



EUROBANK ERGASIAS SERVICES AND HOLDINGS S.A.

CONSOLIDATED PILLAR 3 REPORT

**FOR THE NINE MONTHS ENDED
30 SEPTEMBER 2022**

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Introduction – General Information

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

Evolution of Capital Ratio q-o-q



Risk profile

	30 September 2022 ^{(1) & (4)} € million	30 September 2022 ⁽¹⁾ € million	30 June 2022 ^{(1) & (4)} € million	30 September 2021 ^{(2) & (3)} € million
Available own funds				
Common Equity Tier 1 (CET1) capital	6,302	6,302	6,128	5,401
Tier 1 capital	6,302	6,302	6,128	5,401
Total capital	7,261	7,345	7,078	6,365
Risk-weighted exposure amounts				
Total risk-weighted exposure amount	42,183	42,183	41,718	40,598
Capital ratios				
Common Equity Tier 1 ratio (%)	14.9%	14.9%	14.7%	13.3%
Tier 1 ratio (%)	14.9%	14.9%	14.7%	13.3%
Total capital ratio (%)	17.2%	17.4%	17.0%	15.7%
Leverage ratio				
Leverage ratio	7.4%	7.4%	7.5%	8.5%
Liquidity Ratio				
Liquidity coverage ratio (%)	169.0%	169.0%	174.3%	168.2%
Net Stable Funding Ratio (%)	127.2%	127.2%	126.0%	122.8%

⁽¹⁾ Including year to date profits €1,106 million for the 9M 2022 and € 941 million for the 1H 2022.

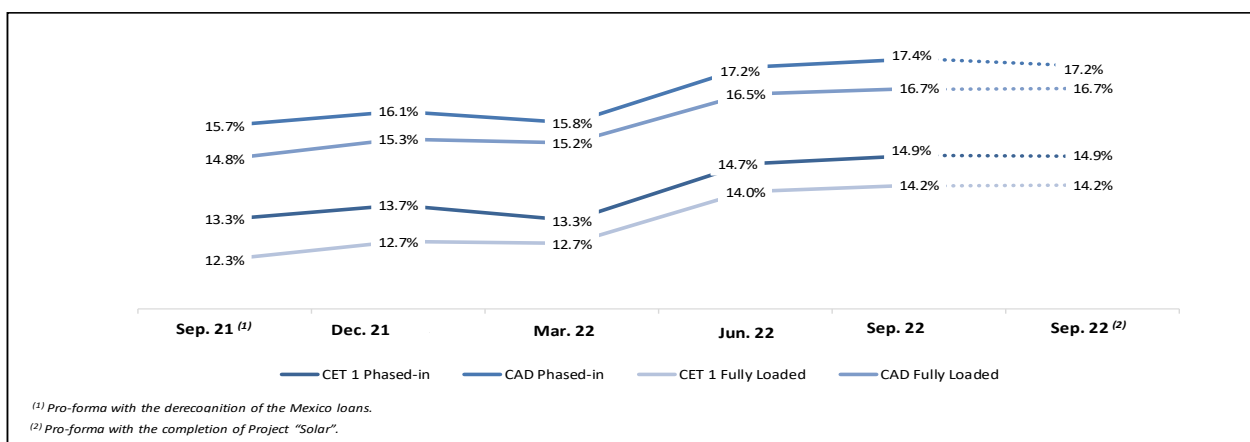
⁽²⁾ Including profits, as approved on 21.07.2022 by the Annual General Meeting (AGM).

⁽³⁾ Pro-forma with the derecognition of the Mexico loans.

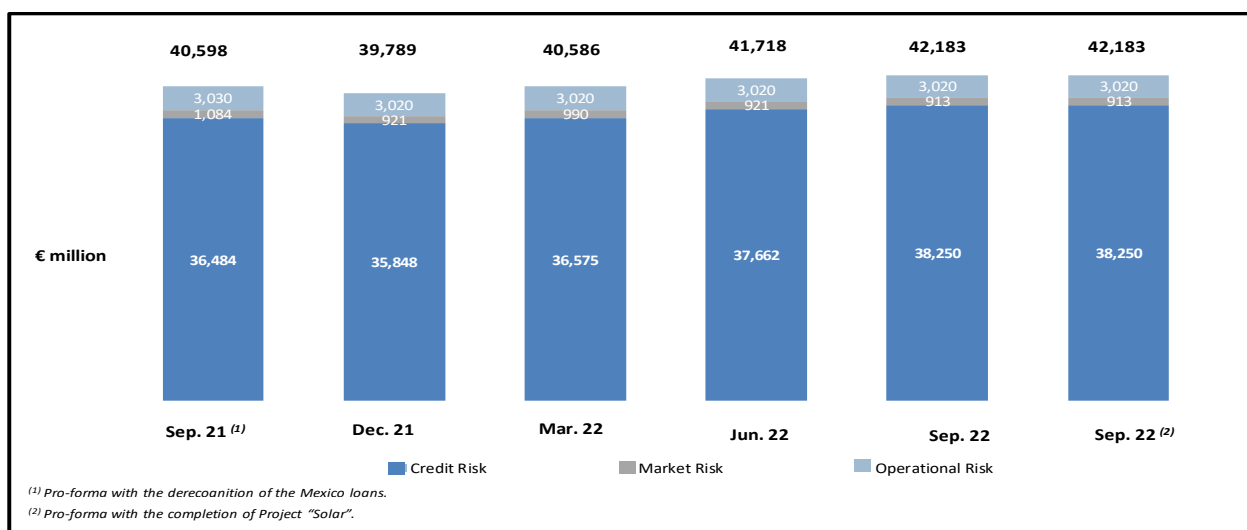
⁽⁴⁾ Pro-forma with the completion of Project "Solar".

