EUROBANK ERGASIAS SERVICES and HOLDINGS S.A.

CONSOLIDATED PILLAR 3 REPORT

FOR THE NINE MONTHS ENDED

30 September 2020

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1. Introduction – General Information

Until 20 March 2020 Eurobank Ergasias S.A. was a credit institution based in Greece and supervised on a standalone and consolidated basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

On 20 March 2020, the demerger of Eurobank Ergasias S.A. (Demerged Entity) through the banking sector's hive down and its transfer to a new credit institution that has been established under the corporate name "Eurobank S.A." (the Bank) was completed. Following the above, the corporate name of the Demerged Entity has been amended to "Eurobank Ergasias Services and Holdings S.A." (the Company or Eurobank Holdings).

Following the demerger "Eurobank Ergasias Services and Holdings S.A." is supervised on a consolidated basis and "Eurobank S.A." is supervised on a standalone basis by ECB and BoG.

The Company 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 and its shares are listed on the Athens Stock Exchange.

NPE Acceleration Plan
In November 2018, Group announced its transformation plan, which included the Merger with Grivalia, which was completed in April 2019, and the non performing loans' (NPEs) reduction Acceleration Plan comprising the following steps: a) the securitisation of ca. € 2 billion of NPEs, through the issue of senior, mezzanine and junior notes and the sale of the 95% of the above mentioned mezzanine and junior notes to a third party investor resulting to the de-recognition of the respective securitised NPEs from the Bank's balance sheet (project Pillar), b) the securitisation of ca. € 7.5 billion of NPEs, through the issue of senior, mezzanine and junior notes (project Cairo), c) the legal separation of the core and non-core operations of the Bank through the hive-down of the core operations to a new subsidiary, d) the entry of a strategic investor into Financial Planning Services S.A. (FPS), the licensed 100% owned loan servicer of the Bank, including the Bank's Troubled Asset Group, e) the sale of a portion of Cairo mezzanine and junior notes to a third party investor and, f) the contemplated de-recognition of the securitised NPEs through the disposal /distribution of the remaining Cairo mezzanine and junior notes, subject inter alia to corporate and regulatory approvals.

Pillar securitization
In June 2019, the Group through its special purpose financing vehicle (SPV) 'Pillar Finance Designated Activity Company', issued asset backed securities (notes) of total value of ca. € 2 billion collateralized by a portfolio of primarily non performing residential mortgage loans (project Pillar), which were fully retained by the Group. The securitization notes consisted of € 1,044 million senior issued at par, € 310 million mezzanine issued at par and € 645 million junior of issue price € 1. In the same month, the Group announced that it has entered into a binding agreement with Celidoria S.A R.L, an entity ultimately owned by funds whose investment manager is the global investment management firm Pimco, for the sale of 95% of the mezzanine and junior notes of the abovementioned securitization. Upon the completion of the transaction, in September 2019, the Group ceased to have control over the SPV.

Cairo securitization
In June 2019, the Group through its 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 (Class A), mezzanine (Class B1 and B2) and junior (Class C1 and C2) notes of total value of ca. € 7.5 billion, collateralized by a mixed assets portfolio primarily of non performing loans, which were fully retained by the Group. The securitization notes consisted of € 2,409 million senior issued at par, € 1,464 million mezzanine issued at par and € 3,633 million junior of issue price € 1.

In the context of Law 4649/2019 ('Hercules' – Hellenic Asset Protection Scheme) voted by the Greek parliament on 16 December 2019, the SPVs opted in for the state guarantee scheme. Specifically, the Bank submitted the relevant applications to the Ministry of Finance on 25 February 2020 for Cairo No. 1 and Cairo No. 2 and on 15 May 2020 for Cairo No. 3. As a prerequisite to the above law, the Group has already obtained the required external rating of the senior notes.

In December 2019, the Bank announced that it has entered into binding agreements with doValue S.p.A. ("doValue") for the sale of 20% of the mezzanine and 50.1% junior notes of the aforementioned Cairo securitization for a cash consideration of ca. € 14 million.

Upon the completion of the transaction, in June 2020, the Group ceased to consolidate the SPVs but continued to recognise the underlying loans and the related assets and liabilities in its balance sheet and recognised a financial liability for the consideration received.

In June 2020, Eurobank Holdings, following a decision of the Board of Directors, proceeded to the contribution of the retained Cairo notes, i.e. 75% of the mezzanine and 44.9% of the junior notes, to its Cyprus-based subsidiary Mairanus Limited renamed to 'Cairo Mezz Plc in exchange for the newly-issued shares.

On 7 July 2020, the BoD of Eurobank Holdings proposed to the General Shareholders' Meeting the distribution of Cairo Mezz Plc shares to Eurobank Holding's shareholders through the decrease in kind of its share capital. The approval of the General Shareholders' Meeting for the aforementioned corporate action was granted on 28 July 2020. The BoD decision for the contribution of the notes retained by Eurobank Holdings, initiated the distribution process and clearly demonstrated Management's commitment to a specific plan for the notes' disposal as the last step to the Group's Corporate Transformation Plan, and eventually the Cairo loan portfolio's de-recognition from its balance sheet.

