

CONSOLIDATED PILLAR 3 REPORT

**FOR THE NINE MONTHS ENDED
30 SEPTEMBER 2024**

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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 Bulgaria, Cyprus and Luxembourg. 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 Capital Requirements Regulation (CRR) and Capital Requirements Directive (CRD) as amended at consolidated level.

1.1 Highlights

Risk profile

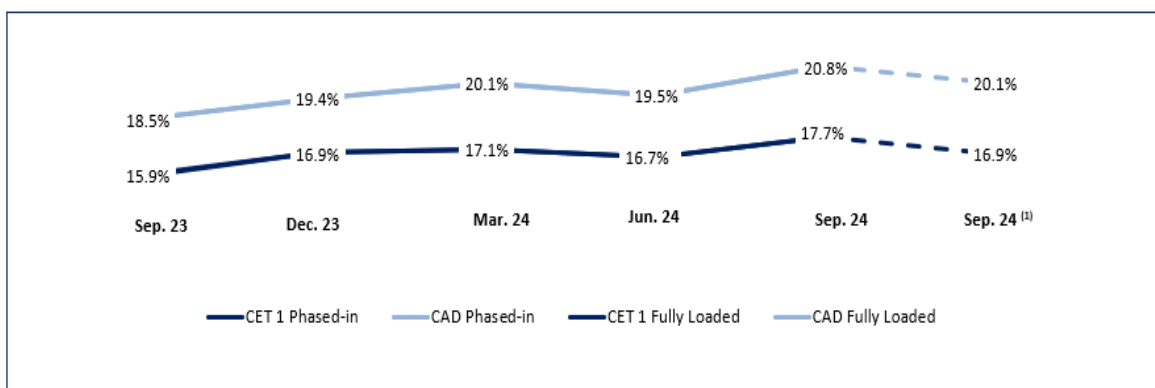
| | 30 September 2024^{(1) & (2)} | 30 September 2024⁽¹⁾ | 30 June 2024⁽¹⁾ | 30 September 2023 |
|---------------------------------------|--|--|---------------------------------------|------------------------------|
| | <u>€ million</u> | <u>€ million</u> | <u>€ million</u> | <u>€ million</u> |
| Available own funds | | | | |
| Common Equity Tier 1 (CET1) capital | 8,107 | 8,520 | 7,670 | 7,047 |
| Tier 1 capital | 8,204 | 8,617 | 7,670 | 7,047 |
| Total capital | 9,625 | 10,038 | 8,958 | 8,169 |
| Risk-weighted exposure amounts | | | | |
| Total risk-weighted exposure amount | 47,956 | 48,235 | 45,884 | 44,225 |
| Capital ratios | | | | |
| Common Equity Tier 1 ratio (%) | 16.9% | 17.7% | 16.7% | 15.9% |
| Tier 1 ratio (%) | 17.1% | 17.9% | 16.7% | 15.9% |
| Total capital ratio (%) | 20.1% | 20.8% | 19.5% | 18.5% |
| Leverage ratio | | | | |
| Leverage ratio | 7.8% | 8.2% | 9.1% | 8.3% |
| Liquidity Ratio | | | | |
| Liquidity coverage ratio (%) | 187.1% | 187.1% | 181.7% | 170.6% |
| Net Stable Funding Ratio (%) | 142.4% | 142.4% | 127.1% | 129.4% |

⁽¹⁾ Including profits € 1,135 million for the 9M 2024 and € 721 million for the 1H 2024.

⁽²⁾ Pro-forma with the completion of project "Solar" and project "Leon" (significant risk transfer recognition is subject to ECB's confirmation) as well as with accrual for dividend distribution from financial year 2024 Group profits, (subject to regulatory approval).

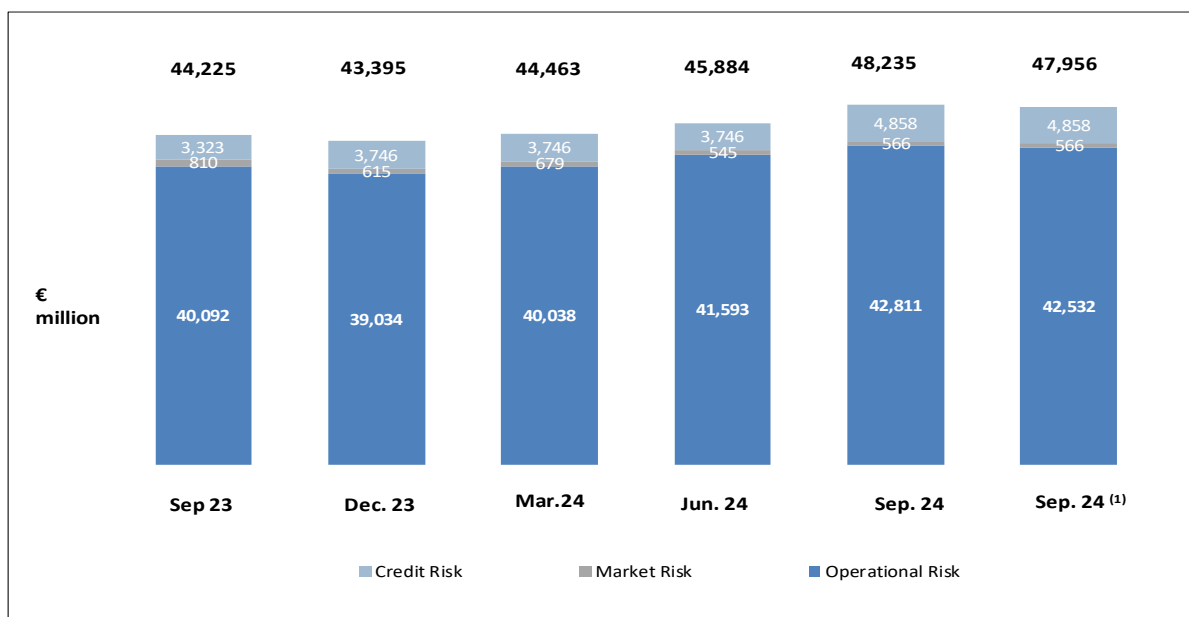
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Evolution of Capital Ratio



⁽¹⁾ Pro-forma with the completion of project “Solar” and project “Leon” (significant risk transfer recognition is subject to ECB’s confirmation) as well as with the accrual for dividend distribution from financial year 2024 Group profits, (subject to regulatory approval).

Evolution of Risk Weighted Exposure Amount



⁽¹⁾ Pro-forma with the completion of project “Solar” and project “Leon” (significant risk transfer recognition is subject to ECB’s confirmation) as well as with the accrual for dividend distribution from financial year 2024 Group profits, (subject to regulatory approval).

1.2 Non-Performing exposures (NPE) Operational targets

In line with the regulatory framework and Single Supervisory Mechanism’s (SSM) requirements for Non-Performing exposures’ (NPE) management, in March 2024, the Group submitted its NPE Management Strategy for 2024-2026, along with the annual NPE stock targets at both Bank and Group level. The plan envisages the decrease of Group’s NPE ratio at 3.2% in 2026.

As at 30 September 2024 the Group’s NPE stock amounting to € 1,663 million includes Hellenic Bank loans of € 0.2 billion covered by the Asset Protection Scheme (APS) agreement in Cyprus. The Group NPE ratio, excluding the NPE covered by

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the APS, decreased to 2.9% (31 December 2023: 3.5%) and the NPE stock, excluding APS decreased to € 1,462 million (31 December 2023: €1,512 million). The NPE coverage ratio improved to 89.9% (31 December 2023: 86.4%). With the inclusion of the above NPE covered by the APS, the Group NPE ratio and the NPE coverage ratio would be 3.3% and 79.5% respectively.

1.3 Project “Solar”

In the context of its NPE management strategy, the Group has been structuring another NPE securitization transaction (project “Solar”), as part of a joint initiative with the other Greek systemic banks initiated since 2018. 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. Out of the notes to be issued by the SPV, in the context of ‘Solar’ securitization, the Banks will hold 100% of the Senior notes as well as the 5% of the Mezzanine and Junior notes and will dispose of the remaining stake of the subordinated tranches. The completion of the transaction is subject to the fulfillment of customary conditions precedent for such transactions, including, among others, confirmation of its inclusion in the HAPS scheme and SRT approval mentioned above.

Since June 2022, the Group classified the underlying corporate loan portfolio as held for sale (HFS).

As at 30 September 2024, the carrying amount of the aforementioned loan portfolio reached € 46 million, comprising loans with gross carrying amount of € 243 million, which carried an impairment allowance of € 197 million. Furthermore, the impairment allowance of the letters of guarantee included in the underlying portfolio reached € 1 million.

