

CONSOLIDATED PILLAR 3 REPORT

FOR THE NINE MONTHS ENDED 30 SEPTEMBER 2025

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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, insurance 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

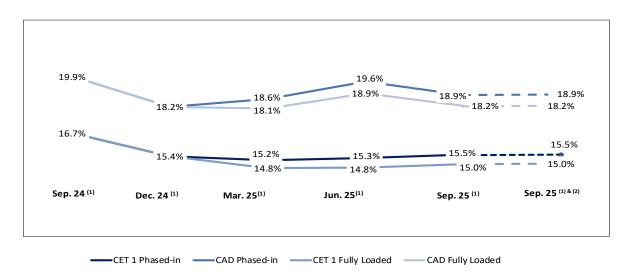
	30 September 2025 ^{(1) & (2)}	30 September 2025 ⁽¹⁾	30 June 2025 ⁽¹⁾	30 September 2024 ⁽¹⁾
	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
Available own funds				
Common Equity Tier 1 (CET1) capital	8,049	8,049	7,932	8,062
Tier 1 capital	8,544	8,544	8,427	8,159
Total capital	9,774	9,775	10,132	9,580
Risk-weighted exposure amounts				
Total risk-weighted exposure amount	51,814	51,836	51,720	48,235
Capital ratios				
Common Equity Tier 1 ratio (%)	15.5%	15.5%	15.3%	16.7%
Tier 1 ratio (%)	16.5%	16.5%	16.3%	16.9%
Total capital ratio (%)	18.9%	18.9%	19.6%	19.9%
Leverage ratio				
Leverage ratio	7.9%	7.7%	7.9%	7.7%
Liquidity Ratio				
Liquidity coverage ratio (%)		180.4%	194.4%	187.1%
Net Stable Funding Ratio (%)		142.7%	143.5%	142.4%

⁽¹⁾ Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

⁽²⁾ Pro-forma with the completion of project "Sun (ex-Solar)".

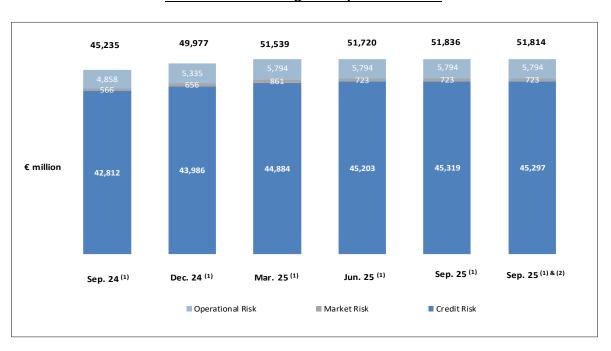


Evolution of Capital Ratios



⁽¹⁾ Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

Evolution of Risk Weighted Exposure Amount



⁽¹⁾ Figures and ratios include profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

1.2 Non-Performing exposures (NPE) Operational targets

As at 30 September 2025 the Group's NPE stock amounting to € 1,531 million (30 June 2025: € 1,496 million) excluding the NPE covered by the Asset Protection Scheme (APS) agreement in Cyprus. The Group NPE ratio, excluding the NPE

 $^{^{(2)}}$ Pro-forma with the completion of project "Sun (ex-Solar)".

⁽²⁾ Pro-forma with the completion) of project "Sun (ex-Solar)".



covered by the APS, amounted to 2.8% (30 June 2025: 2.8%) while the NPE coverage ratio improved to 94% (30 June 2025 92.8%).

1.3 Project Sun (ex-"Solar")

In the context of its NPE management strategy, the Group had participated, since 2018, in a joint initiative with the other Greek systemic banks, to structure an NPE securitization transaction (project "Solar") under the provisions of Hellenic Asset Protection Scheme (HAPS), that was finally abandoned in the first half of 2025. As Management remains committed to its plan to recover the carrying amount of the respective loan portfolio through its disposal, bilateral negotiations have taken place with potential investors for the sale of the same loan perimeter (project "Sun"), which are expected to conclude over the next quarters. Accordingly, the Group has retained the classification of the underlying loans as held for sale.

As at 30 September 2025, the carrying amount of Sun loan portfolio reached € 19 million, comprising loans with gross carrying amount of € 241 million and impairment allowance of € 221 million, including the additional impairment loss of € 25 million recognized in the first semester of 2025, based on estimates of the consideration expected to be received. 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. € 637 million and proceeded with the loans classification as held for sale.

Further to the above, in July 2024, the Group proceeded with the securitization of part of the above NPE portfolio of gross book value ca.€ 0.6 billion, through its special purpose financing vehicle "LEON CAPITAL FINANCE DAC" (SPV), and the transaction complied with the requirements of HAPS law.

