

EUROBANK ERGASIAS S.A. CONSOLIDATED PILLAR 3 REPORT

FOR THE NINE MONTHS ENDED 30 SEPTEMBER 2018

8 Othonos Street, Athens 105 57, Greece www.eurobank.gr, Tel.: (+30) 210 333 7000 Company Registration No: 6068/06/B/86/07

Consolidated Pillar 3 Report



1. Introduction – General Information	3
1.1 Regulatory framework	3
1.2 Regulatory developments	4
1.3 Scope of pillar 3	5
1.3.1 Location, timing and frequency of disclosures	5
1.4 Regulatory versus accounting consolidation	5
2. Capital Management	7
2.1 Regulatory Capital	7
2.2 IFRS 9 capital impact	8
2.3 Capital requirements under Pillar 1	9
3. Credit Risk	10
4. Market Risk	11
5. Counterparty Risk	12
5.1 Definition	12
5.2 Mitigation of counterparty risk	12
5.3 RWA flow statements of CCR exposures under IMM	12
6. Leverage ratio	13

Consolidated Pillar 3 Report



Index of tables

1.	Regulatory versus accounting consolidation	6
2.	Regulatory Capital	7
3.	EU IFRS9 –FL – Comparison of Institutions 'own funds and capital and leverage ratios with and	8
	without the application of transitional arrangements for IFRS9 or analogous ECLs	
4.	EU OV1 – Overview of RWAs	9
5.	EU CR8 - RWA flow statements of credit risk exposures under the IRB approach	10
6.	EU MR2-B – RWA flow of market risk exposures under IMA	11
7.	Summary reconciliation of accounting assets and leverage ratio exposures	13
8.	Leverage ratio common disclosure	14
9.	Split-up on balance sheet exposures (excluding derivatives and SFT's)	15

Consolidated Pillar 3 Report

Introduction – General Information



1. Introduction - General Information

Eurobank Ergasias S.A. (the "Bank" or the "Group") is a credit institution based in Greece and is supervised on a stand alone and consolidated basis by the European Central Bank (ECB) and the Bank of Greece (BoG). The Group is one of the four systemic banks in Greece, operating in key banking product and service markets. The Group offers a wide range of financial services to the retail and corporate clients. It has a strategic focus in Greece in fee-generating activities, such as asset management, private banking, equity brokerage, treasury sales, investment banking, leasing, factoring, real estate and trade finance. The Group is also among the leading providers of banking services and credit to SMEs, small businesses and professionals, large corporates and households.

Eurobank has an international presence in six countries outside of Greece, with operations in Romania (the operations of Romania disposal group are included until 31.3.2018), Bulgaria, Serbia, Cyprus, Luxembourg and the United Kingdom.

On 3 April 2018, Eurobank and Banca Transilvania (BT) concluded all the actions and fulfilled all the conditions precedent for the completion of the transfer of the shares held by the Group in Bancpost S.A., ERB Retail Services IFN S.A. and ERB Leasing IFN S.A. to BT. Prior to this, BT has obtained the relevant regulatory approvals from both the National Bank of Romania and the Romanian Competition Authority for the acquisition. Further information in relation to the completion of the disposal is provided in the Condensed Consolidated Interim Financial Statements notes 13 and 16.

On 7 November 2018 Eurobank announced that it has concluded an agreement with Piraeus Bank S.A. for the acquisition of Piraeus Bank Bulgaria AD, a subsidiary of Piraeus Bank, by Eurobank's subsidiary in Bulgaria, Eurobank Bulgaria AD (Postbank) for a consideration of € 75 million. The completion of the Transaction is subject to approvals by the relevant competent regulatory and supervisory authorities and is expected to take place during the 1st quarter of 2019.

1.1 Regulatory framework

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

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

According to the CRD IV provisions (with gradual implementation until 2019):

- Minimum Common Equity Tier 1 (CET1) ratio: 4.5%;
- Minimum Tier 1 ratio: 6%;
- Minimum Total Capital ratio: 8%
- Furthermore, banks are required to gradually create a capital conservation buffer of 2.5% until 1 January 2019 (0.625% on 1 January 2016, 1.25% on 1 January 2017 and 1.875% on 1 January 2018) beyond the existing minimum capital. Conservation buffer is a capital buffer of 2.5% of total risk exposures that needs to be met with an additional amount of CET1 capital.

Consolidated Pillar 3 Report

Introduction – General Information



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

- a) Minimum CET1 capital ratio 7%; and
- b) Total capital adequacy ratio 10.5%.

