EUROBANK ERGASIAS
SERVICES AND HOLDINGS S.A.

CONSOLIDATED PILLAR 3 REPORT

FOR THE THREE MONTHS ENDED

31 MARCH 2023

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General Commercial Registry No: 00022300100

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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 Holdings 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).

Pursuant to article 22A of Greek Law 4261/2014 (as amended), which incorporated article 21 (a) of Directive 2013/36/EU (as amended) into the Greek legislation and following the ECB's decision in December 2021, Eurobank Holdings was licensed as a financial holding company. This Decision entails that Eurobank Holdings is required to meet the prudential requirements set out in CRR and CRD IV at consolidated level.

1.1 Highlights

Risk profile

	31 March 2023 [(1) & (2)] € million	31 March 2023 [(1)] € million	31 December 2022 [(1)] € million	31 March 2022 [(1)] € million
Available own funds				
Common Equity Tier 1 (CET1) capital	**6,517**	6,568	6,715	5,382
Tier 1 capital	**6,517**	6,568	6,715	5,382
Total capital	**7,733**	7,785	8,026	6,395
Risk-weighted exposure amounts				
Total risk-weighted exposure amount	**41,493**	43,234	41,899	40,586
Capital ratios				
Common Equity Tier 1 ratio (%)	**15.7%**	15.2%	16.0%	13.3%
Tier 1 ratio (%)	**15.7%**	15.2%	16.0%	13.3%
Total capital ratio (%)	**18.6%**	18.0%	19.2%	15.8%
Leverage ratio				
Leverage ratio	**7.9%**	7.7%	7.9%	8.1%
Liquidity Ratio				
Liquidity coverage ratio (%)	**167.5%**	167.5%	172.9%	151.3%
Net Stable Funding Ratio (%)	**127.5%**	127.5%	128.0%	124.0%

(1) Including profits € 237 million for the 1Q 2023, € 1,330 million for year ended 31 December 2022 and € 270 million for the 1Q 2022.
(2) Pro-forma with the completion of Project "Solar" and the disposal of Eurobank Direktna a.d.

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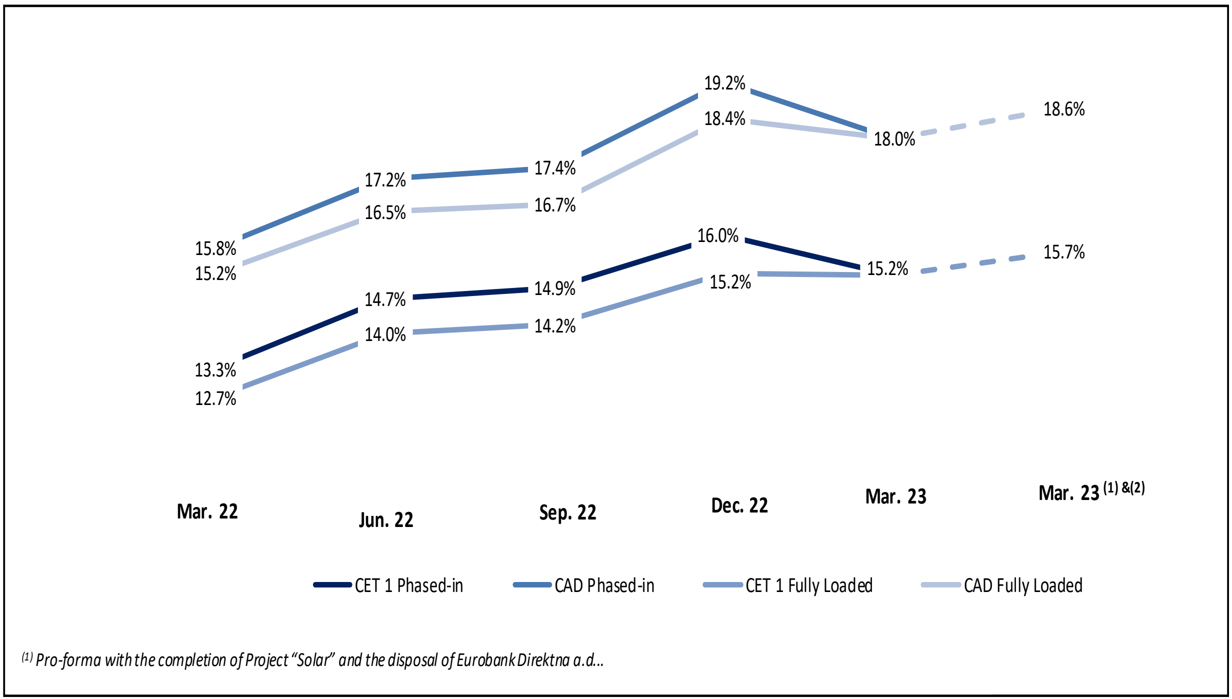
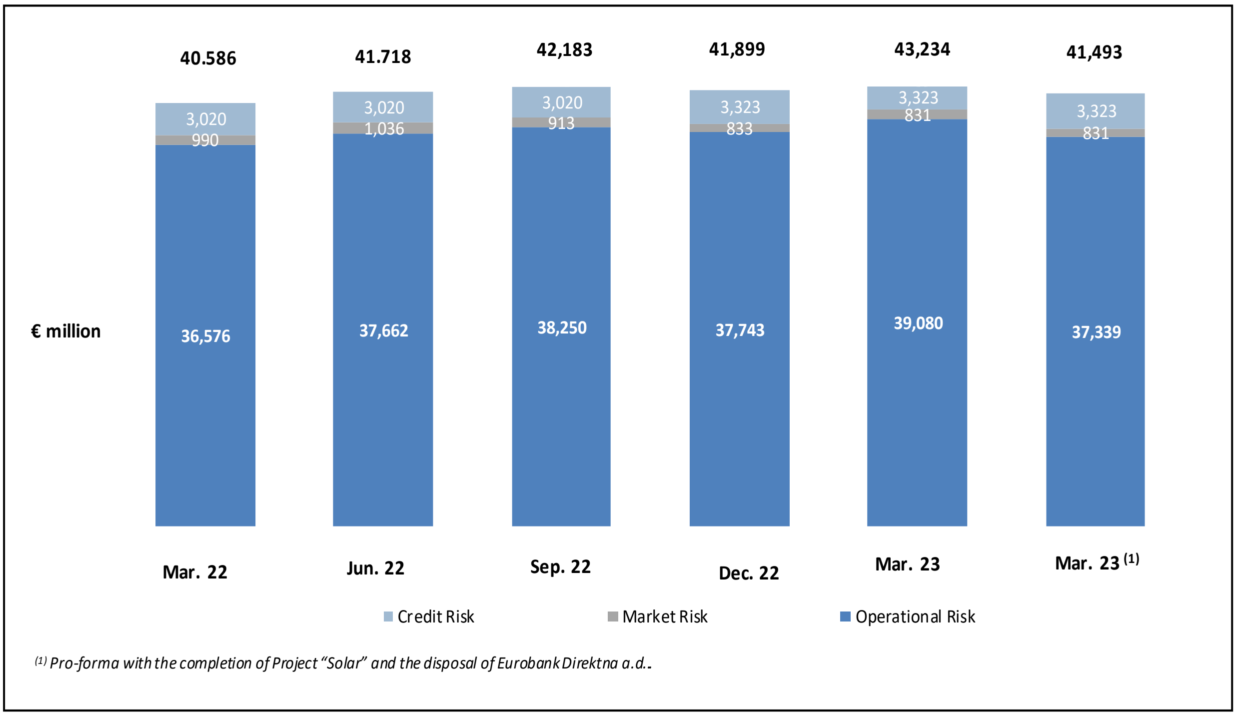
Evolution of Capital Ratio