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 the Group transferred substantially all risks and rewards of the portfolio's ownership and ceased to have control over the portfolio, which resides with the Class B1 noteholders. In addition, the Group recognized the retained notes on its balance sheet, i.e. 100% of the senior, 5% of mezzanine and junior notes.

Further information is provided in the Interim Consolidated Financial Statements notes 15, 24 and 31.

Eurobank FPS Loans and Credits Claim Management S.A., Greece

On 19 December 2019, the Group announced that it has reached an agreement with doValue to dispose 80% of its subsidiary Eurobank FPS Loans and Credits Claim Management S.A. ("FPS"), for a cash consideration of € 248 million, subject to certain adjustments.

As per the agreement, FPS, which was part of Eurobank Ergasias Troubled Asset Group ("TAG") - the unit responsible for the management of the troubled assets portfolio, would take over Eurobank Ergasias TAG unit in order for the sale to be completed. The relevant arrangements were completed at the end of March 2020.

After receiving all regulatory approval, the above sale transaction was completed on 5 June 2020.

Upon the completion of the transaction, the Group derecognized the assets and liabilities of FPS and recognized its retained 20% interest as an associate, to be accounted for using the equity method of accounting, at its fair value of € 62 million. The fair value was determined by reference to the implied enterprise value of € 310 million for 100% of the entity.

The terms of the transaction remained as per the binding agreement of 19 December 2019, which provided for certain adjustments related with the net cash position of the company, assets under management as of December 2019 and the net economic benefit accrued since 1 January 2020.

The cash consideration received, after the above consideration adjustments, amounted to € 211 million and the resulting gain on disposal was € 219 million before tax (€ 173 million after tax), including the costs directly attributable to the transaction and the remeasurement of the retained interest in FPS.

Further information is provided in the Interim Consolidated Financial Statements note 13.

Corporate Transformation – Hive down

On 28 June 2019, the BoD of Eurobank Ergasias S.A. ("Demerged Entity") decided the initiation of the hive down process of the banking sector of the Demerged Entity and its transfer to a new company-credit institution that would be established ("the Beneficiary").

Introduction – General Information

On 31 July 2019, the BoD of Eurobank Ergasias S.A. approved the Draft Demerger Deed through the aforementioned hive down and establishment of a new company-credit institution, pursuant to Article 16 of Law 2515/1997 and Articles 57 (3) and 59- 74 of Law 4601/2019, as currently in force. In particular, the demerger would involve the hive-down of the banking sector of Eurobank Ergasias S.A., to which the assets and the liabilities are included, as described on the transformation balance sheet of the hived-down sector as at 30 June 2019 ("Transformation Date"). In accordance with the Draft Demerger Deed, Eurobank Ergasias S.A. retained the 95% of the Pillar mezzanine and junior notes which in September 2019 were sold to a third party investor, as well as the participation in Pillar DAC and the related Pillar real estate entity.

On 31 January 2020, the Demerged Entity's Extraordinary General Shareholders' Meeting (EGM) resolved, among others, a) the approval of the aforementioned demerger of Eurobank Ergasias through the banking sector's hive down and the establishment of a new company-credit institution under the corporate name "Eurobank S.A." b)) the approval of the Draft Demerger Deed as well as the Articles of Association of the Beneficiary, as they were approved by the Demerged Entity's BoD and c) the adjustment of the Articles of Association of the Demerged Entity which would cease to be a credit institution by amending its object and corporate name as was also approved by its BoD.

On 20 March 2020, the demerger of Eurobank Ergasias S.A. through the banking sector's hive down and the establishment of a new company-credit institution ("Demerger") under the corporate name "Eurobank S.A." as well as the Articles of Association of the Beneficiary were approved by virtue of the decision of the Ministry of Development and Investments No 31847/20.03.2020, which was registered on the same day in the General Commercial Registry. At the aforementioned date: a) the Demerged Entity becomes the shareholder of the Beneficiary by acquiring all the shares issued by the Beneficiary and more specifically 3,683,244,830 common registered shares, of a nominal value of € 1.10 each and b) the Beneficiary substitutes the Demerged Entity, by way of universal succession, to all the transferred assets and liabilities, as set out in the transformation balance sheet of the hived down sector as at 30 June 2019 and formed up to 20 March 2020, day of the Demerger's completion.

On 23 March 2020, the Articles of Association of the Demerged Entity were amended with the decision of the Ministry of Development and Investments, Number 32403/23.03.2020, which was registered on the same day in the General Commercial Registry. According to article 1 of the Articles of Association, the corporate name and the distinctive title of the Demerged Entity is amended to "Eurobank Ergasias Services and Holdings S.A." and "Eurobank Holdings" respectively. The date of change of the Company's corporate name and distinctive title in the Athens Exchange was set for 24 March 2020.