Additional capital buffers that CRD IV introduces are the following:

- a) Countercyclical buffer. The purpose of this buffer is to counteract the effects of the economic cycle on banks' lending activity, thus making the supply of credit less volatile and possibly even reduce the probability of credit bubbles or crunches. Credit institutions are required under the CRD IV to build up an additional buffer of 0 2.5% of CET1 during periods of excess credit growth, according to national circumstances. According to BoG Executive Committee Acts, the countercyclical buffer was set at 0%for 2018.
- b) Global systemic institution buffer (G-SIIs). CRD IV includes a mandatory systemic risk buffer of CET1 for banks that are identified by the relevant authority as globally systemically important, which is not applicable to Greek banks.
- c) Other systemically important institutions buffer. On 23.5.2018, European Banking Authority (EBA) published the updated list of Other Systematically Important Institutions (O-SIIs) in the EU. O-SIIs are those institutions which are deemed systematically relevant in addition to G-SIIs, already identified. This list reflects also the additional capital buffers that the relevant authorities have set for the O-SIIs. The identification of institutions as O-SIIs is based on 2017 data and the list is disclosed on an annual basis, along with the definition of any CET1 capital buffer requirements which may need to be set.

1.2 Regulatory developments

The main published regulations of European Commission during 2018 are the following:

- Regulation 2018/171 on supplementing Regulation (EU) No 575/2013 of the European Parliament and of the Council with regard to regulatory technical standards for the materiality threshold for credit obligations past due;
- Regulation 2018/728 on supplementing Regulation (EU) No 575/2013 of the European Parliament and of the
 Council with regard to regulatory technical standards for procedures for excluding transactions with nonfinancial counterparties established in a third country from the own funds requirement for credit valuation
 adjustment risk.

In March 2018, BCBS published the second set of frequently asked questions (FAQs) on the Basel 3 Standardised approach for measuring counterparty credit risk exposures and the second set of FAQs on the revised market risk standard. Especially about the second publication the questions and answers address clarifications of the standardised approach, the internal models approach and the scope of application of the standard.

2018 Eurobank Stress Test Results

On 5 May 2018, the ECB announced the results of the ST for the four Greek systemic banks, including Eurobank. Based on feedback received by the Single Supervisory Mechanism (SSM), the ST outcome along with other factors that have been assessed by the Supervisory Board (SB) of the SSM, pointed to no capital shortfall and no capital plan needed for the Bank as a result of the exercise.

Under the adverse scenario, the Bank's total capital adequacy ratio (CAD), including the effect of Tier 2 securities, issued in January 2018, is 9.5%, and the Core Tier 1 Capital (CET1) ratio is 6.8%. These ratios would be ca. 40 bps higher, at 9.9% and 7.2% respectively, if the positive impact from the sale of the Romanian disposal group (completed in early April 2018) was taken into account. The capital depletion stood at €3.4 bn (8.7ppts, excluding the negative impact of 250 bps related to the phase-out of grandfathered preference shares). Under the baseline scenario, the Bank is capital accretive, with CAD and CET1 ratios increasing at 19.3% and 16.6%, respectively. These ratios would be ca. 40 bps higher if the positive impact from the sale of Romanian disposal group was included.

The Bank's performance in the ST confirms that it remains resilient to external shocks. The Bank's total capital and overall solid performance, allows it to further streamline efforts on the implementation and delivery of its business priorities, focusing on effective management and rapid decrease of stock of non-performing exposures in line with its

Consolidated Pillar 3 Report

Introduction – General Information



plans, as well as providing financing to its clients, to the Greek economy and the region. The above business priorities, along with additional initiatives associated with the restructuring, transformation or optimization of operations, in Greece and abroad will generate or release further capital and/or reduce risk weighted assets, contributing to the further strengthening of the Group's capital position.

1.3 Scope of pillar 3

The purpose of Pillar 3 report is to provide updated information the Group's risk management practices, risk assessment processes and regulatory capital adequacy ratios.

Pillar 3 disclosures consist of both qualitative and quantitative information and are provided on a consolidated basis. They have been prepared in accordance with Part 8 of the Capital Requirements Regulation within CRD IV (Regulation 2013/575/EU) and according to the regulatory consolidation framework, which is described in the following section. In December 2016 EBA published EBA/GL/2016/11 guidelines on revised Pillar 3 disclosures requirements to improve the consistency and comparability of institutions' regulatory disclosures. These guidelines are applied from 31 December 2017. Even though these guidelines do not change the substance of the regulatory disclosures, they update the presentational aspect of disclosures by introducing the use of specific tables for qualitative information and templates for quantitative information. Moreover, the guidelines harmonise the frequency of disclosures and update the list of requirements to be considered for more frequent disclosures.

According to the above guidelines, for templates that require the disclosure for current and previous reporting periods, the previous reporting period is always referred to as the last data disclosed according to the frequency of the template. When the disclosure is being reported for the first time, the data of the previous period is not required.