Evolution of Risk Weighted Assets Amount



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1.2 NPE Operational targets

In line with the regulatory framework and Single Supervisory Mechanism (SSM) requirements for Non-Performing exposures (NPE) management, in March 2023 the Group submitted its NPE Management Strategy for 2023-2025, along with the annual NPE stock targets at both Bank and Group level. The plan envisages the decrease of NPE ratio at 5.2% at the end of 2023 and at 4.5% in 2025.

1.3 Project Solar

In the context of its NPE management strategy, the Group has structured another NPE securitization transaction (project "Solar"), as part of a joint initiative with the other Greek systemic banks 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 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 31 March 2023 the Group's NPE stock stood at € 2.1 billion and the NPE ratio at 5.1%, following the classification of Eurobank Direktna a.d. disposal group (as of March 2023) and project "Solar" underlying loan portfolio (as of June 2022) as held for sale, (31 December 2022: € 2.3 billion and 5.2% respectively), while the NPE coverage ratio stood at 76.0% (31 December 2022: 75.5%).

1.4 Eurobank Direktna a.d., Serbia

On 2 March 2023, the Bank announced that it has signed a binding agreement (share purchase agreement) with AIK Banka a.d. Beograd ("AIK") for the sale of its 70% shareholding in its subsidiary in Serbia, Eurobank Direktna a.d. (the "Transaction"). The sale is considered highly probable, therefore, as of 31 March 2023 the assets of Eurobank Direktna a.d. and the associated liabilities ("disposal group"), which form part of the share purchase agreement, were classified as held for sale and presented as a discontinued operation. The subsidiary is a major part of the Group's operations in Serbia, which are presented in the International segment.

The Transaction is consistent with Eurobank's strategy to direct capital to opportunities with more compelling RoTBV (Return on Tangible Book Value) and to further enhance its presence in its core markets. In this context, based on the agreement, 100% of Eurobank Direktna a.d. disposal group was valued at €280 million.

The completion of the Transaction is expected to increase Eurobank Holdings Group's CET1 ratio by ca. 50 bps (based on 31 March 2023 ratio), reflecting mainly the release of related RWAs (Risk Weighted Assets). It is expected to be completed within year 2023, subject to customary regulatory and other approvals.

For further details, please refer to Interim Consolidated Financial Statements, Note 13.

1.5 Hellenic Bank

On 4 April 2023after the receipt of the relevant regulatory approvals, the Bank completed the acquisition of an additional 13.41% holding in Hellenic Bank Public Company Limited ("Hellenic Bank"), a financial institution located in Cyprus, for a consideration of € 70 million. Following that, the total holding in Hellenic Bank, including the previously held participation of 15.8% with carrying value amounting to € 103.1 million as at 31 March 2023, reached 29.2% with a total deemed cost of investment € 173 million. The Group is considered to have significant influence over the entity, therefore it will be accounted for as an associate as of the second quarter of 2023.

Hellenic Bank group's total equity amounted to € 1,120.5 million as at 31 December 2022, based on its latest published annual Financial Statements. The Group currently performs the exercise for the determination of the fair values of the identifiable assets and liabilities of the entity at the acquisition date. The initial application of the equity accounting method is expected to have a positive effect on the Group's income statement, reflecting the difference between the share of the fair value of the entity's net identifiable assets and the deemed cost of the Bank's holding in the entity and a minor negative impact on the Group's capital adequacy ratios.

1.6 Hellenic Financial Stability Fund's (HFSF) shares buy back

In 2023, Eurobank Holdings announced its intention to submit an offer for the buyback of its 52.08 million shares (corresponding to a participation of 1.4%), presently owned by the HFSF. Following the receipt of the required approval from the regulator in May 2023, the submission of such an offer is currently subject to the receipt of the approval from the General Meeting of the Company's Shareholders.