In accordance with the Demerger Deed, Eurobank Holdings maintained activities and assets that are not related to the main banking activities but are mainly related to the strategic planning of the administration of non-performing loans and the provision of services to the Group companies and third parties. Furthermore, Eurobank Holdings retained the 95% of Cairo mezzanine and junior notes, the preferred securities and the participations in certain subsidiaries including Be Business Exchanges S.A., Cairo DACs, Pillar and Cairo real estate entities. Accordingly, the Beneficiary, receives the remaining assets (including 100% of Cairo senior and 5% of mezzanine and junior notes that were recognized at fair value) and liabilities that constitute the banking sector, by issuing shares to the Demerged entity. Further information is provided in the Interim Consolidated Financial Statements note 31.

Tier 2 Capital instruments

In January 2018, Eurobank Ergasias S.A. issued Tier 2 capital instruments of face value of € 950 million, in replacement of the preference shares which had been issued in the context of the first stream of Hellenic Republic's plan to support liquidity in the Greek economy under Law 3723/2008. The aforementioned instruments, which 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, as at 30 September 2020, amounted to € 962 million, including € 3 million unamortized issuance costs and € 15.5 million accrued interest.

Considering that the obligations of Eurobank Ergasias S. A (Demerged Entity) arising from the Tier 2 Subordinated Capital Instruments were not transferred to the Beneficiary (i.e. Eurobank S.A.), the latter pursuant to the terms of the Draft Demerger Deed has explicitly and irrevocably undertaken to fulfil the relevant obligations. In that context, on 20 March 2020, the Beneficiary issued a subordinated instrument of equivalent terms with those of Tier 2 mentioned above, which was fully subscribed by the Demerged Entity. Further information is provided in the Interim Consolidated Financial Statements notes 24 and 31.

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 maintain in addition to the Common Equity Tier 1 capital a capital conservation buffer equal to 2.5 % (from 1 January 2019) of their total risk exposure amount calculated.

As a result, the minimum ratios which must be met, including the capital conservation buffer, and which 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 Act No 177, the countercyclical buffer was set at 0% for the fourth quarter of 2020.
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 20.03.2019 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 2018 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. In case of higher capital requirements, these become applicable at least one year after the publication of the O-SIIs list, to give institutions enough time to adjust to the new buffer requirements.

   The EBA methodology has been applied to compute the scores for all the institutions operating in Greece using consolidated data. Based on the above scoring system, all Greek O-SIIs are classified in bucket 4 which corresponds to a capital buffer of 1% which will be phased in until 2022. The date of activation was 1 January 2016 and BoG's Executive Committee Acts163/ 1.11.2019 and 174/26.6.2020 set the O-SII buffer for Greek Institutions for the years 2020 and 2021 at 0.50% respectively.

1.2 Regulatory developments

On 14 February 2020 European Commission published Regulation 2020/429 that amends the Regulation 680/2014, which sets out implementing technical standards on supervisory reporting of institutions under the Capital Requirements Regulation or CRR (575/2013). The key amendments in Regulation 2020/429 relate to reporting on securitization positions, IFRS 16 on leases, non-performing exposures, and liquidity. This Regulation is based on the draft implementing technical standards submitted by EBA to EC. Regulation 2020/429 shall enter into force on the day following that of its publication in the Official Journal of the European Union.

On 20 May 2020, The European Central Bank (ECB) published a guide for consultation that explains how it expects banks to safely and prudently manage climate-related and environmental risks and disclose such risks transparently under the current prudential framework. The ECB wants banks to account for these risks given that they drive existing prudential risk categories and can substantially impact the real economy and banks.

On 29 May 2020, the European Banking Authority (EBA) published its Guidelines on loan origination and monitoring that expect Banks to develop robust and prudent standards to ensure newly originated loans are assessed properly. The Guidelines set requirements for assessing the borrowers' creditworthiness together with the handling of information and data for the purposes of such assessments. In these requirements, the Guidelines bring together the EBA's prudential and consumer protection objectives.

On 18 September 2020 The European Central Bank (ECB) published the finalised guide outlining the methodology it uses to assess how euro area banks calculate their exposure to counterparty credit risk (CCR) and advanced credit valuation adjustment (CVA) risk. The guide published explains the methodology the ECB uses to assess the validity of such models, especially in internal model investigations.

COVID-19 regulatory measures

The COVID-19 pandemic constitutes an unprecedented challenge with very severe socio-economic consequences. Regulatory authorities have responded to this challenge with a number of regulatory measures.

On 12 March 2020, the ECB announced a number of measures to ensure that its directly supervised banks can continue to fulfil their role in funding the real economy. Specifically, banks will be allowed, among others, to operate temporarily below the level of capital defined by the Pillar 2 Guidance and the Combined Buffer Requirement. Banks will also be allowed to partially use capital instruments that do not qualify as CET1 capital, for example Additional Tier 1 or Tier 2 instruments, to meet the Pillar 2 Requirements (P2R).

On 20 March 2020 the ECB published FAQs on supervisory measures in reaction to the coronavirus. The relief measures cover the following: a) asset quality deterioration and non- performing loans, b) operational aspects of supervision and c) capital and liquidity requirements.

Following the ECB recommendation of 27 March of 2020 (2020/19) on dividend distribution, the ECB recommends that at least until 1 October 2020 no dividends are paid out and no irrevocable commitment to pay out dividends is undertaken by the credit institutions for the financial year 2019 and 2020 and that credit institutions refrain from share buy-backs aimed at remunerating shareholders. On 27 July 2020, ECB extended its recommendation to banks on dividend distributions and share buy-backs until 1 January 2021 and asked banks to be extremely moderate with regard to variable remuneration.