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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 Single Supervisory Mechanism (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 at the end of 2022 and below 5% in 2024.

In the context of its NPE management strategy, the Group is contemplating another NPE securitization transaction (project "Solar"), as part of a joint initiative with the other Greek systemic banks initiated since 2018, in order to decrease further its NPE ratio and strengthen its balance sheet de-risking. In addition, the Group targets to the prudential and accounting derecognition of the underlying corporate loan portfolio from its balance sheet by achieving a Significant Risk Transfer (SRT) and including "Solar" securitization under the Hellenic Asset Protection Scheme (HAPS), thus the senior note of the securitization to become entitled to the Greek State's guarantee. In parallel, the Management along with the

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other participating banks have initiated actions towards the disposal of the majority stake of the mezzanine and junior notes to be issued in the context of the above-mentioned securitization.

As at 30 September 2022, following the classification of project “Solar” underlying loan portfolio as held for sale, the Group’s NPE stock amounted to € 2.4 billion (30 June 2022: € 2.5 billion) driving the NPE ratio to 5.6% (30 June 2022: 5.9%), while the NPE coverage ratio stood at 72.7% (30 June 2022: 71.5%).

1.3 Eurobank Merchant Acquiring business - 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 included, among others: a) the sale of 80% of Eurobank’s merchant acquiring business (“PayCo”) to Worldline and b) a long term agreement for the exclusive distribution of PayCo products in Greece through Eurobank’s sales network. On the basis of the aforementioned agreement, as of 31 December 2021 “PayCo” was classified as held for sale.

On 30 June 2022, after receiving all necessary approvals, the spin-off of the Bank’s merchant acquiring business to Cardlink Payment Institution S.A. (“Cardlink One”), a licensed payment institution, and the transfer of 80% of Cardlink One’s shares to Worldline was completed for a cash consideration of € 254 million, after certain adjustments.

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 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.

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%

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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 BoG Executive Committee Act No 202/1/11.03.2022, which lays down the procedure for applying the CCyB rate in Greece and the relevant calibration methodology, BoG assesses, on a quarterly basis, the intensity of cyclical systemic risk and the appropriateness of the CCyB rate, taking into account the standardised credit-to-GDP gap, the buffer guide and, in particular, additional indicators for monitoring the build-up of cyclical systemic risk. On 28 September 2022, BoG announced that would keep the countercyclical capital buffer rate for Greece unchanged at "zero percent" (0%) in the third fourth of 2022, with effect from 1 October 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 4 July 2022, 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 (the size, importance, complexity and interconnectedness). This list is based on end-2020 data and also reflects the capital buffers that the relevant authorities have set for the identified 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 Acts No 195/29.11.2021 and No 212/21.09.2022, the O-SII buffer for Greek institutions is set at 0.75% and 1% for the years 2022 and 2023 respectively.

- 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.

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1.5.1 Regulatory Developments

On 29 May 2020, 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 tables, templates and associated instructions that specify the requirement in Article 449a of Regulation (EU) No 575/2013 to disclose prudential information on environmental, social and governance (ESG) risks, including transition and physical risk, addressed to large institutions with securities traded on a regulated market of any Member State. The Pillar 3 framework on prudential disclosures on ESG risks supports institutions in the public disclosure of meaningful and comparable information on how ESG-related risks and vulnerabilities, and in particular climate change, may exacerbate other risks in their balance sheet. 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.

Large institutions should disclose information on ESG risks from 28 June 2022. For the first year this information must be disclosed on an annual basis and semi-annually thereafter. Consequently, the first disclosure reference date will be 31 December 2022 and the information will be made publicly available during the first months of 2023. An overview of the qualitative and quantitative information is depicted below:

- Three tables are set up for qualitative information on environmental, social and governance risks. Under each risk category, the disclosure requirements target three aspects: governance, business model and strategy, and risk management. First disclosure reference date is 31.12.2022
- Ten templates are set up for quantitative disclosures, more specific:

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- a. four templates on climate change transition risk that should be disclosed with reference date 31.12.2022, except for disclosures on institutions' scope 3 emissions and alignment metrics which have phase-in period until June 2024;
- b. one template on climate change physical risks with first disclosure date on 31.12.2022;
- c. five templates on the actions that institutions are putting in place to mitigate climate-change-related risks, including information on Taxonomy-aligned activities (Green Asset Ratio -GAR and Banking Book Taxonomy Alignment Ratio -BTAR) and on other mitigating actions. The disclosure of information on the GAR will start to apply in 31.12.2023, the additional and separate information on the BTAR will apply from 30.06.2024.

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 ran until 2 August 2022.

On 24 May 2022, EBA published an updated mapping between quantitative disclosure data points and the relevant supervisory reporting data points. The updated mapping applies to the reporting framework 3.0 and the Implementing Technical Standards (ITS) on institutions' Pillar 3 public disclosures. The amendments mainly address issues raised by competent authorities and the industry.

On 23 May 2022, EBA published its final draft RTS specifying the criteria to identify shadow banking entities for the purposes of reporting large exposures. The draft RTS are a short legal text with three main Articles addressing the following:

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- criteria for identifying both shadow banking and non-shadow banking entities;
- definition of banking activities and services; and
- criteria for excluding entities established in third countries from being deemed as shadow banking entities.

