the Board of Directors on 28 March 2024. The Independent Auditor's Report is included in section B I of the Annual Financial Report.

2. Basis of preparation and material accounting policies

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

2.1 Basis of preparation

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

The financial statements are prepared under the historical cost basis except for the financial assets measured at fair value through other comprehensive income and financial assets and financial liabilities measured at fair-value-through-profit-or-loss.

The accounting policies for the preparation of the financial statements of the Company have been consistently applied to the years 2023 and 2022, after taking into account the amendments in IFRSs as described in section 2.1.1 (a) "New and amended standards adopted by the Company as of 1 January 2023". Where necessary, comparative figures have been adjusted to conform to changes in presentation in the current year.

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

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

Notes to the Financial Statements

Going concern considerations

The Company's business strategy and activities are linked to those of its banking subsidiary Eurobank S.A. In this context, the directors monitor closely the capital and liquidity position of the Bank as well as the associated risks, uncertainties and the mitigating factors affecting its operations. The annual financial statements have been prepared on a going concern basis, as the Board of the Directors considered as appropriate, taking into consideration the following:

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

According to EC's winter economic forecasts (February 2024), the real GDP in Bulgaria is expected to grow by 1.9% and 2.5% in 2024 and 2025, respectively (2023: 2%), while the HICP is forecast to decrease to 3.4% in 2024 and 2.9% in 2025 (2023: 8.6%). In Cyprus, the real GDP growth is forecast at 2.8% and 3% in 2024 and 2025, respectively (2023: 2.5%), while the HICP is estimated at 2.4% in 2024 and 2.1% in 2025 (2023: 3.9%).

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

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

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

Regarding the outlook for the next 12 months, the major macroeconomic risks and uncertainties in Greece and our region are associated with: (a) the open war fronts in Ukraine and the Middle East, their implications regarding regional and global stability and security, and their repercussions on the global and the European economy, including the disruption in global trade caused by the recent attacks on trading vessels in the Red Sea, (b) a potential prolongation of the ongoing inflationary wave and its impact on economic growth, employment, public finances, household budgets, firms' production costs, external trade and banks' asset quality, as well as any potential social and/or political ramifications these may entail, (c) the timeline of the anticipated interest rate cuts by

Notes to the Financial Statements

the ECB and the Federal Reserve Bank, as persistence on high rates for longer may keep exerting pressure on sovereign and private borrowing costs and certain financial institutions' balance sheets, but early rate cuts entail the risk of a rebound in inflation, (d) the prospect of Greece's and Bulgaria's major trade partners, primarily the euro area, remaining stagnant or even facing a temporary downturn, (e) the persistently large current account deficits that have started to become once again a structural feature of the Greek economy, (f) the absorption capacity of the NGEU and MFF funds and the attraction of new investments in the countries of presence, especially in Greece, (g) the effective and timely implementation of the reform agenda required to meet the RRF milestones and targets and to boost productivity, competitiveness, and resilience and (h) the exacerbation of natural disasters due to the climate change and their effect on GDP, employment, fiscal balance and sustainable development in the long run.

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

For the year ended 31 December 2023, at the Group level, the net profit attributable to shareholders amounted to € 1,140 million (2022: € 1,347 million, restated). The adjusted net profit, excluding the € 111 million gain arising from the acquisition of the 29.2% shareholding of Hellenic Bank, accounted for as an associate, € 141 million net loss from discontinued operations, € 48 million net loss on projects 'Solar' and 'Leon' related to the NPE reduction plan, € 10 million provision (after tax) for the Bank's contribution to the restoration initiatives after natural disasters, and € 29 million restructuring costs (after tax) amounted to € 1,256 million (2022: € 1,178 million, restated), of which € 468 million profit was related to the international operations (2022: € 211 million profit). The net profit for the Company, carrying the impact of the Bank's distribution of non-mandatory reserves totalling €410 million to the Company (note 15), equals to € 403 million (2022: € 8 million loss). The Group's Total Adequacy Ratio (total CAD) and Common Equity Tier 1 (CET1) ratios stood at 19.4% (31 December 2022: 19.2%) and 16.9% (31 December 2022: 16%) respectively as at 31 December 2023. The Group completed successfully the 2023 EU-wide stress test (ST), which was coordinated by the European Banking Authority (EBA) in cooperation with the ECB and the European Systemic Risk Board (ESRB). On 9 October 2023, the Company completed the buy back of all of its issued shares held by HFSF. Accordingly, the Company and the Bank are no longer subject to Law 3864/2010 and to the special rights of HFSF provided for in the law.

With regard to asset quality, as at 31 December 2023, the Group's NPE stock stood at € 1.5 billion, following the classification of the loan portfolio of project 'Leon' as held for sale, the sale of Eurobank Direktna and the write-offs during the year (31 December 2022: € 2.3 billion), driving the NPE ratio to 3.5% (31 December 2022: 5.2%), while the NPE coverage ratio improved to 86.4% (31 December 2022: 74.6%).

In terms of liquidity, as at 31 December 2023, following the completion of the sale of Eurobank Direktna a.d. disposal group, the Group deposits stood at € 57.4 billion (31 December 2022: € 57.2 billion), while the funding from the ECB refinancing operations amounted to € 3.8 billion (31 December 2022: € 8.8 billion). During the year, the Bank proceeded with the issuance of two preferred senior notes of € 500 million each. More recently, in January 2024, the Company completed the issue of a € 300 million Subordinated Tier II debt instrument. The rise in high quality liquid assets of the Group led the respective Liquidity Coverage ratio (LCR) to 178.6% (31 December 2022: 173%).

Going concern assessment

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

Notes to the Financial Statements

2.1.1 New and amended standards and interpretations

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

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

IAS 8, Amendments, Definition of Accounting Estimates

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Company has adopted the amendments and the temporary exception retrospectively, upon their endorsement by the EU in November 2023. The adoption of the amendments had no impact on the financial statements.

Further information in respect of the Company's exposure to Pillar Two income taxes is provided in note 8.

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

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

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

The amendments, published in January 2020, introduce a definition of settlement of a liability, while they make clear that the classification of liabilities as current or non-current should be based on rights that are in existence at the end of the reporting period. In addition, it is clarified that the assessment for liabilities classification made at the end of the reporting period is not affected by the expectations about whether an entity will exercise its right to defer settlement of a liability. The Board also clarified that when classifying liabilities as current or non-current, an entity can ignore only those conversion options that are classified as equity.

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

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

2.2 Material accounting policies

2.2.1 Investments in subsidiaries

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

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

Dividend income from investments in subsidiaries is recognised in the income statement when the right to receive payment is established, that is when the dividend distribution is approved by the appropriate body of the entity.