On 2 April 2020, the European Banking Authority (EBA) published "Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis before 30 June 2020". On 25 June 2020, EBA introduced a new deadline of 30 September 2020 replacing the previous date of 30 June 2020. The aim of these Guidelines was to clarify the requirements for public and private moratoria, which if fulfilled, will help avoid the classification of exposures under the definition of forbearance or as defaulted under distressed restructuring.

On 28 April 2020, the European Commission has proposed targeted "quick fix" amendments to Regulation (EU) No 575/2013 (Capital Requirements Regulation) and Regulation (EU) 2019/876 (CRR II) in order to mitigate the economic impact of the 2019 novel coronavirus disease (COVID-19) pandemic.

The changes include exceptional temporary measures to alleviate the immediate impact of Coronavirus-related developments, by adapting the timeline of the application of international accounting standards on banks' capital, by treating more favourably public guarantees granted during this crisis, by postponing the date of application of the leverage ratio buffer and by modifying the way of excluding certain exposures from the calculation of the leverage ratio.

The Commission also proposed to advance the date of application: a) of several agreed measures that incentivise banks to finance employees, SMEs and infrastructure projects and b) of the exemption of certain software assets from capital deductions. The Commission called for the Council and the Parliament to adopt the amending Regulation before the end of June 2020.

On 9 June 2020, the Economic and Monetary Affairs Committee MEPs agreed to apply specific changes to the capital requirements regulation (CRR), which will have to be coherently applied in the EU. Banks will have to monitor the effects of the pandemic on their balance sheets, pay close attention to non-performing loans and apply know-your-customer standards. The material changes include:

- Extension by two years of the transitional arrangements for IFRS 9 (international accounting standard) and further relief measures (capital add back);
- Alignment of minimum coverage requirements for non-performing loans guaranteed by the public sector with those guaranteed by official export credit agencies;
- Deferred application of the leverage ratio buffer by one year to January 2023;
- Advanced application of a more favourable prudential treatment of loans to pensioners or employees with a permanent contract that are backed by the borrower's pension or salary;
- Advanced application of both, the SME and infrastructure supporting factors, which allows for a more favourable prudential treatment of certain exposures to SMEs and infrastructure;
- Temporary treatment of unrealised gains and losses measured at fair value through other comprehensive income in relation to exposures to central of governments, to regional governments, to local authorities and public sector entities;
- Banks will no longer be required to deduct certain software assets from their capital.

The plenary session vote on the CRR ‘quick fix’ took place on 19 June 2020.

On June 24, 2020, the EU Council announced that it had adopted Regulation (EU) 2020/873 (CRR ‘quick fix’) amending Regulations (EU) No 575/2013, as amended (“CRR”) and (EU) 2019/876 (“CRR2”).

The CRR ‘quick fix’ legislation intends to help credit institutions to mitigate impact of the COVID-19 outbreak and to provide incentives for banks to continue lending to business and consumers.

On 2 June 2020, EBA published GL/2020/11 guidelines to clarify how to report the CRR ‘quick fix’ amendments that have an impact on templates related to the leverage ratio, own funds and credit risk. The reporting requirements clarified by these guidelines will apply from the date of publication until the reporting reference date of 31 May 2021. The disclosure requirements clarified by these guidelines will apply from the date of publication until and including the last disclosure reference date prior to the disclosure reference date of 28 June 2021.

On 17 September 2020 the European Central Bank (ECB) announced that euro area banks under its direct supervision may exclude certain central bank exposures from the leverage ratio. The move is aimed at easing the implementation of monetary policy. Banks may benefit from this measure until 27 June 2021.

On 14 October 2020, the European Banking Authority (EBA) published its final draft regulatory technical standards (RTS) specifying the prudential treatment of software assets according to Art. 36(4) of the Capital Requirements Regulation (CRR), based on a prudential amortisation of software assets. EBA has concluded that the prudential amortization approach would best fit its purpose and objectives. This method implies that the positive difference between prudential and accounting accumulated depreciation shall be fully deducted from CET1, while the residual portion of the carrying amount shall be risk-weighted. If the useful life of software estimated for accounting purposes is shorter than the prudential amortization period, the former shall be used also for prudential purposes. Additionally, the prudential amortization period has been set at maximum 3 years, starting from the date on which the software asset is available for use. The prudential amortizations and deductions shall be made separately for each software asset. All the investments made for maintaining, enhancing or upgrading the existing software assets shall be treated as separate assets, considering that those investments are recognized as an intangible asset on the balance sheet. In line with the recent CRR ‘quick fix’, the date of entry into force of the RTS has been moved forward to the day following its publication in the Official Journal of the EU.