On 13 September 2024, the Group, as the holder of the notes issued by the aforementioned SPV, disposed of the 95% of the mezzanine and junior tranches to a third party investor.

In April 2025, the Group obtained the HAPS approval for the senior note and in June 2025 the confirmation by ECB regarding the significant risk transfer (SRT) recognition for the "Leon" loan portfolio.

As at 30 September 2025, the remaining loan portfolio designated for sale, with a gross carrying amount of € 42 million and an equal impairment allowance, was written off in its entirety, as the Group concluded that there was no reasonable expectation of recovering the portfolio's expected cash flows.

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

1.5 Project "Wave"

In the context of the Group's initiatives for the optimization of its regulatory capital, In December 2024, the Bank proceeded with the execution of another synthetic risk transfer transaction (project "Wave VI") in the form of credit linked notes ("CLN"), where the Bank issued a CLN of € 80 million that provides credit protection over the mezzanine loss of a portfolio of performing SME and Large Corporate loans amounting to € 1.1 billion.

In January 2025, the Bank proceeded with an SRT notification to the JST and an STS notification to the Bank of Greece.

Following the ECB's recognition of the significant risk transfer (SRT) on the basis of Art. 245 and Art. 262 (SEC-SA) of the CRR, Wave VI transaction contributed 17bps to the Group's CET1 ratio in September 2025.



1.6 Corporate actions in relation to Hellenic Bank group

Hellenic Bank Public Company Ltd ("Hellenic Bank"), a financial institution based in Cyprus was accounted for as a Group's associate under the equity method since April 2023 until June 2024.

In June 2024, the Bank acquired an additional 26.3% holding in Hellenic Bank and also announced, pursuant to the Takeover Bids Law of 2007 of the Republic of Cyprus ("Law"), the submission of a Mandatory Takeover Bid to all shareholders of Hellenic Bank for the acquisition of up to 100% of its issued share capital. The acceptance period for the Mandatory Takeover Bid expired on 30 July 2024 and the Bank acquired control over Hellenic Bank group within July, despite being the holder of 55.48% of Hellenic Bank's shares as at 30 June 2024. Accordingly, Hellenic Bank and its subsidiaries were included in the Company's consolidated financial statements from the beginning of the third quarter of 2024. The total percentage of acceptance of the Takeover Bid reached 0.481%, giving Eurobank total participation of 55.962% in the issued share capital of Hellenic Bank.

Moreover, in November 2024, the Bank announced that it has entered into share purchase agreements with certain shareholders of the Hellenic Bank, pursuant to which, it has agreed to acquire an additional total holding of 37.51% in the entity.

On 11 February 2025 after the receipt of the relevant regulatory approvals, the acquisition of a total 37.51% stake in Hellenic Bank, was completed resulting in the Bank's total holding in Hellenic Bank at 93.47%. Following that and pursuant to the provisions of the Takeover Bids Law in Cyprus, the Bank also announced the submission of a Mandatory Takeover Bid to the shareholders of Hellenic Bank for the acquisition of up to 100% of the issued share capital of Hellenic Bank.

On 25 April 2025, the Bank announced that the total percentage of acceptance of the Takeover Bid reached 4.525%, resulting in the Bank's total participation of 97.994% in the issued share capital of Hellenic Bank. Moreover, on 28 April 2025, the Bank applied to the Cyprus Securities and Exchange Commission for the exercise of the Squeeze Out right provided by Article 36 of the Takeover Bids Law, for the acquisition of the remaining shares of Hellenic Bank.

On 11 June 2025, the Bank announced the completion of the Squeeze Out procedure. It acquired the remaining 8,279,967 shares of Hellenic Bank, representing 2.006% of its issued share capital. Following this transaction, the Bank's holding in the company's share capital reached 100%.

As of the second quarter of 2025, the fair value exercise performed by the Group to measure the identifiable assets acquired and liabilities incurred from the acquisition of Hellenic Bank has been completed, without any significant differences identified, compared to the acquisition values that were presented in the consolidated financial statements for the year ended 31 December 2024. Moreover, from 1 January 2025, the fair value adjustments that were previously included on a provisional basis within the balance sheet lines 'Other assets' and 'Other liabilities', are presented to the respective balance sheet lines they relate to.

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

1.7 Acquisition of CNP Cyprus Insurance Holdings Limited

On 16 April 2025, Hellenic Bank (currently Eurobank Limited) announced that following the receipt of all relevant regulatory approvals, the acquisition of CNP Cyprus Insurance Holdings Limited from CNP Assurances (the "Transaction") was completed, with a total consideration of € 182 million. As of May 2025, the acquired entity has been renamed ERB Cyprus Insurance Holdings Limited.