The final draft RTS clarify that entities carrying out banking activities or services and which have been authorised and supervised in accordance with the EU prudential framework, shall not be considered as shadow banking entities.

For those entities established in a third country, the final draft RTS differentiate between institutions and other entities.

The draft RTS will be submitted to the Commission for endorsement following which they will be subject to scrutiny by the European Parliament and the Council before being published in the Official Journal of the European Union.

On 17 October 2022, EBA published an Opinion on the amendments proposed by the European Commission (EC) to the EBA final draft ITS on prudential disclosures of ESG information. EC's version of the ITS, compared to the final draft ITS submitted by the EBA on January 2022, includes two substantive changes, mainly with regard to the calculation and disclosure of the BTAR. In particular, the Commission has proposed amendments to emphasise: i) that institutions 'may' choose to disclose this information, instead of being required to do it on a 'a best effort basis' and ii) that the collection of the information from the counterparties will be on a 'voluntary basis', including that institutions need to inform the counterparties about the voluntary nature of this request of information.

On 20 October 2022, EBA published a final set of Guidelines and two final draft RTS specifying technical aspects of the revised framework capturing interest rate risks for banking book (IRRBB) positions. These regulatory products complete the onboarding into EU law of the Basel standards on IRRBB and are of crucial importance given the current interest rate environment. The EBA will also closely monitor their implementation and more generally the impact of the evolving interest rates on the management of IRRBB by EU institutions and on other related prudential aspects. The Guidelines will replace the current Guidelines on technical aspects of the management of interest rate risk arising from non-trading activities under the supervisory review process (SREP) published in 2018.

On 8 November 2022, the Council of the EU published its position (general approach) on the proposals amending

- Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor the capital requirements directive and the capital requirements regulation;
- Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks, and amending Directive 2014/59/EU (CRD).

Following the usual legislative procedure, the Council's general approach will be discussed together with European Parliament's final position and the European Commission's initial legislative proposal to agree on a final version of the texts. The trilogue is expected to start in the new year.

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

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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 communication to the Bank, the fully calibrated MREL (final target) to be met by Eurobank S.A. on a consolidated basis until the end of 2025 is set at 27.36% of its total risk weighted assets (RWAs), including a fully-loaded combined buffer requirement (CBR) of 3.76%. The final MREL target is updated by the SRB on an annual basis. The interim binding MREL target, which is applicable from 1 January 2022, stands at 17.82% of RWAs, including a CBR of 3.31%, while an interim non-binding MREL target of 20.45%, including a CBR of 3.67%, will apply from January 2023.

In the period ended 30 September 2022, in the context of the implementation of its medium-term strategy to meet its MREL requirements, the Bank proceeded with the issuance of an MREL-eligible senior preferred bond with a nominal value of € 500 million. As at 30 September 2022, the Bank's MREL ratio at consolidated level stands at 21.30% of RWAs including profit for the period ended 30 September 2022 (30 June 2022 20.7%) which is significantly above the aforementioned interim binding MREL target of 17.82%.

1.7 2023 EU-wide stress test

On 21 July 2022, EBA published its 2023 EU-wide stress test draft methodology, templates and template guidance. The methodology covers all risk areas and builds on the one prepared for the 2021 EU wide stress test exercise. New features in the Stress test are a) the projections on net fee and commission income (NFCI) which will be based on a top-down model and b) the sample coverage has been increased with additional 26 banks compared to the 2021 exercise, with Eurobank Ergasias Services and Holdings S.A being one of them.

The exercise will be carried out on the basis of year-end 2022 figures, and the scenarios will be applied over a period of 3 years from end 2023 to end 2025. Banks will be assessed under a static balance sheet. No single capital threshold has been set for the 2023 exercise and the stress test results will be used as input to the SREP in line with the EBA Guidelines.

On 4 November 2022, EBA published the final methodology, draft templates and template guidance for the 2023 EU-wide stress test along with the milestone dates for the exercise. The stress test templates along with a template guidance were published in their draft versions as they can still be subject to minor technical adjustments before their final publication.

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The EU-wide stress test will be launched in January 2023 and the results are expected to be published by the end of July 2023 on a bank-by-bank basis and in the form of aggregated analyses using EBA common disclosure templates. Milestones for the 2023 EU-wide stress test:

- Launch of the exercise at the end of January 2023;
- First submission of results to the EBA at the beginning of April 2023;
- Second submission to the EBA in mid-May 2023;
- Third submission to the EBA at the end of June 2023;
- Final submission to the EBA in mid-July 2023;
- Publication of results by end-July 2023.

1.8 Climate Risk

The Group's updated Governance introduces several new aspects and responsibilities in relation to Climate-related 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 2022 ECB Climate Risk Stress Test

The Group participated in ECB's supervisory climate risk stress test, which was conducted in the first half of 2022. The 2022 climate risk stress test assessed how well banks are set up to deal with climate-related risks. A total of 104 significant banks participated in the test consisting of three modules, in which banks provided information on their: (i) own climate stress-testing capabilities, (ii) reliance on carbon-emitting sectors, and (iii) performance under different scenarios over several time horizons.

The test, which was part of the ECB's wider climate roadmap, was not a capital adequacy exercise but rather a learning one for banks and supervisors alike, aiming at identifying vulnerabilities and best practices and providing guidance to banks for the green transition. In this context, the Group has successfully completed the 2022 climate risk stress test exercise.