For further details, please refer to Interim Consolidated Financial Statements, Note 16.

1.4 Project “Leon”

In December 2023, the Group, aiming to accelerate further its NPE reduction plan, initiated the sale process of a mixed NPE portfolio of total gross book value ca. € 400 million, engaging in parallel in negotiations with potential investors. Accordingly, at 31 December 2023, the bank classified the aforementioned portfolio as held-for-sale.

In the first half of 2024, the Bank revised its NPE sale target and increased the aforementioned perimeter of NPE loans by ca. € 240 million, which were also classified as held-for-sale. Accordingly, as at 30 June 2024, the carrying amount of the loan portfolio under held for sale perimeter reached € 239 million, comprising loans with gross carrying amount of € 637 million, which carried an impairment allowance of € 398 million.

on 8 July 2024, the Group through its special purpose financing vehicle “LEON CAPITAL FINANCE DAC” (SPV), issued senior, mezzanine and junior notes of nominal amount of ca. € 1.5 billion, via the securitization of a mixed NPE portfolio that was classified as held for sale at 30 June 2024 (project’s “Leon” perimeter).

For further details, please refer to Interim Consolidated Financial Statements, Note 16.

1.5 Project “Wave”

In July 2024, the Bank proceeded with the execution of another synthetic risk transfer transaction (project “Wave V”) in the form of a financial guarantee, providing credit protection over the mezzanine loss of a portfolio of performing SME and Large Corporate loans amounting to € 1.1 billion (the reference portfolio). Similarly to the previous synthetic risk transfer transactions of similar characteristics (“Wave” projects), the Wave V transaction was accounted for as a purchased financial guarantee contract that is not integral to the contractual terms of the reference portfolio. The reference portfolios of Wave projects continued to be recognized on the Group’s Balance Sheet.

As at 30 September 2024, the Wave V transaction, that was performed in the context of the Group’s initiatives for the optimization of its regulatory capital, resulted in a capital benefit of 25 bps.

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For further details, please refer to Interim Consolidated Financial Statements, Note 16.

1.6 Hellenic Bank Public Company Ltd, Cyprus

Hellenic Bank Public Company Ltd (“Hellenic Bank”), a financial institution located in Cyprus and listed in the Cyprus Stock Exchange, is accounted for as a Group’s associate under the equity method since April 2023 until June 2024.

The Bank had entered into agreements with certain of the Hellenic Bank’s shareholders since August 2023 for the acquisition of an additional total holding of 26.1% in the entity and the relevant transactions were completed on 4 June 2024. On the same date, following the Transaction, pursuant to the Takeover Bids Law of 2007 of the Republic of Cyprus, L.41(I)/2007 as amended, the Bank also announced the submission of a Mandatory Takeover Bid (“Takeover Bid”) to all shareholders of Hellenic Bank for the acquisition of up to 100% of the issued share capital of Hellenic Bank.

As of 30 June 2024, the Bank’s participation percentage in Hellenic Bank reached 55.48%. Despite being the holder of over 50% of Hellenic Bank’s shares, until the expiration of the time allowed for the acceptance of the Takeover Bid, and pursuant to the Law, Eurobank as the offeror, its nominees and persons acting in concert with it could not be appointed to the Board of Directors (BoD) of Hellenic Bank, nor they could exercise, or procure the exercise of, the votes attaching to any shares they held in Hellenic Bank. In addition, during the period when they became aware that a bid was imminent and until expiration of the Takeover Bid acceptance period, the Board of Directors of Hellenic Bank could not without prior authorization of the general meeting of shareholders, take any action which could result in the frustration of the Takeover Bid.

On 30 July 2024 the acceptance period for the aforementioned Takeover Bid expired, therefore the restrictions imposed by the Law on the Bank’s ability to exercise its voting rights no longer applied, and Eurobank since then, has been able to exercise its rights in full. Moreover, after considering the relevant provisions of the Cyprus’ legal framework including the Companies Law Cap. 113, and Hellenic Bank’s articles of association in relation to the exercise of shareholders’ rights, including the timing for convening a general meeting of the shareholders, it was assessed that the Group acquired control over Hellenic Bank group within July. As such, Hellenic Bank and its subsidiaries are included in the Company’s consolidated financial statements from the third quarter of 2024.

For further details, please refer to Interim Consolidated Financial Statements, Note 18.2.

1.7 Dividends

On 6 June 2024, the Company announced that it received approval from the European Central Bank (ECB) on 5 June 2024 to pay a cash dividend of € 342 million, corresponding to a 30% payout ratio of the Group’s net profit for 2023.

On 23 July 2024, the Annual General Meeting of the shareholders of the Company, among others, approved the distribution of a cash dividend of € 342 million from the “Special Reserves” account, corresponding to a gross dividend of € 0.09333045 per share.

For further details, please refer to Interim Consolidated Financial Statements, Note 27.

1.8 Tier 1 Capital instruments

Tier 1 capital consists of perpetual convertible capital securities (CCS 1 and CCS 2) of nominal value € 2 million and € 128 million (out of which € 27 million in total were held by Group entities), that bear an annual interest rate payable on a quarterly basis of 11% and 10%, respectively, listed on the Cyprus Stock Exchange and issued by Hellenic Bank. Under the terms of their issue, CCS1 and CCS2 represent contracts that will or may be settled in the entity's own equity instruments and include an obligation by Hellenic Bank to deliver a variable number of its own equity instruments. The notes are unsecured, subordinated obligations that the issuer may at its sole discretion redeem at par including accrued interest.

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Hellenic Bank's Board of Directors, as per the company's announcement on 6 November 2024, has approved to request regulatory permission to redeem the Tier 1 capital instruments (CCS1 and CCS2) at par including accrued interest, at the next possible interest payment date.

1.9 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 2 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.

On 19 January 2024, the Company announced the issuance of a € 300 million subordinated Tier 2 debt instrument which matures in April 2034, is callable at par in April 2029 offering a coupon of 6.25% 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.

As at 30 September 2024, Tier II subordinated instruments include notes issued by Hellenic Bank with nominal value € 200 million, out of which € 33 million were held by Group entities. The notes were issued in March 2023 at par offering a coupon of 10.25% per annum, mature in 14 June 2033, are callable at par for a 3-month period commencing on 14 March 2028 and are listed on the Luxembourg Stock Exchange's Euro MTF market.

1.10 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 checks that banks are equipped to manage those risks properly.
- Pillar 3 intends to enhance market discipline by developing a set of quantitative and qualitative disclosure requirements, which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes and hence the capital adequacy and the internal liquidity adequacy of credit institutions.

According to the CRD IV provisions:

- Minimum Common equity Tier 1 (CET1) ratio: 4.5%;
- Minimum Tier 1 ratio: 6%;
- Minimum Total Capital ratio: 8%.

Furthermore, banks are required to maintain in addition to the above minimum ratios, a Capital Conservation Buffer (CCB) equal to 2.5% (from 1 January 2019) of their total risk exposure amount calculated.

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As a result, the minimum ratios which must be met, including the CCB 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 may be required under the CRD IV to build up an additional buffer up to 2.5% of CET1 capital 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 (Gross Domestic Product) gap, the buffer guide and, in particular, additional indicators for monitoring the build-up of cyclical systemic risk. On 18 October 2024, BoG announced that would keep the countercyclical capital buffer rate for Greece unchanged at "zero percent" (0%) in the fourth quarter of 2024, with effect from 1 October 2024.

Under Executive Committee Act 235/1/07.10.2024, the Bank of Greece adopted a framework for a positive neutral rate of the countercyclical capital buffer, which is activated at an early stage in the economic and financial cycle, when cyclical systemic risks are neither elevated nor subdued. Based on this framework, BoG has decided to set the countercyclical capital buffer rate for Greece at 0.25%, applicable from 1 October 2025.

b) Global systemic institution buffer

CRD IV includes a mandatory Systemic Risk Buffer (SyRB) 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 22 December 2022, ECB published the November 2022 Governing Council statement on macroprudential policies regarding the revised floor methodology for assessing capital buffers for O-SIIs. The revised floor methodology increases the number of buckets to which O-SIIs are allocated from four to six and raises the floor level for the highest bucket to 1.50% while keeping the floor of the lowest bucket unchanged at 0.25%. The ECB uses the revised floor methodology to assess O-SII buffers proposed by national authorities as of 1 January 2024.

From 1 January 2024, the O-SII buffer for the Group increased to 1.25% (from 1.00% in 2023), in accordance with the Executive Committee Act 221/1/17.10.2023 of BoG, following the above change in the floor methodology. Based on the Executive Committee Act 234/23.09.2024, BoG has decided that would keep O-SIIs buffer for the Group unchanged at 1.25% for 2025 with effect from 1 January 2025.

