EUROBANK ERGASIAS SERVICES AND HOLDINGS S.A.

CONSOLIDATED PILLAR 3 REPORT

FOR THE THREE MONTHS ENDED 31 MARCH 2022

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1. Introduction – General Information

Eurobank Ergasias Services and Holdings S.A. (the Company or Eurobank Holdings), which is the parent company of Eurobank S.A. (the Bank) and its subsidiaries (the Group), consisting mainly of Eurobank S.A. Group, are active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Group operates mainly in Greece and in Central and Southeastern Europe. The Company is incorporated in Greece and its shares are listed on the Athens Stock Exchange.

Eurobank Ergasias Services and Holdings S.A. is supervised on a consolidated basis and "Eurobank S.A." is supervised on a standalone basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

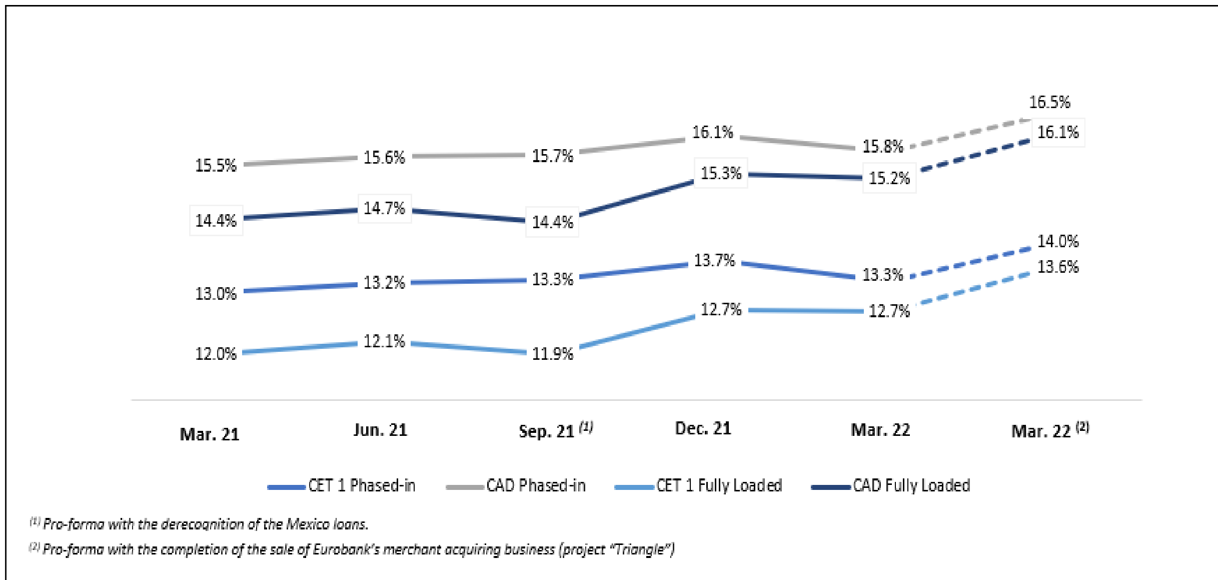
1.1 Highlights

Risk profile

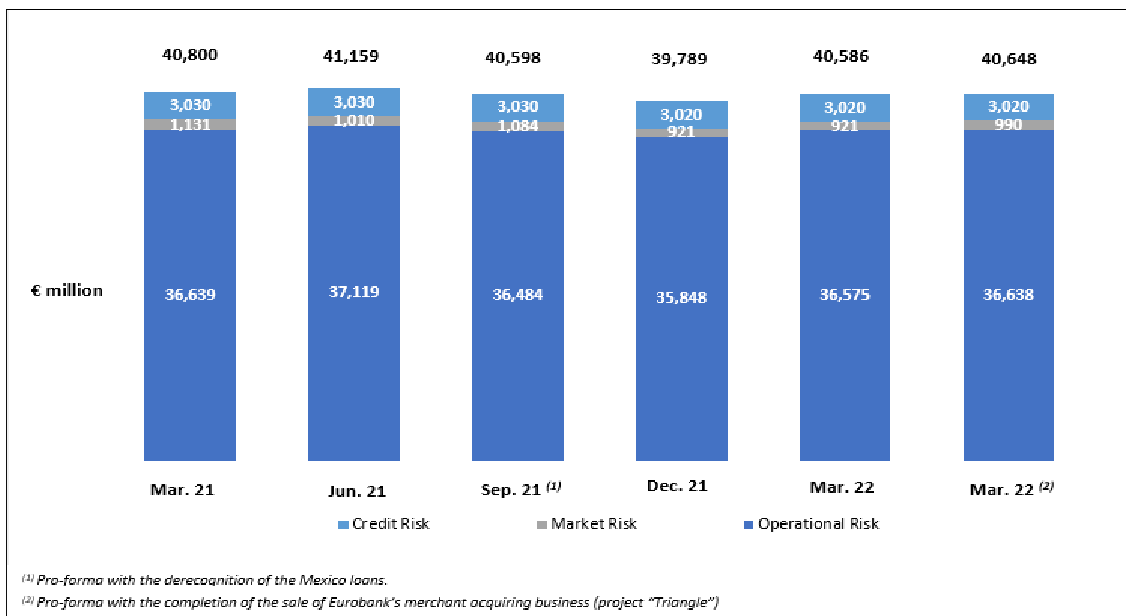
	31 March 2022 [(1) & (2)] € million	**31 March 2022 [(1)] € million**	31 December 2021 [(1)] € million	31 March 2021 [(1)] € million
Available own funds				
Common Equity Tier 1 (CET1) capital	**5,703**	5,382	5,436	5,319
Tier 1 capital	**5,703**	5,382	5,436	5,319
Total capital	**6,717**	6,395	6,386	6,314
Risk-weighted exposure amounts				
Total risk-weighted exposure amount	**40,648**	40,586	39,789	40,800
Capital ratios				
Common Equity Tier 1 ratio (%)	**14.0%**	13.3%	13.7%	13.0%
Tier 1 ratio (%)	**14.0%**	13.3%	13.7%	13.0%
Total capital ratio (%)	**16.5%**	15.8%	16.1%	15.5%
Leverage ratio				
Leverage ratio	**8.5%**	8.1%	8.2%	8.3%
Liquidity Ratio				
Liquidity coverage ratio (%)	**151.3%**	151.3%	152.2%	140.6%
Net Stable Funding Ratio(%)	**124.5%**	124.0%	124.0%	

[(1)] Including profits € 270 million for the 1Q 2022, € 328 million for year ended 31 December 2021 and € 70 million for the 1Q 2021.
[(2)] Pro-forma with the completion of the sale of Eurobank's merchant acquiring business (project "Triangle").