1.7 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.

On 30 November 2022, the Company announced the issuance of a € 300 million subordinated Tier II debt instrument which matures in December 2032, is callable in December 2027 offering a coupon of 10% per annum and is listed on the Luxembourg Stock Exchange's Euro MTF market. On the same date, the Bank issued a subordinated instrument of equivalent terms, held by the Company. The proceeds from the issue will support Eurobank Holding's group strategy to ensure ongoing compliance with its total capital adequacy ratio requirements and will be used for Eurobank S.A.'s general funding purposes.

1.8 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 March 2023, BoG announced that would keep the countercyclical capital buffer rate for Greece unchanged at "zero percent" (0%) in the second quarter of 2023, with effect from 1 April 2023.

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%. According to BoG Executive Committee Act No 212/21.09.2022, the O-SII buffer for Greek institutions is set at 1% for 2023.

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.

1.9 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

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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 needs to be expanded to existing loans that have been renegotiated and to the stock of existing loans.

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 thereinafter. Consequently, the first disclosure reference date is 31 December 2022 and the information is 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, specifically:
  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 on 31.12.2023, the additional and separate information on the BTAR will apply from 30.06.2024.

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 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. Proposed implementation date is 1 January 2025;
- 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 trialogue is expected to start in 2023.

On 31 January 2023, EBA published a consultation on draft ITS on supervisory reporting with respect to IRRBB. The consultation paper proposes new, harmonised reporting requirements for the assessment and monitoring of institutions' IRRBB across the EU. This new reporting will provide supervisors the necessary data to monitor IRRBB risks in credit institutions, taking into careful consideration the concept of proportionality. The consultation runs until 2 May 2023. EBA expects to submit this draft ITS to the European Commission in mid-2023. The expected application of the revised requirements is for 30 June 2024 reporting reference date.

On 14 February 2023, EBA published the final draft RTS setting out the conditions for the assessment of the homogeneity of the underlying exposures in a pool of a Simple Transparent and Standardised (STS) on-balance-sheet securitisation. In general, the proposed amendments consider the specificities of on-balance-sheet securitisations and aim at enabling both the originators and the investors to assess the underlying risks of the pool of the underlying exposures on the basis of common methodologies and parameters in line with the overarching objective of the homogeneity requirement. The final draft RTS will be submitted to the Commission for endorsement. Following the submission, RTS will be subject to scrutiny by the European Parliament and the Council before being published in the Official Journal of the European Union.

On 13 March 2023, ESAs together with ECB published a Joint Statement on climate-related disclosure for structured finance products. The Statement encourages the development of disclosure standards for securitised assets through harmonised climate-related data requirements. Securitisation transactions are often backed by assets that could be directly exposed to physical or transition climate-related risks, such as real estate mortgages or auto loans. Finally, the introduction of new climate change-related disclosure requirements for securitisations may become also relevant for similar funding instruments backed by the same type of underlying assets, such as covered bonds.

On 21 March 2023, EBA launched a public consultation on its draft ITS amending the ITS on specific reporting requirements on market risks (FRTB reporting), aiming at providing supervisors with the necessary tools to monitor these risks. The consultation runs until 21 June 2023. As the full implementation of the FRTB in the EU approaches proposed to be 1 January 2025, the proposals set out in the consultation paper complement the already existing reporting requirements with a comprehensive set of information on the instruments and positions to which institutions apply related to the FRTB approaches.

On 21 April 2023, EBA launched a public consultation on its draft Guidelines on the criteria related to simplicity, standardisation and transparency and additional specific criteria for on-balance-sheet securitisations (so-called STS criteria). The Consultation Paper is composed of two sections. The main section includes the Draft Guidelines for on-balance-sheet securitisations. With the introduction of STS criteria for on-balance-sheet securitisations in the Securitisation Regulation, on-balance-sheet securitisations are now eligible for preferential risk-weight treatment under CRR. The second section includes the targeted amendments to the Guidelines for non-ABCP and ABCP securitisation to ensure that the interpretation provided by the EBA is, where appropriate, the same and consistent across all three sets of guidelines. The consultation runs until 7 July 2023.

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

Under the Directive 2014/59 (Bank Recovery and Resolution Directive), as in force, which was transposed into the Greek legislation pursuant to Law 4335/2015 as in force, European banks are required to meet the minimum requirement for own funds and eligible liabilities (MREL). The Single Resolution Board (SRB) has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry (SPE) strategy for resolution purposes. Based on the latest 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 27.46% of its total risk weighted assets (RWAs), including a fully-loaded combined buffer requirement (CBR) of

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3.86%. 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 18.21% of RWAs, including a CBR of 3.70%, while an interim non-binding MREL target of 20.48%, including a CBR of 3.70%, applies from January 2023.

In 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 and a Tier 2 instrument of €300 million.

In January 2023, the Bank successfully completed an issue of € 500 million senior preferred notes. The proceeds from the issue will support Eurobank Group's strategy to ensure ongoing compliance with its MREL requirement and will be used for Eurobank's general funding purposes.

As at 31 March 2023, the Bank's MREL ratio at consolidated level stands at 23.03% of RWAs including profit (31 December 2022: 23.07%) which is significantly above the aforementioned interim MREL target of 20.48%. In terms of Leverage Ratio Exposure (LRE), the Bank's MREL ratio stands at 11.60%, which is significantly above the relevant MREL target of 5.91%.

1.11 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 is based on a top-down model and b) the sample coverage has been increased compared to the 2021 exercise. This exercise is coordinated by the EBA in cooperation with the ECB and national supervisory authorities and is conducted according to the EBA's methodology. 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.