Climate Risk Stress Test Results

In July 2022, ECB published the climate risk stress test aggregated results, showing that banks must improve their focus on climate risk. Furthermore, all participating entities, including the Group, received individual feedback and are expected to take action accordingly, in line with the set of best practices that the ECB will publish later this year. The results have shown that the Group has made significant progress in incorporating a climate risk stress testing framework, with an overall performance in line with the average score of European Banks. The Group continues to work in order to implement its climate risk action plan, to further integrate climate risks into its business strategy and risk management practices, and to support its clients towards climate transition and sustainable business growth.

The results will feed into the SREP from a qualitative point of view and could have an indirect potential impact on Pillar 2 requirements through the SREP scores, without however directly impacting capital through Pillar 2 guidance.

1.10 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.

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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, forbore 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.

On 24 May 2022, EBA published an updated mapping between quantitative disclosure data points and the relevant supervisory reporting data points. The amendments mainly address issues raised by competent authorities and the industry. The updated mapping applies to the reporting framework 3.0 and the ITS on institutions' Pillar 3 public disclosures.

1.11 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.

Introduction – General Information

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 24 November 2022.

Introduction – General Information

1.12 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 2022 and 30 June 2022.

Table 1: Regulatory and accounting Balance Sheet

Balance sheet per published financial statements and per regulatory consolidation

Ref.	30 September 2022 € million	30 June 2022 € million
Assets		
Cash and Balances with central banks	16,165	14,456
Due from credit institutions	1,011	1,098
Securities held for trading	75	93
Derivative financial instruments	2,485	1,880
Loans and advances to customers	41,409	40,533
Investment securities	12,984	12,777
Investments in associates and joint ventures	183	191
Property, plant and equipment	816	816
Investment property	1,372	1,397
Intangible assets	<i>a</i> 293	284
Deferred tax asset	4,259	4,298
of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	<i>b</i> -	-
of which deferred tax credit	3,439	3,474
of which deferred tax assets arising from temporary differences	<i>c</i> 820	824
Other assets	2,224	2,181
Assets of disposal group classified as held for sale	162	176
Total assets	83,438	80,180
Liabilities		
Due to central banks	11,596	11,604
Due to credit institutions	2,228	1,197
Derivative financial instruments	2,286	1,818
Due to customers	55,696	53,996
Debt securities in issue	3,193	3,100
Other liabilities	1,958	2,088
of which tier 2 instruments	<i>e</i> 950	950
Liabilities of disposal group classified as held for sale	55	64
Total liabilities	77,012	73,867
Equity		
Ordinary share capital	816	816
Share premium	8,056	8,055
Reserves and retained earnings	(2,540)	(2,653)
of which cash flow hedge reserves	<i>d</i> (11)	(13)
Non controlling interests	94	95
Total equity	<i>f</i> 6,426	6,313
Total equity and liabilities	83,438	80,180

Capital Management

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

	30 September 2022 ⁽¹⁾	30 September 2022 ⁽²⁾	30 June 2022 ⁽¹⁾	31 March 2022 ⁽¹⁾	31 December 2021	30 September 2021 ⁽⁴⁾
	€ million	€ million	€ million	€ million	€ million	€ million
Available own funds (amounts)						
1 Common Equity Tier 1 (CET1) capital	6,302	5,959	6,137	5,382	5,436	5,401
2 Tier 1 capital	6,302	5,959	6,137	5,382	5,436	5,401
3 Total capital	7,345	7,002	7,163	6,395	6,386	6,365
Risk-weighted exposure amounts						
4 Total risk-weighted exposure amount	42,183	42,104	41,718	40,586	39,789	40,598
Capital ratios (as a percentage of risk-weighted exposure amount)						
5 Common Equity Tier 1 ratio (%)	14.9%	14.2%	14.7%	13.3%	13.7%	13.3%
6 Tier 1 ratio (%)	14.9%	14.2%	14.7%	13.3%	13.7%	13.3%
7 Total capital ratio (%)	17.4%	16.6%	17.2%	15.8%	16.1%	15.7%
Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)						
EU 7a 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%
EU 7b of which: to be made up of CET1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7c of which: to be made up of Tier 1 capital (percentage points)	2.25%	2.25%	2.25%	2.25%	2.25%	2.25%
EU 7d 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)						
8 Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a 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%
9 Institution specific countercyclical capital buffer (%)	0.06%	0.06%	0.06%	0.06%	0.06%	0.05%
EU 9a Systemic risk buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Global Systemically Important Institution buffer (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 10a Other Systemically Important Institution buffer	0.75%	0.75%	0.75%	0.75%	0.50%	0.50%
11 Combined buffer requirement (%)	3.31%	3.31%	3.31%	3.31%	3.06%	3.05%
EU 11a Overall capital requirements (%)	14.31%	14.31%	14.31%	14.31%	14.06%	14.05%
12 CET1 available after meeting the total SREP own funds requirements (%)	6.42%	5.63%	6.17%	4.66%	5.06%	4.73%
	30 September 2022 ⁽¹⁾	30 September 2022 ⁽²⁾	30 June 2022 ⁽¹⁾	31 March 2022 ⁽¹⁾	31 December 2021 ⁽³⁾	30 September 2021 ⁽³⁾
	€ million	€ million	€ million	€ million	€ million	€ million
Leverage ratio ⁽⁵⁾						
13 Leverage ratio total exposure measure	84,745	84,719	82,128	66,598	66,397	64,073
14 Leverage ratio	7.4%	7.0%	7.5%	8.1%	8.2%	8.5%
Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)						
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.16%	3.16%	3.16%
Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)						
EU 14d Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.16%	3.16%	3.16%