1.3.1 Location, timing and frequency of disclosures

Pillar 3 disclosures are provided on a quarterly basis, following the relevant recommendation of EBA Guidelines 2016/11, which do not change the approach in the EBA Guidelines 2014/14 but update the list of requirements to be considered for more frequent disclosures.

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

Pillar 3 disclosures are provided in a designated location on the Bank's website (www.eurobank.gr/en/group/investor-relations/financial-results) in chronological order and cover both quantitative and qualitative information.

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

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee.

1.4 Regulatory versus accounting consolidation

From 2017 onwards the regulatory consolidation, applied for reporting to the regulatory authorities, followed the principles used for the accounting consolidation.

According to CRD IV, holdings in insurance companies and financial institutions that the Bank has a significant investment, must be deducted from Common Equity Tier 1 (CET1) in case the total investment exceeds 10% of the aggregate amount of CET1 before certain deductions. Amount which is not deducted, is risk weighted by 250%.

Following the sale of 80% of Eurolife ERB Insurance Group Holdings S.A., insurance companies are not consolidated and the retained 20% interest is recognised both for regulatory and accounting consolidation purposes, as an associate. Consequently, there is no difference between regulatory and accounting consolidation.

Consolidated Pillar 3 Report



Introduction – General Information

ERB Hellas Funding Ltd and ERB Hellas Plc are included in the calculation of the non-consolidated capital requirements and regulatory own funds of the Bank (solo consolidation).

List of all subsidiary undertakings can be found in the Condensed Consolidated Interim Financial Statements note 16.

The table below shows the Group's regulatory and accounting Balance Sheet as at 30 September and 30 June 2018.

Table 1: Regulatory and accounting Balance Sheet

Balance sheet per published financial statements	30 September	30 June
and per regulatory consolidation	2018	2018
Assets Re	f. <u>€ million</u>	<u>€ million</u>
Cash and Balances with central banks	1,877	1,857
Due from credit institutions	2,286	2,187
Securities held for trading	62	84
Derivative financial instruments	1,708	1,794
Loans and advances to customers	35,917	36,206
Investment securities	7,575	6,906
Investments in associaties and joint ventures	136	138
Property, plant and equipment	342	339
Investment property	321	317
Intangible assets a	169	168
Deferred tax asset	4,904	4,889
of which deferred tax assets that rely on future profitability b	81	84
of which deferred tax credit	3,940	3,956
of which deferred tax assets arising from temporary differences	883	849
Other assets	1,890	1,904
Assets of disposal group classified as held for sale	68	-
Total assets	57,255	56,789
Liabilities		
Due to central banks	3,210	5,050
Due to credit institutions	6,694	5,403
Derivative financial instruments	1,747	1,832
Due to customers	37,555	36,388
Debt securities in issue	2,201	2,306
Other liabilities	789	748
Total liabilities	52,196	51,727
Equity		
Ordinary share capital	655	655
Share premium	8,055	8,054
Reserves and retained earnings	(3,693)	(3,689)
of which cash flow hedge reserves	• •	(36)
Preferred securities e		42
Total equity f	-	5,062
Total equity and liabilities	57,255	56,789

Consolidated Pillar 3 Report

Capital Management



2. Capital Management

2.1 Regulatory Capital

The table below shows the composition of the Group's regulatory capital as at 30 September 2018 and 30 June 2018, which is calculated according to CRD IV rules.

Table 2: Regulatory capital

	30 September	30 September	
	2018 ⁽¹⁾	2018	30 June 2018
Ref.	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
Total equity f	5,059	5,059	5,062
Less: Preferred securities e	(42)	(42)	(42)
Regulatory adjustments			
Part of interim or year-end profit not eligible	-	(45)	-
Cash flow hedge reserves d	36	36	36
Own credit risk			
Adjustments due to IFRS 9 transitional arrangements	1,003	1,003	1,003
Intangible assets a	(169)	(169)	(168)
IRB shortfall of credit risk adjustments to expected losses	(71)	(71)	(89)
Deferred tax assets that rely on future profitability (unused tax losses) b	(81)	(81)	(84)
Deferred tax assets arising from temporary differences (amount above 10% threshold)	(158)	(163)	(126)
*			
Common Equity Tier I capital	5,577	5,527	5,592
Preferred Securities subject to phase-out e	17	17	17
Total Tier I capital	5,594	5,544	5,609
Tier II capital - subordinated debt Total Regulatory Capital	950	950	950
Total Regulatory Capital	6,544	6,494	6,559
Risk Weighted Assets	38,239	38,227	37,795
Ratios			
Common Equity Tier I	14.6%	14.5%	14.8%
Tier I	14.6%	14.5%	14.8%
Total Capital Adequacy Ratio	17.1%	17.0%	17.4%

 $^{^{(1)}}$ Including interim profits (1/7/2018-30/9/2018) € 45 million.