A listing of the Company's subsidiaries is set out in note 10.

2.2.2 Foreign currencies

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

Monetary assets and liabilities denominated in foreign currencies are translated into the functional currency at the exchange rates prevailing at each reporting date and exchange differences are recognized in the income statement.

Non-monetary assets and liabilities are translated into the functional currency at the exchange rates prevailing at initial recognition.

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2.2.3 Interest income and expense

Interest income and expense are recognized in the income statement for all interest bearing financial instruments on an accrual basis, using the effective interest rate (EIR) method. The effective interest rate is the rate that exactly discounts estimated future cash payments or receipts through the expected life of the financial instrument or, when appropriate, a shorter period to the gross carrying amount of the financial asset or to the amortized cost of a financial liability. When calculating the EIR for financial instruments, the Company estimates future cash flows considering all contractual terms of the financial instrument but does not consider expected credit losses.

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

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

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

For financial assets that have become credit-impaired subsequent to initial recognition (exposures in Stage 3), the Company calculates interest income by applying the effective interest rate to the amortized cost of the financial asset (i.e. gross carrying amount adjusted for the expected credit loss allowance). If the asset is no longer credit-impaired, then the EIR is applied again to the gross carrying amount.

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

2.2.4 Impairment of subsidiaries

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

If any indication of impairment exists at each reporting date, the Company estimates the recoverable amount of the investment, being the higher of its fair value less costs to sell and its value in use.

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

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

2.2.5 Financial assets

Financial assets – Classification and measurement

The Company classifies its financial assets based on the business model for managing those assets and their contractual cash flow characteristics. Accordingly, financial assets are classified into one of the following measurement categories: amortized cost (AC) and fair value through other comprehensive income (FVOCI).

Financial Assets measured at Amortized Cost ('AC')

The Company classifies and measures a financial asset at AC only if both of the following conditions are met:

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(a) The financial asset is held within a business model whose objective is to collect contractual cash flows (hold-to-collect business model) and,

(b) The contractual terms of the financial asset give rise on specified dates to cash flows that are solely payments of principal and interest on the principal amount outstanding (SPPI).

These financial assets are recognized initially at fair value plus or minus direct and incremental transaction costs that are attributable to the acquisition of these assets, and are subsequently measured at amortized cost, using the effective interest rate (EIR) method (as described in 2.2.3 above).

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

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

The Company classifies and measures a financial asset at FVOCI only if both of the following conditions are met:

(a) The financial asset is held within a business model whose objective is achieved by both collecting contractual cash flows and selling financial assets (hold-to-collect-and-sell business model) and,

(b) The contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI.

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

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

Business model and contractual characteristics assessment

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

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

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

Types of business models

The Company's business models fall into two categories, which are indicative of the key strategies used to generate returns. The hold-to-collect (HTC) business model has the objective to hold the financial assets in order to collect contractual cash flows. Financial assets classified within this business model include investment securities and due from banks, which are measured at amortized cost. Sales within this model are monitored and may be performed for reasons which are not inconsistent with this business model. More specifically, sales of financial assets due to credit deterioration, as well as sales close to the maturity are considered consistent with the objective of hold-to-collect contractual cash flows regardless of value and frequency. Sales for other reasons may be consistent with the HTC model such as liquidity needs in any stress case scenario or sales made to manage high concentration level of credit risk. Such sales are monitored and assessed depending on frequency and value to conclude whether they are consistent with the HTC model.

The hold-to-collect-and-sell business model (HTC&S) has the objective both to collect contractual cash flows and sell the assets. Activities such as liquidity management, interest yield and duration are consistent with this business model, while sales of assets

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

Cash flow characteristics assessment

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

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

More specifically, at the initial recognition of a financial asset, an assessment is performed of whether the financial asset contains a contractual term that could change the amount or timing of contractual cash flows in a way that it would not be consistent with the above condition. The Company considers the existence of various features, including among others, prepayment terms, deferred interest-free payments, extension and equity conversion options. Where the contractual terms introduce exposure to risk or volatility that are inconsistent with a basic lending arrangement, the related financial asset is considered to have failed the SPPI assessment and will be measured at FVTPL.

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

Derecognition of financial assets

The Company derecognizes a financial asset when its contractual cash flows expire, or the rights to receive those cash flows are transferred in an outright sale in which substantially all risks and rewards of ownership have been transferred. In addition, a financial asset is derecognized even if rights to receive cash flows are retained but at the same time the Company assumes an obligation to pay the received cash flows without a material delay (pass through agreement) or when substantially all the risks and rewards are neither transferred nor retained but the Company has transferred control of the asset. Control is transferred if, and only if, the transferee has the practical ability to sell the asset in its entirety to unrelated third party and is able to exercise that ability unilaterally and without imposing additional restrictions on the transfer.

On derecognition of a financial asset, the difference between the carrying amount of the asset and the consideration received (including any new asset obtained less any new liability assumed) is recognized in income statement.

Modification of financial assets that may result in derecognition

In addition, derecognition of financial asset arises when its contractual cash flows are modified and the modification is considered substantial enough so that the original asset is derecognized and a new one is recognised. Substantial modifications resulting in derecognition may include among others change in borrower, change in the asset's denomination currency, debt consolidation of unsecured exposure into a single new secured asset. The Company records the modified asset as a 'new' financial asset at fair value plus any eligible transaction costs and the difference with the carrying amount of the existing one is recorded in the income statement as derecognition gain or loss.

2.2.6 Financial liabilities

Financial liabilities - Classification and measurement

The Company classifies its financial liabilities at amortized cost category.

These financial liabilities are recognized initially at fair value minus transaction costs that are attributable to the issue of these liabilities, and are subsequently measured at amortized cost, using the effective interest rate (EIR) method (as described in 2.2.3 above).

Derecognition of financial liabilities

A financial liability is derecognized when the obligation under the liability is discharged, cancelled or expires. When an existing financial liability of the Company is replaced by another from the same counterparty on substantially different terms, or the terms

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of an existing liability are substantially modified, such an exchange or modification is treated as an extinguishment of the original liability and the recognition of a new liability and any difference arising is recognized in the income statement.

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

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

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

2.2.7 Fair value measurement of financial instruments

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

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

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

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

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

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

2.2.8 Impairment of financial assets

The Company recognizes allowance for expected credit losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at AC. ECL are a probability-weighted average estimate of credit losses that reflects the time value of money.

Upon initial recognition of the financial instruments, the Company records a loss allowance equal to 12-month ECL, being the ECL that result from default events that are possible within the next twelve months. Subsequently, for those financial instruments that have experienced a significant increase in credit risk (SICR) since initial recognition, a loss allowance equal to lifetime ECL is recognized, arising from default events that are possible over the expected life of the instrument.