Capital Management

	30 September 2022 ⁽¹⁾	30 September 2022 ⁽²⁾	30 June 2022 ⁽¹⁾	31 March 2022 ^{(1) & (3)}	31 December 2021 ⁽³⁾	30 September 2021 ⁽³⁾
	€ million	€ million	€ million	€ million	€ million	€ million
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	13,051	13,051	12,480	11,974	10,054
EU 16a	Cash outflows - Total weighted value	9,205	9,205	8,826	8,576	7,977
EU 16b	Cash inflows - Total weighted value	1,112	1,112	1,116	1,082	1,126
16	Total net cash outflows (adjusted value)	8,093	8,093	7,710	7,494	6,851
17	Liquidity coverage ratio (%) (adjusted value) ⁽⁶⁾	161.3%	161.3%	162.0%	160.0%	145.9%
	Liquidity coverage ratio (%)	169.0%	169.0%	174.3%	151.3%	168.2%
Net Stable Funding Ratio						
18	Total available stable funding	60,485	60,167	59,190	58,918	56,754
19	Total required stable funding	47,287	47,287	46,982	47,499	46,223
20	NSFR ratio (%)	127.9%	127.2%	126.0%	124.0%	122.8%

⁽¹⁾ Including year to date profits €1,106 million for the 9M 2022, € 941 million for the 1H 2022 and € 270 million for the 1Q 2022.

⁽²⁾ Includes 1H 2022 year to date profits after tax minus 20% of 1H 2022 recurring profit after tax, as maximum provision for dividend distribution, subject to regulatory approval.

⁽³⁾ Restated following the approval of profits for the financial year 2021 from AGM on 21.07.2022.

⁽⁴⁾ Pro-forma with the derecognition of the Mexico loans.

⁽⁵⁾ After 31.03.2022 the benefit from the temporary COVID relief measure, regarding the exclusion of certain central bank exposures from the denominator of the leverage ratio, has ceased.

⁽⁶⁾ Average figures based on previous monthly data points.

⁽⁷⁾ Pro-forma CET1 and Total Capital Adequacy ratios as at 30 September 2022 with the completion of Project "Solar" would be 14.9% and 17.2%, respectively.

Capital Management

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 30 September 2022 and 30 June 2022 which is calculated according to CRD IV as amended.

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

		30 September 2022 ⁽¹⁾	30 September 2022 ⁽²⁾	30 June 2022 ⁽¹⁾
	<i>Ref.</i>	€ million	€ million	€ million
Total equity	<i>f</i>	6,426	6,426	6,313
Interim or year-end profit not eligible		-	(318)	-
Minority interest not allowed in CET1		(38)	(38)	(39)
Cash flow hedge reserves	<i>d</i>	11	11	13
Adjustments due to IFRS 9 transitional arrangements		271	271	269
Temporary treatment of unrealised losses measured at FVTOCI in accordance with Article 468 of the CRR		92	92	72
Intangible assets	<i>a</i>	(196)	(196)	(191)
<i>of which Goodwill</i>		(2)	(2)	(2)
IRB shortfall of credit risk adjustments to expected losses		(101)	(101)	(118)
Deferred tax assets that rely on future profitability (unused tax losses)	<i>b</i>	-	-	-
Deferred tax assets arising from temporary differences (amount above 10% threshold)	<i>c</i>	(111)	(136)	(131)
Prudent Valuation Adjustments		(8)	(8)	(8)
Other regulatory adjustments		(44)	(44)	(43)
Amount exceeding the 17.65% threshold	<i>c</i>	-	-	-
Common Equity Tier I capital		6,302	5,959	6,137
Regulatory adjustments		-	-	-
Total Tier I capital		6,302	5,959	6,137
Tier II capital - subordinated debt	<i>e</i>	950	950	950
IRB Excess of impairment allowances over expected losses eligible		93	93	76
Total Regulatory Capital		7,345	7,002	7,163
Risk Weighted Assets		42,183	42,104	41,718
Ratios				
Common Equity Tier I		14.9%	14.2%	14.7%
Tier I		14.9%	14.2%	14.7%
Total Capital Adequacy Ratio		17.4%	16.6%	17.2%

⁽¹⁾ Including year to date profits €1,106 million for the 9M 2022 and € 941 million for the 1H 2022.

⁽²⁾ Includes 1H 2022 year to date profits after tax minus 20% of 1H 2022 recurring profit after tax, as maximum provision for dividend distribution, subject to regulatory approval.

⁽³⁾ The Group's CET1 ratio as at 30 September 2022 based on the full implementation of the Basel III rules in 2025 (fully loaded CET1), would be 14.2% including year to date 9M 2022 profit (30 June 2022 including interim profits: 14.0%).

⁽⁴⁾ The pro-forma CET1 and Total Capital Adequacy ratios as at 30 September 2022 with the completion of Project "Solar" would be 14.9% and 17.2%, respectively.

As depicted in table above, CET1 ratio has increased during the 3rd quarter 2022, mainly due the quarterly profitability which is partly offset by the increase of RWAs from the new production of loans, loan commitments and Letters of Guarantee, and the mark down of investment securities at FVOCI.

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.

Capital Management

As at 30 September 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 € 3,438 million (30 June 2022 € 3,474 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 unamortised losses from the Private Sector Involvement (PSI) and the Greek State Debt Buyback Program, which are subject to amortization over a thirty-year period and (b) on the sum of (i) the unamortised part of the DTC eligible crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015.

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 2022.