In January 2023, EBA launched the 2023 EU-wide stress test exercise which is designed to provide valuable input for assessing the resilience of the European banking sector in the current uncertain and changing macroeconomic environment. It is carried out on the basis of year-end 2022 figures and assesses the performance of EU banks under a baseline and adverse macroeconomic scenario, covering the period of 3 years from 2023 to 2025. The baseline scenario for EU countries is based on the projections from the EU national central banks of December 2022. The adverse scenario, although unlikely to unfold, is used to assess the resilience of banks to a hypothetical severe scenario of a significant deterioration in the overall outlook for the economy and financial markets in the next three years. The narrative depicts an adverse scenario related to a hypothetical worsening of geopolitical developments leading to a severe decline in GDP with persistent inflation and high interest rates. In terms of GDP decline, the 2023 adverse scenario is the most severe used in the EU wide stress up to now. Eurobank Holdings Group is participating in the EBA-led stress test.

In parallel, the ECB will conduct its own stress test for a number of medium sized- banks that it supervises directly and that are not included in the EBA-led stress test sample.

In March 2023, the Group completed the Advanced Data Collection (ADC) and the first Full Data Collection (FDC 1), while the second FDC (FDC 2) took place on 16 May 2023. The EBA expects to publish the results of the exercise at the end of July 2023 on a bank-by-bank basis and in the form of aggregated analyses using EBA common disclosure templates.

The stress test results will be used to update each bank's Pillar 2 Guidance (P2G) in the context of the Supervisory Review and Evaluation Process (SREP), while qualitative findings on weaknesses in banks' stress testing practices could also affect their Pillar 2 Requirements (P2R).

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1.12 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.

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.

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On 19 December 2022, the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 was published in the Official Journal. The ITS amending the ITS laid down in Implementing Regulation (EU) 2021/637 as regards the uniform disclosure formats for the disclosure of ESG risks. This Implementing Regulation was entered into force on 8 January 2023. As the disclosure is being reported for the first time, the data of the previous period is not required.

1.13 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 19 May 2023.

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1.14 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 2023 and 31 December 2022.

Table 1: Regulatory and accounting Balance Sheet

Balance sheet per published financial statements and per regulatory consolidation	Ref.	31 March 2023 € million	31 December 2022 € million
Assets			
Cash and Balances with central banks		14,027	14,994
Due from credit institutions		1,741	1,329
Securities held for trading		142	134
Derivative financial instruments		1,005	1,185
Loans and advances to customers		40,037	41,677
Investment securities		13,745	13,261
Investments in associaties and joint ventures		192	173
Property, plant and equipment		741	775
Investment property		1,382	1,410
Intangible assets	*a*	284	297
Deferred tax asset		4,120	4,161
of which deferred tax assets that rely on future profitability excluding those arising from temporary differences	*b*	-	-
of which deferred tax credit		3,355	3,402
of which deferred tax assets arising from temporary differences	*c*	765	759
Other assets		2,044	1,980
Assets of disposal group classified as held for sale		2,417	84
Total assets		**81,877**	81,460
Liabilities			
Due to central banks		8,329	8,774
Due to credit institutions		2,287	1,814
Derivative financial instruments		1,588	1,661
Due to customers		55,092	57,239
Debt securities in issue		4,055	3,552
Other liabilities		1,655	1,701
of which tier 2 instruments	*e*	1,262	1,259
Liabilities of disposal group classified as held for sale		1,885	1
Total liabilities		**74,891**	74,742
Equity			
Ordinary share capital		816	816
Share premium		1,161	1,161
Reserves and retained earnings		4,924	4,646
of which cash flow hedge reserves	*d*	(15)	(12)
Non controlling interests		84	95
Total equity	*f*	**6,986**	6,718
Total equity and liabilities		**81,877**	81,460

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 2023 [1] € million	31 March 2023 € million	31 December 2022 [1] € million	30 September 2022 [1] € million	30 June 2022 [1] € million	31 March 2022 [1] € million
Available own funds (amounts)						
Common Equity Tier 1 (CET1) capital	**6,568**	6,180	6,715	6,302	6,137	5,382
Tier 1 capital	**6,568**	6,180	6,715	6,302	6,137	5,382
Total capital	**7,785**	7,396	8,026	7,345	7,163	6,395
Risk-weighted exposure amounts						
Total risk-weighted exposure amount	**43,234**	43,145	41,899	42,183	41,718	40,586
Capital ratios (as a percentage of risk-weighted exposure amount)						
Common Equity Tier 1 ratio (%)	**15.2%**	14.3%	16.0%	14.9%	14.7%	13.3%
Tier 1 ratio (%)	**15.2%**	14.3%	16.0%	14.9%	14.7%	13.3%
Total capital ratio (%)	**18.0%**	17.1%	19.2%	17.4%	17.2%	15.8%
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 (%)	**2.75%**	2.75%	3.00%	3.00%	3.00%	3.00%
of which: to be made up of CET1 capital (percentage points)	**1.55%**	1.55%	1.69%	1.69%	1.69%	1.69%
of which: to be made up of Tier 1 capital (percentage points)	**2.06%**	2.06%	2.25%	2.25%	2.25%	2.25%
Total SREP own funds requirements (%)	**10.75%**	10.75%	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 (%)	**0.20%**	0.20%	0.14%	0.06%	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	**1.00%**	1.00%	0.75%	0.75%	0.75%	0.75%
Combined buffer requirement (%)	**3.70%**	3.70%	3.39%	3.31%	3.31%	3.31%
Overall capital requirements (%)	**14.45%**	14.45%	14.39%	14.31%	14.31%	14.31%
CET1 available after meeting the total SREP own funds requirements (%)	**7.13%**	6.26%	7.78%	6.42%	6.17%	4.66%
Leverage ratio [2]						
Leverage ratio total exposure measure	**85,407**	85,375	84,686	84,745	82,128	66,598
Leverage ratio	**7.7%**	7.2%	7.9%	7.4%	7.5%	8.1%
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%	0.00%
of which: to be made up of CET1 capital (percentage points)	**0.00%**	0.00%	0.00%	0.00%	0.00%	0.00%
Total SREP leverage ratio requirements (%)	**3.00%**	3.00%	3.00%	3.00%	3.00%	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%	0.00%
Overall leverage ratio requirements (%)	**3.00%**	3.00%	3.00%	3.00%	3.00%	3.16%