As depicted in table above, CET1 ratio has decreased during the 3nd quarter 2018, due to the decrease of Other Comprehensive Income (OCI) mainly from Debt securities at FVOCI fair value changes and increase of Risk Weighted Assets (see section 2.3).

Consolidated Pillar 3 Report

Capital Management



2.2 IFRS 9 capital impact

Regarding IFRS 9 adoption from 1.1.2018 and according to Regulation (EU) 2017/2395 of the European Parliament and the Council, a five year transition period is introduced, which allows banks to add back to their CET 1 capital 95% of IFRS 9 impact in 2018 and 85%, 70%, 50% and 25% in the subsequent four years. The full impact is expected as of 1 January 2023.

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

Table 3: EU IFRS-FL: Template on the comparison of Institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs.

	30 September 2018 ⁽¹⁾	30 September 2018	30 June 2018	31 March 2018
Available capital	€ million	€ million	€ million	€ million
Common Equity Tier 1 (CET1) capital	5,577	5,527	5,592	5,660
Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs	5,577	3,327	3,392	3,000
transitional arrangements had not been applied	4,401	4,352	4,437	4,410
Tier 1 capital	5,594	5,544	5,609	5,677
Tier 1 capital as if IFRS 9 or analogous ECLs transitional				
arrangements had not been applied Total capital	4,401 6,544	4,352 6.404	4,437 6,559	4,410 6,664
Total capital Total capital as if IFRS 9 or analogous ECLs transitional	0,344	6,494	0,559	0,004
arrangements had not been applied	5,453	5,403	5,487	5,458
Risk weighted assets				
Total risk-weighted assets	38,239	38,227	37,795	38,617
Total risk-weighted assets as if IFRS 9 or analogous ECLs	27 (02	27.000	27.250	20.025
transitional arrangements had not been applied	37,693	37,680	37,250	38,035
Capital ratios				
Common Equity Tier 1 (as a percentage of risk exposure amount)	14.6%	14.5%	14.8%	14.7%
Common Equity Tier 1 (as a percentage of risk exposure amount) as				
if IFRS 9 or analogous ECLs transitional arrangements had not been	11.7%	11.5%	11.9%	11.6%
applied				
Tier 1 (as a percentage of risk exposure amount)	14.6%	14.5%	14.8%	14.7%
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	11.7%	11.5%	11.9%	11.6%
Total capital (as a percentage of risk exposure amount)	17.1%	17.0%	17.4%	17.3%
Total capital (as a percentage of risk exposure amount) as if IFRS 9	44.50/	44.20/	4.4.70/	44.20/
or analogous ECLs transitional arrangements had not been applied	14.5%	14.3%	14.7%	14.3%
Leverage ratio				
Leverage ratio total exposure measure	59,873	59,868	58,805	61,207
Leverage ratio	9.34%	9.26%	9.54%	9.28%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.41%	7.29%	7.61%	7.27%
and the second process of the second process	7270	,.25,0	.101/1	,,,0

 $^{^{(1)}}$ Including interim profits (1/7/2018-30/9/2018) € 45 million.

Consolidated Pillar 3 Report

Capital Management



2.3 Capital requirements under Pillar 1

The table below shows the Group's risk weighted assets (RWAs) and capital requirements as at 30 September and 30 June 2018. The minimum capital requirements under Pillar 1 are calculated as 8% of RWAs.