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 SyRB and of identifying the sets of institutions to which it applies. According to BoG Executive Committee Act No 197/2/21.12.2021, BoG decided to adopt the European Banking Authority (EBA) guidelines on the appropriate subsets of exposures to which the competent authority or the designated authority may apply a SyRB buffer based on paragraph 5 of article 133 of CRD.

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The SyRB consists of CET1 capital and is expressed as a percentage of the total risk exposure amount of credit institutions. It can be set in multiples of 0.5% and may exceed 3% provided that the relevant procedures laid down in EU law are respected. The BoG has set neither a sectoral nor a broader SyRB rate as yet.

1.10.1 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 took place within Q2 2021, while gradually and until Q2 2024 the application of the Guidelines was 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 Environmental, Social and Governance (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 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 disclose information on ESG risks from 28 June 2022. For the first year this information was disclosed on an annual basis and semi-annually thereafter. An overview of the qualitative and quantitative information is depicted below:

- Three tables for qualitative information on ESG risks. Under each risk category, the disclosure requirements target three aspects: governance, business model and strategy, and risk management. First disclosure reference date was 31.12.2022.
- Ten templates for quantitative disclosures, specifically:
 - a. four templates on climate change transition risk that are 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 applies from 31.12.2023, the additional and separate information on the BTAR applies from 30.06.2024.

On 14 December 2023, the Single Resolution Board (SRB) launched a public consultation on the review of its MREL (Minimum Requirement for own funds and Eligible Liabilities) Policy, covering, among others, the calibration of the Market Confidence Charge (component of the MREL target) and the process for monitoring the eligibility of MREL instruments. On 14 May 2024, the SRB published the updated MREL Policy which introduces a revised approach on internal and external Market Confidence Charge calibration and on the monitoring of MREL eligibility.

On 20 December 2023, the EBA published its final draft ITS on amendments to disclosure and reporting of the minimum requirement for MREL and TLAC. These amendments reflect the new requirement to deduct investments in eligible liabilities instruments of entities belonging to the same resolution group, the so called 'daisy chain' framework, and other changes to the prudential framework. The amendments apply for the reference date as of end-June 2024 for banks subject to the obligation to meet the final MREL target as of December 2023, which is not the case for the Group that has an extended transitional period to meet the final MREL target by end-2025.

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On 14 December 2023, EBA published two draft ITS amending Pillar 3 disclosures and supervisory reporting requirements. These consultation papers are a first step in the implementation of the Banking Package (CRR3 and CRD6). In particular, these draft ITS seek to implement the changes related to the output floor, credit risk, including immovable property (IP) losses, capital valuation adjustment (CVA), market risk and leverage ratio.

In line with the Roadmap, the EBA will follow a two-step sequential approach to amend both the Pillar 3 disclosures and supervisory reporting ITS, prioritizing, in phase 1, those changes necessary to implement and monitor Basel III requirements in the EU. Later in 2024, as part of phase 2, the EBA will develop those reporting and disclosure requirements that are not directly linked to Basel III implementation, together with those requirements with an extended implementation timeline.

On 20 February 2024 EBA launched a public consultation on two drafts ITS amending Pillar 3 disclosures and supervisory reporting requirements for operational risk. These consultations complement two additional consultation papers on Pillar 3 and supervisory reporting published on 14 December 2023, in line with the roadmap for the implementation of the EU Banking Package. These amending ITS implement the new CRR3 reporting and disclosure requirements linked to the introduction of the revised framework for the calculation of own funds requirements for operational risk. The consultations are part of phase 1 in the implementation of the EU Banking Package.

On 20 February 2024, EBA launched a consultation on two set of draft Regulatory Technical Standards (RTS) and one ITS aiming to clarify the composition of the new business indicator (BI) at the heart of the operational risk capital requirements calculation, mapping the business indicator items to financial reporting (FINREP) items and highlighting possible adjustments to the BI in case of specific operations. The draft ITS map, where possible, the typical items of the business indicator to their corresponding reporting cells in FINREP. Finally, the draft RTS on BI adjustments requires institutions to use the actual three-year historical data or a limited number of alternative methodologies following an operation. In the context of disposals, the draft RTS specifies the conditions under which permission to exclude business indicator items related to disposed entities or activities may be granted.

On 4 March 2024, EBA published a draft RTS under CRR3 regarding the classification's criteria of off-balance sheet items under the standardised approach (STD) of credit risk. The exposure values of off-balance exposure depend on the application of certain percentages, which in turn depend on a bucket classification. The CRR3 is set to introduce amendments to update the calibration of applicable percentages, which results in the introduction of an adjusted weighting scheme and an additional bucket, increasing the number of risk buckets from 4 to 5, and the conversion factor possibilities to 10%, 20%, 40%, 50% or 100%. Furthermore, it specifies the factors that may constrain the institutions' ability to cancel the unconditionally cancellable commitments. These RTS are part of step 1 of the EBA roadmap on the implementation of the EU banking package.

On 9 April 2024, EBA published its final Guidelines on the resubmission of historical data under the EBA reporting framework. The Guidelines provide a common approach to the resubmission of historical data by the financial institutions to the competent and resolution authorities in case of errors, inaccuracies or other changes in the data reported, in accordance with the supervisory and resolution reporting framework developed by the EBA.

The Guidelines set out a general approach for the resubmission of historical data with the aim of limiting the number of historical periods. Under this general approach, financial institutions are expected to resubmit the corrected data for the current reporting date, and historical data for past reference dates, going back at least one calendar year (except for the data with monthly reporting frequency). The Guidelines also clarify the general circumstances under which the resubmission may not be required. The new precision requirement is applicable from 1 April 2025.

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On 19 June 2024, the following were published in the Official Journal of the EU:

- Directive (EU) 2024/1619 of the EP and of the Council of 31 May 2024 amending the Capital Requirements Directive IV as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks (CRD 4).
- Regulation (EU) 2024/1623 of the EP and of the Council of 31 May 2024 amending the Capital Requirements Regulation as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor (CRR 3).

Member States will have 18 months to transpose CRD 4 into national legislation, whilst CRR 3 will apply from 1 January 2025.

On 21 June 2024, EBA published a final draft ITS on public disclosures by institutions that implement the changes in the Pillar 3 disclosure framework introduced by the amending Regulation (EU) 2024/1623 (CRR 3). These ITS will ensure that market participants have sufficient comparable information to assess the risk profiles of institutions and understand compliance with CRR 3 requirements, further promoting market discipline.

CRR 3 introduced new and amended disclosure requirements stemming from the latest Basel III Pillar 3 reforms, and a mandate for the EBA to develop IT solutions, including templates and instructions, for the disclosure requirements laid down in the banking regulation. The new ITS implement the CRR 3 prudential disclosures by including new requirements on output floor, credit risk, market risk, CVA risk, Operational risk and a transitional disclosure on exposures to crypto-assets. In addition, they aim to provide institutions with a comprehensive integrated set of uniform disclosure formats while promoting market discipline.

Later in 2024, the EBA will complement these ITS with the CRR 3 disclosure requirements that are not directly linked to Basel III implementation, in particular the extension of the disclosure requirements on ESG risks to all institutions in accordance with the proportionality principle, and new disclosure requirements on shadow banking.

On 9 July 2024, EBA published its final draft ITS on supervisory reporting requirements implementing the changes necessary to keep the supervisory reporting framework relevant and meaningful and aligned with the amending CRR 3, which implements the latest Basel III reforms. These ITS update the EBA supervisory reporting framework by including new or amended CRR3 requirements on output floor, credit risk, market risk, CVA risk, leverage ratio and on the transitional treatment of exposures to crypto-assets. On Operational risk, these ITS include some minimum reporting requirements based on the consultation launched in February 2024, while the more extensive reporting requirements on this topic will be finalised by the end of this year, together with the new framework for the BI for Operational risk.

EBA will publish during Q4 2024 a technical package, including the Data Point Model (DPM), validation rules and taxonomy, that shall be used by institutions to submit this supervisory reporting information to supervisors.

On 13 August 2024, EBA published final amendments to its RTS on the fundamental review of the trading book. The revisions mostly aim to align these RTS with the CRR3 and ensure stability in the applicable regulatory framework. The RTS are part of the roadmap on the Banking Package.

The EBA has been mandated to review the RTS on the treatment of foreign-exchange and commodity risk in the banking book, the RTS on profit and loss attribution test and the RTS on risk factor model liability assessment.