Capital Management

	31 March 2023 [1] € million	31 March 2023 € million	31 December 2022 € million	30 September 2022 € million	30 June 2022 € million	31 March 2022 € million
Liquidity Coverage Ratio						
Total high-quality liquid assets (HQLA) (Weighted value - average)	**15,118**	15,118	14,012	13,051	12,480	11,974
Cash outflows - Total weighted value	**9,970**	9,970	9,626	9,205	8,826	8,576
Cash inflows - Total weighted value	**1,071**	1,071	1,118	1,112	1,116	1,082
Total net cash outflows (adjusted value)	**8,899**	8,899	8,508	8,093	7,710	7,494
Liquidity coverage ratio (%) (adjusted value) [3]	**169.7%**	169.7%	164.4%	161.3%	162.0%	160.0%
Liquidity coverage ratio (%)	**167.5%**	167.5%	172.9%	169.0%	174.3%	151.3%
Net Stable Funding Ratio						
Total available stable funding	**58,803**	58,803	59,111	60,485	59,190	58,918
Total required stable funding	**46,109**	46,109	46,181	47,287	46,982	47,499
NSFR ratio (%)	**127.5%**	127.5%	128.0%	127.9%	126.0%	124.0%

(1) Including profits € 237 million for the 1Q 2023, € 1,330 million for year ended 31 December 2022, € 1,106 million for the 9M 2022, € 941 million for the 1H 2022 and € 270 million for the 1Q 2022.

(2) 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.

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

(4) Pro-forma CET1 and Total Capital Adequacy ratios as at 31 December 2022 with the completion of Project "Solar" and the disposal of Eurobank Direktna a.d. would be 15.7% and 18.6%, 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 31 March 2023 and 31 December 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

	Ref.	31 March 2023 (1) € million	31 March 2023 (2) € million	31 December 2022 (1) € million
Total equity	*f*	6,986	6,986	6,718
Regulatory adjustments				
Interim or year-end profit not eligible		-	(357)	-
Minority interest not allowed in CET1		(29)	(29)	(27)
Cash flow hedge reserves	*d*	15	15	12
Adjustments due to IFRS 9 transitional arrangements		-	-	279
Temporary treatment of unrealised losses measured at FVTOCI in accordance with Article 468 of the CRR		-	-	85
Intangible assets	*a*	(206)	(206)	(193)
of which Goodwill		(2)	(2)	(2)
IRB shortfall of credit risk adjustments to expected losses		-	-	(61)
Deferred tax assets that rely on future profitability (unused tax losses)	*b*	-	-	-
Deferred tax assets arising from temporary differences (amount above 10% threshold)	*c*	(55)	(86)	(33)
Prudent Valuation Adjustments (3)		(6)	(6)	(6)
Other regulatory adjustments		(137)	(137)	(59)
Amount exceeding the 17.65% threshold	*c*	-	-	-
Common Equity Tier I capital		**6,568**	**6,180**	6,715
Regulatory adjustments		-	-	-
Total Tier I capital		**6,568**	**6,180**	6,715
Tier II capital - subordinated debt	*e*	1,217	1,217	1,250
IRB Excess of impairment allowances over expected losses eligible		-	-	61
Total Regulatory Capital		**7,785**	**7,396**	8,026
Risk Weighted Assets		**43,234**	**43,145**	41,899
Ratios				
Common Equity Tier I		**15.2%**	**14.3%**	16.0%
Tier I		**15.2%**	**14.3%**	16.0%
Total Capital Adequacy Ratio		**18.0%**	**17.1%**	19.2%

(1) Including profits € 237 million for the 1Q 2023 and € 1,330 million for year ended 31 December 2022.

(2) Excludes 1Q 2023 profits after tax and FY 2022 maximum dividend according to the dividend policy, approved by the Board of Directors, based on requirements of Decision ECB/2015/6561 for permission of profits inclusion in regulatory capital.

(3) The AVA calculation is based on the simplified approach according to Commission Delegated Regulation (EU) No 101/2016. The total AVAs are deducted from CET1 capital, in accordance with Article 34 of the CRR.

(4) The pro-forma CET1 and Total Capital Adequacy ratios as at 31 March 2023 with the completion of Project "Solar" and the disposal of Eurobank Direktna a.d. would be 15.7% and 18.6%, respectively.

Capital Management

As depicted in table above, CET1 ratio was decreased mainly due to the ending of the 5-year period of the IFRS 9 transitional adjustments and the FVOCI prudential treatment, as well as the reversion from IRB to STD approach for Credit Risk, which is partly offset by the quarterly organic profitability along with the mark up of investment securities at FVOCI. Total Capital ratio has further decreased due to the Tier 2 capital amortisation.

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 2023, pursuant to the Law 4172/2013, as in force, the Bank's eligible DTAs/deferred tax credits (DTCs) against the Greek State amounted to € 3,355 million (31 December 2023 € 3,402 million). 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. 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.

For further details, please refer to Interim 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 and temporary measures capital impact

According to Regulation (EU) 2017/2395 of the European Parliament and the Council the five year transition period for the recognition of the impact of IFRS 9 adoption on the regulatory capital ended on 1 January 2023. As a result, the full impact is recognised in the regulatory capital.