Accordingly, ECL are recognized using a three-stage approach based on the extent of credit deterioration since origination:

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- Stage 1 – When there is no significant increase in credit risk since initial recognition of a financial instrument, an amount equal to 12-month ECL is recorded. The 12 – month ECL represent a portion of lifetime losses, that result from default events that are possible within the next 12 months after the reporting date and is equal to the expected cash shortfalls over the life of the instrument or group of instruments, due to loss events probable within the next 12 months. Not credit-impaired financial assets that are either newly originated or purchased, as well as assets recognized following a substantial modification accounted for as a derecognition, are classified initially in Stage 1.
- Stage 2 – When a financial instrument experiences a SICR subsequent to origination but is not considered to be in default, it is included in Stage 2. Lifetime ECL represent the expected credit losses that result from all possible default events over the expected life of the financial instrument.
- Stage 3 – Financial instruments that are considered to be in default are included in this stage. Similar to Stage 2, the allowance for credit losses captures the lifetime expected credit losses.

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

- The borrower faces a significant difficulty in meeting his financial obligations.
- There has been a breach of contract, such as a default or past due event.
- The Company, for economic or contractual reasons relating to the borrower's financial difficulty, has granted to the borrower a concession(s) that the Company would not otherwise consider.
- There is a probability that the borrower will enter bankruptcy or other financial re-organization.

The Company determines the risk of default using an internal credit rating scale. In particular, the Company considers financial assets as credit impaired if the internal rating of the counterparty corresponds to a rating equivalent to "C" (Moody's rating scale).

Significant increase in credit risk (SICR) and staging allocation

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

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

Specifically, the assessment of SICR is performed on an individual basis based on the number of notches downgrade in the internal credit rating scale since the origination date.

Transfers from Stage 2 to Stage 1

A financial asset, which is classified to Stage 2 due to SICR, is reclassified to Stage 1, as long as it does not meet anymore any of the Stage 2 Criteria.

Transfers from Stage 3 to Stage 2

A financial asset is transferred from Stage 3 to Stage 2, when the criteria based on which the financial asset was characterized as credit impaired, are no longer valid.

Measurement of Expected Credit Losses/ECL Key Inputs

The ECL calculations are based on the term structures of the probability of default (PD), the loss given default (LGD) and the exposure at default (EAD). Generally, these parameters are based on observed point-in-time and historical data, derived by international rating agencies.

The PDs are obtained by an international rating agency using risk methodologies that maximize the use of objective non-judgmental variables and market data. The Company assigns internal credit ratings to each counterparty based on these PDs.

The Exposure at default (EAD) is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date.

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

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Presentation of impairment allowance

For financial assets measured at amortized cost, impairment allowance is recognized as a loss allowance reducing the gross carrying amount of the financial assets in the balance sheet. The respective ECL is recognised within impairment losses.

Write-off of financial assets

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

2.2.9 Income tax

Income tax consists of current and deferred tax.

(i) Current income tax

Income tax payable on profits, based on the applicable tax law and the tax rate enacted at the reporting date, is recognized as an expense in the period in which profits arise.

(ii) Deferred tax

Deferred tax is provided in full, using the liability method, on temporary differences arising between the tax base of assets and liabilities and their carrying amounts in the financial statements. Deferred tax assets and liabilities are measured at the tax rates that are expected to apply to the period when the asset is realized or the liability is settled, based on tax rates (and tax laws) that have been enacted or substantively enacted by the balance sheet date.

Deferred tax assets are recognized where it is probable that future taxable profit will be available against which the temporary differences can be utilized. The carrying amount of deferred tax assets is reviewed at each reporting date and reduced to the extent that it is no longer probable that sufficient taxable profits will be available to allow all or part of the asset to be recovered. Any such reduction is reversed to the extent that it becomes probable that sufficient taxable profit will be available. The Company recognises a previously unrecognised deferred tax asset to the extent that it has become probable that future taxable profit will allow the deferred tax asset to be recovered. The deferred tax asset on income tax losses carried forward is recognized as an asset when it is probable that future taxable profits will be available against which these losses can be utilized.

The Company has applied the mandatory temporary exception (relief) to the requirement of IAS 12 and does not recognise or disclose information about deferred taxes arising from the Pillar Two Income taxes.

(iii) Uncertain tax positions

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

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

The Company as a general rule has opted to obtain an 'Annual Tax Certificate', which is issued after a tax audit is performed by the same statutory auditor or audit firm that audits the annual financial statements. Further information in respect of the Annual Tax Certificate and the related tax legislation, is provided in note 8.

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2.2.10 Employee benefits

(i) Short term benefits

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

(ii) Pension obligations

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

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

The Company operates unfunded defined benefit plans, under the regulatory framework. In accordance with the local labor legislation, the Company provides for staff retirement indemnity obligation for employees which are entitled to a lump sum payment based a) on the number of years of service, as of the date when employee service first leads to benefits under the plan until the date when further employee service will lead to no material amount of further benefits, and b) the level of remuneration at the date of retirement, if they remain in the employment of the Company until normal retirement age. In addition, the Company provides termination benefits mainly in respect of the Voluntary Exit Schemes (VES), which have been implemented through either lump-sum payments or long-term leaves during which the employees will be receiving a percentage of a monthly salary, or a combination thereof. Provision has been made for the actuarial value of the lump sum payable on retirement (SLSRI) and termination benefits using the projected unit credit method. Under this method the cost of providing retirement indemnities and termination benefits is charged to the income statement so as to spread the cost over the period of service of the employees, in accordance with the respective actuarial valuations which are performed every year.

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

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

Termination benefits are payable when employment is terminated by the Company before the normal retirement date, or whenever an employee accepts voluntary redundancy in exchange for these benefits (including those in the context of the VES implemented by the Company). The Company recognizes termination benefits at the earlier of the following dates: (a) when the Company can no longer withdraw the offer of those benefits; and (b) when the Company recognizes costs for a restructuring that involves the payment of termination benefits. Any reversals of the SLSRI obligation arising from employees that are included in the long-term leaves scheme are accounted for as a curtailment gain recognized in the income statement. In the case of an offer made to encourage voluntary redundancy, the termination benefits are measured based on the number of employees expected to accept the offer. Termination benefits falling due more than 12 months after the end of the reporting period are discounted to their present value.

(iv) Performance-based cash payments

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

(v) Share-based payments

The Company's Management awards employees with bonuses in the form of shares and share options on a discretionary basis and after taking into account the current legal framework. Non-performance related shares vest in the period granted. Share based

Notes to the Financial Statements

payments that are contingent upon the achievement of a performance and service condition, vest only if both conditions are satisfied.