On 11 October 2024, EBA launched a consultation on the Pillar 3 data hub, which will centralise prudential disclosures by institutions through a single electronic access point on the EBA website. This project is part of the Banking Package laid down in CRR3 and CRD6. The consultation paper defines the IT solutions and processes that large and other institutions shall follow to publish Pillar 3 information centrally in the EBA data hub. The proposed IT solutions leverage the EBA's past and ongoing work and infrastructures in the area of disclosures and reporting. The Pillar 3 data hub will centralise on

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the EBA website the Pillar 3 disclosures of all EU institutions, thus allowing users to download data and visualize the Pillar 3 information in a standardised format. The consultation run until 11 November 2024.

On 14 November 2024, EBA published an Opinion on the amendments proposed by the European Commission to the EBA final draft ITS on public disclosures by institutions and supervisory reporting under the revised CRR3. The EBA acknowledges that the Commission’s proposal provides some flexibility compared to the current version of the ITS and accepts it as an intermediate step. The Commission and the EBA will continue to work together to better articulate and further operationalise these ITS.

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

Under the Bank Recovery and Resolution Directive and Single Resolution Mechanism Regulation, European banks are required to meet the MREL. SRB has determined Eurobank S.A. as the Group’s resolution entity and a Single Point of Entry strategy for resolution purposes. Based on the latest SRB’s communication, 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 28.03% of its total Risk Weighted Exposure Amounts (RWEAs), including a fully-loaded combined buffer requirement (CBR) of 4.46%. The final MREL target is updated by the SRB on an annual basis. The 2024 interim non-binding MREL target, applicable from January 2024, stands at 23.36% of RWEAs, including a CBR of 4.31%.

As of 30 September 2024, the Bank’s MREL ratio at consolidated level stood at 28.99% of RWEAs including profits for the period ended 30 September 2024 (30 June 2024: 25.21%), which is higher than both the interim non-binding MREL target and the final MREL target stated above. The Bank’s MREL ratio at consolidated level, pro-forma for the completion of project “Solar”, project “Leon” (significant risk transfer recognition is subject to ECB’s confirmation), as well as with the accrual for dividend distribution from financial year 2024 Group profits, stood at 28.30% of RWA. In terms of Leverage Ratio Exposure, the Bank’s MREL ratio as of 30 September 2024 stood at 16.52%, significantly above the relevant MREL target of 5.91%.

On 8 July 2024, Eurobank Holdings announced that the Bank successfully completed, through a private placement, a tap of € 100 million to the senior preferred notes of € 650 million issued in April 2024. On 18 September 2024, the Company announced that the Bank successfully completed the issuance of € 850 million Green Senior Preferred Notes. The proceeds from the issue support Eurobank Group’s strategy to ensure ongoing compliance with its MREL requirement and aim at increasing Eurobank’s MREL ratio towards the end-state MREL targeted compliance range.

1.12 Fit-for-55 Climate Risk Scenario Analysis

Eurobank participated in the One-off Fit-for-55 Climate Risk Scenario Analysis exercise, launched by the EBA in collaboration with the ECB and the ESRB in 2023. Following the relevant guidelines issued by the ECB and EBA, the Bank complied with the methodological requirements by timely submitting all the required templates. The exercise involved seven templates focusing on credit and market risk data, as well as extended information on climate risk (reference date for the data submitted was 31/12/2022). These templates covered data considering:

- Top 15 Counterparties per climate relevant NACE 2 Sector under Credit and Market Risk;
- Aggregated data for the main climate-relevant sectors under Credit and Market Risk;
- Real Estate;
- Interest Income and Fee and Commission Income.

The regulatory exercise aimed to assess the financial sector’s resilience in alignment with the Fit-for-55 package, providing valuable insights into the financial system’s capability to support the transition to a low-carbon economy, particularly under stress conditions.

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1.13 Scope of Pillar 3

The purpose of Pillar 3 report is to provide updated information on 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. Group. Although the Group's NPE ratio stands at 2.9% for 30 September 2024, it continues to report the aforementioned information following article 4 of Regulation 680/2014. Based on this article, Group may stop reporting information subject to thresholds from the next reporting reference date where it has fallen below the relevant thresholds on three consecutive reporting reference dates.

In June 2019, the 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 CRR2 rules follow a phased implementation with significant elements entering into force in 2021.

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 (International Financial Reporting Standards) 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 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.

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.

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1.14 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.

Moreover, the Group has issued an internal approved by the BoD "Consolidated Pillar 3 Disclosures Policy" in order to ensure consistent and continuous compliance with the Pillar 3 disclosures requirements. In addition, the Group puts in place and maintains internal processes, systems and controls to verify that the disclosures are appropriate and in compliance with the aforementioned regulatory framework.

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 BoD on 28 November 2024 prior to their publication on the Group's website.

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1.15 Prudential versus accounting consolidation

The Pillar III disclosures are different from the disclosures presented in the Interim Consolidated Financial Statements, which have been prepared in accordance with the International Accounting Standard (IAS) 34 ‘Interim Financial Reporting’ as endorsed by the European Union (EU). This is mainly due to differences between the prudential consolidation and the accounting consolidation used by the Group. Following the changes introduced in the CRR, Article 18(7) has been amended in order to regulate the treatment of subsidiaries which are excluded from the scope of prudential consolidation since they are different from institutions. The Pillar III disclosures are based on disclosure requirements set out in Regulation EU 575/2013 (CRR) as amended and pertain to the conditions of the Group’s prudential consolidation, which excludes insurance subsidiaries.

1.15.1 Prudential consolidation

The prudential consolidation applied for reporting to SSM follows the principles used for the accounting consolidation with the following difference. Participations in insurance companies are excluded from prudential consolidation and are accounted for using the equity method and are deducted from regulatory capital subject to thresholds.

The following table presents a list of the Group’s subsidiaries at 30 September 2024 for which prudential consolidation is different compared to the accounting consolidation:

Table 1: Group’s insurance subsidiaries

| Prudential consolidation | | | Accounting consolidation | | Description of Business |
|--------------------------|---------------|-----------------------|--------------------------|---------------|-------------------------|
| Full consolidation | Equity method | Deduction from equity | Full consolidation | Equity method | |

Subsidiary undertakings

| | | | | | |
|--|---|--|---|--|-----------------------|
| Pancyprian Insurance Ltd (55.94%) | x | | x | | General Insurance |
| Hellenic Life Insurance Company Ltd (55.94%) | x | | x | | Life Insurance |
| Hellenic Bank Insurance Holding Ltd (55.94%) | x | | x | | Insurance services |
| Hellenic Insurance Agency Ltd (55.94%) | x | | x | | Insurance Intermediat |

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

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

The table below shows a comparison between the Balance Sheet included in the Interim Consolidated Financial Statements and the Balance Sheet prepared under the prudential scope of consolidation as at 30 September 2024.

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Table 2: Prudential and accounting Balance Sheet

| | | 30 September 2024 | | |
|---------------------|--|--|---|---|
| | | Balance sheet per published financial statements | Deconsolidation of insurance and consolidation by the equity method | Balance sheet per prudential scope of consolidation |
| Ref. ⁽¹⁾ | | € million | € million | € million |
| Assets | | | | |
| | Cash and Balances with central banks | 17,393 | - | 17,393 |
| | Due from credit institutions | 2,097 | (10) | 2,087 |
| | Securities held for trading | 300 | - | 300 |
| | Derivative financial instruments | 786 | - | 786 |
| | Loans and advances to customers | 49,112 | - | 49,112 |
| | Investment securities | 21,186 | (113) | 21,073 |
| | Investments in associates and joint ventures | 220 | 33 | 253 |
| | Property, plant and equipment | 962 | (6) | 956 |
| | Investment property | 1,308 | (1) | 1,307 |
| | Intangible assets | 407 | (2) | 405 |
| | Deferred tax asset | 3,802 | - | 3,802 |
| | of which deferred tax assets that rely on future profitability and do not arise from temporary differences | - | - | - |
| | of which deferred tax assets that do not rely on future profitability | 3,070 | - | 3,070 |
| | of which deferred tax assets that rely on future profitability and arise from temporary differences | 732 | - | 732 |
| | Other assets | 1,926 | (20) | 1,906 |
| | Assets of disposal group classified as held for sale | 93 | - | 93 |
| | Total assets | 99,592 | (119) | 99,473 |
| Liabilities | | | | |
| | Due to central banks | 3,104 | - | 3,104 |
| | Due to credit institutions | 2,791 | 29 | 2,820 |
| | Derivative financial instruments | 1,221 | - | 1,221 |
| | Due to customers | 74,625 | (17) | 74,608 |
| | Debt securities in issue | 6,485 | - | 6,485 |
| | of which tier 2 instruments | 1,791 | - | 1,421 |
| | Other liabilities | 1,905 | (105) | 1,800 |
| | Total liabilities | 90,131 | (93) | 90,038 |
| Equity | | | | |
| | Ordinary share capital | 809 | - | 809 |
| | Share premium | 1,145 | - | 1,145 |
| | Reserves and retained earnings | 6,785 | - | 6,785 |
| | of which cash flow hedge reserves | (14) | - | (14) |
| | Non controlling interests | 722 | (26) | 696 |
| | Total equity | 9,461 | (26) | 9,435 |
| | Total equity and liabilities | 99,592 | (119) | 99,473 |

⁽¹⁾ References provide the mapping of items of the statement of financial position prepared under the regulatory scope of consolidation used to calculate regulatory capital as reflected in column "References" in Section 2.2 "EU CC2 - Reconciliation of regulatory own funds to balance sheet in the prudential consolidation Balance sheet".