Table 4: EU OV1 - Overview of RWAs

Credit risk (excluding CCR) 31,804 31,535 2,544 Of which the standardised approach 15,059 15,061 1,205 Of which the foundation IRB (FIRB) approach 7,953 8,407 636 Of which the advanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which the standardised approach 76 634 61 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which standardised approach 798		30 September	30 June	30 September
Credit risk (excluding CCR) 31,804 31,535 2,544 Of which the standardised approach 15,059 15,061 1,205 Of which the standardised approach 7,953 8,407 636 Of which the davanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which internal model method (IMM) 7 2 2 Of which risk exposure amount for contributions to the default fund of a CCP 3 142 12 Of which CVA 153 142 12 Settlement risk 2 2 2 Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 5 2 1 2 Of which IRB approach 2 2 1 2 Of which IRB supervisory formula approach (SFA) - - <t< td=""><td></td><td></td><td>2018</td><td>•</td></t<>			2018	•
Credit risk (excluding CCR) 31,804 31,535 2,544 Of which the standardised approach 15,059 15,061 1,205 Of which the foundation IRB (FIRB) approach 7,953 8,407 636 Of which the devanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which original exposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Settlement risk - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which IRB supervisory formula approach (IAA) -				Minimum
Credit risk (excluding CCR) 31,804 31,535 2,544 Of which the standardised approach 15,059 15,061 1,205 Of which the foundation IRB (FIRB) approach 7,953 8,407 636 Of which the advanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 760 634 61 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which nest adardised approach 474 354 38 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which standardised approach - - - Of which the standardised approach 10		RWAs	RWAs	capital
Credit risk (excluding CCR) 31,804 31,535 2,544 Of which the standardised approach 15,059 15,061 1,205 Of which the foundation IRB (FIRB) approach 7,953 8,407 636 Of which the advanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which risk apposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Of which CVA 153 142 12 Settllement risk - - - Settllement risk - - - Settllement risk - - - Of which IRB approach 5				requirements
Of which the standardised approach 15,059 15,061 1,205 Of which the foundation IRB (FIRB) approach 7,953 8,407 636 Of which the advanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which original exposure - - - Of which internal model method (IMM) - - - Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP - - - Of which CVA 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - -		€ million	€ million	€ million
Of which the standardised approach 15,059 15,061 1,205 Of which the foundation IRB (FIRB) approach 7,953 8,407 636 Of which the advanced IRB (AIRB) approach 8,539 7,857 683 Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which original exposure - - - Of which internal model method (IMM) - - - Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Of which CVA 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (IFA) - - - <td></td> <td></td> <td></td> <td></td>				
Of which the foundation IRB (FIRB) approach Of which the advanced IRB (AIRB) approach of which the advanced IRB (AIRB) approach or the IMA and the simple risk-weighted approach or the IMA 7,953 b,539 b,539 b,7857 b,833 b,7857 b,833 b,7857 b,7	Credit risk (excluding CCR)	31,804	31,535	2,544
Of which the advanced IRB (AIRB) approach or the IMA 8,539 7,857 683 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which original exposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Of which CVA 153 142 12 Settlement risk - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which internal assessment approach (IAA) - - - Of which standardised approach - - - Of which the standardised approach 105 60 8 Of which IMA 693	Of which the standardised approach	15,059	15,061	1,205
Of which equity IRB under the simple risk-weighted approach or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which original exposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - - Of which risk exposure amount for contributions to the default fund of a CCP 153 142 12 Of which IVA 153 142 12 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which standardised approach - - - - Of which the standardised approach 105 60 8 Of which IMA 693 701 55 <	, , , ,	7,953	8,407	636
or the IMA 253 210 20 Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which original exposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - - Of which risk exposure amount for contributions to the default fund of a CCP -		8,539	7,857	683
Counterparty Credit Risk 760 634 61 Of which mark to market 133 138 11 Of which original exposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP - - - Of which CVA 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which IRB supervisory formula approach (IAA) - - - Of which standardised approach - - - Of which standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - <t< td=""><td></td><td>253</td><td>210</td><td>20</td></t<>		253	210	20
Of which mark to market 133 138 11 Of which original exposure - - - Of which the standardised approach 474 354 38 Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP - - - Of which CVA 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which internal assessment approach (IAA) - - - Of which standardised approach - - - Of which the standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - - Of which basic indicator approach - -		760	634	61
Of which the standardised approach Of which internal model method (IMM) Of which internal model method (IMM) Of which risk exposure amount for contributions to the default fund of a CCP Of which CVA Of which CVA Settlement risk Securitisation exposures in the banking book (after the cap) Of which IRB approach Of which IRB supervisory formula approach (SFA) Of which internal assessment approach (IAA) Of which standardised approach Of which standardised approach Of which IMA Of which basic indicator approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which basic indicator approach Of which advanced measurement approach Of which advanced measurement approach Of which advanced measurement sproach Of which advanced measurement sproach Of which standardised on the thresholds for deduction (subject to				
Of which the standardised approach Of which internal model method (IMM) Of which internal model method (IMM) Of which risk exposure amount for contributions to the default fund of a CCP Of which CVA Of which CVA Settlement risk Securitisation exposures in the banking book (after the cap) Of which IRB approach Of which IRB supervisory formula approach (SFA) Of which internal assessment approach (IAA) Of which standardised approach Of which standardised approach Of which IMA Of which basic indicator approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which basic indicator approach Of which advanced measurement approach Of which advanced measurement approach Of which advanced measurement sproach Of which advanced measurement sproach Of which standardised on the thresholds for deduction (subject to	Of which original exposure	-	-	-