Capital Management

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

	30 September 2022 ⁽¹⁾	30 September 2022 ⁽²⁾	30 June 2022 ⁽¹⁾	31 March 2022 ⁽¹⁾	31 December 2021	30 September 2021 ⁽³⁾
Available capital	€ million	€ million	€ million	€ million	€ million	€ million
CET1 capital	6,302	5,959	6,137	5,382	5,436	5,401
CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,122	5,779	5,959	5,208	5,118	5,032
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	6,184	5,841	6,046	5,358		
Fully Loaded CET1 capital	5,964	5,615	5,826	5,135	5,044	4,958
Tier 1 capital	6,302	5,959	6,137	5,382	5,436	5,401
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,122	5,779	5,959	5,208	5,118	5,032
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	6,184	5,841	6,046	5,358		
Fully Loaded Tier 1 capital	5,964	5,615	5,826	5,135	5,044	4,958
Total capital	7,345	7,002	7,163	6,395	6,386	6,365
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,167	6,824	7,001	6,246	6,152	6,076
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	7,227	6,884	7,072	6,372		
Fully Loaded Total capital	7,009	6,660	6,869	6,173	6,077	6,002
Risk weighted assets						
Total risk-weighted assets	42,183	42,104	41,718	40,586	39,789	40,598
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	42,091	42,011	41,628	40,500	39,618	40,428
Fully Loaded Total risk-weighted assets	42,091	42,011	41,628	40,500	39,618	40,428
Capital ratios						
CET1 (as a percentage of risk exposure amount)	14.9%	14.2%	14.7%	13.3%	13.7%	13.3%
CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.5%	13.8%	14.3%	12.9%	12.9%	12.4%
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	14.7%	13.9%	14.5%	13.2%		
Fully Loaded CET1 (as a percentage of risk exposure amount)	14.2%	13.4%	14.0%	12.7%	12.7%	12.3%
Tier 1 (as a percentage of risk exposure amount)	14.9%	14.2%	14.7%	13.3%	13.7%	13.3%
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	14.5%	13.8%	14.3%	12.9%	12.9%	12.4%
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	14.7%	13.9%	14.5%	13.2%		
Fully Loaded Tier 1 (as a percentage of risk exposure amount)	14.2%	13.4%	14.0%	12.7%	12.7%	12.3%
Total capital (as a percentage of risk exposure amount)	17.4%	16.6%	17.2%	15.8%	16.1%	15.7%
Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	17.0%	16.2%	16.8%	15.4%	15.5%	15.0%
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 had not been applied	17.1%	16.3%	17.0%	15.7%		
Fully Loaded Total capital (as a percentage of risk exposure amount)	16.7%	15.9%	16.5%	15.2%	15.3%	14.8%

Capital Management

	30 September 2022 ⁽¹⁾ € million	30 September 2022 ⁽²⁾ € million	30 June 2022 ⁽¹⁾ € million	31 March 2022 ⁽¹⁾ € million	31 December 2021 € million	30 September 2021 € million
Leverage ratio ⁽⁴⁾						
Leverage ratio total exposure measure	84,745	84,719	82,128	66,598	66,397	64,073
Leverage ratio	7.4%	7.0%	7.5%	8.1%	8.2%	8.5%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7.2%	6.8%	7.3%	7.8%	7.7%	7.9%
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	7.3%	6.9%	7.7%	8.0%		
Fully Loaded Leverage ratio	7.0%	6.6%	7.1%	7.7%	7.6%	7.8%

⁽¹⁾ Including year to date profits €1,106 million for 9M 2022, €941 million for the 1H 2022 and € 270 million for the 1Q 2022.

⁽²⁾ Includes 1H 2022 year to date profits after tax minus 20% of 1H 2022 recurring profit after tax, as maximum provision for dividend distribution, subject to regulatory approval.

⁽³⁾ Pro-forma with the derecognition of the Mexico loans.

⁽⁴⁾ After 31.03.2022 the benefit from the temporary COVID relief measure, regarding the exclusion of certain central bank exposures from the denominator of the leverage ratio, has ceased.

⁽⁵⁾ Pro-forma CET1 and Total Capital Adequacy ratios as at 30 September 2022 with the completion of Project "Solar" would be 14.9% and 17.2%, 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 3Q 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 second quarter of 2022 stemming from the exposures in Bulgaria and Luxemburg).

The table below shows the capital requirements of the Group for 30 September 2022.

Table 5: Pillar 2 Requirements

	30 September 2022	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement		
Pillar 2 Requirement (P2R)	4.50%	8.00%
Total SREP Capital Requirement (TSCR)	6.19%	11.00%
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCB)	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.

Capital Management

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 € 713 million (based on RWAs of € 42,183 million).

As at 30 September 2022, Eurobank's transitional CET1 ratio and Total Capital ratio, including 9M 2022 profit € 1.106 million, were 14.9% and 17.4% respectively, which exceeded the 2022 transitional minimum requirements of 9.50% and 14.31%.