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

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

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

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

Share options granted by the Company to employees of group entities are treated as a contribution by the Company to these entities, thus increasing the investment cost in them.

2.2.11 Related party transactions

Related parties of the Company include:

- (a) an entity that has control over the Company and entities controlled, jointly controlled or significantly influenced by this entity, as well as members of its key management personnel and their close family members;
- (b) an entity that has significant influence over the Company and entities controlled by this entity;
- (c) members of key management personnel of the Company, their close family members and entities controlled or jointly controlled by the abovementioned persons;
- (d) subsidiaries; and
- (e) post-employment benefit plans established for the benefit of the Group's employees.

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

2.2.12 Provisions and contingent liabilities

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

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

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

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

2.2.13 Share capital

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

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

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

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

2.2.14 Cash and cash equivalents

Cash and cash equivalents include cash in hand and due from credit institutions that are all carried at amortised cost.

3. Critical accounting estimates and judgments in applying accounting policies

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

The most significant areas in which the Company makes judgments, estimates and assumptions in applying its accounting policies are set out below:

3.1 Impairment losses on financial assets

The expected credit losses (ECL) measurement of financial instruments requires management to apply judgement relating to the risk parameters used in the calculation of the ECL and in assessing whether a significant increase of credit risk (SICR) event has occurred since initial recognition. These estimates are based on quantitative and qualitative information reasonable and supportable forward looking information. A degree of uncertainty is involved in making estimations using assumptions that may be subjective and sensitive to the risk factors.

Specifically, the assessment of SICR is performed on an individual basis based on the number of notches downgrade in the internal credit rating scale since the origination date, while the PD used for the ECL measurement is received by an international rating agency using risk methodologies that maximize the use of observable variables and market data. Furthermore, the LGD used is based on historical data derived from rating agencies' studies that present the recoveries on such instruments taking into account the seniority of the exposure.

The Company independently validates all ECL key inputs and underlying assumptions used in the ECL measurement through competent resources.

3.2 Impairment losses on investment in subsidiaries

The Company assesses for impairment its investment in subsidiaries at each reporting date as described in note 2.2.4. If an indication of impairment exists, the Company performs an impairment test by comparing the carrying value of the investment in the subsidiary with its estimated recoverable amount, determined as the higher of its fair value less cost to sell and its value in use, based on reasonable and supportable information. The calculation of the recoverable amount involves the exercise of judgement in selecting the appropriate parameters, such as the applicable discount and growth rates.

3.3 Income tax

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

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

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regarding the future financial performance of the Company. As at 31 December 2023, based on the Management's assessment the Company is not expected to have sufficient future taxable profits, against which the unused tax losses can be utilized (note 8).

3.4 Retirement benefit obligations

The present value of the retirement benefit obligations depends on a number of factors that are determined on an actuarial basis using a number of assumptions, such as the discount rate and future salary increases. Any changes in these assumptions impact the carrying amount of the pension obligations.

The Company determines the appropriate discount rate used to calculate the present value of the estimated retirement obligations, at the end of each year based on interest rates of high quality corporate bonds. The currency and term to maturity of the bonds used are consistent with the currency and estimated average term to maturity of the retirement benefit obligations. The salary rate increase assumption is based on future inflation estimates reflecting also the Company's reward structure and expected market conditions.

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

For information in respect of the Company's retirement benefit obligations refer to note 13.

3.5 Share-based payments

The Company grants shares and share options to its employees as well as the employees of the Group's entities, as a common feature of employee remuneration.

For shares granted to employees, the fair value is measured directly at the market price of the entity's shares, adjusted to take into account the terms and conditions upon which the shares were granted. For share options granted to employees, in many cases market prices are not available because the options granted are subject to terms and conditions that do not apply to traded options. If this is the case, the Company estimates the fair value of the equity instruments granted using a valuation technique, which is consistent with generally accepted valuation methodologies.

The valuation method and the inputs used to measure the share options granted to employees of the Company and its Group entities are presented in note 16.

4. Financial risk management and fair value

The Company is exposed to financial risks such as credit risk, market risk (including currency and interest rate risk) liquidity risk, operational risk and other non-financial risks, as well as to climate risk.

4.1 Financial risk factors and risk management

As part of its overall system of internal controls the Company has engaged in a Service Level Agreement (SLA) with Eurobank S.A. in order to receive supporting and advisory services in all applicable areas of risk management (credit, market, liquidity and non-financial risks) undertaken by the Company.

The Company's overall risk management strategy seeks to minimize any potential adverse effects on its financial performance, financial position and cash flows.

The main financial risks to which the Company is exposed relate to:

(a) Credit risk

The Company takes on exposure to credit risk which is the risk that a counterparty will be unable to fulfill its payment obligations in full when due. The Company is exposed to credit risk arising mainly from subordinated instruments (note 9) issued by its subsidiary Eurobank S.A. and from its deposits that are placed with the latter of € 399 million. Accordingly, the aggregate carrying amount of the above financial assets approximates the maximum credit risk exposure of the Company.

(b) Market risk

The Company takes on exposure to market risk, which is the risk of potential financial loss due to an adverse change in market variables, such as interest rates and foreign exchange rates.

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The Company's interest rate risk, which relates to the position in the aforementioned subordinated fixed rate instruments, is eliminated by the subordinated Tier II debt instruments issued by the Company, which have equivalent terms with those of the former.

With respect to the deposits and borrowing of the Company, a sensitivity analysis is performed to assess the impact on net interest income (NII) to a hypothetical change in the market interest rates.

The impact on NII is calculated under the scenario of an instantaneous parallel shift of all interest rates by +/- 100bps, for a 1-year period, assuming a static balance sheet approach. As at 31 December 2023 the impact on NII, under the scenario of a parallel shift in the yield curves, stands at € 2 million (+100bps) and € -2 million (-100bps).

The Company's financial assets and liabilities are in Euro, therefore, currency risk is eliminated.

(c) Liquidity risk

The maturity of the Company's main assets and liabilities, which relate to the aforementioned subordinated instruments, match, and the underlying cash flows are the same. Accordingly, the Company's liquidity or cash flow risk for these instruments is substantially eliminated. In addition, the majority of the Company's aforementioned deposits with Eurobank S.A. mature within three months, while its borrowing from the latter (€ 30 million outstanding balance) matures within one year.