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2. Capital Management

2.1 Key Metrics

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

Table 3: EU KM1 - Key Metrics template

| | | a | b | c | d | e | |
|--|--|-------------------|-----------------------------|------------------------------|------------------|-------------------|--------|
| | 30 September 2024 ⁽¹⁾ | 30 September 2024 | 30 June 2024 ⁽¹⁾ | 31 March 2024 ⁽¹⁾ | 31 December 2023 | 30 September 2023 | |
| | € million | € million | € million | € million | € million | € million | |
| Available own funds (amounts) | | | | | | | |
| 1 | Common Equity Tier 1 (CET1) capital | 8,520 | 7,813 | 7,670 | 7,598 | 7,348 | 7,047 |
| 2 | Tier 1 capital | 8,617 | 7,911 | 7,670 | 7,598 | 7,348 | 7,047 |
| 3 | Total capital | 10,038 | 9,331 | 8,958 | 8,924 | 8,422 | 8,169 |
| Risk-weighted exposure amounts | | | | | | | |
| 4 | Total risk exposure amount | 48,235 | 48,235 | 45,884 | 44,463 | 43,395 | 44,225 |
| Capital ratios (as a percentage of risk-weighted exposure amount) | | | | | | | |
| 5 | Common Equity Tier 1 ratio (%) | 17.7% | 16.2% | 16.7% | 17.1% | 16.9% | 15.9% |
| 6 | Tier 1 ratio (%) | 17.9% | 16.4% | 16.7% | 17.1% | 16.9% | 15.9% |
| 7 | Total capital ratio (%) | 20.8% | 19.3% | 19.5% | 20.1% | 19.4% | 18.5% |
| 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 (%) | 2.75% | 2.75% | 2.75% | 2.75% | 2.75% | 2.75% |
| EU 7b | of which: to be made up of CET1 capital (percentage points) | 1.55% | 1.55% | 1.55% | 1.55% | 1.55% | 1.55% |
| EU 7c | of which: to be made up of Tier 1 capital (percentage points) | 2.06% | 2.06% | 2.06% | 2.06% | 2.06% | 2.06% |
| EU 7d | Total SREP own funds requirements (%) | 10.75% | 10.75% | 10.75% | 10.75% | 10.75% | 10.75% |
| 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 (%) | 0.56% | 0.56% | 0.48% | 0.43% | 0.43% | 0.27% |
| 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 | 1.25% | 1.25% | 1.25% | 1.25% | 1.00% | 1.00% |
| 11 | Combined buffer requirement (%) | 4.31% | 4.31% | 4.23% | 4.18% | 3.93% | 3.77% |
| EU 11a | Overall capital requirements (%) | 15.06% | 15.06% | 14.98% | 14.93% | 14.68% | 14.52% |
| 12 | CET1 available after meeting the total SREP own funds requirements (%) | 9.80% | 8.34% | 8.66% | 8.82% | 8.66% | 7.73% |
| Leverage ratio | | | | | | | |
| 13 | Leverage ratio total exposure measure | 105,284 | 105,284 | 84,679 | 84,233 | 84,402 | 84,942 |
| 14 | Leverage ratio | 8.2% | 7.5% | 9.1% | 9.0% | 8.7% | 8.3% |
| 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% | 3.00% | 3.00% | 3.00% |
| 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% | 3.00% | 3.00% | 3.00% |

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| | | a | b | c | d | e | |
|---------------------------------|--|----------------------|-----------------|------------------|---------------------|----------------------|--------|
| | 30 September 2024 | 30 September 2024 | 30 June 2024 | 31 March 2024 | 31 December 2023 | 30 September 2023 | |
| | € million | € million | € million | € million | € million | € million | |
| Liquidity Coverage Ratio | | | | | | | |
| 15 | Total high-quality liquid assets (HQLA) (Weighted value - average) | 18,502 | 18,502 | 17,658 | 17,472 | 17,177 | 16,850 |
| EU 16a | Cash outflows - Total weighted value | 11,660 | 11,660 | 11,391 | 11,310 | 11,047 | 10,828 |
| EU 16b | Cash inflows - Total weighted value | 1,388 | 1,388 | 1,287 | 1,227 | 1,118 | 1,071 |
| 16 | Total net cash outflows (adjusted value) | 10,272 | 10,272 | 10,104 | 10,083 | 9,929 | 9,757 |
| | Liquidity coverage ratio (%) (adjusted value) ⁽²⁾ | 180.1% | 180.1% | 174.9% | 173.4% | 173.1% | 172.8% |
| 17 | Liquidity coverage ratio (%) | 187.1% | 187.1% | 181.7% | 179.0% | 178.6% | 170.6% |
| Net Stable Funding Ratio | | | | | | | |
| 18 | Total available stable funding | 75,020 | 75,020 | 59,353 | 59,034 | 59,007 | 60,606 |
| 19 | Total required stable funding | 52,680 | 52,680 | 46,703 | 46,223 | 46,079 | 46,828 |
| 20 | NSFR ratio (%) | 142.4% | 142.4% | 127.1% | 127.7% | 128.1% | 129.4% |

⁽¹⁾ Including profits € 1,135 million for the 9M 2024, € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

⁽²⁾ Average figures based on previous monthly data points.

⁽³⁾ Pro-forma CET1 and Total Capital Adequacy ratios as at 30 September 2024 with the completion of project "Solar" and project "Leon (significant risk transfer recognition is subject to ECB's confirmation) as well as the accrual for dividend distribution from financial year 2024 Group profits, (subject to regulatory approval would be 16.9% and 20.1%, respectively).

2.2 Regulatory capital

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

The table below shows the composition of the Group's regulatory capital as at 30 September and 30 June 2024 which is calculated according to CRD IV as amended.

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Table 4: EU CC2 - Reconciliation of regulatory own funds to balance sheet under the scope of prudential consolidation

| | | 30 September 2024 ⁽¹⁾ | 30 September 2024 | 30 June 2024 ⁽¹⁾ |
|---|-------|-------------------------------------|----------------------|--------------------------------|
| Ref. | | € million | € million | € million |
| Total equity | i | 9,435 | 9,435 | 8,614 |
| Regulatory adjustments | | | | |
| Interim or year-end profit not eligible ⁽²⁾ | | - | (706) | - |
| Minority interest not allowed in CET1 | | (415) | (415) | - |
| Cash flow hedge reserves | h | 14 | 14 | 15 |
| Adjustments due to IFRS 9 transitional arrangements | | - | - | - |
| Temporary treatment of unrealised losses measured at FVTOCI in accordance with Article 468 of the CRR | | - | - | - |
| Intangible assets | b | (291) | (291) | (246) |
| of which Goodwill | | (42) | (42) | (42) |
| Deferred tax assets that rely on future profitability and do not arise from temporary differences | c | - | - | - |
| Deferred tax assets that rely on future profitability and arise from temporary differences (amount above 10% threshold) | d | - | - | - |
| Prudent Valuation Adjustments ⁽³⁾ | | (5) | (5) | (5) |
| Other regulatory adjustments | | (218) | (218) | (325) |
| Amount exceeding the 17.65% threshold | a & d | - | - | (383) |
| Common Equity Tier I capital | | 8,520 | 7,813 | 7,670 |
| Additional Tier I capital | | 97 | 97 | - |
| Total Tier I capital | | 8,617 | 7,910 | 7,670 |
| Tier II capital - subordinated debt | e | 1,421 | 1,421 | 1,288 |
| Total Regulatory Capital | | 10,038 | 9,331 | 8,958 |
| | | | | |
| Risk Weighted Assets | | 48,235 | 48,235 | 45,884 |
| | | | | |
| Ratios⁽⁴⁾⁽⁵⁾ | | | | |
| Common Equity Tier I | | 17.7% | 16.2% | 16.7% |
| Tier I | | 17.9% | 16.4% | 16.7% |
| Total Capital Adequacy Ratio | | 20.8% | 19.3% | 19.5% |

⁽¹⁾ Including profits € 1,135 million for the 9M 2024 and € 721 million for the 1H 2024.