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 which is applicable for 2023 and for 2024 is 50% and 25% respectively. The full impact is expected as of 1 January 2025.

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 temporary treatment of unrealised gains and losses from Sovereign investment securities measured fair value through other comprehensive income (FVOCI), introduced by CRR 'quick fix' Article 468, ceased to apply from 1 January 2023.

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

Available capital	31 March 2023 [(1)] € million	31 March 2023 € million	31 December 2022 [(1)] € million	30 September 2022 [(1)] € million	30 June 2022 [(1)] € million	31 March 2022 [(1)] € million
CET1 capital	**6,568**	6,180	6,715	6,302	6,137	5,382
CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**6,568**	6,180	6,495	6,122	5,959	5,208
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			6,606	6,184	6,046	5,358
Fully Loaded CET1 capital	**6,562**	6,170	6,362	5,964	5,826	5,135
Tier 1 capital	**6,568**	6,180	6,715	6,302	6,137	5,382
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**6,568**	6,180	6,495	6,122	5,959	5,208
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			6,606	6,184	6,046	5,358
Fully Loaded Tier 1 capital	**6,562**	6,170	6,362	5,964	5,826	5,135
Total capital	**7,785**	7,396	8,026	7,345	7,163	6,395
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**7,785**	7,396	7,835	7,167	7,001	6,246
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			7,917	7,227	7,072	6,372
Fully Loaded Total capital	**7,779**	7,387	7,702	7,009	6,869	6,173
Risk weighted assets						
Total risk-weighted assets	**43,234**	43,145	41,899	42,183	41,718	40,586
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**43,234**	43,145	41,899	42,091	41,628	40,500
Fully Loaded Total risk-weighted assets	**43,234**	43,145	41,801	42,091	41,628	40,500
Capital ratios						
CET1 (as a percentage of risk exposure amount)	**15.2%**	14.3%	16.0%	14.9%	14.7%	13.3%
CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**15.2%**	14.3%	15.5%	14.5%	14.3%	12.9%
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			15.8%	14.7%	14.5%	13.2%
Fully Loaded CET1 (as a percentage of risk exposure amount)	**15.2%**	14.3%	15.2%	14.2%	14.0%	12.7%
Tier 1 (as a percentage of risk exposure amount)	**15.2%**	14.3%	16.0%	14.9%	14.7%	13.3%
Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**15.2%**	14.3%	15.5%	14.5%	14.3%	12.9%
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			15.8%	14.7%	14.5%	13.2%
Fully Loaded Tier 1 (as a percentage of risk exposure amount)	**15.2%**	14.3%	15.2%	14.2%	14.0%	12.7%
Total capital (as a percentage of risk exposure amount)	**18.0%**	17.1%	19.2%	17.4%	17.2%	15.8%
Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**18.0%**	17.1%	18.7%	17.0%	16.8%	15.4%
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			18.9%	17.1%	17.0%	15.7%
Fully Loaded Total capital (as a percentage of risk exposure amount)	**18.5%**	17.1%	18.5%	16.7%	16.5%	15.2%

Capital Management

Leverage ratio [2]	31 March 2023 [1] € million	31 March 2023 € million	31 December 2022 [1] € million	30 September 2022 [1] € million	30 June 2022 [1] € million	31 March 2022 [1] € million
Leverage ratio total exposure measure	**85,407**	85,375	84,686	84,745	82,128	66,598
Leverage ratio	**7.7%**	7.2%	7.9%	7.4%	7.5%	8.1%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	**7.7%**	7.2%	7.7%	7.2%	7.3%	7.8%
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			7.8%	7.3%	7.7%	8.0%
Fully Loaded Leverage ratio	**7.7%**	7.2%	7.5%	7.0%	7.1%	7.7%

[1] Including profits € 237 million for the 1Q 2023, € 1,330 million for year ended 31 December 2022, € 1,106 million for 9M 2022, € 941 million for the 1H 2022 and € 270 million for the 1Q 2022.
[2] 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.
[3] Pro-forma CET1 and Total Capital Adequacy ratios as at 31 March 2023 with the completion of Project "Solar" and the disposal of Eurobank Direktna a.d. would be 15.7% and 18.6%, respectively.

2.4 Supervisory Review and Evaluation Process (SREP) capital requirements

According to the 2022 SREP decision communicated by the ECB, in 1Q 2023 Eurobank Holdings was required to meet on a consolidated basis a CET1 ratio of at least 9.75% and a Total Capital Adequacy Ratio of at least 14.45% (Overall Capital Requirements including the Capital Conservation Buffer of 2.50%, the Other Systemically Important Institution buffer of 1.00% and the applicable Countercyclical Capital Buffer of 0.20% for the first quarter of 2023 stemming mainly from the exposures in Bulgaria and Luxemburg).

The table below shows the capital requirements of the Group for 31 March 2023.

Table 5: Pillar 2 Requirements

	31 March 2023	
	CET1 Capital Requirements	Total Capital Requirements
Minimum regulatory requirement	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.55%	2.75%
Total SREP Capital Requirement (TSCR)	**6.05%**	**10.75%**
Combined Buffer Requirement (CBR)		
Capital conservation buffer (CCB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.20%	0.20%
Other systemic institutions buffer (O-SII)	1.00%	1.00%
Overall Capital Requirement (OCR)	**9.75%**	**14.45%**

The ECB's relief measures for capital requirements to address the effects of Covid-19 ended at 31 December 2022.

At consolidated level, the Pillar 2 Requirement was set at 2.75% for 2023 and part of that (1.55%) 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 was € 670 million (based on RWAs of € 43,234 million). The ECB's decision for the reduction of the P2R to 2.75% (from 3.00% in 2022) reflects the improved Group's financial position particularly in terms of asset quality.