Of which internal model method (IMM) - - - Of which risk exposure amount for contributions to the default fund of a CCP - - - Of which CVA 153 142 12 Settlement risk - - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which standardised approach - - - - Of which standardised approach - - - - - Of which the standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - - Of which basic indicator approach - - - Of which standardised approach - - - Of which basic indicator approach - - - Of which standardised approach		474	354	38
Of which risk exposure amount for contributions to the default fund of a CCP Of which CVA Settlement risk Securitisation exposures in the banking book (after the cap) Of which IRB approach Of which IRB supervisory formula approach (SFA) Of which internal assessment approach (IAA) Of which standardised approach Of which the standardised approach Of which the standardised approach Of which IMA Of which basic indicator approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which standardised approach Of which basic indicator approach Of which advanced measurement approach Amounts below the thresholds for deduction (subject to	• •	_	-	-
default fund of a CCP default fund of a CCP Of which CVA 153 142 12 Settlement risk - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which IRB supervisory formula approach (IAA) - - - Of which internal assessment approach (IAA) - - - Of which standardised approach - - - - Of which the standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - - Operational risk 3,122 3,122 250 Of which basic indicator approach - - - Of which advanced measurement approach - - - Amounts below the thresholds for deduction (subject to 1,723 1,722 138 <td>• • •</td> <td></td> <td></td> <td>-</td>	• • •			-
Settlement risk - - - Securitisation exposures in the banking book (after the cap) 20 21 2 Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which IRB supervisory formula approach (SFA) - - - Of which internal assessment approach (IAA) - - - Of which standardised approach - - - Of which the standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - - Operational risk 3,122 3,122 250 Of which basic indicator approach - - - Of which advanced measurement approach - - - Amounts below the thresholds for deduction (subject to 1,723 1,722 138	•	-	-	
Securitisation exposures in the banking book (after the cap)20212Of which IRB approach20212Of which IRB supervisory formula approach (SFA)Of which internal assessment approach (IAA)Of which standardised approachMarket risk79876164Of which the standardised approach105608Of which IMA69370155Large exposuresOperational risk3,1223,122250Of which basic indicator approachOf which standardised approach3,1223,122250Of which advanced measurement approachAmounts below the thresholds for deduction (subject to1,7231,722138	Of which CVA	153	142	12
Of which IRB approach Of which IRB supervisory formula approach (SFA) Of which internal assessment approach (IAA) Of which standardised approach Of which standardised approach Market risk Of which the standardised approach Of which IMA Of which IMA Of which IMA Operational risk Of which basic indicator approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which standardised approach Of which basic indicator approach Of which standardised approach Of which standardised approach Of which advanced measurement approach Amounts below the thresholds for deduction (subject to	Settlement risk	-	-	-
Of which IRB approach 20 21 2 Of which IRB supervisory formula approach (SFA) - - - Of which internal assessment approach (IAA) - - - Of which standardised approach - - - Market risk 798 761 64 Of which the standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - - - Operational risk 3,122 3,122 250 Of which basic indicator approach - - - - Of which standardised approach 3,122 3,122 250 Of which advanced measurement approach - - - - Amounts below the thresholds for deduction (subject to 1,723 1,722 138	Securitisation exposures in the banking book (after the cap)	20	21	2
Of which IRB supervisory formula approach (SFA) Of which internal assessment approach (IAA) Of which standardised approach Market risk Of which the standardised approach Of which IMA Of which		20	21	
Of which internal assessment approach (IAA) Of which standardised approach Market risk Of which the standardised approach Of which IMA Comparison of the standardised approach Of which IMA Comparison of the standardised approach Operational risk Of which basic indicator approach Of which standardised approach Of which standardised approach Of which standardised approach Of which standardised approach Of which advanced measurement approach Amounts below the thresholds for deduction (subject to	• •	<u>-</u>	_	_
Of which standardised approach - - - - - - - - - - - - - - - - - 64 68 8 60 8 60 8 60 8 60 8 60 8 701 55 60 8 701 55 60 8 701 55 60 8 701 701 701 701 701 701 701 701 701 701 701 701 701 701 701 701 70		_	-	-
Market risk 798 761 64 Of which the standardised approach 105 60 8 Of which IMA 693 701 55 Large exposures - - - Operational risk 3,122 3,122 250 Of which basic indicator approach - - - Of which standardised approach 3,122 3,122 250 Of which advanced measurement approach - - - Amounts below the thresholds for deduction (subject to 1,723 1,722 138		-	-	-
Of which IMA 693 701 55 Large exposures Operational risk 3,122 3,122 250 Of which basic indicator approach Of which standardised approach 3,122 3,122 250 Of which advanced measurement approach Amounts below the thresholds for deduction (subject to 1,723 1,722 138)		798	761	64
Large exposures Operational risk 3,122 3,122 250 Of which basic indicator approach Of which standardised approach Of which advanced measurement approach Amounts below the thresholds for deduction (subject to	Of which the standardised approach	105	60	8
Operational risk3,1223,122250Of which basic indicator approachOf which standardised approach3,1223,122250Of which advanced measurement approachAmounts below the thresholds for deduction (subject to1,7231,722138	Of which IMA	693	701	55
Of which basic indicator approach Of which standardised approach Of which advanced measurement approach Amounts below the thresholds for deduction (subject to	Large exposures	-	-	-
Of which standardised approach Of which advanced measurement approach Amounts below the thresholds for deduction (subject to 1.723 3,122 3,122 250 1,723	Operational risk	3,122	3,122	250
Of which advanced measurement approach Amounts below the thresholds for deduction (subject to	Of which basic indicator approach	-		
Amounts below the thresholds for deduction (subject to	Of which standardised approach	3,122	3,122	250
1.723	Of which advanced measurement approach	-	-	-
250% risk weight) 1,725 1,722 138	Amounts below the thresholds for deduction (subject to	1 722	1 722	120
 	250% risk weight)	1,723	1,/22	130
Floor adjustment	Floor adjustment	_		
Total 38,227 37,795 3,058	Total	38,227	37,795	3,058