Evolution of Capital Ratio



Evolution of Risk Weighted Assets Amount



1.2 NPE Management Strategy and Operational targets

In line with the regulatory framework and SSM requirements for non performing exposures (NPE) management, in March 2022 the Group submitted its NPE Management Strategy for 2022-2024, along with the annual NPE stock targets at both Bank and Group level. The plan envisages the decrease of NPE ratio at 5.8% in 2022 and below 5% in 2024. As at 31 March 2022, the Group's NPE stock amounted to € 2.7 billion (31 December 2021: € 2.8 billion) driving the NPE ratio to 6.7% (31 December 2021: 6.8%), while the NPE coverage ratio stood at at 70.6% (31 December 2021: 69.2%). In the context of its NPE management strategy, the Group is contemplating an NPE securitization transaction, as part of a joint initiative with the

other Greek systemic banks initiated since 2018 (project 'Solar'). It is expected that the participating banks will seek to include 'Solar' securitization under the Hellenic Asset Protection Scheme (HAPS), thus the senior note of the securitization to become entitled to the Greek State's guarantee which is subject to the accounting derecognition of the securitized loan portfolio from the participating banks' balance sheet. The Group's contribution on the above securitization transaction that it is still at an early stage, refers to a portfolio of corporate NPE loans of gross carrying amount of ca. € 0.3 bn.

1.3 Eurobank Merchant Acquiring business classified as held for sale - Project 'Triangle'

On 7 December 2021, the Company announced that its subsidiary Eurobank S.A. ("Eurobank") has signed a binding agreement with Worldline B.V. ("Worldline") that includes: a) the sale of 80% of Eurobank's merchant acquiring business ("PayCo") to Worldline with Eurobank maintaining the remaining 20% and b) a long term agreement for the exclusive distribution of PayCo products in Greece through Eurobank's sales network.

The agreement values 100% of PayCo at € 320 million, subject to customary adjustments as of the date of completion of the Transaction. The transaction also entails an additional conditional payment, referral fees from PayCo and customary minority protection rights.

On the basis of the aforementioned agreement Eurobank Merchant Acquiring business has been classified as held for sale since 31 December 2021.

The Transaction is expected to be completed by the second quarter of 2022, subject to obtaining the relevant regulatory approvals and to contribute ca. 80 bps to the Group's CET1 ratio.

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

1.4 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 31 March 2022, amounted to € 963 million, including € 15 million accrued interest and € 3 million unamortized issuance costs.

1.5 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 and liquid asset holdings are adequate in relation to risk profile (Internal Capital Adequacy Assessment Process - ICAAP and Internal Liquidity Assessment Process - ILAAP). Moreover, Pillar 2 introduces the Supervisory Review & Evaluation Process (SREP), which assesses the risks banks face and check that banks are equipped to manage those risks properly.
- Pillar 3 intends to enhance 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:

- 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 above minimum ratios, 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 shall apply from 1 January 2019 are:

- Minimum CET1 capital ratio 7% and
- Total capital adequacy ratio 10.5%.

Additional capital buffers that CRD IV introduces are the following:

a) Countercyclical buffer (CCyB). 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 relevant BoG Executive Committee Act No 196/9.12.2021, the countercyclical buffer is set at 0% for Greece for the first quarter of 2022.

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 (O-SIIs). On 15.04.2021, European Banking Authority (EBA) published the updated list of O-SIIs in the EU, which, together with G-SIIs, are identified as systemically important by the relevant authorities according to harmonised criteria laid down in the EBA Guidelines. This list reflects also the additional capital buffers that the relevant authorities have set for the O-SIIs. The list of O-SIIs is disclosed on an annual basis, along with any CET1 capital buffer requirements, which may need to be set or reset. Higher capital requirements will become applicable in case relevant authorities decide to set institution specific buffer requirements following the O-SII identification. For each O-SIII, the list includes the overall score in terms of basis points resulting from the EBA scoring methodology.

   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 up to 1% initially to be phased in until 2022. In order to provide further flexibility to credit institutions in reaction to the coronavirus and mitigate the subsequent financial impact, the initial phasing-in period has been adjusted until 2023. According to relevant BoG Executive Committee Act No 195/29.11.2021, the O-SII buffer for Greek institutions is set at 0.75% for the year 2022.

d) Systemic Risk Buffer (SyRB). According to article 133 of CRD, SyRB can be used to address a broad range of systemic risks, which may also stem from exposures to specific sectors, as long as they are not already covered by the Capital Requirements Regulation or by the CCyB or the G-SII/O-SII buffers. The level of the SyRB may vary across institutions or sets of institutions as well as across subsets of exposures. There is no maximum limit for this buffer. Competent authority is in charge of setting the systemic risk buffer and of identifying the sets of institutions to which it applies. According to BoG Executive Committee Act No 197/21.12.2021, BoG decided to adopt the EBA guidelines on the

appropriate subsets of exposures to which the competent authority or the designated authority may apply a systemic risk buffer based on paragraph 5 of article 133 of CRD.

1.5.1 Regulatory Developments

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. The application of the Guidelines for newly originated loans needs to be in place within Q2 2021, while gradually and until Q2 2024 the application of the Guidelines need to be expanded to existing loans that have been renegotiated and to the stock of existing loans.

On 22 October 2021, the three European Supervisory Authorities (EBA, EIOPA and ESMA – ESAs) delivered to the European Commission (EC) their Final Report with draft Regulatory Technical Standards (RTS) regarding disclosures under the Sustainable Finance Disclosure Regulation (SFDR) as amended by the Regulation on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation). The disclosures relate to financial products that make sustainable investments contributing to environmental objectives. The draft RTS aim to:

- provide disclosures to end investors regarding the investments of financial products in environmentally sustainable economic activities, providing them with comparable information to make informed investment choices; and
- establish a single rulebook for sustainability disclosures under the SFDR and the Taxonomy Regulation.

On 27 October 2021, the European Commission adopted a review of EU banking rules (the Capital Requirements Regulation and the Capital Requirements Directive). The package finalises the implementation of the Basel III agreement in the EU. The review consists of the following legislative elements:

- legislative proposal to amend the Capital Requirements Directive (Directive 2013/36/EU);
- legislative proposal to amend the Capital Requirements Regulation (Regulation 2013/575/EU);
- separate legislative proposal to amend the Capital Requirements Regulation in the area of resolution (the so-called "daisy chain" proposal).

The Group will monitor developments on the aforementioned proposals until their expected adoption by the European Parliament and the Council of the EU.

On 24 January 2022, EBA published its final draft ITS on Pillar 3 disclosures on ESG risks. The final draft ITS put forward disclosures to show how climate change may exacerbate other risks within institutions' balance sheets, how institutions are mitigating those risks, and their ratios, including the Green Asset Ratio (GAR), on exposures financing taxonomy-aligned activities. Disclosure of information on ESG risks is a vital tool to promote market discipline, allowing stakeholders to assess banks' ESG related risks and sustainable finance strategy. In line with the requirements laid down in CRR, the draft ITS set out comparable quantitative disclosures on climate-change related transition and physical risks, including information on exposures towards carbon related assets and assets subject to chronic and acute climate change events. They also include quantitative disclosures on institutions' mitigating actions supporting their counterparties in the transition to a carbon neutral economy and in the adaptation to climate change. In addition, they include KPIs on institutions' assets financing activities that are environmentally sustainable according to the EU taxonomy (GAR and Banking Book Taxonomy Alignment Ratio (BTAR)).