⁽²⁾ Excludes 3Q 2024 interim profits and 1H 2024 dividend according to the dividend policy, approved by the BoD, based on requirements of Decision ECB/2015/6561 for permission of profits inclusion in regulatory capital.

⁽³⁾ The Additional Value Adjustments 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⁾ CET1 and Total Capital Adequacy ratios increased mainly due to i) the Group's organic profitability, ii) the change in the mapping, following the publication of the Commission Implementing Regulation (EU) 2024/1872, between corporate credit ratings and respective risk weighting factors (Credit Quality Steps), set out in Regulation EU 575/2013 and iii) the change of the applicable Risk Weighting Factors (RWF) for Central Bank/Central Government assets, according to article 500a (applicable from 1 July 2024) of Regulation EU/2024/1623, partly offset by the increase of the RWAs mainly due to the inclusion of Hellenic Bank and its subsidiaries in the Company's consolidated financial statements in the third quarter of 2024 and the new production of loans.

⁽⁵⁾ The pro-forma CET1 and Total Capital Adequacy ratios as at 30 September 2024 with the completion of project "Solar" and project "Leon" (significant risk transfer recognition is subject to ECB's confirmation) as well as the accrual for dividend distribution from financial year 2024 Group profits (subject to regulatory approval), would be 16.9% and 20.1%, respectively.

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

As at 30 September 2024, pursuant to the Law 4172/2013, as in force, the Bank's eligible Deferred Tax Assets/Deferred Tax Credits (DTCs) against the Greek State amounted to € 3,070 million (31 June 2024 € 3,117 million). DTCs are accounted for on: (a) the unamortised losses from the Private Sector Involvement 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 13.

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 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 2024 is 25%. 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.

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Table 5: 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

| | a | | b | c | d | e |
|--|----------------------------------|-------------------|-----------------------------|------------------------------|------------------|-------------------|
| | 30 September 2024 ⁽¹⁾ | 30 September 2024 | 30 June 2024 ⁽¹⁾ | 31 March 2024 ⁽¹⁾ | 31 December 2023 | 30 September 2023 |
| | € million | € million | € million | € million | € million | € million |
| Available capital | | | | | | |
| 1 CET1 capital | 8,520 | 7,813 | 7,670 | 7,598 | 7,348 | 7,047 |
| 2 CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 8,520 | 7,813 | 7,670 | 7,598 | 7,348 | 7,047 |
| 2a 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 | | | | | | |
| Fully Loaded CET1 capital | 8,520 | 7,813 | 7,670 | 7,598 | 7,348 | 7,047 |
| 3 Tier 1 capital | 8,617 | 7,911 | 7,670 | 7,598 | 7,348 | 7,047 |
| 4 Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 8,617 | 7,911 | 7,670 | 7,598 | 7,348 | 7,047 |
| 4a 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 | | | | | | |
| Fully Loaded Tier 1 capital | 8,617 | 7,911 | 7,670 | 7,598 | 7,348 | 7,047 |
| 5 Total capital | 10,038 | 9,331 | 8,958 | 8,924 | 8,422 | 8,169 |
| 6 Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 10,038 | 9,331 | 8,958 | 8,924 | 8,422 | 8,169 |
| 6a 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 | | | | | | |
| Fully Loaded Total capital | 10,038 | 9,331 | 8,958 | 8,924 | 8,422 | 8,169 |
| Risk weighted assets | | | | | | |
| 7 Total risk-weighted assets | 48,235 | 48,235 | 45,884 | 44,463 | 43,395 | 44,225 |
| 8 Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 48,235 | 48,235 | 45,884 | 44,463 | 43,395 | 44,225 |
| Fully Loaded Total risk-weighted assets | 48,235 | 48,235 | 45,884 | 44,463 | 43,395 | 44,225 |
| Capital ratios | | | | | | |
| 9 CET1 (as a percentage of risk exposure amount) | 17.7% | 16.2% | 16.7% | 17.1% | 16.9% | 15.9% |
| 10 CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 17.7% | 16.2% | 16.7% | 17.1% | 16.9% | 15.9% |
| 10a 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 | | | | | | |
| Fully Loaded CET1 (as a percentage of risk exposure amount) | 17.7% | 16.2% | 16.7% | 17.1% | 16.9% | 15.9% |
| 11 Tier 1 (as a percentage of risk exposure amount) | 17.9% | 16.4% | 16.7% | 17.1% | 16.9% | 15.9% |
| 12 Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 17.9% | 16.4% | 16.7% | 17.1% | 16.9% | 15.9% |
| 12a 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 | | | | | | |
| Fully Loaded Tier 1 (as a percentage of risk exposure amount) | 17.9% | 16.4% | 16.7% | 17.1% | 16.9% | 15.9% |
| 13 Total capital (as a percentage of risk exposure amount) | 20.8% | 19.3% | 19.5% | 20.1% | 19.4% | 18.5% |
| 14 Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 20.8% | 19.3% | 19.5% | 20.1% | 19.4% | 18.5% |
| 14a 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 | | | | | | |
| Fully Loaded Total capital (as a percentage of risk exposure amount) | 20.8% | 19.3% | 19.5% | 20.1% | 19.4% | 18.5% |

Capital Management

| | a | | b | | c | | d | | e | |
|---|----------------------------------|-------------------|-----------------------------|------------------------------|------------------|-------------------|---|--|---|--|
| | 30 September 2024 ⁽¹⁾ | 30 September 2024 | 30 June 2024 ⁽¹⁾ | 31 March 2024 ⁽¹⁾ | 31 December 2023 | 30 September 2023 | | | | |
| | € million | € million | € million | € million | € million | € million | | | | |
| Leverage ratio | | | | | | | | | | |
| 15 Leverage ratio total exposure measure | 105,284 | 105,284 | 84,679 | 84,233 | 84,402 | 84,942 | | | | |
| 16 Leverage ratio | 8.2% | 7.5% | 9.1% | 9.0% | 8.7% | 8.3% | | | | |
| 17 Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied | 8.2% | 7.4% | 9.1% | 9.0% | 8.7% | 8.3% | | | | |
| 17a 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 | | | | | | | | | | |
| Fully Loaded Leverage ratio | 8.2% | 7.5% | 9.1% | 9.0% | 8.7% | 8.3% | | | | |

⁽¹⁾ Including profits € 1,135 million for the 9M 2024, € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

⁽²⁾ Pro-forma CET1 and Total Capital Adequacy ratios as at 30 September 2024 with the completion of project "Solar" and project "Leon" (significant risk transfer recognition is subject to ECB's confirmation), as well as the accrual for dividend distribution from financial year 2024 Group profits, (subject to regulatory approval), would be 16.9% and 20.1%, respectively.

2.4 Supervisory Review and Evaluation Process (SREP) capital requirements

According to the 2023 SREP decision, from January 2024 the P2R for the Group remains at 2.75% in terms of total capital (or at 1.55% in terms of CET1 capital). Thus, as of 30 September 2024, the Group was required to meet a CET1 ratio of at least 12.18% (including Additional Tier 1 (AT1) shortfall) and a Total Capital Adequacy Ratio of at least 15.06% (Overall Capital Requirements - OCR) including Combined Buffer Requirement of 4.31%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

From 1 January 2024, the O-SII buffer for the Group increased to 1.25% (from 1.00% in 2023), in accordance with the Executive Committee Act 221/1/17.10.2023 of the Bank of Greece, following a change in the methodology applied for the determination of the O-SII buffer rate. In addition, in accordance with the Executive Committee Act 235/07.10.2024 of the Bank of Greece, from 1 October 2025, a countercyclical capital buffer rate of 0.25% will apply to banks' exposures to Greece, which is expected to increase the Group's capital requirements by 14 basis points. The countercyclical capital buffer is updated on a quarterly basis in accordance with the countercyclical capital buffer rates applicable in each country to which the Group has exposures. The breakdown of the Group's CET1 and Total Capital requirements is presented below.

Table 6: Pillar 2 Requirements

| | 30 September 2024 | |
|---|---------------------------|----------------------------|
| | 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) | 0.56% | 0.56% |
| Other systemic institutions buffer (O-SII) | 1.25% | 1.25% |
| Overall Capital Requirement (OCR) | 10.36% | 15.06% |
| AT1 and Tier 2 capital shortfall | 1.82% | - |
| Overall Capital Requirement (OCR), including shortfall | 12.18% | 15.06% |

The above CET1 capital requirement of 12.18% takes into account that the Group covered only partially the 2.02% AT1 requirement allowed by the legislation as part of Total SREP Capital Requirement (TSCR) with the €97m AT1 capital stemming from the consolidation of Hellenic Bank. Assuming that the Group had fully utilized the AT1 capital capacity as of 30 September 2024, the CET1 requirement would stand at 10.36%.