Capital Management

As at 31 March 2023, Eurobank's transitional CET1 ratio and Total Capital ratio, including 1Q 2023 profit € 237 million, were 15.2% and 18.0% respectively, which exceeded the 2023 minimum requirements of 9.75% and 14.45%.

For Q2 2023, the Group is required to meet a Common Equity Tier 1 Ratio of at least 9.78% and a Total Capital Adequacy Ratio of at least 14.48% (Overall Capital Requirements or OCR) including Combined Buffer Requirement of 3.73% (Capital conservation buffer of 2.50%, Countercyclical capital buffer of 0.23% and Other Systemically Important Institution (O-SII) buffer of 1.00%).

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 31 March 2023 and 31 December 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
	31 March 2023[1] € million	31 March 2023 € million	31 December 2022[1] € million	31 December 2022 € million	31 March 2023 € million
Credit risk (excluding CCR)	**34,315**	**34,315**	33,292	33,292	**2,745**
Of which the standardised approach	34,315	34,315	18,440	18,440	2,745
Of which the foundation IRB (FIRB) approach	-	-	6,813	6,813	-
Of which: slotting approach	-	-	3,394	3,394	-
Of which: equities under the simple riskweighted approach	-	-	489	489	-
Of which the advanced IRB (AIRB) approach	-	-	4,156	4,156	-
Counterparty credit risk - CCR	**490**	**490**	447	447	**39**
Of which the standardised approach	171	171	137	137	14
Of which internal model method (IMM)	-	-	-	-	-
Of which exposures to a CCP	14	14	16	16	1
Of which credit valuation adjustment - CVA	105	105	132	132	8
Of which other CCR	200	200	162	162	16
Settlement risk	-	-	-	-	-
Securitisation exposures in the non-trading–book (after the cap)	**1,896**	**1,896**	1,757	1,757	**152**
Of which SEC-IRBA approach	-	-	360	360	-
Of which SEC-ERBA (including IAA)	351	351	320	320	28
Of which SEC-SA approach	1,545	1,545	1,077	1,077	124
Of which 1250%	-	-	-	-	-
Position, foreign exchange and commodities risks (Market risk)	**831**	**831**	833	833	**66**
Of which the standardised approach	228	228	249	249	18
Of which IMA	603	603	584	584	48
Large exposures	-	-	-	-	-
Operational risk	**3,323**	**3,323**	3,323	3,323	**266**
Of which basic indicator approach	-	-	-	-	-
Of which standardised approach	3,323	3,323	3,323	3,323	266
Of which advanced measurement approach	-	-	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight)	**2,379**	**2,290**	2,247	2,217	**183**
Total	**43,234**	**43,145**	41,899	41,869	**3,452**

(1) Including profits € 237 million for the 1Q 2023 and € 1,330 million for year ended 31 December 2022.

(2) The increase of the RWAs compared to 31 December 2022 is mainly due to the reversion from the Internal Ratings Based Approach (IRB) to the Standardized Approach (SA) and the new production of loans, loan commitments and Letters of Guarantee.

3. Credit Risk

On 1st of March 2023, the Group received approval from ECB to revert to the Standardized approach for all credit risk exposures. The Group's decision to move to a less sophisticated method for capital requirements calculation was based on the fact that the historical data and performance on which Internal Ratings Based (IRB) models are calibrated is of limited representativeness taking into account that, since the years of the financial crisis, the Bank capabilities, as well as the Greek economic and legal environment have changed dramatically. The Bank intends to continue utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring. To that end, the Group has applied to the Q1 2023 CoRep reporting the requirements of EU Regulation 575/2013 ('CRR') under Title II, Chapter 2 ('Standardised approach') and its subsequent amendments and has aligned respectively the Pillar III disclosures.

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

	31 March 2023						
	VaR € million	SVaR € million	IRC € million	Comprehensive risk measure € million	Other € million	Total RWAs € million	Total own funds requirements € million
1 RWAs at 1 January 2023	159	383	42	-	-	584	47
1a Regulatory adjustment[2]	(128)	(303)	-	-	-	(431)	(34)
1b RWAs at the previous quarter-end (end of the day)[3]	32	79	42	-	-	153	12
2 Movement in risk levels	41	(40)	18	-	-	19	2
3 Model updates/changes	-	-	-	-	-	-	-
4 Methodology and policy	-	-	-	-	-	-	-
5 Acquisitions and disposals	-	-	-	-	-	-	-
6 Foreign exchange movements	-	-	-	-	-	-	-
7 Other	-	-	-	-	-	-	-
8a RWAs at the end of the reporting period (end of the day)[3]	25	83	36	-	-	144	12
8b Regulatory adjustment[2]	175	259	24	-	-	458	37
8 RWAs at 31 March 2023	**200**	**342**	**60**	**-**	**-**	**603**	**48**

(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

As of 31 of March 2023, the Group held a small number of positions on CDS Indices (protection bought € 200 million), as well as a put option on a European sovereign bond (protection sold € 20 million).

As of 31 December 2022, the Group had no outstanding positions on CDS, or other credit derivatives.

The Bank does not have any brokerage activity in this market. Furthermore, the Bank does not hedge its loan portfolio with CDSs as this market in Greece is not developed.

Table 8: 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 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 2023, including profits, was at 7.7% (31 December 2022: 7.9%), according to the transitional definition of Tier 1 capital, significantly over the proposed minimum threshold of 3%.

The below table includes the summary of the Group's leverage ratio with reference dates 31 March 2023 and 31 December 2022.