Furthermore the Basel Committee's oversight body, the Group of Central Bank Governors and Heads of Supervision (GHOS), has endorsed a set of measures to provide additional operational capacity for banks and supervisors to respond to the immediate financial stability priorities resulting from the impact of the coronavirus disease (COVID-19) on the global banking system:

- The implementation date of the Basel III standards finalised in December 2017 has been deferred by one year to 1 January 2023. The accompanying transitional arrangements for the output floor has also been extended by one year to 1 January 2028;
- The implementation date of the revised market risk framework finalised in January 2019 has been deferred by one year to 1 January 2023;
- The implementation date of the revised Pillar 3 disclosure requirements finalised in December 2018 has been deferred by one year to 1 January 2023.

2020 EU – wide stress test postponed to 2021

An EU - wide stress test was announced by the European Banking Authority (EBA) launched in January 2020 to assess the resilience of EU banks to an adverse economic shock.

The 2020 EU-wide stress test consisted of two stress-testing exercises – the EBA EU-wide stress test and the ECB SREP stress test – the results of which would be factored into its overall assessment within the 2020 Supervisory Review and Evaluation Process (SREP).

The scope of the 2020 ECB SREP stress test would complement the 2020 EBA EU-wide stress test in order to address those ECB supervised entities not included in the 2020 EBA EU-wide stress test. Eurobank would participate in the ECB SREP stress test of 2020.

On 12 March 2020, the EBA and the ECB decided to postpone the stress test exercises to 2021 to mitigate the impact of COVID-19 on the EU banking sector and thus allow banks to focus on and ensure continuity of their core operations, including support for their customers. For 2020, the EBA launched on 4 May an additional EU-wide transparency exercise to provide market participants with updated information on the financial conditions of EU banks as of 31 December 2019, prior to the start of the COVID-19 pandemic. The EBA published the results of this exercise, including those for Eurobank Ergasias S.A. in June 2020.

On 25 September, the EBA launched its 7th annual EU-wide transparency exercise, which will complement the EU-wide transparency exercise of June 2020. This exercise seeks to provide market participants with updated information on the financial conditions of European banks based on data as of March and June 2020. The results of this exercise will be published at the beginning of December 2020.

In July 2020, the EBA announced that the 2021 EU-wide stress test exercise is expected to be launched at the end of January 2021 and its results to be published at the end of July 2021.

1.3 Scope of Pillar 3

The purpose of Pillar 3 report is to provide updated information regarding 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 harmonised the frequency of disclosures and updated 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.

In December 2018 EBA published EBA/GL/2018/10 guidelines, which include enhanced disclosure formats for credit institutions for disclosures related to non-performing exposures, forborne exposures and foreclosed assets. Some templates are applicable to significant credit institutions that have a gross NPE ratio of 5% or above, as is the case for Eurobank.

In response to the COVID-19 pandemic, EBA published EBA/GL/2020/07 guidelines, which introduce additional requirements in relation to the disclosure on exposures subject to the EBA Guidelines on legislative and non-legislative moratoria on loan repayments applied in the light of the COVID-19 crisis and on newly originated exposures subject to public guarantee schemes. The disclosure requirements will apply semi-annually.

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

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 EBA guidelines.

Pillar 3 disclosures are provided in a designated location on the Company's website (www.eurobankholdings.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 Company 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 and was approved by the Board of Directors on 18 November 2020.

1.4 Regulatory versus accounting consolidation

There is no difference between regulatory and accounting consolidation.

List of all Company's subsidiaries can be found in the Interim Consolidated Financial Statements note 17.

The table below shows the Group's regulatory and accounting Balance Sheet as at 30 September 2020 and 30 June 2020.

Table 1: Regulatory and accounting Balance Sheet

Balance sheet per published financial statements and per regulatory consolidation	*Ref.*	**30 September 2020 € million**	30 June 2020 € million
Assets			
Cash and Balances with central banks		5,591	3,943
Due from credit institutions		3,827	3,962
Securities held for trading		59	130
Derivative financial instruments		2,502	2,545
Loans and advances to customers		36,988	34,442
Investment securities		8,851	9,803
Investments in associates and joint ventures		302	301
Property, plant and equipment		745	740
Investment property		1,413	1,370
Intangible assets	*a*	395	388
Deferred tax asset		4,732	4,719
of which deferred tax assets that rely on future profitability	*b*	1	1
of which deferred tax credit		3,723	3,756
of which deferred tax assets arising from temporary differences	*c*	1,008	962
Other assets		1,995	2,063
Assets of disposal group classified as held for sale		54	2,559
Total assets		**67,454**	66,965
Liabilities			
Due to central banks		8,009	8,019
Due to credit institutions		1,554	1,914
Derivative financial instruments		2,965	3,211
Due to customers		46,156	45,157
Debt securities in issue		2,175	2,041
Other liabilities		1,247	1,153
Liabilities of disposal group classified as held for sale		0	26
Total liabilities		**62,106**	61,521
Equity			
Ordinary share capital		816	853
Share premium		8,055	8,055
Reserves and retained earnings		(3,523)	(3,464)
of which cash flow hedge reserves	*d*	(50)	(51)
Total equity	*f*	**5,348**	5,444
Total equity and liabilities		**67,454**	66,965

2. Capital Management

2.1 Regulatory Capital

The table below shows the composition of the Group's regulatory capital as at which is calculated according to CRD IV rules.