(d) Climate related and environmental risks

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

4.2 Fair value of financial assets and liabilities

The Company's financial instruments carried at amortized cost are categorised into the three levels of fair value hierarchy based on whether the inputs to their fair values are market observable or unobservable, as follows:

- Level 1 - Financial instruments are measured based on quoted prices (unadjusted) in active markets for identical financial instruments that the Company can access at the measurement date. A market is considered active when quoted prices are readily and regularly available from an exchange, dealer, broker, industry group, pricing service, or regulatory agency and represent actually and regularly occurring transactions. None of the Company's financial instruments is categorised into Level 1 of the fair value hierarchy.
- Level 2 – Financial instruments are measured using valuation techniques with inputs other than level 1 quoted prices, observable either directly or indirectly, such as (i) quoted prices for similar financial instruments in active markets (ii) quoted prices for identical financial instruments in markets that are not active, (iii) inputs other than quoted prices that are directly or indirectly observable, mainly interest rates and yield curves observable at commonly quoted intervals, forward exchange rates, equity prices, credit spreads and implied volatilities obtained from internationally recognised market data providers and (iv) other unobservable inputs which are insignificant to the entire fair value measurement. Level 2 financial instruments include the subordinated instruments (note 9) issued by its subsidiary Eurobank S.A. and the subordinated Tier II debt instruments (note 12) issued by the Company.
- Level 3 - Financial instruments are measured using valuation techniques with significant unobservable inputs. When developing unobservable inputs, best information available is used, including own data, while at the same time market participants' assumptions are reflected (e.g. assumptions about risk). The Company's financial instruments, which are categorised into Level 3 of the fair value hierarchy refer mainly to the borrowing and deposits with Eurobank S.A.

The fair value of the subordinated Tier II debt instruments issued by the Company (note 12) were determined by using quotes for identical financial instruments in non-active markets obtained from Bloomberg and amounted to € 1,226 million (2022: € 1,188 million). The fair value of the subordinated instruments issued by the Company's subsidiary Eurobank S.A. (note 9) and held by the Company was determined based on the aforementioned instruments which have equivalent terms, therefore, amounted also to € 1,226 million (2022: € 1,188 million).

Moreover, the carrying amount of the Company's borrowing and deposits with Eurobank S.A. represent reasonable approximation of their fair value.

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5. Net interest income

	31 December 2023 € million	31 December 2022 € million
Interest income		
Securities	92	63
	<u>92</u>	<u>63</u>
Interest expense		
Banks	(1)	-
Debt securities in issue	(92)	(63)
	<u>(93)</u>	<u>(63)</u>
Total	<u>(1)</u>	<u>(0)</u>

In the year ended 31 December 2023, the interest expense that was recognised in the income statement mainly relates to the subordinated Tier II instruments issued by the Company, while the interest income of a similar amount relates to the subordinated Tier II notes issued by Eurobank S.A. and held by the Company.

6. Other income/(expenses)

In the year ended 31 December 2023, other income /(expenses), amounting to € 4 million (2022: € 3 million), consist of € 3 million income from IT services (2022: € 1.7 million) and € 1 million income regarding loan portfolio's related services provided to the Bank (2022: € 1.6 million).

7. Operating expenses

In the year ended 31 December 2023, the operating expenses of € 11 million (2022: € 10 million) mainly refer: a) to staff cost € 4.4 million (2022: € 4.1 million) and b) other administrative expenses € 6.3 million (2022: € 5.2 million). Administrative expenses include € 4.3 million (2022: € 4.5 million) insurance premiums relating to the Group's financial lines insurance, including protection for professional liability.

8. Income tax

According to Law 4172/2013 currently in force, the Greek corporate tax rate for legal entities other than credit institutions (i.e. credit institutions that fall under the requirements of article 27A of Law 4172/2013 regarding eligible DTAs/deferred tax credits) is 22%. In addition, the withholding tax rate for dividends distributed, other than intragroup dividends, is 5%. In particular, the intragroup dividends under certain preconditions are relieved from both income and withholding tax.

Current income tax for the year ended 31 December 2023 amounted to € 1 thousand (2022: € 5 thousand). Based on the management's assessment the Company is not expected to have sufficient future taxable profits against which the unused tax losses can be utilized and accordingly, in the year ended 31 December 2023, no deferred tax has been recognized in the statement of comprehensive income.

Pillar Two income taxes

The Pillar Two legislation that introduces a minimum global tax rate at 15% on multinational entities with consolidated revenues over €750 million (top up tax), effective as of 1 January 2024, has been enacted or substantively enacted in certain jurisdictions that the Group operates.

In accordance with the Pillar Two legislation, the Ultimate Parent Entity of an MNE Group is primarily liable for the Globe Top-up Tax of all Low-Tax (subject to an ETR below 15%) Constituent Entities. Top-up taxation is mainly triggered when the jurisdictional GloBE ETR is below 15% and is levied on the aggregated Globe Pillar Two results of all Constituent Entities per jurisdiction.

The Company, as the ultimate parent entity of the Group, has identified potential exposure to Pillar Two income taxes mainly through its subsidiaries in Bulgaria and Cyprus. The Pillar Two effective tax rate is lower than 15% in the above jurisdictions mainly due to their nominal corporate tax rates (CIT) applying on their profits (i.e. the current CIT in Bulgaria and Cyprus is 10% and 12.5% respectively).

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Further information on Pillar Two income taxes is provided in note 13 of the consolidated financial statements for the year ended 31 December 2023.

Tax certificate and open tax years

For fiscal years starting from 1 January 2016 onwards, pursuant to the Tax Procedure Code, an 'Annual Tax Certificate' on an optional basis, is provided for the Greek entities, with annual financial statements audited compulsorily, which is issued after a tax audit is performed by the same statutory auditor or audit firm that audits the annual financial statements. The Company has opted to obtain such certificate.

Following the completion in 2023, of the tax audit of the Company by the tax authorities for the tax year 2019, its open tax years are 2018 and 2020-2023. The tax certificates, which have been obtained by the Company are unqualified for the open tax years until 2022, while for the year ended 31 December 2023, the tax audit from external auditor is in progress.

In accordance with the Greek tax legislation and the respective Ministerial Decisions issued, additional taxes and penalties may be imposed by the Greek tax authorities following a tax audit within the applicable statute of limitations (i.e. five years as from the end of the fiscal year within which the relevant tax return should have been submitted), irrespective of whether an unqualified tax certificate has been obtained from the tax paying company.

In reference to its total uncertain tax positions, the Company assesses all relevant developments (e.g. legislative changes, case law, ad hoc tax/legal opinions, administrative practices) and raises adequate provisions.