The transaction is in line with Eurobank's strategic objective to expand in the Cypriot insurance market. The acquired entity's subsidiaries, hold a leading position in Cyprus in the insurance sector and offer life and general insurance products and services through a large network of independent agents. The Transaction is expected to further expand and



strengthen the existing position of Eurobank Limited in the insurance market, increasing significantly its market share in the life and general insurance sectors.

The results of the former CNP Cyprus subgroup were incorporated in the Group's financial statements prospectively, as of 1 April 2025.

For prudential purposes, the aforementioned companies are accounted for as Group's associates and are consolidated under the equity method.

For further details, please refer to Interim Consolidated Financial Statements, Note 18.3.

1.8 Merger process between Eurobank Holdings and Eurobank S.A.

In respect of the merger process between Eurobank Ergasias Services and Holdings S.A. and Eurobank S.A., on 30 April 2025, the Board of Directors of both companies approved the draft merger agreement. On 19 May 2025, the companies announced the completion of the publicity formalities for the Draft Merger Agreement, pursuant to which Eurobank S.A. will absorb Eurobank Holdings, in accordance with the provisions of the applicable laws. In addition, on 22 October 2025, the General Meeting of Eurobank S.A. approved the above merger. The completion of the merger, which is expected in the fourth quarter of 2025, is subject to the required approvals by the General Meeting of Eurobank Holdings and the receipt of all necessary permits and approvals from the competent authorities.

For further details, please refer to Interim Consolidated Financial Statements, Note 18.1.

1.9 Agreement with Fairfax for the acquisition of Eurolife FFH Life Insurance and the partial disposal of ERB Asfalistiki Ltd

On 13 October 2025, Eurobank Ergasias Services and Holdings S.A. and its subsidiary, Eurobank S.A. together ("Eurobank"), announced that Eurobank Holdings has signed a term sheet with Fairfax Financial Holdings Limited ("Fairfax") pursuant to which Eurobank shall acquire 80% of the life insurance business ("Eurolife Life") (the Transaction) for a cash consideration of € 813 million. Following this acquisition, Eurobank will hold 100% of Eurolife Life and will retain its 20% interest in Eurolife Holdings' general insurance business ("Eurolife General Insurance").

In addition to the aforementioned Transaction, Fairfax shall procure that certain affiliates of Fairfax will acquire 45% of the share capital of ERB Asfalistiki ("ERBA"), the non-life (property and casualty) insurance company of Eurobank Limited in Cyprus, for a cash consideration of € 59 million. Fairfax will also have the right to acquire the remaining 55% of the share capital of ERBA over time.

The completion of both transactions, which is expected within the first quarter of 2026, is subject to actuarial and financial due diligence, the required approvals from the relevant authorities and the process for related party transactions.

For further details, please refer to Interim Consolidated Financial Statements, Note 18.1.

1.10 Dividends/Shareholders' remuneration

On 29 April 2025, the Company received the approval from the ECB to remunerate its shareholders with an amount of € 674 million for the financial year 2024, with a combination of cash and share buyback, corresponding to a 50% payout ratio of the Group's net profit for 2024 less the gain on acquisition of a shareholding in Hellenic Bank of € 99.5 million.

In October 2025, the BoD approved, in accordance with the provisions of paragraph 3 of article 162 of Law 4548/ 2018 and in line with its shareholders' remuneration policy, the distribution of an interim cash dividend of € 170 million for the financial year 2025 from its non-mandatory reserves. The Company obtained the necessary approval from the ECB in late October and will proceed with the payment of the interim dividend to its shareholders in November 2025.

For further details, please refer to Interim Consolidated Financial Statements, Note 26.



1.11 Additional Tier 1 capital instruments

On 4 June 2025, the Company issued fixed rate reset Additional Tier 1 perpetual contingent temporary write-down notes (the "Notes") of nominal value € 500 million. On the same date, the Bank issued notes of equivalent terms, which are held by the Company. The Notes, subject to their terms and conditions, are redeemable in full at the Company's sole and full discretion on any interest payment date falling on or after 4 June 2031 (the first reset date) or at any time following the occurrence of certain events. They bear non-cumulative interest, which is cancellable subject to conditions, at a fixed rate of 6.625% per annum until the first reset date, and thereafter at a reset rate based on the aggregate of 5-year mid-swap rate plus a margin of 445.4 bps. The interest is payable semi-annually in arrears, commencing on 4 December 2025. The Notes are listed on the Euro MTF market of the Luxembourg Stock Exchange.