Table 2: Regulatory capital

	Ref.	**30 September 2020** **€ million**	30 June 2020 € million
Total equity	*f*	5,348	5,444
Regulatory adjustments			
Part of interim or year-end profit not eligible		-	-
Cash flow hedge reserves	*d*	50	51
Adjustments due to IFRS 9 transitional arrangements		778	919
Fixed assets' revaluation reserve			-
Intangible assets	*a*	(395)	(388)
of which Goodwill		(161)	(161)
IRB shortfall of credit risk adjustments to expected losses		(91)	(43)
Deferred tax assets that rely on future profitability (unused tax losses)	*b*	(1)	(1)
Deferred tax assets arising from temporary differences (amount above 10% threshold)	*c*	(380)	(332)
Prudent Valuation Adjustments		(10)	(11)
Other regulatory adjustments		(15)	(16)
Amount exceeding the 17.65% threshold		(36)	(20)
Common Equity Tier I capital		**5,248**	5,603
Preferred Securities subject to phase-out	*e*	-	-
Regulatory adjustments		-	-
Total Tier I capital		5,248	5,603
Tier II capital - subordinated debt		950	950
Fixed assets' revaluation reserve		-	-
IRB Excess of impairment allowances over expected losses eligible		-	104
Total Regulatory Capital		6,198	6,657
Risk Weighted Assets		39,801	42,208
Ratios			
Common Equity Tier I		**13.2%**	13.3%
Tier I		**13.2%**	13.3%
Total Capital Adequacy Ratio		**15.6%**	15.8%

[1] *The Group's CET1 ratio as at 30 September 2020, based on the full implementation of the Basel III rules in 2025 (fully loaded CET1), would be 11.2% (30 June : 11.0%).*
[2] *The Group's pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 30 June 2020, with the derecognition of the Cairo loans would be 13.0%, 13.0% and 15.5% respectively, whereas the pro-forma fully loaded CET1 ratio as at 30 June 2020 would be 11.2%.*

As depicted in table above, Regulatory capital has decreased during the third quarter 2020, mainly due to the Cairo transaction completion that resulted in the decrease of Other Comprehensive Income from the distribution of Cairo mezzanine notes to Eurobank Holding's shareholders, the decrease of CRR IFRS 9 transitional arrangements and the increase of IRB provisions shortfall due to the derecognition of Cairo loans.

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.

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

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

In addition, the CRR 'quick fix' with the Article 468 introduces a temporary treatment that allows institutions to remove from the calculation of their CET1 items unrealised gains and losses measured at fair value through other comprehensive income during the period from 1 January 2020 to 31 of December 2022.

The Group is not applying the temporary treatment specified in Article 468 therefore the own funds, capital and leverage ratios reflect the full impact of unrealised gains and losses measured at fair value through other comprehensive income.

Table 3: Template IFRS 9/Article 468 - 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 and the temporary treatment in accordance with Article 468 of the CRR

Available capital	**30 September 2020** **€ million**	30 June 2020 € million	**31 March 2020 [1]** **€ million**
Common Equity Tier 1 (CET1) capital	5,248	5,603	6,625
Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4,443	4,613	5,858
Tier 1 capital	5,248	5,603	6,625
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	4,443	4,613	5,858
Total capital	6,198	6,657	7,645
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5,489	5,668	6,914
Risk weighted assets			
Total risk-weighted assets	39,801	42,208	42,953
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	39,546	41,949	42,725
Capital ratios			
Common Equity Tier 1 (as a percentage of risk exposure amount)	**13.2%**	13.3%	15.4%
Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**11.2%**	11.0%	13.7%
Tier 1 (as a percentage of risk exposure amount)	**13.2%**	13.3%	15.4%
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**11.2%**	11.0%	13.7%
Total capital (as a percentage of risk exposure amount)	**15.6%**	15.8%	17.8%
Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**13.9%**	13.5%	16.2%
Leverage ratio			
Leverage ratio total exposure measure	63,888	68,691	70,516
Leverage ratio	**8.21%**	8.16%	9.39%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**6.94%**	6.71%	8.46%

[1] Including interim profits (1/1/2020-31/3/2020) € 57 million.

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 2020 and 30 June 2020. The minimum capital requirements under Pillar 1 are calculated as 8% of RWAs.

Table 4: EU OV1 – Overview of RWAs

	30 September 2020 RWAs € million	30 June 2020 RWAs € million	30 September 2020 Minimum capital requirements € million
Credit risk (excluding CCR)	**32,621**	34,493	**2,611**
Of which the standardised approach	16,844	17,286	1,348
Of which the foundation IRB (FIRB) approach	9,257	9,516	741
Of which the advanced IRB (AIRB) approach	6,062	7,226	485
Of which equity IRB under the simple risk-weighted approach or the IMA	458	465	37
Counterparty Credit Risk	**475**	524	**38**
Of which mark to market	188	199	15
Of which original exposure	-	-	-
Of which the standardised approach	222	239	18
Of which internal model method (IMM)	-	-	-
Of which risk exposure amount for contributions to the default fund of a CCP	-	-	-
Of which CVA	65	86	5
Settlement risk	-	-	-
Securitisation exposures in the banking book (after the cap)	**1,033**	998	**83**
Of which IRB approach	35	36	3
Of which IRB supervisory formula approach (SFA)	-	-	-
Of which internal assessment approach (IAA)	-	-	-
Of which standardised approach	998	962	80
Market risk	**922**	1,380	**74**
Of which the standardised approach	251	313	20
Of which IMA	671	1,067	54
Large exposures	-	-	-
Operational risk	**3,077**	3,077	**246**
Of which basic indicator approach	-	-	-
Of which standardised approach	3,077	3,077	246
Of which advanced measurement approach	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight)	**1,673**	1,736	**134**
Floor adjustment	-	-	-
Total	**39,801**	42,208	**3,184**