On 18 March 2022, EBA published its final revised Guidelines on common procedures and methodologies for Supervisory Review and Evaluation Process (SREP) and supervisory stress testing. The revisions aim at implementing the amendments to CRD V and CRR II and promoting convergence towards best supervisory practices. The revision of the SREP Guidelines,

while keeping the original framework with the main SREP elements intact, reflects the amendments at Level 1, which include, among other things, the introduction of the assessment of the risk of excessive leverage and the revision of the methodology for the determination of the Pillar-2 Guidance. This revision is also aimed at aligning the text with other relevant guidelines, technical standards, as well as enhancing the guidance by incorporating identified best practices. Additional relevant changes are related to the enhancement of the principle of proportionality as well as the encouragement of cooperation among prudential supervisory authorities and AML/CFT supervisors, as well as resolution authorities.

On 25 March 2022, the three European Supervisory Authorities (EBA, EIOPA and ESMA – ESAs) updated their joint supervisory statement on the application of the Sustainable Finance Disclosure Regulation (SFDR). This includes a new timeline, expectations about the explicit quantification of the product disclosures under Article 5 and 6 of the Taxonomy Regulation, and the use of estimates. The supervisory statement aims to promote an effective and consistent application and national supervision of the SFDR, thus creating a level playing field and protecting investors. On 25 November 2021, the Commission sent a letter announcing that the application date of the RTS would be 1 January 2023. The European Commission is required to endorse the ESAs draft RTS within 3 months of the publication. Subject to the non-objection by the European Parliament and Council of the European Union – within 3 months following the Commission's endorsement – the RTS will be adopted by the Commission by means of a delegated regulation.

On 2 May 2022, EBA published a Discussion Paper on the role of environmental risks in the prudential framework for credit institutions and investment firms. The Paper provides an analysis of the extent to which environmental risks are already reflected in the Pillar 1 own funds requirements via internal and external ratings, valuation of financial instruments and collateral, or scenario analysis. It launches the discussion on the potential incorporation of a forward-looking perspective in the prudential framework. It also stresses the importance of collecting relevant and reliable information on environmental risks and their impact on institutions' financial losses. While the Discussion Paper focuses on Pillar 1 own funds requirements, it highlights the need for a holistic regulatory approach and should be seen as part of the EBA's broader work in the area of ESG risks, which includes transparency, risk management, Pillar 2 supervision and macroprudential capital buffers. The Paper also highlights interlinkages with the accounting framework. The consultation runs until 2 August 2022.

1.5.2 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 10 February 2022, ECB announced the end of the last temporary relief measures still available to banks, hence confirming the return to normality under the initially envisaged timeline. More specifically, ECB decided that banks are expected to operate above the Pillar 2 Guidance from January 2023, while it will not extend beyond March 2022 the supervisory measure that allows banks to exclude central bank exposures from their leverage ratios.

On 17 January 2022, EBA confirmed the need to continue monitoring exposures and the credit quality of loans benefitting from various public support measures due to the uncertainty over Covid-19 developments. To facilitate such monitoring by the competent authorities, especially in the jurisdictions where loans under moratoria and public guarantee schemes remain a concern, the EBA confirms that the Guidelines on the reporting and disclosure of exposures subject to measures applied in response to the Covid-19 crisis adopted on 2 June 2020 continue to apply until further notice.

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.

1.6 Minimum Requirements for Eligible Own Funds and Eligible Liabilities (MREL)

Under the Directive 2014/59 (Bank Recovery and Resolution Directive or BRRD), as amended by Directive 2019/879 (BRRD2), which was transposed into the Greek legislation pursuant to Law 4799/2021 amending Law 4335/2015, European banks are required to meet the minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board (SRB) has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes. Based on the latest official SRB's decision, the fully calibrated MREL (final target) to be met by Eurobank S.A. on a consolidated basis until the end of 2025 is set at 26.87% of its total risk weighted assets (RWAs), including a fully-loaded combined buffer requirement (CBR) of 3.56%.

As at 31 March 2022, the Bank's MREL ratio at consolidated level stands at 18.14% of RWAs including profit for the period ended 31 March 2022 (31 December 2021 18.47%) well above the interim binding MREL target of 17.82% of RWAs, including a CBR of 3.31%, which is applicable from 1 January 2022). The final MREL target is updated by the SRB on an annual basis.1.7 Climate Risk Stress Test.

On 27 January 2022, ECB launched a supervisory climate risk stress test to assess how prepared banks are for dealing with financial and economic shocks stemming from climate risk.

The exercise consists of three distinct modules: (i) a questionnaire on banks' climate stress test capabilities, (ii) a peer benchmark analysis to assess the sustainability of banks' business models and their exposure to emission-intensive companies, and (iii) a bottom-up stress test. To ensure the proportionality of the exercise, smaller banks will not be asked to provide their own stress test projections.

The stress test targets specific asset classes exposed to climate risk rather than banks' overall balance sheets. It focuses on exposures and income sources that are most vulnerable to climate-related risk, combining traditional loss projections with new qualitative data collections.

The exercise will be conducted in the first half of 2022 after which the ECB will publish aggregate results. The results will feed into the SREP from a qualitative point of view and could have an indirect potential impact on P2R through the SREP scores, without however directly impacting capital through P2G.

The Group has successfully submitted the first data cycle (FDC 1) as per ECB's time plan.

1.8 Climate Risk

The Group's updated Governance introduces several new aspects and responsibilities in relation to Credit Risk and Environmental (CR&E) risks and ESG based on the regulatory guidelines and market practices. Key developments include the assignment of ESG and CR&E relevant responsibilities to a member of the BoD, the creation of the Group Climate Risk Division, the updated role of the ESG Division, the introduction of the ESG Management Committee, as well as the integration of the Climate Risk & ESG matters in the Bank's business operations.

1.9 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 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 NPL ratio of 5% or above, as is the case for the Group.

In June 2019 the European Parliament (EP) and the Council published the Regulation (EU) No 876/2019 or CRR2 amending the CRR, regarding among others the reporting and disclosure framework. The CRR 2 rules follow a phased implementation with significant elements entering into force in 2021.

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 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.

In June 2020, EBA published new ITS on public disclosures by institutions and revised final draft ITS on supervisory reporting that implements changes introduced in the revised Capital Requirements Regulation (CRR2) and the Prudential Backstop Regulation. The two ITS aim to promote market discipline through enhanced and comparable public disclosures for stakeholders and to keep the reporting requirements in line with the evolving needs for Supervisory Authorities' risk assessments.