Unused tax losses

As at 31 December 2023, the Company has not recognised deferred tax asset (DTA) on unused tax losses amounted to € 337 million (2022: € 380 million). The analysis of unrecognized DTA on unused tax losses of the Company per year of maturity of related tax losses is presented in the table below:

	Unrecognised DTA € million
Year of maturity of unused tax losses	
2024	61
2025	261
2026	12
2027	1
2028	2
Total	337

9. Investment securities

As at 31 December 2023, the total carrying amount of the subordinated debt instruments, issued by the Bank, held by the Company and categorised as at amortised cost, amounted to € 1,277 million (31 December 2022: € 1,275 million), including accrued interest of € 32.9 million (31 December 2022: € 32.8 million), € 4.2 unamortized issuance costs (31 December 2022: € 5.2 million) and impairment allowance of € 1.5 million (31 December 2022: € 2.7 million) (12-month ECL). In particular, in the year ended 31 December 2023, the Company recognised in the statement of comprehensive income € 1.2 million gain, in relation to the reversal of impairment allowance (31 December 2022: € 1.2 million loss). The fair value of the said debt instruments held by the Company was determined based on quotes for the related subordinated Tier II debt instruments issued by the Company (note 12) and amounted to € 1,226 million (31 December 2022: € 1,188 million).

In addition, in the second quarter of 2023, the Company acquired from third parties € 4.6 million debt securities, issued by the Bank, which were classified as financial assets measured at Fair Value through Other Comprehensive Income ('FVOCI'). The abovementioned debt securities were sold to the Bank at the end of June 2023, with an immaterial effect on the Company's operating income (note 19).

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Post balance sheet event

In January 2024, the Bank following the issuance of a € 300 million subordinated Tier II debt instrument by the Company (note 12), issued a subordinated instrument of equivalent terms, held by the Company.

10. Shares in subsidiaries

The following is a listing of the Company's subsidiaries held directly at 31 December 2023:

<u>Name</u>	<u>Percentage holding</u>	<u>Country of Incorporation</u>	<u>Line of business</u>
Eurobank S.A.	100.00	Greece	Banking
Be Business Exchanges S.A. of Business Exchanges Networks and Accounting and Tax Services	98.01	Greece	Business-to-business-commerce, accounting, tax and sundry services

11. Other assets

As at 31 December 2023, other assets amounting to € 4 million (31 December 2022: € 5 million) primarily consist of (a) € 1.3 million (31 December 2022: € 2 million) prepaid expenses mainly for insurance premiums, (b) € 1.2 million (31 December 2022: € 1.7 million) receivables for IT services provided to the Group companies and third parties, (c) € 0.3 million (31 December 2022: € 0.4 million) receivables from Fairfax Group relating to financial consulting services (d) € 0.2 million in relation to property and equipment and intangible assets (31 December 2022: € 0.3 million).

12. Debt securities in issue

In November 2022, the Company announced that it had completed the issuance of €300 million subordinated Tier II debt instruments. The said instruments, mature in December 2032, are callable in December 2027 offering a coupon of 10% per annum and are listed on the Luxembourg Stock Exchange's Euro MTF market. Their carrying amount, as at 31 December 2023, was € 298 million (31 December 2022: € 297 million), including € 4.3 million unamortized issuance costs (31 December 2022: € 5.2 million) and € 2.1 million accrued interest (31 December 2022: € 2.1 million). Their fair value, at the same date, which was determined by using quotes for identical financial instruments in non-active markets, amounted to € 339 million (31 December 2022: € 302 million).

In January 2018, Eurobank Ergasias S.A. issued subordinated Tier II debt instruments of face value of € 950 million, in replacement of the preference shares, which had been issued in the context of the first stream of Hellenic Republic's plan to support liquidity in the Greek economy under Law 3723/2008. The said instruments, mature in January 2028 and pay fixed nominal interest rate of 6.41%, that shall be payable semi-annually. Their carrying amount, as at 31 December 2023, was € 979 million (31 December 2022: € 978 million), including € 1.7 million unamortized issuance costs (31 December 2022: € 2.2 million) and € 30.8 million accrued interest (31 December 2022: € 30.6 million). Their fair value, at the same date, which was determined by using quotes for identical financial instruments in non-active markets, amounted to € 887 million (31 December 2022: € 886 million).

Post balance sheet event

In January 2024, the Company announced the issuance of a € 300 million subordinated Tier II debt instrument which matures in April 2034, is callable at par in April 2029 offering a coupon of 6.25% per annum and is listed on the Luxembourg Stock Exchange's Euro MTF market.

13. Other liabilities

As at 31 December 2023, other liabilities amounting to € 2 million (31 December 2022: € 3 million) primarily consist of (a) € 0.9 million (31 December 2022: € 0.8 million) accrued expenses, (b) € 0.8 million (31 December 2022: € 1 million) current payables to suppliers and (c) € 0.2 million (31 December 2022: € 0.2 million) Standard legal staff retirement indemnity obligations.

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

The Company provides for staff retirement indemnity obligation for its employees, who are entitled to a lump sum payment based on the number of years of service and the level of remuneration at the date of retirement, if they remain in the employment of the Company until normal retirement age, in accordance with the local labor legislation. The above retirement indemnity obligations

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typically expose the Company to actuarial risks such as interest rate risk and salary risk. Therefore, a decrease in the discount rate used to calculate the present value of the estimated future cash outflows or an increase in future salaries will increase the staff retirement indemnity obligations of the Company.

The movement of the liability for standard legal staff retirement indemnity obligations is as follows:

	2023 € million	2022 € million
Balance at 1 January	0.2	0.2
Current service and interest cost	0.04	0.04
Past service cost and (gains)/losses on settlements	-	-
Remeasurements:		
Actuarial (gains)/losses arising from changes in financial assumptions	0.00	(0.04)
Actuarial (gains)/losses arising from experience adjustments	(0.04)	0.03
Benefits paid	-	-
Balance at 31 December	0.2	0.2

Note: For 2023 and 2022, there were no employee termination benefits provided to the Company's personnel in the context of the Voluntary Exit Schemes (VES) launched by Eurobank Holdings group.

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

	2023 %	2022 %
Discount rate	3.6	3.2
Future salary increases	3.2	2.8

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

As at 31 December 2023, the average duration of the standard legal staff retirement indemnity obligation was 7 years (2022: 9 years).

A quantitative sensitivity analysis based on reasonable changes to significant actuarial assumptions as at 31 December 2023 is as follows:

An increase/(decrease) of the discount rate assumed, by 50 bps/(50 bps), would result in a (decrease)/ increase of the standard legal staff retirement obligations by (€ 0.01 million)/ € 0.01 million.

An increase/(decrease) of the future salary growth assumed, by 0.5%/(0.5%), would result in an increase /(decrease) of the standard legal staff retirement obligations by € 0.01 million/ (€ 0.01 million).