Based on their terms, such as the fully discretionary and non-cumulative nature of interest, perpetual maturity, and loss-absorbing features that relate to specific regulatory requirements or trigger events, the Notes have been classified as equity instruments with coupon payments, if any, to be recognized as dividends in accordance with the principles of IAS 32. The Notes also qualify as Additional Tier 1 capital instruments under the CRR.

The issuance is in line with Eurobank Holdings Group's strategy to further optimize its capital structure and enhance its capacity to support future strategic initiatives.

On 4 November 2025, the Company announced that it had successfully completed the pricing of the issuance of €600 million Fixed Rate Reset Additional Tier 1 Perpetual Contingent Temporary Write-Down Notes.

The Notes are perpetual and (subject to the terms and conditions of Notes) are callable on any interest payment date falling on or after 10 November 2033 (PNC8). Settlement will take place on the 10 November 2025 and the Notes will be listed on the Luxembourg Stock Exchange's Euro MTF market.

Further information is available on the Company's website.

1.12 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. In September 2025 the Company proceeded with the early redemption of the 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.

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 31 December 2024, Tier 2 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.

In January 2025, the Company announced that it has successfully priced the issuance of € 400 million subordinated Tier 2 debt instruments (New Instruments) which mature in April 2035, are callable at par from 30 January 2030 until 30 April 2030, offering a coupon of 4.25% per annum and are listed on the Luxembourg Stock Exchange's Euro MTF market. In addition, the Company announced an any-and-all exchange offers for Hellenic Bank's outstanding € 200 million Tier 2 notes, out of which € 33 million were held by Group entities, with additional Eurobank Holdings Tier 2 subordinated notes, issued under a single series and with same terms with the € 400 million subordinated notes. The offer period was set from 21 January 2025 until 27 January 2025.

On 28 January 2025, the Company announced that it has decided to accept all existing notes offered for exchange, pursuant to the exchange offer, with nominal value of € 157 million. The nominal value of new instruments issued is € 188.5 million, which will form a single series with the New Instruments with a combined aggregate nominal amount of € 589 million. As a result of the aforementioned exchange, the Group recognized a buy-back loss of approximately € 9 million, in the income statement line "Other income/(expenses)".

The purpose of the Exchange Offer and the issuance of the Eurobank Holdings subordinated notes is to optimize the regulatory efficiency of Eurobank Holdings' capital base while the proceeds will be used for general financing purposes.

1.13 Regulatory framework

The general Basel IV regulatory framework is structured around three mutually reinforcing pillars:

- Pillar 1 defines the minimum regulatory capital requirements, based on principles, rules and methodologies specifying
 and measuring credit, market and operational risk. These requirements are covered by regulatory own funds,
 according to the rules and specifications of CRR. The Basel IV revisions introduce substantial enhancements to Pillar
 1, aiming to improve the consistency and comparability of risk-weighted asset calculations.
- 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. The Basel IV framework indirectly reinforces Pillar 2 by elevating supervisory expectations regarding model governance, stress testing practices, and the integration of revised risk metrics into ICAAP methodologies.
- 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. Basel IV further strengthens Pillar 3 by expanding transparency obligations enhancing comparability and accountability across 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.



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.

Under Executive Committee Act 248/1/06.10.2025, the BoG has decided to set the CCyB rate for Greece at 0.5%, i.e. to the level of the target positive neutral CCyB rate, applicable from 1 October 2026. The positive neutral CCyB is activated at an early stage in the economic and financial cycle, when cyclical systemic risks are neither elevated nor subdued. For the period from 1.10.2025 to 30.09.2026, the CCyB rate that credit institutions are required to maintain is 0.25%, in accordance with Executive Committee Act 235/2/07.10.2024.

- 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 decided that would keep O-SIIs buffer for the Group unchanged at 1.25% for 2025. On 15 September 2025, BoG published the Executive Act 246/15.9.2025 for the determination of O-SIIs and the O-SII buffer thereof for 2026. BoG has decided that it would keep O-SIIs buffer for the Group unchanged at 1.25% for 2026 with effect from 1 January 2026.
- 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 based on paragraph 5 of article 133 of CRD.

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.



1.13.1 Regulatory Developments

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.

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.

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

- Directive (EU) 2024/1619 of the European Parliament 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 6).
- Regulation (EU) 2024/1623 of the European Parliament 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 6 into national legislation, whilst CRR 3 applied from 1 January 2025.