On 6 August 2021, EBA published an updated tool, which specifies the mapping between quantitative disclosure data points and the relevant supervisory reporting data points. This tool aims at facilitating institutions' compliance with disclosure requirements and improving the consistency and quality of the information disclosed.

1.10 Location, timing and frequency of disclosures

Pillar 3 disclosures are provided on a quarterly basis in electronic format, after taking into consideration the relevant recommendation of EBA Guidelines 2016/11, which include the list of requirements to be considered for more frequent, than annual basis, 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 a standalone document that provides a readily accessible source of prudential information for users and is available on a designated location on the Company's website (https://www.eurobankholdings.gr/en/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.

Regarding the timing of disclosures, CRR clarifies that disclosures shall be published on the same date as the date on which the institution publishes its financial reports or as soon as possible thereafter. The Group's Pillar 3 disclosures will be published the latest either within one month from the publication of the financial statements or within the deadline of relevant Financial statements publication, as defined in Law 3556/2007.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee and was approved by the Board of Directors on 25 May 2022.

1.11 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 31 March 2022 and 31 December 2021.

Table 1: Regulatory and accounting Balance Sheet

Balance sheet per published financial statements and per regulatory consolidation	Ref.	31 March 2022 € million	31 December 2021 € million
Assets			
Cash and Balances with central banks		13,064	13,515
Due from credit institutions		1,756	2,510
Securities held for trading		117	119
Derivative financial instruments		1,501	1,949
Loans and advances to customers		39,293	38,967
Investment securities		12,164	11,316
Investments in associaties and joint ventures		207	267
Property, plant and equipment		804	815
Investment property		1,487	1,492
Intangible assets	a	282	269
Deferred tax asset		4,388	4,422
of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	b	-	-
of which deferred tax credit		3,510	3,547
of which deferred tax assets arising from temporary differences	c	878	875
Other assets		2,027	2,065
Assets of disposal group classified as held for sale		131	146
Total assets		**77,221**	77,852
Liabilities			
Due to central banks		11,633	11,663
Due to credit institutions		1,015	973
Derivative financial instruments		1,817	2,394
Due to customers		52,449	53,168
Debt securities in issue		2,596	2,552
Other liabilities		1,858	1,358
Liabilities of disposal group classified as held for sale		96	109
Total liabilities		**71,464**	72,217
Equity			
Ordinary share capital		816	816
Share premium		8,055	8,055
Reserves and retained earnings		(3,208)	(3,332)
of which cash flow hedge reserves	d	(9)	(12)
Non controlling interests		95	96
Total equity	e	**5,757**	5,635
Total equity and liabilities		**77,221**	77,852

2. Capital Management

2.1 Key Metrics

The table below provides an overview of Group's prudential regulatory metrics.

Table 2: EU KM1 - Key Metrics template

	31 March 2022 [1] € million	31 March 2022 € million	31 December 2021 [1] € million	30 September 2021 [1] & [2] € million	30 June 2021 [1] € million	31 March 2021 [1] € million
Available own funds (amounts)						
Common Equity Tier 1 (CET1) capital	**5,382**	4,683	5,436	5,401	5,447	5,319
Tier 1 capital	**5,382**	4,683	5,436	5,401	5,447	5,319
Total capital	**6,395**	5,697	6,386	6,365	6,441	6,314
Risk-weighted exposure amounts						
Total risk-weighted exposure amount	**40,586**	40,334	39,789	40,598	41,159	40,800
Capital ratios (as a percentage of risk-weighted exposure amount)						
Common Equity Tier 1 ratio (%)	**13.3%**	11.6%	13.7%	13.3%	13.2%	13.0%
Tier 1 ratio (%)	**13.3%**	11.6%	13.7%	13.3%	13.2%	13.0%
Total capital ratio (%)	**15.8%**	14.1%	16.1%	15.7%	15.6%	15.5%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
Additional own funds requirements to address risks other than the risk of excessive leverage (%)	**3.00%**	3.00%	3.00%	3.00%	3.00%	3.00%
of which: to be made up of CET1 capital (percentage points)	**1.69%**	1.69%	1.69%	1.69%	1.69%	1.69%
of which: to be made up of Tier 1 capital (percentage points)	**2.25%**	2.25%	2.25%	2.25%	2.25%	2.25%
Total SREP own funds requirements (%)	**11.00%**	11.00%	11.00%	11.00%	11.00%	11.00%
Combined buffer requirement (as a percentage of risk-weighted exposure amount)						
Capital conservation buffer (%)	**2.50%**	2.50%	2.50%	2.50%	2.50%	2.50%
Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	**0.00%**	0.00%	0.00%	0.00%	0.00%	0.00%
Institution specific countercyclical capital buffer (%)	**0.06%**	0.06%	0.06%	0.05%	0.06%	0.06%
Systemic risk buffer (%)	**0.00%**	0.00%	0.00%	0.00%	0.00%	0.00%
Global Systemically Important Institution buffer (%)	**0.00%**	0.00%	0.00%	0.00%	0.00%	0.00%
Other Systemically Important Institution buffer	**0.75%**	0.75%	0.50%	0.50%	0.50%	0.50%
Combined buffer requirement (%)	**3.31%**	3.31%	3.06%	3.05%	3.06%	3.06%
Overall capital requirements (%)	**14.31%**	14.31%	14.06%	14.05%	14.06%	14.06%
CET1 available after meeting the total SREP own funds requirements (%)	**4.66%**	3.12%	5.06%	4.73%	4.65%	

	31 March 2022 [1] € million	31 March 2022 € million	31 December 2021 [1] € million	30 September 2021 [1] € million	30 June 2021 [1] € million	31 March 2021 [1] € million
Leverage ratio						
Leverage ratio total exposure measure	**66,598**	66,497	66,397	64,073	63,078	63,867
Leverage ratio	**8.08%**	7.04%	8.19%	8.50%	8.63%	8.33%
Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)						
Additional own funds requirements to address the risk of excessive leverage (%)	**0.00%**	0.00%	0.00%	0.00%	0.00%	
of which: to be made up of CET1 capital (percentage points)	**0.00%**	0.00%	0.00%	0.00%	0.00%	
Total SREP leverage ratio requirements (%)	**3.16%**	3.16%	3.16%	3.16%	3.16%	
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
Leverage ratio buffer requirement (%)	**0.00%**	0.00%	0.00%	0.00%	0.00%	
Overall leverage ratio requirements (%)	**3.16%**	3.16%	3.16%	3.16%	3.16%	