⁽¹⁾ The increase of the RWAs compared to 30 June 2018, is mainly due to the increase of RWAs on the IRB defaulted portfolio and the increase of RWAs for counterparty credit risk of Repo transactions.

Consolidated Pillar 3 Report

Credit Risk



3. Credit Risk

The following table shows the main changes in capital requirements of credit risk exposures under the IRB approach as at 30 September 2018

Table 5: EU CR8 – RWA flow statements of credit risk exposures under the IRB approach

	30 September 2018		
	RWA Cap		
	amounts	requirements	
	<u>€ million</u>	<u>€ million</u>	
RWAs as at 30 June 2018	16,263	1,301	
Asset size	(78)	(6)	
Asset quality	(424)	(34)	
Model updates	-	-	
Methodology and policy	691	55	
Acquisitions and disposals	-	-	
Foreign exchange movements	38	3	
Other	2	0	
RWAs as at 30 September 2018	16,492	1,319	

Note:

Asset size: Under this item the changes in RWAs due to the changes in EAD are reported. These changes can be due to new originations or repayments of the loans.

Asset quality: The changes to the RWAs due to the borrower risk (i.e. rating grade migration) are reported under this item.

Model updates: The changes to the RWAs due to updates in risk parameters following the annual validation process or regulatory reviews.

Methodology and policy: Under this item, the changes in RWAs for defaulted exposures are presented. In line with the positive evolutions in the Greek macro-environment and the recent developments in the legal framework, the Bank has re-assessed the appropriate ELbe estimates by examining the most appropriate macro coefficients that affect ELbe.

Foreign exchange movements: The changes to the RWAs due to the foreign currency translation movements are reported.

Other: Under this item the changes in RWAs due to other factors that are used in the calculation of RWAs are reported. These, for example, include changes in total sales of the corporate borrowers and maturity of exposures.

Compared to the previous quarter, asset quality improvements on the performing portfolio and deleveraging partly counterbalance the increase of RWAs arising on the defaulted portfolio as well as from foreign exchange movements.

Consolidated Pillar 3 Report

Market Risk



4. Market Risk

The following table summarises the components of the capital requirement, under the IMM approach applied by the Bank as at 30 September 2018.

Table 6: EU MR2-B – RWA flow statements of market risk exposures under the IMA

	30 September 2018						
	VaR	Stressed VaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total capital requirements
	€ million	€ million	€ million	€ million	€ million	€ million	€ million
RWAs at 30 June 2018	180	408	114	-	-	701	56
Regulatory adjustment	-	-	-	-	-	-	-
RWAs at the previous quarter-end (end of the day)	180	408	114	-	-	701	56
Movement in risk levels	24	(33)	1	-	-	(8)	(1)
Model updates/changes	-	-	-	-	-	-	-
Methodology and policy	-	-	-	-	-	-	-
Acquisitions and disposals	-	-	-	-	-	-	-
Foreign exchange movements	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-
RWAs at the end of the reporting period (end of the day)	-	-	-	-	-	-	-
Regulatory adjustment		-	-	-	-	-	-
RWAs at 30 September 2018	204	375	115	•	-	693	55

Consolidated Pillar 3 Report

Counterparty Risk



5. Counterparty Risk

5.1 Definition

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

5.2 Mitigation of counterparty risk

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

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

5.3 RWA flow statements of CCR exposures under IMM

Table 7 EU CCR7 - RWA flow statements of CCR exposures under the IMM is not included as the Bank does not use an internal model for the calculation of the RWAs of CCR exposures.

Consolidated Pillar 3 Report

Leverage Ratio



6. Leverage ratio

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

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

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

The level of the leverage ratio with reference date 30 September 2018 on consolidated basis was at 9.26% (30 June 2018 9.54%), according to the transitional definition of Tier 1 capital, significantly over the 3% minimum threshold applied by the competent authorities.

In the table below, the detailed disclosures on the Group's leverage ratio are presented with reference date 30 September 2018 and 30 June 2018.