[1] The decrease in the Credit Risk RWAs compared to 30.06.2020 is mainly due to the derecognition of Cairo loans and the decrease in Market Risk RWAs is mainly due to the decrease of trading exposures in GGBs.

2.4 Supervisory Review and Evaluation Process (SREP) capital requirements

In response to the COVID-19 outbreak, on 12 March 2020, the ECB announced a number of measures to ensure that its directly supervised banks can continue to fulfil their role in funding the real economy. Specifically, banks will be allowed, among others, to operate below the level of capital defined by the Pillar 2 Guidance and the Combined Buffer Requirement (i.e. Capital Conservation Buffer, Countercyclical Capital Buffer, Other Systemically Important Institutions Buffer) until at least the end of 2022, as per the latest ECB's communication issued on 28 July. Banks will also be allowed to partially use capital instruments that do not qualify as CET1 capital, for example Additional Tier 1 or Tier 2 instruments, to meet the Pillar 2 Requirements (P2R).

Taking into account the aforementioned developments and the 2019 SREP decision, for 2020, the Group is required to meet a Common Equity Tier 1 ratio of at least 9.24% (instead of 10.58% required in the pre- COVID-19 outbreak) and a Total Capital Adequacy Ratio of at least 14.05% (Overall Capital Requirements or OCR), including the Combined Buffer Requirement (the OCR remains at the same level as in the pre- COVID-19 outbreak). The capital relief measures mentioned above do not change the level of the Combined Buffer Requirement (stands at 3.05% and covered with CET1 capital), which sits on top of the Total SREP Capital Ratio (11%) resulting in an OCR of 14.05% in terms of total capital. According to the FAQs published by the ECB (last updated 28 July 2020), the allowance provided to banks to operate below the combined buffer requirement results in the ECB taking a flexible approach to approving capital conservation plans that banks are legally required to submit if they breach the combined buffer requirement.

The table below shows the capital requirements of the Bank for 30 September 2020.

	30 September 2020	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.69%	3.00%
Total SREP Capital Requirement (TSCR)	**6.19%**	**11.00%**
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCoB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.05%	0.05%
Other systemic institutions buffer (O-SII)	0.50%	0.50%
Overall Capital Requirement (OCR)	**9.24%**	**14.05%**

3. Credit Risk

In June 2008, the Group received the approval of BoG to use the Internal Ratings Based (IRB) approach to calculate the capital requirement for credit risk. Therefore, with effect from 1 January 2008 the Group applies:

- The Foundation IRB approach to calculate risk weighted assets for the corporate loans' portfolio of Eurobank Ergasias S.A. in Greece
- The Advanced IRB for the majority of the retail loans' portfolio of the Bank, i.e. mortgages, small business lending, credit cards and revolving credits in consumer lending.
- From September 2009 the Foundation IRB approach was applied for the corporate loans' portfolio of Eurobank Ergasias Leasing S.A. in Greece.
- From March 2010 the Advanced IRB approach was applied for the Bank's portfolio of personal and car loans.

The implementation of IRB covers 73.9% of the Group's lending portfolio excluding portfolio segments which are immaterial in terms of size and risk profile as well as, permanent exemptions.

There is a permanent exemption from the IRB approach, up to 10% of Risk Weighted Assets, for which the Standardised approach is applied. In addition to the exemption of up to 10% of Risk Weighted Assets, permanent exemption has been granted for the following exposure classes as prescribed in the CRD:

- exposures to/or guaranteed by central governments and central banks;
- exposures to/or guaranteed by credit and financial institutions; and
- exposures to administrative bodies and non-commercial undertakings.

The following table shows the main changes in capital requirements of credit risk exposures under the IRB approach as at 30 September 2020:

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

	30 September 2020	
	RWA amounts € million	Capital requirements € million
RWAs as at 30 June 2020	16,742	1,340
Asset size	(91)	(7)
Asset quality	(46)	(4)
Model updates	-	-
Methodology and policy	-	-
Acquisitions and disposals	(1,196)	(96)
Foreign exchange movements	(86)	(7)
Other	(4)	-
RWAs as at 30 September 2020	**15,319**	**1,226**

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: The changes in RWAs attributed to methodological aspects.
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.

The movement in acquisitions and disposals is mainly due to the completion of Cairo transaction.
Asset size movement is attributed to deleveraging actions of corporate portfolio.