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	31 March 2022 € million	31 December 2021 € million	30 September 2021 € million	30 June 2021 € million	31 March 2021 € million
Liquidity Coverage Ratio					
Total high-quality liquid assets (HQLA) (Weighted value - average)	**11,974**	11,173	10,054	8,807	7,784
Cash outflows - Total weighted value	**8,576**	8,219	7,977	7,680	7,460
Cash inflows - Total weighted value	**1,082**	1,048	1,126	1,142	1,166
Total net cash outflows (adjusted value)	**7,494**	7,171	6,851	6,539	6,294
Liquidity coverage ratio (%) (adjusted value) [3]	**160.00%**	155.43%	145.93%	134.69%	123.67%
Liquidity coverage ratio (%)	**151.34%**	152.24%	168.16%	166.43%	140.59%
Net Stable Funding Ratio					
Total available stable funding	**58,319**	59,722	56,538	55,640	
Total required stable funding	**47,503**	48,445	46,223	45,970	
NSFR ratio (%)	**122.77%**	123.28%	122.32%	121.04%	

[1] Including profits € 270 million for the 1Q 2022, € 328 million for year ended 31 December 2021, € 216 million for the 9M 2021, € 190 million for the 1H 2021 and € 70 million for the 1Q 2021.
[2] Pro-forma with the derecognition of the Mexico loans.
[3] Average figures based on previous monthly data points.
[4] Pro-forma Common Equity Tier 1 and Total Capital Adequacy ratios as at 31 March 2022 with the completion of the sale of Eurobank's merchant acquiring business would be 14.0% and 16.5%, respectively.

2.2 Regulatory capital

The Group has sought to maintain an actively managed capital base to cover risks inherent in the business. The adequacy of the Group's capital is monitored using, among other measures, the rules and ratios established by the Basel Committee on Banking Supervision and adopted by the European Union and the SSM in supervising the Bank.

The table below shows the composition of the Group's regulatory capital as at 31 March 2022 and 31 December 2021 which is calculated according to CRD IV.

Capital Management

Table 3: EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

	Ref.	31 March 2022 (1) € million	31 March 2022 € million	31 December 2021 (1) € million
Total equity	*e*	5,757	5,757	5,635
Part of interim or year-end profit not eligible		-	(598)	-
Minority interest not allowed in CET1		(37)	(37)	(39)
Cash flow hedge reserves	*d*	9	9	12
Adjustments due to IFRS 9 transitional arrangements		264	264	528
Temporary treatment of unrealised losses measured at FVTOCI in accordance with Article 468 of the CRR		22	22	-
Intangible assets	*a*	(210)	(210)	(191)
of which Goodwill		(2)	(2)	(2)
IRB shortfall of credit risk adjustments to expected losses		(122)	(122)	(212)
Deferred tax assets that rely on future profitability (unused tax losses)	*b*	-	-	-
Deferred tax assets arising from temporary differences (amount above 10% threshold)	*c*	(254)	(314)	(237)
Prudent Valuation Adjustments		(8)	(8)	(9)
Other regulatory adjustments		(39)	(39)	(37)
Amount exceeding the 17.65% threshold	*c*	-	(41)	(14)
Common Equity Tier I capital		**5,382**	**4,683**	5,436
Regulatory adjustments		-	-	-
Total Tier I capital		**5,382**	**4,683**	5,436
Tier II capital - subordinated debt		950	950	950
IRB Excess of impairment allowances over expected losses eligible		64	64	-
Total Regulatory Capital		**6,395**	**5,697**	6,386
Risk Weighted Assets		**40,586**	**40,334**	39,789
Ratios				
Common Equity Tier I		**13.3%**	**11.6%**	13.7%
Tier I		**13.3%**	**11.6%**	13.7%
Total Capital Adequacy Ratio		**15.8%**	**14.1%**	16.1%

(1) Including profits € 270 million for the 1Q 2022 and € 328 million for year ended 31 December 2021.

(2) The Group's CET1 ratio as at 31 March 2022 based on the full implementation of the Basel III rules in 2025 (fully loaded CET1), would be 12.7% including profit for year ended 31 December 2021 (31 December 2021 including interim profits: 12.7%).

(3) Pro-forma Common Equity Tier 1 and Total Capital Adequacy ratios as at 31 March 2022 with the completion of the sale of Eurobank's merchant acquiring business would be 14.0% and 16.5%, respectively.

As depicted in table above, CET1 ratio has decreased during the 1st quarter 2022, mainly due the CRR transitional rules applied in the first quarter of each year (mainly IFRS 9 lower capital add back from 50% to 25%) and RWAs increase from the new production of loans, loan commitments and Letters of Guarantee, as well the increase of investments securities. In addition, the binding agreement with Worldline B.V. for the sale of Eurobank's merchant acquiring business (project "Triangle") will contribute circa 80 bps to the Group's CET1 capital.

The CET1 ratio is defined as CET1 capital divided by RWAs, the Tier 1 ratio is defined as Tier 1 capital divided by RWAs and Total Capital Adequacy ratio is defined as Total Regulatory Capital divided by RWAs.

As at 31 March 2022, pursuant to the Law 4172/2013, as in force, the Bank's eligible DTAs/deferred tax credits (DTCs) against the Greek State amounted to € 3,510 million (31 December 2021 € 3,547 million). The decrease is due to the annual amortization of PSI losses and DTC eligible crystallized loan losses from write-offs and disposals. The DTCs will be converted into directly enforceable claims (tax credit) against the Greek State provided that the Bank's after tax accounting result for the year is a loss. In particular, DTCs are accounted for on: (a) the losses from the Private Sector

Involvement (PSI) and the Greek State Debt Buyback Program and (b) on the sum of (i) the unamortized part of the crystallized loan losses from write-offs and disposals, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015.

For further details, please refer to Consolidated Financial Statements, Note 12.

According to Regulation (EU) No. 575/2013, article 39, deferred tax assets that can be replaced with a tax credit, shall not be deducted from CET1, but instead be risk weighted by 100%.

2.3 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 December 2022.

As of 31.03.2022, the Group is applying the temporary treatment specified in Article 468 of the CRR, as amended by the Regulation EU 2020/873, therefore the Group's phased in own funds, capital and leverage ratios reflect the 60% of unrealised losses accounted for as fair value changes of debt instruments measured at fair value through other comprehensive income, corresponding to specific debt exposures as provided for in the said article, for the period from 1.1.2020 to 31.3.2022.