CRR Leverage Ratio - Disclosure Template

Summary reconciliation of accountng assets and leverage ratio exposures

	30 September 2018 <u>€ million</u>	30 June 2018 € million
Total assets as per published financial statements	57,255	56,789
Adjustment for entities which are consolidated for accounting puroses but are outside the		
scope of regulatory consolidation	-	-
Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable		
accounting frameworkbut excluded from the leverage ratio exposure measure to article	-	-
429(11)of Regulation (EU)NO 575/2013		
Adjustments for derivative financial instruments	(283)	(376)
Adjustments for securities financing transactions	2,158	1,502
Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	1,426	1,426
(Adjustment for intragroup exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (7) of Regulation (EU) No 575/2013)	-	-
(Adjustment for exposures excluded from the leverage ratio exposure measure in accordance with Article 429 (14) of Regulation (EU) No 575/2013)	-	-
Other adjustments	(688)	(536)
Total leverage ratio exposure	59,868	58,805

Consolidated Pillar 3 Report

Leverage Ratio



Leverage ratio common disclosure

Leverage ratio continion disclosure		
	CRR leverage	CRR leverage
	ratio exposures	ratio exposures
	30 September	30 June
	2018	2018
	<u>€ million</u>	€ million
On - balance sheet exposures (excluding derivatives and SFT's)		
On-balance sheet items (excluding derivatives and SFT's, but including collateral)	55,150	54,618
Asset amounts deducted in determining Tier I capital	(448)	(431)
Total on-balance sheet exposures (excluding derivatives and SFT's)	54,703	54,187
Derivative exposures		
Replacement cost associated with derivatives transactions	1,122	1,163
Add-on amounts for PPE associated with derivatives transactions	303	259
Gross-up for derivatives collateral provided where deducted from the balance sheet assets		
pursuant to the applicable accounting framework	<u> </u>	-
(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	
(Exempted CCP leg of client-cleared trade exposures)		-
Adjusted effective notional amount of written credit derivatives		-
(Adjusted effective notional offsets and add-on deductions for written credit derivatives)		-
Total derivative exposures	1,425	1,422
Securities financing transaction exposures		
Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	-	-
(Netted amounts of cash payables and cash receivables of gross SFT assets)		-
Counterparty credit risk exposure for SFT assets	2,314	1,770
Derogation for SFTs: Counterparty credit risk exposure in accordance with Article 429b (4) and 222		
of Regulation (EU) No 575/2013		-
Agent transaction exposures	<u> </u>	-
(Exempted CCP leg of client-cleared SFT exposure)		-
Total securities financing transaction exposures	2,314	1,770
Off-balance sheet exposures		
Off-balance sheet exposures of gross notional amount	4,303	4,152
Adjustments for conversion to credit equivalent amounts ¹	(2,876)	(2,726)
Total off-balance sheet exposures	1,426	1,426
Exempted exposures in accordance with CRR Article 429 (7) and (14) (on and off balance sheet)		
(Exemption of intragroup exposures (solo basis) in accordance with Article 429(7) of Regulation (EU) No 575/2013 (on and off balance sheet))	<u> </u>	-
(Exposures exempted in accordance with Article 429 (14) of Regulation (EU) No 575/2013 (on and off balance sheet))		
Capital and Total Exposures		-
Tier I capital	 5,544	5,609
Total leverage ratio exposures		
	59,868	58,805
Leverage Ratio Leverage Ratio	9.26%	9.54%
Choise on transitional arrangements and amount of derecognised fidiciary items		3.3 170
Choice on transitional arrangements for the definition of capital measure	 Transitional	Transitional
Amounts of derecognised fiduciary items in accordance with the Article 429(11) of Regulation (EU)		mansitional
Amounts of defectognised fiduciary items in accordance with the Article 429(11) of Regulation (EO)		

NO 575/2013

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

Consolidated Pillar 3 Report

Leverage Ratio



CRR leverage

CRR leverage

Split-up on balance sheet exposures (excluding derivatives and SFT's)

	•	•
	ratio exposures	ratio exposures
	30 September	30 June
	2018	2018
	<u>€ million</u>	<u>€ million</u>
Total on-balance sheet exposures (excluding derivatives and SFT'S) of which:	55,150	54,618
Trading book exposures	0	-
Banking book exposures of which:	55,150	54,618
Covered bonds	154	153
Exposures treated as sovereigns	13,952	13,300
Exposures to regional goverments, MOB, international organisations and PSE NOT treates as		
sovereigns	0	-
Institutions	2,361	2,310
Secured by mortgages of immovable properties	11,183	11,120
Retail exposures	4,794	4,828
Corporate	11,812	11,860
Exposure in default	8,485	8,650
Other exposures (eg equity, securitisations and other non-credit obligation assets)	2,410	2,396