Table 9: EU LR – Leverage Ratio

	31 March 2023 [(1)]	31 March 2023	31 December 2022 [(1)]	31 December 2022
	€ million	€ million	€ million	€ million
Tier 1 capital - transitional definition	**6,568**	**6,180**	6,715	6,585
Total Leverage Ratio exposure measure - using a transitional definition of Tier 1 capital	**85,407**	**85,375**	84,686	84,676
Leverage Ratio - using a transitional definition of Tier 1 capital	**7.7%**	**7.2%**	7.9%	7.8%

[(1)] *Including profits € 237 million for the 1Q 2023 and € 1,330 million for year ended 31 December 2022.*

7. Liquidity Risk

The Group is exposed to daily calls on its available cash resources due to deposits withdrawals, maturity of medium or long-term notes 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) and on centrally cleared transactions (CCPs) result in liquidity exposure. The Group maintains cash resources to meet all of these needs. The 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.

7.1 Liquidity Coverage Ratio (LCR) calculations

LCR as of 31 March 2023 is equal to 167.5% (31 December 2022: 173.0%). The corresponding HQLA as of 31 March 2023 as defined by the regulation for the calculation of LCR are € 16,180 million.

The next table presents the key components of group's LCR, as per the respective guidelines on LCR disclosure (EBA/GL/2017/01). According to the guideline, 12 monthly data points are used in the calculations below.

Liquidity Risk

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

Table 10: LIQ1 - Quantitative information of LCR

		Total unweighted value					Total weighted value				
	Quarter ending on	31 March 2023	31 December 2022	30 September 2022	30 June 2022	31 March 2022	31 March 2023	31 December 2022	30 September 2022	30 June 2022	31 March 2022
		€ 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)						15,118	14,012	13,051	12,480	11,974
	CASH-OUTFLOWS										
2	Retail deposits and deposits from small business customers, of which:	32,841	32,235	31,545	30,767	30,055	2,111	2,041	1,985	1,920	1,857
3	Stable deposits	24,599	24,647	24,323	23,981	23,665	1,230	1,232	1,216	1,199	1,183
4	Less stable deposits	8,241	7,587	7,221	6,785	6,389	881	807	768	720	673
5	Unsecured wholesale funding	14,419	14,119	13,573	13,120	12,684	6,161	6,032	5,796	5,632	5,458
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,933	1,931	1,919	1,851	1,783	474	474	471	454	437
7	Non-operational deposits (all counterparties)	12,487	12,187	11,654	11,270	10,901	5,687	5,558	5,325	5,178	5,021
8	Unsecured debt	-	-	-	-	-	-	-	-	-	-
9	Secured wholesale funding						120	120	117	102	90
10	Additional requirements	3,873	3,186	2,821	2,648	2,595	1,234	1,088	960	846	856
11	Outflows related to derivative exposures and other collateral requirements	960	874	771	663	679	960	874	771	663	679
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	2,913	2,313	2,050	1,985	1,915	273	214	189	183	177
14	Other contractual funding obligations	113	115	121	105	103	102	104	110	94	92
15	Other contingent funding obligations	3,462	3,435	3,362	3,261	3,144	241	241	237	231	222
16	TOTAL CASH OUTFLOWS						9,970	9,626	9,205	8,826	8,576
	CASH-INFLOWS										
17	Secured lending (eg reverse repos)	105	224	342	433	446	14	20	27	30	21
18	Inflows from fully performing exposures	835	874	867	879	896	693	736	737	756	766
19	Other cash inflows	1,591	1,589	1,533	1,449	1,372	363	362	348	330	295
20	TOTAL CASH INFLOWS	2,531	2,688	2,742	2,761	2,715	1,071	1,118	1,112	1,116	1,082
EU-20a	*Fully exempt inflows*	-	-	-	-	-	-	-	-	-	-
EU-20b	*Inflows Subject to 90% Cap*	-	-	-	-	-	-	-	-	-	-
EU-20c	*Inflows Subject to 75% Cap*	2,531	2,688	2,742	2,761	2,715	1,071	1,118	1,112	1,116	1,082
							TOTAL ADJUSTED VALUE				
21	LIQUIDITY BUFFER						15,118	14,012	13,051	12,480	11,974
22	TOTAL NET CASH OUTFLOWS						8,899	8,508	8,093	7,710	7,494
23	LIQUIDITY COVERAGE RATIO (%)						169.7%	164.4%	161.3%	162.0%	160.0%

7.2 Net Stable Funding Ratio (NSFR) calculations

NSFR as of 31 March 2023 is equal to 127.5% (31 December 2022: 128.0%). The minimum regulatory threshold for NSFR is set at 100%.

Appendix 1: List of Abbreviations

Abbreviation	Definition
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
CLOs	Collateralized Loan Obligation
COREPs	Common Reports
CRD	Capital Requirements Directive
CRR	Capital Requirements Regulation
CVA	Credit Value Adjustment
DoD	Definition of Default
EBA	European Banking Authority
EC	European Commission
ECB	European Central Bank
ECL	Expected Credit Loss
ESG	Enviromental, Social and Governance
GAR	Green Asset Ratio
GGBs	Greek Government Bonds
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
ITS	Implementing Technical Standards
LCR	Liquidity Coverage Ratio
LGD	Loss Given Default
MDA	Maximum Distributable Amount
MREL	Minimum Requirement for own funds and Eligible Liabilities
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
O-SIIs	Other Systemically Important Institution
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
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SSM	Single Supervisory Mechanism
SSM	Single Supervisory Fees
ST	Stress Test
SyRB	Systemic Risk Buffer
TLTRO	Targeted Longer-Term Refinancing Operations
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*
MR2-B	RWA flow of market risk exposures under IMA	*Table 7*
CCR7	RWEA flow statements of CCR exposures under the IMM	*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 10*
	LEVERAGE RATIO - COMMISSION IMPLEMENTING REGULATION (EU) 2016/200	
LR	Leverage Ratio	*Table 9*
	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*