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Table 4: 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

Available capital	31 March 2022 [1] € million	31 March 2022 € million	31 December 2021 [1] € million	30 September 2021 [1] & [2] € million	30 June 2021 [1] € million	31 March 2021 [1] € million
CET1 capital	**5,382**	4,683	5,436	5,401	5,447	5,319
CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**5,208**	4,509	5,118	5,032	5,045	4,907
CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied	**5,358**	4,659				
Fully Loaded CET1 capital	**5,135**	4,436	5,044	4,958	4,961	4,818
Tier 1 capital	**5,382**	4,683	5,436	5,401	5,447	5,319
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**5,208**	4,509	5,118	5,032	5,045	4,907
Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	**5,358**	4,659				
Fully Loaded Tier 1 capital	**5,135**	4,436	5,044	4,958	4,961	4,818
Total capital	**6,395**	5,697	6,386	6,365	6,441	6,314
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**6,246**	5,546	6,152	6,076	6,092	5,952
Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	**6,372**	5,673				
Fully Loaded Total capital	**6,173**	5,473	6,077	6,002	6,007	5,863
Risk weighted assets						
Total risk-weighted assets	**40,586**	40,334	39,789	40,598	41,159	40,800
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**40,500**	40,249	39,618	40,428	40,989	40,619
Fully Loaded Total risk-weighted assets	**40,500**	40,249	39,618	40,428	40,989	40,619
Capital ratios						
CET1 (as a percentage of risk exposure amount)	**13.3%**	11.6%	13.7%	13.3%	13.2%	13.0%
CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**12.9%**	11.2%	12.9%	12.4%	12.3%	12.1%
CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	**13.2%**	11.6%				
Fully Loaded CET1 (as a percentage of risk exposure amount)	**12.7%**	11.0%	12.7%	12.3%	12.1%	11.9%
Tier 1 (as a percentage of risk exposure amount)	**13.3%**	11.6%	13.7%	13.3%	13.2%	13.0%
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**12.9%**	11.2%	12.9%	12.4%	12.3%	12.1%
Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	**13.2%**	11.6%				
Fully Loaded Tier 1 (as a percentage of risk exposure amount)	**12.7%**	11.0%	12.7%	12.3%	12.1%	11.9%
Total capital (as a percentage of risk exposure amount)	**15.8%**	14.1%	16.1%	15.7%	15.6%	15.5%
Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**15.4%**	13.8%	15.5%	15.0%	14.9%	14.7%
Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR	**15.7%**	14.1%				
Fully Loaded Total capital (as a percentage of risk exposure amount)	**15.2%**	13.6%	15.3%	14.8%	14.7%	14.4%

Leverage ratio	31 March 2022 [1] € million	31 March 2022 € million	31 December 2021 [1] € million	30 September 2021[1] € million	30 June 2021[1] € million	31 March 2021[1] € million
Leverage ratio total exposure measure	**66,598**	66,497	66,397	64,073	63,078	63,867
Leverage ratio	**8.08%**	7.04%	8.19%	8.50%	8.63%	8.33%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**7.83%**	6.79%	7.71%	7.88%	8.01%	7.66%
Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	**8.05%**	7.01%				
Fully Loaded Leverage ratio	**7.72%**	6.68%	7.60%	7.75%	7.88%	7.53%

(1) Including profits € 270 million for the 1Q 2022, € 328 million for year ended 31 December 2021, € 216 million for the 9M 2021, € 190 million for the 1H 2021 and € 70 million for the 1Q 2021.

(2) Pro-forma with the derecognition of the Mexico loans.

(3) Pro-forma Common Equity Tier 1 and Total Capital Adequacy ratios as at 31March 2022 with the completion of the sale of Eurobank's merchant acquiring business would be 14.0% and 16.5%, respectively.

2.4 Supervisory Review and Evaluation Process (SREP) capital requirements

According to the 2021 Supervisory Review and Evaluation Process (SREP) decision communicated by the ECB, in 1Q 2022 Eurobank Holdings was required to meet on a consolidated basis a CET1 ratio of at least 9.50% and a Total Capital Adequacy Ratio of at least 14.31% (Overall Capital Requirements including the Capital Conservation Buffer of 2.50%, the Other Systemically Important Institution buffer of 0.75% and the applicable Countercyclical Capital Buffer of 0.06% for the first quarter of 2022 stemming from the exposures in Bulgaria and Luxemburg).

The table below shows the capital requirements of the Group for 31 March 2022.

Table 5: Pillar 2 Requirements

	31 March 2022	
	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)	0.06%	0.06%
Other systemic institutions buffer (O-SII)	0.75%	0.75%
Overall Capital Requirement (OCR)	**9.50%**	**14.31%**

Under the supervisory relief measures taken by the ECB in response to the Covid-19 outbreak, banks have been allowed, among others, to operate below the level of capital defined by the Pillar 2 Guidance and without prejudice to the restrictions set out in CRD IV, the Combined Buffer Requirement (i.e. Capital Conservation Buffer (CCB), Countercyclical Capital Buffer, Other Systemically Important Institutions Buffer) until the end of 2022. According to the FAQs published by the ECB, the above 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 that requirement.

At consolidated level, the Pillar 2 Requirement is set at 3% for 2022 and part of that (1.69%) must be held in the form of CET1 capital while the Group may use AT1 and Tier 2 capital, where available, for the remaining part. The amount of additional own funds required on a consolidated basis to be met with CET1 capital is € 682 million (based on RWAs of € 40,334 million).

As at 31 March 2022, Eurobank's transitional CET1 ratio and Total Capital ratio, including 1Q 2022 profit € 270 million, were 13.3% and 15.8% respectively, which exceeded the 2022 transitional minimum requirements of 9.50% and 14.31%.

2.5 Capital requirements under Pillar 1

The table below shows the Group's risk weighted assets (RWAs) and capital requirements as at 31 March 2022 and 31 December 2021. The minimum capital requirements under Pillar 1 are calculated as 8% of RWAs.

Table 6: EU OV1 - Overview of risk weighted exposure amounts

	Risk weighted exposure amounts (RWEAs)				Total own funds requirements
	31 March 2022[(1)] € million	31 March 2022 € million	31 December 2021[(1)] € million	31 December 2021 € million	31 March 2022 € million
Credit risk (excluding CCR)	**32,584**	**32,584**	31,972	31,972	**2,607**
Of which the standardised approach	18,224	18,224	18,215	18,215	1,458
Of which the foundation IRB (FIRB) approach	6,384	6,384	5,877	5,877	511
Of which: slotting approach	3,015	3,015	2,869	2,869	241
Of which: equities under the simple riskweighted approach	465	465	423	423	37
Of which the advanced IRB (AIRB) approach	4,496	4,496	4,588	4,588	360
Counterparty credit risk - CCR	**475**	**475**	472	472	**38**
Of which the standardised approach	193	193	226	226	15
Of which internal model method (IMM)	-	-	-	-	-
Of which exposures to a CCP	12	12	11	11	1
Of which credit valuation adjustment - CVA	110	110	105	105	9
Of which other CCR	160	160	130	130	13
Settlement risk	-	-	-	-	-
Securitisation exposures in the non-trading–book (after the cap)	**1,592**	**1,592**	1,505	1,505	**127**
Of which SEC-IRBA approach	317	317	283	283	25
Of which SEC-ERBA (including IAA)	217	217	155	155	17
Of which SEC-SA approach	1,058	1,058	1,067	1,067	85
Of which 1250%/ deduction	-	-	-	-	-
Position, foreign exchange and commodities risks (Market risk)	**992**	**992**	921	921	**79**
Of which the standardised approach	274	274	301	301	22
Of which IMA	718	718	620	620	57
Large exposures	-	-	-	-	-
Operational risk	**3,020**	**3,020**	3,020	3,020	**242**
Of which basic indicator approach	-	-	-	-	-
Of which standardised approach	3,020	3,020	3,020	3,020	242
Of which advanced measurement approach	-	-	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight)	**1,923**	**1,671**	1,899	1,754	**134**
Total	**40,586**	**40,334**	39,789	39,644	**3,227**

[(1)] Including profits € 270 million for the 1Q 2022 and € 328 million for year ended 31 December 2021.