Capital Management

2.5 Capital requirements under Pillar 1

The table below shows the Group's risk weighted assets (RWAs) and capital requirements as at 30 September 2022 and 30 June 2022. 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
	30 September 2022 ⁽¹⁾ € million	30 September 2022 € million	30 June 2022 ⁽¹⁾ € million	30 June 2022 € million	30 September 2022 € million
Credit risk (excluding CCR)	34,166	34,166	33,567	33,567	2,733
Of which the standardised approach	18,334	18,334	18,226	18,226	1,467
Of which the foundation IRB (FIRB) approach	6,539	6,539	6,763	6,763	523
Of which: slotting approach	4,230	4,230	3,526	3,526	338
Of which: equities under the simple riskweighted approach	476	476	478	478	38
Of which the advanced IRB (AIRB) approach	4,587	4,587	4,574	4,574	367
Counterparty credit risk - CCR	436	436	399	399	35
Of which the standardised approach	151	151	157	157	12
Of which internal model method (IMM)	-	-	-	-	-
Of which exposures to a CCP	14	14	15	15	1
Of which credit valuation adjustment - CVA	118	118	91	91	9
Of which other CCR	153	153	136	136	12
Settlement risk	1	1	1	1	-
Securitisation exposures in the non-trading-book (after the cap)	1,577	1,577	1,656	1,656	126
Of which SEC-IRBA approach	228	228	309	309	18
Of which SEC-ERBA (including IAA)	305	305	288	288	24
Of which SEC-SA approach	1,044	1,044	1,059	1,059	84
Of which 1250%	-	-	-	-	-
Position, foreign exchange and commodities risks (Market risk)	913	913	1,036	1,036	73
Of which the standardised approach	284	284	275	275	23
Of which IMA	629	629	761	761	50
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)	2,070	1,992	2,039	2,002	159
Total	42,183	42,104	41,718	41,681	3,368

⁽¹⁾ Including year to date profits €1,106 million for the 9M 2022 and €941 million for the 1H 2022.

⁽²⁾ The increase of the RWAs compared to 30 June 2022 is mainly due to the new production of loans, loan commitments and Letters of Guarantee.

Credit Risk

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 72.7% 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

	30 September 2022	30 June 2022
	Risk weighted exposure amount	Risk weighted exposure amount
	€ million	€ million
Risk weighted exposure amount as at 1 July 2022	14,863	13,895
Asset size (+/-)	477	798
Asset quality (+/-)	(154)	28
Model updates (+/-)	-	-
Methodology and policy (+/-)	-	-
Acquisitions and disposals (+/-)	-	-
Foreign exchange movements (+/-)	172	152
Other (+/-)	(2)	(10)
Risk weighted exposure amount as at 30 September 2022	15,356	14,863

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 third quarter of 2022, RWAs under IRB increased by € 493 million. The main driver for the increase was the new production of the Corporate portfolio.

Market Risk

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

	30 September 2022						Total own funds requirements
	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	
	€ million	€ million	€ million	€ million	€ million	€ million	
RWAs at 1 July 2022 ¹	128	477	156	-	-	761	61
Regulatory adjustment ²	(92)	(361)	(17)	-	-	(470)	(38)
RWAs at the previous quarter-end (end of the day) ³	36	116	139	-	-	291	23
Movement in risk levels	59	(71)	(120)	-	-	(132)	(11)
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	36	100	31	-	-	168	13
Regulatory adjustment ²	151	305	5	-	-	461	37
RWAs at 30 September 2022¹	187	405	36	-	-	629	50

Market Risk

	30 June 2022						Total own funds requirements
	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	
	€ million	€ million	€ million	€ million	€ million	€ million	
RWAs at 31 March 2022¹	117	458	143	-	-	718	57
Regulatory adjustment ²	(84)	(306)	(24)	-	-	(414)	(33)
RWAs at the previous quarter-end (end of the day)³	33	151	119	-	-	304	24
Movement in risk levels	11	19	13	-	-	43	3
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	36	116	139	-	-	291	23
Regulatory adjustment ²	92	361	17	-	-	470	38
RWAs at 30 June 2022¹	128	477	156	-	-	761	61

⁽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).

Counterparty Risk

5. Counterparty risk

5.1 Definition

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

5.2 Mitigation of counterparty risk

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

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

5.3 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.

Leverage Ratio

6. Leverage Ratio

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

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

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

The level of the leverage ratio with reference date 30 September 2022 on consolidated basis, including profits, was at 7,4% (30 June 2022: 7.5%), according to the transitional definition of Tier 1 capital, significantly over the proposed minimum threshold of 3%.

In June 2021 ECB decided that the supervisory measure that allowed the exclusion of certain central bank exposures from the denominator of leverage ratios, in the context of Covid relief measures, will be extended until March 2022. From 01 of April 2022 the exempted central banks exposures are reincluded in the leverage ratios.

The below table includes the summary of the Group's leverage ratio with reference dates 30 September 2022 and 30 June 2022.

Table 10: EU LR – Leverage Ratio

	30 September 2022 ⁽¹⁾	30 September 2022	30 June 2022 ⁽¹⁾	30 June 2022
	€ million	€ million	€ million	€ million
Tier 1 capital - transitional definition	6,302	5,959	6,137	5,973
Total Leverage Ratio exposure measure - using a transitional definition of Tier 1 capital	84,745	84,719	82,128	82,116
Leverage Ratio - using a transitional definition of Tier 1 capital	7.4%	7.0%	7.5%	7.3%

⁽¹⁾ Including year to date profits €1,106 million for the 9M 2022 and € 941 million for the 1H 2022.

Liquidity Risk

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 30 September 2022 is equal to 169.0% (30 June 2022: 174.3%) 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%).

The decrease of LCR ratio compared to 30 June 2022 is mainly due to the partial phasing-out of the pandemic collateral easing measures by ECB and due to the stricter provision applied for the volatility of financial collateral after the significant market movements in Q3 2022.