The above sensitivity analysis is based on a change in an assumption while holding all other assumptions constant. In practice, this is unlikely to occur, and changes in some of the assumptions may be correlated.

The methods and assumptions used in preparing the above sensitivity analysis were consistent with those used to estimate the retirement benefit obligation and did not change compared to the previous year.

Post balance sheet event

In February 2024, Eurobank Holdings group decided to launch a new VES for eligible units in Greece, which will be offered mainly to employees over a specific age limit. The new VES will be implemented through either lump-sum payments or long term leaves during which the employees will be receiving a percentage of a monthly salary, or a combination thereof and the cost mainly refers to Eurobank S.A. and its subsidiaries.

14. Share capital, share premium and treasury shares

As at 31 December 2023, the par value of the Company's shares is € 0.22 per share (2022: € 0.22). All shares are fully paid. The movement of share capital and share premium is as follows:

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	Share capital € million	Share premium € million
Balance at 1 January 2022	816.0	8,055.7
Offsetting of equity accounts	-	(6,894.4)
Share capital increase following the exercise of stock options	0.3	0.0
Balance at 31 December 2022	<u>816.3</u>	<u>1,161.3</u>
Balance at 1 January 2023	816.3	1,161.3
Share capital increase following the exercise of stock options (note 16)	1.3	0.1
Balance at 31 December 2023	<u>817.6</u>	<u>1,161.4</u>

Share capital increase

Following the exercise of share options granted to executives of the Group under the current share options' plan (see below), and by virtue of the decision of the Board of Directors of the Company on 31 August 2023, the Company's share capital increased by € 1,276,499.18 through the issue of 5,802,269 new common voting shares, of a nominal value of € 0.22 per share and exercise price of € 0.23 per share. The difference between the exercise price of the new shares and their nominal value, net of the expenses directly attributable to the equity transaction, amounted to € 39,286 and was recorded in the account "Share premium". Following the above increase, as at 31 December 2023, the share capital of the Company amounts to € 817,625,550.94 divided into 3,716,479,777 common shares with a nominal value of € 0.22 each. The new shares were listed on the Athens Exchange on 14 September 2023.

The following is an analysis of the movement in the number of the Company's shares outstanding:

	Number of shares		
	Issued Shares	Treasury Shares	Net
Balance at 1 January 2022	3,709,161,852	-	3,709,161,852
Share capital increase following the exercise of stock options	1,515,656	-	1,515,656
Balance at 31 December 2022	<u>3,710,677,508</u>	-	<u>3,710,677,508</u>
Balance at 1 January 2023	3,710,677,508	-	3,710,677,508
Share capital increase following the exercise of stock options (note 16)	5,802,269	-	5,802,269
Buyback of shares held by HFSF	-	(52,080,673)	(52,080,673)
Balance at 31 December 2023	<u>3,716,479,777</u>	<u>(52,080,673)</u>	<u>3,664,399,104</u>

Treasury shares- Buyback of shares held by HFSF

Following the receipt of the required approval from the regulator in May 2023, the General Meeting of the Company's Shareholders (AGM), which was held on 20 July 2023, approved the acquisition of all the 52,080,673 Company's shares held by the HFSF, corresponding to approximately 1.4% of the Company's share capital and voting rights, and authorized the Board of Directors to determine the specific conditions and relevant details for the acquisition.

On 9 October 2023, the acquisition of all the shares held by the HFSF was completed for a total consideration of € 94 million, including related fees. Following the above, the Company is no longer subject to Law 3864/2010 and to the special rights of Hellenic Financial Stability Fund (HFSF) provided for in such law.

Notes to the Financial Statements
15. Reserves and retained earnings/(losses)

	31 December 2023 € million	31 December 2022 € million
Special reserves	1,414	1,004
Non-taxed reserves	770	770
Corporate law reserves	20	-
Other reserves	408	408
Treasury shares	(94)	-
Retained earnings/(losses)	(23)	(3)
Total	2,495	2,179

As of 31 December 2023, 'Special reserves' of € 1,414 million (2022: € 1,004 million) relate to dividends from participations. In particular, in December 2023, the Company recognised € 410 million dividend income, following the Bank's distribution of reserves of equal amount to the Company (see below).

Dividends/ distribution of profits

In December 2023, the Bank proceeded with the distribution of non-mandatory reserves totalling €410 million to its sole shareholder, Eurobank Holdings, in order to enable the latter to distribute dividend out of the profits of the financial year 2023 to its shareholders in accordance with the provisions of article 159 of Company Law 4548/2018.

Based on the Group's financial performance for the financial year 2023, Eurobank Holdings aims to distribute to its shareholders a cash dividend equivalent to at least 25% of the Group's adjusted net profit for financial year 2023, subject to the approval of the Annual General Meeting of its shareholders and the regulatory authorities.

In addition, Eurobank Holdings intends to proceed also with the distribution of profits to the employees in accordance with its remuneration policy, subject to the approval of the Annual General Meeting of its shareholders.

16. Share options

The Annual General Meeting of the shareholders of Eurobank Holdings held on 28 July 2020 approved the establishment of a five year shares award plan, starting from 2021, in the form of share options rights by issuing new shares with a corresponding share capital increase, in accordance with the provisions of article 113 of law 4548/2018, awarded to executives and personnel of Eurobank Holdings and its affiliated companies according to article 32 of law 4308/2014. The maximum number of rights that can be approved was set at 55,637,000 rights, each of which would correspond to one new share. The exercise price of each new share would be equal to € 0.23. The Annual General Meeting authorized the Board of Directors of Eurobank Holdings to define the eligible staff and determine the remaining terms and conditions of the plan.

The final terms and the implementation of the share options plan, which is a forward-looking long-term incentive aiming at the retention of key executives, are defined and approved annually by the Board of Directors in accordance with the applicable legal and regulatory framework, as well as the policies of the Company and the Group.

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

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

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

Notes to the Financial Statements

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

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

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

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

⁽¹⁾ Based on the earliest contractual exercise date.

In accordance with the Company's accounting policy on employees' share based payments, the grant date fair value of the options is recognized as an expense with a corresponding increase in equity over the vesting period. The share options granted by the Company to employees of Group entities, were treated as a contribution by the Company to the Bank, being their parent entity, thus increasing the investment cost of the Company in the latter.

The fair value at grant date is determined using an adjusted form of the Black-Scholes model for Bermudan equity options which takes into account the exercise price, the exercise dates, the term of the option, the share price at grant date and expected price volatility of the underlying share, the expected dividend yield and the risk-free interest rate for the term of the options.