4. Market Risk

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

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

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

Furthermore, the Bank calculates and monitors the market risk of the banking book for its operations in Greece on a daily basis using the internal VaR model. For its operations abroad, Eurobank applies sensitivity analysis, whereas the VaR methodology is applied on a daily basis.

The following table summarises the components of the capital requirement, under the IMM approach applied by the Bank as at 30 September 2020:

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

	30 September 2020						
	VaR € million	Stressed VaR € million	IRC € million	Comprehensive risk measure € million	Other € million	Total RWAs € million	Total capital requirements € million
RWAs at 30 June 2020	263	466	338	-	-	1,067	**85**
Regulatory adjustment	-	-	-	-	-	-	**-**
RWAs at the previous quarter-end (end of the day)	263	466	338	-	-	1,067	**85**
Movement in risk levels	(109)	(91)	(196)	-	-	(397)	**(32)**
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)	154	375	142	-	-	671	**54**
Regulatory adjustment	-	-	-	-	-	-	**-**
RWAs at 30 September 2020	**154**	**375**	**142**	**-**	**-**	**671**	**54**

[1] The decrease in RWAs is mainly attributed to the decrease in GGBs' Trading activity, along with the decreased regulatory multiplier, stemming from the results of the Back-testing process.

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.

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 2020 on consolidated basis was at 8.21% (30 June 2020 8.16%) 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 2020 and 30 June 2020:

CRR Leverage Ratio - Disclosure Template

Summary reconciliation of accountng assets and leverage ratio exposures

	30 September 2020 € million	30 June 2020 € million
Total assets as per published financial statements	67,454	66,965
Adjustment for entities which are consolidated for accountng 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	(362)	(585)
Adjustments for securities financing transactions	1,154	1,244
Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	1,832	1,810
(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) [1]	(5,206)	-
Other adjustments	(984)	(743)
Total leverage ratio exposure	**63,888**	68,691

[1] *Following ECB's decision 2020/1306 certain exposures to central banks are temporarily excluded from the total exposure measure, in view of the Covid-19 pandemic. Such exposures include coins and banknotes, deposits held in the deposit facility and balances held on reserve accounts with the Eurosystem.*

Leverage ratio

Leverage ratio common disclosure

	30 September 2020 CRR leverage ratio exposures € million	30 June 2020 CRR leverage ratio exposures € million
On - balance sheet exposures (excluding derivatives and SFT's)		
On-balance sheet items (excluding derivatives and SFT's, but including collateral)	64,105	63,752
Asset amounts deducted in determining Tier I capital	(137)	(74)
Total on-balance sheet exposures (excluding derivatives and SFT's)	**63,968**	63,678
Derivative exposures		
Replacement cost associated with derivatives transactions	1,847	1,704
Add-on amounts for PPE associated with derivatives transactions	293	256
Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
(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	**2,140**	1,960
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	1,154	1,243
Derogation for SFTs: Counterparty credit risk exposure in accordance with Article 429b (4) and 222 of Regulation (EU) No 575/2013	-	-
Agent transaction exposures	-	-
(Exempted CCP leg of client-cleared SFT exposure)	-	-
Total securities financing transaction exposures	**1,154**	1,243
Off-balance sheet exposures		
Off-balance sheet exposures of gross notional amount	5,463	5,269
Adjustments for conversion to credit equivalent amounts [1]	(3,631)	(3,459)
Total off-balance sheet exposures	**1,832**	1,810
Exempted exposures in accordance with CRR Article 429 (7) and (14) (on and off balance		
(Exemption of intragroup exposures (solo basis) in accordance with Article 429(7) of Regulation (EU) No 575/2013 (on and off balance sheet))	-	-
(Exposures exempted in accordance with Article 429 (14) of Regulation (EU) No 575/2013 (on and off balance sheet))	*(5,206)*	-
Capital and Total Exposures	-	
Tier I capital	5,248	5,602
Total leverage ratio exposures	63,888	68,691
Leverage Ratio		
Leverage Ratio	**8.21%**	8.16%
Choise on transitional arrangements and amount of derecognised fiduciary items	**-**	-
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) 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).*

Leverage ratio

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

	30 September 2020 CRR leverage ratio exposures € million	30 June 2020 CRR leverage ratio exposures € million
Total on-balance sheet exposures (excluding derivatives and SFT'S) of which:	58,899	63,752
Trading book exposures	0	-
Banking book exposures of which:	58,899	63,752
Covered bonds	397	302
Exposures treated as sovereigns [1]	13,075	17,245
Exposures to regional goverments,MOB, international organisations and PSE NOT treates as sovereigns	0	-
Institutions	4,202	4,542
Secured by mortgages of immovable properties	10,745	10,982
Retail exposures	4,873	4,771
Corporate	14,830	15,264
Exposure in default	2,534	4,665
Other exposures (eg equity, securitisations and other non-credit obligation assets)	8,244	5,981

[1] *Following ECB's decision 2020/1306 certain exposures to central banks are temporarily excluded from the total exposure measure, in view of the Covid-19 pandemic. Such exposures include coins and banknotes, deposits held in the deposit facility and balances held on reserve accounts with the Eurosystem.*