Liquidity Risk

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

Table 11: LIQ1 - Quantitative information of LCR

Quarter ending on	Total unweighted value					Total weighted value				
	30 September 2022	30 June 2022	31 March 2022	31 December 2021	30 September 2021	30 September 2022	30 June 2022	31 March 2022	31 December 2021	30 September 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	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS										
1 Total high-quality liquid assets (HQLA)						13,051	12,480	11,974	11,173	10,054
CASH-OUTFLOWS										
2 Retail deposits and deposits from small business customers, of which:	31,545	30,767	30,055	29,397	28,520	1,985	1,920	1,857	1,806	1,742
3 Stable deposits	24,323	23,981	23,665	23,311	22,778	1,216	1,199	1,183	1,166	1,139
4 Less stable deposits	7,221	6,785	6,389	6,085	5,742	768	720	673	640	602
5 Unsecured wholesale funding	13,573	13,120	12,684	12,078	11,706	5,796	5,632	5,458	5,179	5,074
6 Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,919	1,851	1,783	1,652	1,537	471	454	437	404	375
7 Non-operational deposits (all counterparties)	11,654	11,270	10,901	10,426	10,126	5,325	5,178	5,021	4,775	4,656
8 Unsecured debt	-	-	0	0	43	-	-	0	0	43
9 Secured wholesale funding						117	102	90	83	83
10 Additional requirements	2,821	2,648	2,595	2,541	2,445	960	846	856	853	802
11 Outflows related to derivative exposures and other collateral requirements	771	663	679	684	642	771	663	679	684	642
12 Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-	-	-
13 Credit and liquidity facilities	2,050	1,985	1,915	1,857	1,804	189	183	177	169	161
14 Other contractual funding obligations	121	105	103	94	78	110	94	92	84	68
15 Other contingent funding obligations	3,362	3,261	3,144	3,023	2,949	237	231	222	214	208
16 TOTAL CASH OUTFLOWS						9,205	8,826	8,576	8,219	7,977
CASH-INFLOWS										
17 Secured lending (eg reverse repos)	342	433	446	509	693	27	30	21	12	5
18 Inflows from fully performing exposures	867	879	896	886	967	737	756	766	748	818
19 Other cash inflows	1,533	1,449	1,372	1,314	1,360	348	330	295	287	303
20 TOTAL CASH INFLOWS	2,742	2,761	2,715	2,709	3,020	1,112	1,116	1,082	1,048	1,126
EU-20a Fully exempt inflows	-	-	-	-	-	-	-	-	-	-
EU-20b Inflows Subject to 90% Cap	-	-	-	-	-	-	-	-	-	-
EU-20c Inflows Subject to 75% Cap	2,742	2,761	2,715	2,709	3,020	1,112	1,116	1,082	1,048	1,126
TOTAL ADJUSTED VALUE										
21 LIQUIDITY BUFFER						13,051	12,480	11,974	11,173	10,054
22 TOTAL NET CASH OUTFLOWS						8,093	7,710	7,494	7,171	6,851
23 LIQUIDITY COVERAGE RATIO (%)						161.3%	162.0%	160.0%	155.4%	145.9%

Net Stable Funding Ratio (NSFR) calculations

NSFR as of 30 September 2022 is equal to 127.2% (30 June 2022: 125.7%) on a group level. The minimum regulatory threshold for NSFR is set at 100%.

Appendix 1: Abbreviations

Appendix 1: List of Abbreviations

Abbreviation	Definition
ABSs	Asset Backed Securities
A-IRB	Advanced Internal Rating Based Approach
AQR	Asset Quality Review
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
CCF	Credit Conversion Factor
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CET1	Common equity Tier 1
COREPs	Common Reports
CRD	Capital Requirements Directive IV
CR&E	Credit Risk and Environmental
CRR	Capital Requirements Regulation
CSA	Credit Support Annex
CVA	Credit Value Adjustment
DoD	Definition of Default
EAD	Exposure At Default
EBA	European Banking Authority
EC	European Commission
ECAIs	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
ESG	Environmental, Social and Governance
F-IRB	Foundation Internal Rating Based Approach
GAR	Green Asset Ratio
GGBs	Greek Government Bonds
GHOS	Governors and Heads of Supervision
GMRA	Global Master Repurchase Agreement
G-SIIs	Global Systemic Institution Buffer
HDIGF	Hellenic Deposit and Investment Guarantee Fund
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
IRR	IRR Interest Rate Risk
IRRBB	Interest Rate risk in the Banking Book
IRC	Incremental Risk Charge
ISDA	International Swaps and Derivatives Association
ITS	Implementing Technical Standards
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
MDA	Maximum Distributable Amount
MRA	Moody's Risk Advice
MREL	Minimum Requirement for own funds and Eligible Liabilities
MRO	Main Refinancing Operations
NPE	Non Performing Exposures
NPV	Net Present Value
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
RBA	Ratings Based Approach
RCSA	Risk & Control Self-Assessment
RSS	Remedial & Servicing Strategy Sector
RTS	Regulatory Technical Standards
RWAs	Risk Weighted Assets
SA	Standard Approach
SEC-ERBA	Securitisation-External Ratings Based Approach
SFDR	Sustainable Finance Disclosure Regulation
SFTs	Securities Financing Transactions
SPE	Single Point of Entry
SPV	Special Purpose Vehicle
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRF	Single Resolution Fund
SRM	Single Resolution Mechanism
SRT	Significant Risk Transfer
SSM	Single Supervisory Mechanism
SSF	Single Supervisory Fees
ST	Stress Test
SyRB	Systemic Risk Buffer
TLTRO	Targeted Long Term Refinancing Operations
TSCR	Total SREP Capital Requirement
TTC	Through The Cycle
VAR	Value at Risk

Appendix 2: Guidelines and Regulations mapping on Disclosures Requirements

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