[(2)] The increase of the RWAs compared to 31 December 2021 is mainly due to the new production of loans, loan commitments and Letters of Guarantee, as well the increase of investments securities.

3. Credit Risk

Eurobank Group (the "Bank" or the "Group") first applied the Basel II framework under the Standardised approach in January 2007 and included the respective risk asset ratio figures in its published financial statements. Until that date the Group had been applying the Basel I rules.

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 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 Leasing S.A. in Greece;
- From March 2010, the Advanced IRB approach was applied for the Bank's portfolio of personal and car loans;
- In October 2021, following the demerger of Eurobank Leasing Single Member S.A. the Bank acquired the majority of Leasing portfolio, without any change in the approach followed for capital requirements calculations.

Following the Mexico derecognition, the implementation of IRB covers 70.7% of the Group's lending portfolio excluding portfolio segments which are immaterial in terms of size and risk profile as well as, permanent exemptions.

The following table shows the main changes in capital requirements of credit risk exposures under the IRB approach:

Table 7: EU CR8 - RWEA flow statements of credit risk exposures under the IRB approach

	31 March 2022	31 December 2021
	Risk weighted exposure amount € million	Risk weighted exposure amount € million
Risk weighted exposure amount as at 1 January 2022	13,333	15,709
Asset size (+/-)	418	399
Asset quality (+/-)	96	(653)
Model updates (+/-)	-	-
Methodology and policy (+/-)	-	-
Acquisitions and disposals (+/-)	-	(2,189)
Foreign exchange movements (+/-)	39	97
Other (+/-)	9	(30)
Risk weighted exposure amount as at 31 March 2022	**13,895**	13,333

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 due to regulatory framework changes are presented.*
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 maturity of exposures.*

In the first quarter of 2022, RWAs under IRB increased by € 562 million. The main driver for the increase was the new production 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 (SA) is applied.

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

Table 8: EU MR2-B - RWA flow of market risk exposures under IMA

	31 March 2022						
	VaR € million	SVaR € million	IRC € million	Comprehensive risk measure € million	Other € million	Total RWAs € million	Total own funds requirements € million
RWAs at 31 December 2021[1]	97	394	129	-	-	620	50
Regulatory adjustment [2]	(73)	(322)	-	-	-	(395)	(32)
RWAs at the previous quarter-end (end of the day) [3]	24	72	129	-	-	225	18
Movement in risk levels	20	64	14	-	-	97	8
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)[3]	33	151	119	-	-	304	24
Regulatory adjustment[2]	84	307	24	-	-	414	33
RWAs at 31 March 2022[1]	**117**	**458**	**143**	**-**	**-**	**718**	**57**

	31 December 2021						
	VaR € million	SVaR € million	IRC € million	Comprehensive risk measure € million	Other € million	Total RWAs € million	Total own funds requirements € million
RWAs at 30 September 2021[1]	111	525	85	-	-	721	58
Regulatory adjustment2	(82)	(351)	(17)	-	-	(450)	(36)
RWAs at the previous quarter-end (end of the day)3	29	174	68	-	-	271	22
Movement in risk levels	(14)	(131)	44	-	-	(100)	(8)
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)3	24	72	129	-	-	225	18
Regulatory adjustment2	73	322	-	-	-	395	32
RWAs at 31 December 2021[1]	97	394	129	-	-	620	50

(1) RWA at previous and current reporting period (quarter end).
(2) Regulatory Adjustment indicates the difference between RWA and RWA (end of day) at previous and current reporting period.
(3) RWA that would be estimated on the basis of the previous or current quarter end figure (instead of the max of it and the 60-day average).

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 Global Master Repurchase Agreement (GMRA) contracts.

5.3 Credit derivatives

Table 9: EU CCR7 - RWEA 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 of the ratio and the factors that affect it.

The level of the leverage ratio with reference date 31 March 2021 on consolidated basis, including profits, was at 8.08% (31 December 2021: 8.19%), according to the transitional definition of Tier 1 capital, significantly over the proposed minimum threshold of 3% and the overall leverage ratio requirement of 3.16 % applied by the competent authorities.

The below table includes the summary of the Group's leverage ratio with reference dates 31 March 2022 and 31 December 2021.

Table 10: EU LR – Leverage Ratio

	31 March 2022 [1]	31 March 2022	31 December 2021 [1]	31 December 2021
	€ million	€ million	€ million	€ million
Tier 1 capital - transitional definition	**5,382**	**4,683**	5,436	5,050
Total Leverage Ratio exposure measure - using a transitional definition of Tier 1 capital	**66,598**	**66,497**	66,397	66,339
Leverage Ratio - using a transitional definition of Tier 1 capital	**8.08%**	**7.04%**	8.19%	7.61%

[1] *Including € 270 million for the 1Q 2022 and € 328 million for year ended 31 December 2021.*

7. Liquidity Risk

The Group is exposed on a daily basis to events that affect the level of its available cash resources due to deposits withdrawals, maturity of medium or long-term notes and maturity of secured or unsecured funding (interbank repos and money market takings), loan drawdowns and forfeiture of guarantees. Furthermore, margin calls on secured funding transactions (with ECB and the market) and on risk mitigation, contracts (CSAs, GMRAs) result in liquidity exposure. The Group maintains cash resources to meet all of these needs. The Board Risk Committee (BRC) sets liquidity limits to ensure that sufficient funds are available to meet such contingencies.

Past experience shows that liquidity requirements to support calls under guarantees and standby letters of credit are considerably less than the amount of the commitment. This is also the case with credit commitments where the outstanding contractual amount to extend credit does not necessarily represent future cash requirements, as many of these commitments will expire or terminate without being funded.

The matching and controlled mismatching of the maturities and interest rates of assets and liabilities is fundamental to the management of the Group. It is unusual for banks to be completely matched, as transacted business is often of uncertain term and of different types. An unmatched position potentially enhances profitability, but also increases the risk of losses.

The maturities of assets and liabilities and the ability to replace, at an acceptable cost, interest bearing liabilities as they mature, are important factors in assessing the liquidity of the Group.

Liquidity Coverage Ratio (LCR) calculations

LCR as of 31 December 2021 is equal to 151.34% (31 December2021: 152.2%) on a group level. The next table presents the key components of group's LCR, as per the respective guidelines on LCR disclosure (EBA/GL/2017/01). It should be noted that the data points used in the calculations below, refer to the period after the restoration of the LCR above the minimum regulatory threshold (100%).

Liquidity Risk

The table below shows the level and components of the Liquidity Coverage Ratio.