The weighted average fair value of the share options granted in July 2023 was € 1.13 (2022: € 0.63). The significant inputs into the model were a share price of € 1.442 (2022: € 1.021) at the grant date, exercise price of € 0.23, annualized dividend yield of 3% (2022: 3%), expected average volatility of 41% (2022: 38%), expected option life of 1-5 years, and a risk-free interest rate corresponding to the options' maturities, based on the Euro swap yield curve. The expected volatility is measured at the grant date of the options and is based on the average historical volatility of the share price over the last one and a half year.

17. Cash and cash equivalents

For the purpose of the cash flow statement, cash and cash equivalents with original maturities of three months or less, as at 31 December 2023, amount to € 399 million (31 December 2022: € 57 million).

For the year ended 31 December 2023, changes in debt securities in issue arising from accrued interest and amortisation of debt issuance costs amount to € 1.3 million (31 December 2022: € 33 million). In addition, changes in income/(losses) on investment securities arising from amortization of discounts and accrued interest amount to € 1 million (31 December 2022: € 33 million).

18. Post balance sheet events

Details of post balance sheet events are provided in the following notes:

- Note 2.1 - Basis of preparation
- Note 9 - Investment securities
- Note 12 - Debt securities in issue
- Note 13 - Other liabilities

Notes to the Financial Statements

19. Related parties

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

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

Fairfax Group, which holds 32.93% of Eurobank Holdings' share capital as of 31 December 2023 (31 December 2022: 32.99%), is considered to have significant influence over the Company. In addition, following the completion of the acquisition of all of Eurobank Holdings' shares held by the HFSF, on 9 October 2023 (note 14), the HFSF is no longer considered to have significant influence over the Company.

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

A number of transactions are entered into with related parties in the normal course of business and are conducted on an arm's length basis. The outstanding balances of the transactions with the Company's subsidiaries are as follows:

	31 December 2023	31 December 2022
	Subsidiaries ⁽¹⁾	Subsidiaries ⁽¹⁾
	€ million	€ million
Due from credit institutions	399.23	56.67
Investment securities	1,277.05	1,274.92
Other assets	0.54	1.87
Due to credit institutions	30.56	-
Other liabilities	0.57	0.63
Net interest income ⁽²⁾	91.72	63.11
Dividend income	410.00	-
Other operating income/(expense)	2.31	2.00
Other Impairment losses	1.24	(1.23)

⁽¹⁾ The expenses in relation to KMP services provided by the Company's subsidiary Eurobank S.A. are included in Key management compensation disclosed below.

⁽²⁾ For the year ended 31 December 2023, it includes interest income of € 0.06 million on investment securities issued by the Bank, which were purchased from third parties and sold to the Bank during the period (note 9).

As at 31 December 2023, the Company has recognised receivables and operating income of amount € 0.32 million related to financial consulting services with Fairfax group (31 December 2022: € 0.35 million). In addition, for the year ended 31 December 2023 the Company has recognized operating expenses of € 0.14 million (2022: € 0.12 million income) related to the Group's associate Eurolife FFH Insurance Group Holdings S.A., which is also a member of Fairfax Group.

Key management compensation

In the year ended 31 December 2023, the Company recognized Key management compensation amounting to € 0.2 million that is referring mainly to KMP services provided by Eurobank S.A. in accordance with the relevant agreement (2022: € 0.2 million).

Notes to the Financial Statements

20. External Auditors

The Company has adopted a Policy on External Auditors' Independence which provides amongst others, for the definition of the permitted and non-permitted services the Company's auditors may provide further to the statutory audit. For any such services to be assigned to the Company's auditors there are specific controlling mechanisms in order for the Company's Audit Committee to ensure that a) the non-audit services assigned to "KPMG Certified Auditors S.A.", along with the KPMG network (KPMG), have been reviewed and approved as required and b) there is proper balance between audit and permitted non-audit work.

The total fees of the Company's independent auditor KPMG for audit and other services provided are analyzed as follows:

	2023 € million	2022 € million
Statutory audit ⁽¹⁾	(0.24)	(0.23)
Tax certificate	(0.03)	(0.03)
Other audit related assignments	(0.27)	(0.31)
Non audit assignments	(0.02)	(0.01)
Total	(0.57)	(0.58)

⁽¹⁾ Includes fees for statutory audit of the Company's annual financial statements.

Notes to the Financial Statements

21. Board of Directors

The Board of Directors (BoD) was elected by the Annual General Meeting of the Shareholders (AGM) held on 23 July 2021 for a three-year term of office that will expire on 23 July 2024, prolonged until the end of the period the AGM for the year 2024 will take place.

Further to that:

- The AGM held on 20 July 2023 approved the appointment of Mr. Burkhard Eckes and Mr. John Arthur Hollows as new independent non-executive members of Eurobank Holdings BoD, whose term of office will expire concurrently with the term of office of the other members of the BoD. On the same day the BoD decided its constitution.
- On 9 October 2023, Eurobank Holdings announced the acquisition of all of its issued shares held by the HFSF, namely 52,080,673 common registered shares (note 14). On the same day, the HFSF notified Eurobank Holdings that effective as of 11 October 2023, the HFSF will no longer have the special rights provided in law 3864/2010, including the right to appoint a representative in the Board of Directors and the Board Committees. Following these developments, the HFSF representative Mrs. Efthymia Deli, member of the Boards of Directors and of the Committees of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 26 October 2023 her resignation from the abovementioned positions, effective as of 7 November 2023.
- Mr. Andreas Athanasopoulos, Deputy CEO and Executive Member of the Boards of Directors of Eurobank Holdings and Eurobank, submitted on 31 October 2023 his resignation from the abovementioned positions, effective as of 31 December 2023.

Following the above, the BoD is as follows:

G. Zanias	Chairman, Non-Executive Member
G. Chryssikos	Vice Chairman, Non-Executive Member
F. Karavias	Chief Executive Officer
S. Ioannou	Deputy Chief Executive Officer
K. Vassiliou	Deputy Chief Executive Officer
B.P. Martin	Non-Executive Member
A. Gregoriadi	Non-Executive Independent Member
I. Rouvitha Panou	Non-Executive Independent Member
R. Kakar	Non-Executive Independent Member
J. Mirza	Non-Executive Independent Member
C. Basile	Non-Executive Independent Member
B. Eckes	Non-Executive Independent Member
J. A. Hollows	Non-Executive Independent Member

Athens, 28 March 2024

Georgios P. Zanias
 I.D. No AI - 414343
 CHAIRMAN
 OF THE BOARD OF DIRECTORS

Fokion C. Karavias
 I.D. No AI - 677962
 CHIEF EXECUTIVE OFFICER

Harris V. Kokologiannis
 I.D. No AN - 582334
 GENERAL MANAGER OF GROUP FINANCE
 CHIEF FINANCIAL OFFICER