Capital Management

At consolidated level, the Pillar 2 Requirement was set at 2.75% for 2024 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 to be met with CET1 capital on a consolidated basis was € 878 million (based on RWEAs of € 48,236million).

As at 30 September 2024, Eurobank's consolidated CET1 ratio and Total Capital ratio, including profit of € 1,135 million for the period ended 30 September 2024, were 17.7% and 20.8% respectively, which exceeded the 2024 minimum requirements of 12.18% and 15.06%.

2.5 Capital requirements under Pillar 1

The table below shows the Group's RWEAs and capital requirements as at 30 September and 30 June 2024. The minimum capital requirements under Pillar 1 are calculated as 8% of RWEAs.

Table 7: EU OV1 - Overview of risk weighted exposure amounts

| | a | | b | | c |
|--|--|-------------------|-----------------------------|--------------|------------------------------|
| | Risk weighted exposure amounts (RWEAs) | | | | Total own funds requirements |
| | 30 September 2024 ⁽¹⁾ | 30 September 2024 | 30 June 2024 ⁽¹⁾ | 30 June 2024 | 30 September 2024 |
| | € million | € million | € million | € million | € million |
| 1 Credit risk (excluding CCR) | 37,790 | 37,790 | 36,189 | 36,189 | 3,023 |
| 2 Of which the standardised approach ⁽²⁾ | 37,790 | 37,790 | 36,189 | 36,189 | 3,023 |
| 3 Of which the foundation IRB (FIRB) approach | - | - | - | - | - |
| 4 Of which: slotting approach | - | - | - | - | - |
| EU 4a Of which: equities under the simple riskweighted approach | - | - | - | - | - |
| 5 Of which the advanced IRB (AIRB) approach | - | - | - | - | - |
| 6 Counterparty credit risk - CCR | 598 | 598 | 611 | 611 | 48 |
| 7 Of which the standardised approach | 208 | 208 | 212 | 212 | 17 |
| 8 Of which internal model method (IMM) | - | - | - | - | - |
| EU 8a Of which exposures to a CCP | 7 | 7 | 7 | 7 | 1 |
| EU 8b Of which credit valuation adjustment - CVA | 185 | 185 | 196 | 196 | 15 |
| 9 Of which other CCR | 198 | 198 | 196 | 196 | 16 |
| 15 Settlement risk | - | - | - | - | - |
| 16 Securitisation exposures in the non-trading-book (after the cap) | 2,040 | 2,040 | 1,811 | 1,811 | 163 |
| 17 Of which SEC-IRBA approach | - | - | - | - | - |
| 18 Of which SEC-ERBA (including IAA) | 431 | 431 | 306 | 306 | 34 |
| 19 Of which SEC-SA approach | 1,609 | 1,609 | 1,505 | 1,505 | 129 |
| EU 19a Of which 1250%/ deduction | - | - | - | - | - |
| 20 Position, foreign exchange and commodities risks (Market risk) | 566 | 566 | 545 | 545 | 45 |
| 21 Of which the standardised approach | 112 | 112 | 112 | 112 | 9 |
| 22 Of which IMA | 454 | 454 | 433 | 433 | 36 |
| EU 22a Large exposures | - | - | - | - | - |
| 23 Operational risk | 4,858 | 4,858 | 3,746 | 3,746 | 389 |
| EU 23a Of which basic indicator approach | 1,112 | 1,112 | - | - | 89 |
| EU 23b Of which standardised approach | 3,746 | 3,746 | 3,746 | 3,746 | 300 |
| EU 23c Of which advanced measurement approach | - | - | - | - | - |
| 24 Amounts below the thresholds for deduction (subject to 250% risk weight) | 2,383 | 2,383 | 2,982 | 2,625 | 191 |
| 29 Total | 48,235 | 48,235 | 45,884 | 45,527 | 3,859 |

⁽¹⁾ Including profits € 1,135 million for the 9M 2024, € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

⁽²⁾ The increase of the credit risk RWEAs compared to 31 June 2024 is mainly due to the inclusion of Hellenic Bank and its subsidiaries in the Company's consolidated financial statements in the third quarter of 2024 and the new production of loans, which are partly offset by the decrease of the RWAs due to the change in the mapping, following the publication of the Commission Implementing Regulation (EU) 2024/1872, between corporate credit ratings and respective risk weighting factors (Credit Quality Steps), set out in Regulation EU 575/2013 and the change of the applicable Risk Weighting Factors (RWF) for Central Bank/Central Government assets, according to article 500a (applicable from 1 July 2024) of Regulation EU/2024/1623.

Market Risk

3. 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 Incremental Risk Charge (IRC) 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 STD 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, further supplemented by sensitivity analysis and stress testing, historical simulation and other market risk metrics (e.g., expected shortfall).

Since 2005 the Bank is validated by the Competent Authorities to employ the internal model approach (IMA) in the calculation of regulatory capital for the trading positions of its activities in Greece.

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

| | a | b | c | d | e | f | g |
|---|-------------------|-----------|-------------------|--------------|-----------|-------------|------------------------------|
| | 30 September 2024 | | | | | | |
| | VaR | SVaR | Comprehensive IRC | risk measure | Other | Total RWEAs | Total own funds requirements |
| | € million | € million | € million | € million | € million | € million | € million |
| 1 RWEAs at 1 July 2024 ¹ | 110 | 188 | 135 | - | - | 433 | 35 |
| 1a Regulatory adjustment ² | (94) | (133) | (65) | - | - | (292) | (23) |
| 1b RWEAs at the previous quarter-end (end of the day) ³ | 16 | 55 | 70 | - | - | 141 | 11 |
| 2 Movement in risk levels | (29) | 12 | 38 | - | - | 21 | 2 |
| 3 Model updates/changes | - | - | - | - | - | - | - |
| 4 Methodology and policy | - | - | - | - | - | - | - |
| 5 Acquisitions and disposals | - | - | - | - | - | - | - |
| 6 Foreign exchange movements | - | - | - | - | - | - | - |
| 7 Other | - | - | - | - | - | - | - |
| 8a RWEAs at the end of the reporting period (end of the day) ³ | 22 | 67 | 152 | - | - | 240 | 19 |
| 8b Regulatory adjustment ² | 59 | 133 | 22 | - | - | 213 | 17 |
| 8 RWEAs at 30 September 2024 ¹ | 81 | 200 | 173 | - | - | 454 | 36 |

⁽¹⁾ RWEAs at previous and current reporting period (quarter end).

⁽²⁾ Regulatory Adjustment indicates the difference between RWEAs and RWEAs (end of day) at previous and current reporting period.

⁽³⁾ RWEAs 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

4. Counterparty risk

4.1 Definition

Counterparty credit risk (CCR) 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).

4.2 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 International Swaps and Derivatives Association - ISDA contracts), which allow the bank to net positive and negative replacement values in the event of default of the counterparty.

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

4.3 Credit derivatives

As of 30 September 2024, the Group held a number of positions on CDS Indices (protection bought € 647 million).

As of 30 June 2024, the Group had a number of positions on CDS Indices (protection bought € 703 million, protection sold € 178 million).

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 9: EU CCR7 - RWEAs 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 RWEAs of CCR exposures.

Leverage Ratio

5. 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 30 September 2024, including profits, was at 8.2% (30 June 2024: 9.1%), 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 30 September and 30 June 2024.

Table 10: EU LR – Leverage Ratio

| | 30 September 2024 ⁽¹⁾ | 30 September 2024 | 30 June 2024 ⁽¹⁾ |
|---|-------------------------------------|----------------------|--------------------------------|
| | <u>€ million</u> | <u>€ million</u> | <u>€ million</u> |
| Tier 1 capital - transitional definition | 8,617 | 7,911 | 7,670 |
| Total Leverage Ratio exposure measure - using a transitional definition of Tier 1 capital | 105,284 | 105,284 | 84,679 |
| Leverage Ratio - using a transitional definition of Tier 1 capital | 8.2% | 7.5% | 9.1% |

⁽¹⁾ Including profits € 1,135 million for the 9M 2024 and € 721 million for the 1H 2024.

⁽²⁾ The decrease of the Leverage Ratio is mainly due to the inclusion of Hellenic Bank and its subsidiaries in the Company's consolidated financial statements in the third quarter of 2024.

Liquidity Risk

6. 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 (Credit Support Annex - CSAs, GMRAs) and on centrally cleared transactions with CCPs 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.