Table 11: LIQ1 - Quantitative information of LCR

		Total unweighted value					Total weighted value				
	Quarter ending on	31 March 2022	31 December 2021	30 September 2021	30 June 2021	31 March 2021	31 March 2022	31 December 2021	30 September 2021	30 June 2021	31 March 2021
		€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
	Number of data points used in the calculation of averages	12	12	12	12	10	12	12	12	12	10
	HIGH-QUALITY LIQUID ASSETS										
1	Total high-quality liquid assets (HQLA)						11,974	11,173	10,054	8,807	7,784
	CASH-OUTFLOWS										
2	Retail deposits and deposits from small business customers, of which:	30,055	29,397	28,520	27,518	26,899	1,857	1,806	1,742	1,670	1,629
3	Stable deposits	23,665	23,311	22,778	22,132	21,689	1,183	1,166	1,139	1,107	1,084
4	Less stable deposits	6,389	6,085	5,742	5,385	5,210	673	640	602	563	544
5	Unsecured wholesale funding	12,684	12,078	11,706	11,349	11,103	5,458	5,179	5,074	4,874	4,758
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,783	1,652	1,537	1,429	1,377	437	404	375	348	335
7	Non-operational deposits (all counterparties)	10,901	10,426	10,126	9,877	9,675	5,021	4,775	4,656	4,483	4,372
8	Unsecured debt	0	0	43	43	51	0	0	43	43	51
9	Secured wholesale funding						90	83	83	77	79
10	Additional requirements	2,595	2,541	2,445	2,387	2,301	856	853	802	792	727
11	Outflows related to derivative exposures and other collateral requirements	679	684	642	638	577	679	684	642	638	577
12	Outflows related to loss of funding on debt products	-	-	-	-	-	0	0	0	-	-
13	Credit and liquidity facilities	1,915	1,857	1,804	1,749	1,724	177	169	161	153	150
14	Other contractual funding obligations	103	94	78	73	76	92	84	68	64	66
15	Other contingent funding obligations	3,144	3,023	2,949	2,896	2,883	222	214	208	203	201
16	TOTAL CASH OUTFLOWS						8,576	8,219	7,977	7,680	7,460
	CASH-INFLOWS										
17	Secured lending (eg reverse repos)	446	509	693	835	992	21	12	5	-	-
18	Inflows from fully performing exposures	896	886	967	988	1,019	766	748	818	831	866
19	Other cash inflows	1,372	1,314	1,360	1,395	1,398	295	287	303	310	300
20	TOTAL CASH INFLOWS	2,715	2,709	3,020	3,217	3,409	1,082	1,048	1,126	1,142	1,166
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-	-	-
EU-20b	*Inflows Subject to 90% Cap*	-	-	-	-	-	-	-	-	-	-
EU-20c	*Inflows Subject to 75% Cap*	2,715	2,709	3,020	3,217	3,409	1,082	1,048	1,126	1,142	1,166
							TOTAL ADJUSTED VALUE				
21	LIQUIDITY BUFFER						11,974	11,173	10,054	8,807	7,784
22	TOTAL NET CASH OUTFLOWS						7,494	7,171	6,851	6,539	6,294
23	LIQUIDITY COVERAGE RATIO (%)						160.00%	155.43%	145.93%	134.69%	123.67%

Net Stable Funding Ratio (NSFR) calculations

NSFR as of 31 March 2022 is equal to 122.77% (31 December 2021: 123.28%) on a group level. The minimum regulatory threshold for NSFR is set at 100%.

Appendix 1: List of Abbreviations

Abbreviation	Definition
A-IRB	Advanced Internal Rating Based Approach
AT1	Additional Tier 1
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
BTAR	Banking Book Taxonomy Alignment Ratio
CBR	Combined Buffer Requirement
CCB	Capital Conservation Buffer
CCyB	Counter Cyclical Buffer
CCR	Counterparty Credit Risk
CET1	Common Equity Tier 1
CRD	Capital Requirements Directive IV
CR&E	Credit Risk and Environmental
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Value Adjustment
EAD	Exposure At Default
EBA	European Banking Authority
EC	European Commission
ECB	European Central Bank
ECL	Expected Credit Loss
ESG	Enviromental, Social and Governance
F-IRB	Foundation Internal Rating Based Approach
GAR	Green Asset Ratio
GHOS	Governors and Heads of Supervision
GMRA	Global Master Repurchase Agreement
G-SIIs	Global Systemic Institution Buffer
HAPS	Hellenic Asset Protection Scheme
HQLA	High Quality Liquid Assets.
ICAAP	Internal Capital Adequacy Assessment Process
ILAAP	Internal Liquidity Adequacy Assessment Process
IMA	Internal Model Approach
IRB	Internal Ratings Based Approach
IRC	Incremental Risk Charge
ISDA	International Swaps and Derivatives Association
LCR	Liquidity Coverage Ratio
MREL	Minimum Requirement for own funds and Eligible Liabilities
NPE	Non Performing Exposures
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
O-SIIs	Other Systemically Important Institution
PD	Probability of Default
P2G	Pillar 2 Guidance
P2R	Pillar 2 Requirement
RTS	Regulatory Technical Standards
RWAs	Risk Weighted Assets
SA	Standard Approach
SEC-ERBA	Securitisation-External Ratings Based Approach
SFDR	Sustainable Finance Disclosure Regulation
SPE	Single Point of Entry
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SSM	Single Supervisory Mechanism
ST	Stress Test
SyRB	Systemic Risk Buffer
TSCR	Total SREP Capital Requirement
VAR	Value at Risk

Appendix 2: Guidelines and Regulations mapping on Disclosures Requirements

EBA/GL/2016/11		
OV1	Overview of risk weighted exposure amounts	*Table 6*
CR8	RWEA flow statements of credit risk exposures under the IRB approach	*Table 7*
CCR7	RWEA flow statements of CCR exposures under the IMM	*Table 9*
MR2-B	RWA flow of market risk exposures under IMA	*Table 8*

REVISED PILLAR 3 DISCLOSURES REQUIREMENTS - BCBS		
KM1	Key Metrics template	*Table 2*

GUIDELINES ON LCR DISCLOSURE - EBA/GL/2017/01		
LIQ1	Quantitative information of LCR	*Table 11*

LEVERAGE RATIO - COMMISSION IMPLEMENTING REGULATION (EU) 2016/200		
LR1	LR: Leverage Ratio	*Table 10*

GUIDELINES ON UNIFORM DISCLOSURES UNDER ARTICLE 473A OF REGULATION (EU) NO 575/2013 AS REGARDS THE TRANSITIONAL PERIOD FOR MITIGATING THE IMPACT OF THE INTRODUCTION OF IFRS 9 ON OWN FUNDS - EBA/GL/2018/01		
IFRS 9-FL	Comparison of equity, capital ratios and leverage of entities with or with out the application of the transitional arrangements of IFRS 9 or analog ECL	*Table 4*