6.1 Liquidity Coverage Ratio (LCR) calculations

LCR as of 30 September 2024 is equal to 187.1% (30 June 2024: 181.7%). The corresponding High Quality Liquid Assets as of 30 September 2024 as defined by the regulation for the calculation of LCR are € 25,064 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.

The table below shows the level and components of the LCR.

Liquidity Risk

Table 11: LIQ1 - Quantitative information of LCR

| | Total unweighted value (average) | | | | Total weighted value (average) | | | |
|--|----------------------------------|--------------|---------------|------------------|--------------------------------|--------------|---------------|------------------|
| | a | b | c | d | e | f | g | h |
| EU 1a Quarter ending on | 30 September 2024 | 30 June 2024 | 31 March 2024 | 31 December 2023 | 30 September 2024 | 30 June 2024 | 31 March 2024 | 31 December 2023 |
| | € million | € million | € million | € million | € million | € million | € million | € million |
| EU 1b Number of data points used in the calculation of averages | 12 | 12 | 12 | 12 | 12 | 12 | 12 | 12 |
| HIGH-QUALITY LIQUID ASSETS | | | | | | | | |
| 1 Total high-quality liquid assets (HQLA) | | | | | 18,502 | 17,658 | 17,472 | 17,177 |
| CASH-OUTFLOWS | | | | | | | | |
| 2 Retail deposits and deposits from small business customers, of which: | 35,196 | 34,252 | 34,126 | 33,935 | 2,511 | 2,441 | 2,424 | 2,368 |
| 3 Stable deposits | 21,973 | 21,388 | 21,432 | 22,039 | 1,099 | 1,069 | 1,072 | 1,102 |
| 4 Less stable deposits | 13,222 | 12,863 | 12,694 | 11,897 | 1,413 | 1,372 | 1,352 | 1,266 |
| 5 Unsecured wholesale funding | 15,569 | 15,392 | 15,381 | 15,225 | 7,388 | 7,316 | 7,288 | 7,040 |
| 6 Operational deposits (all counterparties) and deposits in networks of cooperative banks | 1,165 | 1,211 | 1,304 | 1,515 | 287 | 298 | 321 | 372 |
| 7 Non-operational deposits (all counterparties) | 14,354 | 14,132 | 14,036 | 13,710 | 7,052 | 6,969 | 6,926 | 6,669 |
| 8 Unsecured debt | 49 | 49 | 41 | - | 49 | 49 | 41 | - |
| 9 Secured wholesale funding | | | | | 170 | 101 | 93 | 96 |
| 10 Additional requirements | 6,284 | 5,951 | 5,602 | 5,442 | 1,151 | 1,168 | 1,152 | 1,214 |
| 11 Outflows related to derivative exposures and other collateral requirements | 608 | 665 | 686 | 771 | 608 | 665 | 686 | 771 |
| 12 Outflows related to loss of funding on debt products | - | - | - | - | - | - | - | - |
| 13 Credit and liquidity facilities | 5,677 | 5,286 | 4,916 | 4,671 | 544 | 503 | 466 | 443 |
| 14 Other contractual funding obligations | 111 | 67 | 83 | 86 | 96 | 53 | 70 | 74 |
| 15 Other contingent funding obligations | 5,434 | 4,841 | 4,303 | 3,753 | 343 | 311 | 283 | 254 |
| 16 TOTAL CASH OUTFLOWS | | | | | 11,660 | 11,391 | 11,310 | 11,047 |
| CASH-INFLOWS | | | | | | | | |
| 17 Secured lending (eg reverse repos) | 214 | 210 | 203 | 160 | 64 | 47 | 31 | 17 |
| 18 Inflows from fully performing exposures | 1,261 | 1,163 | 1,089 | 962 | 1,093 | 1,001 | 928 | 806 |
| 19 Other cash inflows | 1,055 | 1,108 | 1,244 | 1,373 | 232 | 239 | 267 | 296 |
| EU-19a (Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies) | | | | | - | - | - | - |
| EU-19b (Excess inflows from a related specialised credit institution) | | | | | - | - | - | - |
| 20 TOTAL CASH INFLOWS | 2,529 | 2,481 | 2,535 | 2,495 | 1,388 | 1,287 | 1,227 | 1,118 |
| EU-20a Fully exempt inflows | - | - | - | - | - | - | - | - |
| EU-20b Inflows Subject to 90% Cap | - | - | - | - | - | - | - | - |
| EU-20c Inflows Subject to 75% Cap | 2,529 | 2,481 | 2,535 | 2,495 | 1,388 | 1,287 | 1,227 | 1,118 |
| TOTAL ADJUSTED VALUE | | | | | | | | |
| EU-21 LIQUIDITY BUFFER | | | | | 18,502 | 17,658 | 17,472 | 17,177 |
| 22 TOTAL NET CASH OUTFLOWS | | | | | 10,272 | 10,104 | 10,083 | 9,929 |
| 23 LIQUIDITY COVERAGE RATIO (%) | | | | | 180.1% | 174.9% | 173.4% | 173.1% |

⁽¹⁾ The increase of the Liquidity Coverage Ratio is mainly due to the inclusion of Hellenic Bank and its subsidiaries in the Company's consolidated financial statements in the third quarter of 2024.

6.2 Net Stable Funding Ratio (NSFR) calculations

NSFR as of 30 September 2024 is equal to 142.4% (30 June 2024: 127.1%). The minimum regulatory threshold for NSFR is set at 100%. The increase of the Net Stable Funding Ratio is mainly due to the inclusion of Hellenic Bank and its subsidiaries in the Company's consolidated financial statements in the third quarter of 2024.

Appendix 1: List of Abbreviations

Appendix 1: List of Abbreviations

| Abbreviation | Definition |
|--------------|--|
| AT1 | Additional Tier 1 |
| AVA | Additional Value Adjustments |
| BoD | Board of Directors |
| BoG | Bank of Greece |
| BRC | Board Risk Committee |
| CBR | Combined Buffer Requirement |
| CCB | Capital Conservation Buffer |
| CCyB | Counter Cyclical Buffer |
| CCP | Central Counterparty |
| CCR | Counterparty Credit Risk |
| CET1 | Common equity Tier 1 |
| CRD | Capital Requirements Directive |
| CRR | Capital Requirements Regulation |
| CVA | Credit Value Adjustment |
| DTC | Deferred Tax Credit |
| EBA | European Banking Authority |
| EC | European Commission |
| ECB | European Central Bank |
| EP | European Parliament |
| ESG | Enviromental, Social and Governance |
| FL | Fully Loaded |
| FVOCI | Fair Value through Other Comprehensive Income |
| GMRA | Global Master Repurchase Agreement |
| G-SIIs | Global Systemic Institution Buffer |
| HAPS | Hellenic Asset Protection Scheme |
| HBA | Hellenic Bank Association |
| HFS | Held For Sale |
| HQLA | High Quality Liquid Assets. |
| ICAAP | Internal Capital Adequacy Assessment Process |
| ILAAP | Internal Liquidity Adequacy Assessment Process |
| IMA | Internal Model Approach |
| ITS | Implementing Technical Standards |
| LCR | Liquidity Coverage Ratio |
| MREL | Minimum Requirement for own funds and Eligible Liabilities |
| NPE | Non-Performing exposures |
| NSFR | Net Stable Funding Ratio |
| OCR | Overall Capital Requirement |
| O-SIIs | Other Systemically Important Institution |
| P2R | Pillar 2 Requirement |
| RTS | Regulatory Technical Standards |
| RWAs | Risk Weighted Assets |
| STD | Standardised Approach |
| SRB | Single Resolution Board |
| SREP | Supervisory Review and Evaluation Process |
| SSM | Single Supervisory Mechanism |
| SyRB | Systemic Risk Buffer |
| TSCR | Total SREP Capital Requirement |
| 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 7 |
| MR2-B | RWA flow of market risk exposures under IMA | Table 8 |
| CCR7 | RWEA flow statements of CCR exposures under the IMM | Table 9 |
| REVISED PILLAR 3 DISCLOSURES REQUIREMENTS - BCBS | | |
| KM1 | Key Metrics template | Table 3 |
| GUIDELINES ON LCR DISCLOSURE - EBA/GL/2017/01 | | |
| LIQ1 | Quantitative information of LCR | Table 11 |
| LEVERAGE RATIO - COMMISSION IMPLEMENTING REGULATION (EU) 2016/200 | | |
| LR | Leverage Ratio | Table 10 |
| OWN FUNDS REQUIREMENTS - COMMISSION IMPLEMENTING REGULATION (UE) 1423/2013 | | |
| CC2 | Reconciliation of regulatory own funds to balance sheet in the audited financial statements | Table 4 |
| 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 5 |