In addition, following its publication in the Official Journal of the European Union, the Commission Implementing Regulation (EU) 2024/1872 of 1 July 2024, amended the implementing technical standards laid down in Implementing Regulation (EU) 2016/1799 as regards the mapping tables specifying the correspondence between the credit risk assessments of external credit assessment institutions and the credit quality steps set out in Regulation (EU) No 575/2013 of the European Parliament and of the Council.

On 8 January 2025, EBA published the final guidelines on the management of environmental, social and governance (ESG) risks. The guidelines specify requirements regarding the internal processes and ESG risk management arrangements that institutions should have in place in accordance with the Capital Requirements Directive (CRD6). These guidelines, which will apply from 11 January 2026, establish requirements for institutions' internal processes and ESG risk management arrangements, including embedding ESG risks into their risk appetite, internal controls, and the ICAAP, as well as developing specific transition plans to manage the impact of ESG factors over short, medium, and long-term horizons.

On 12 February 2025, EBA published its final draft ITS on the Pillar 3 data hub for large and other institutions, 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 the CRR3 and CRD6.

The ITS detail the IT solutions and processes to be followed by large and other institutions when submitting their respective Pillar 3 disclosures. This includes the IT solutions to be used, the data exchange formats to be considered and the technical validations to be performed by the EBA. The EBA will provide additional detailed information to the submitters of Pillar 3 information in the onboarding communication plan.



To submit the information to the EBA, institutions will benefit from a transition period for the information with disclosure reference dates from June to December 2025. This will give them enough time to prepare for the new publication process.

On 22 May 2025, EBA published an onboarding plan for large and other institutions, setting out the steps required for accessing and submitting information to the new Pillar 3 Data Hub (P3DH) – the EBA's centralised platform for public disclosures under CRR3.

The onboarding plan outlines the procedural steps that institutions need to follow to ensure timely and accurate submissions of Pillar 3 information. The onboarding plan provides a step-by-step guide for the identification of institutions and to give them access to the EBA's EUCLID Regulatory Reporting Platform, through which the Pillar 3 data will be submitted. It also spells out the timeline for the process, which will follow a phased-in approach. This means that institutions will be able to continue to fulfil their Pillar 3 disclosure obligations during 2025 as usual, and the submissions to the P3DH will occur only at a later stage. This approach will give institutions enough time to complete the onboarding process and align their internal processes, without impacting the compliance with the CRR requirements. P3DH information will be available to the public from December 2025. In 2025, the Single Resolution Board (SRB) has carried out a series of public consultations to enhance transparency and predictability of upcoming policies and expectations.

On 22 May 2025, EBA launched a public consultation on proposed amendments to the European Commission's Implementing Regulation on Pillar 3 disclosures under the CRR3. The proposal specifies enhanced and proportionate disclosure requirements related to ESG-related risks, equity exposures and aggregate exposure to shadow banking entities. It also implements the new codes for the statistical classification of economic activities in the EU (NACE). The consultation paper was published for a three-month consultation period i.e. until 22 August 2025.

On 16 June 2025, EBA published three final draft technical standards that are crucial for the implementation of the EU Banking Package and will allow supervisors to monitor institutions' compliance. In particular, the EBA is publishing the following Regulatory Technical Standards (RTS) and Implementing Technical Standards (ITS):

- RTS concerning the calculation and adjustments of the Business Indicator (BI), which is central to the standardised and harmonised application of the operational risk capital requirements.
- ITS on the mapping to FINREP, which will ensure consistency and reduce implementation, administrative and operational costs.
- Amending ITS on operational risk reporting, which will keep the supervisory reporting framework relevant, meaningful and aligned with the amended regulation.

After the submission of the final draft ITS to the Commission for adoption, the EBA will publish on the website the IT tools, including binding instructions. The EBA will publish during Q4 2025 a technical package, including the DPM, validation rules and taxonomy, that shall be used by institutions to submit this supervisory reporting information to supervisors. The first applicable reference date for reporting under the draft ITS is 31 March 2026.

On 3 December 2024, the SRB published a consultation paper on the 'Operational guidance for banks on resolvability self-assessment', outlining the capabilities that banks are expected to maintain over time in order to be deemed resolvable. The final document was published on 7 August 2025. On 17 March 2025, the SRB launched a public consultation on 'Operational Guidance on Resolvability Testing for Banks' that seeks to promote a harmonized approach for the implementation of the multi-annual testing programme across the main resolvability dimensions. The final document was published on 26 September 2025. Lastly, on 2 April 2025, the SRB started a public consultation on 'Expectations on Valuation Capabilities' that introduces an updated, comprehensive set of information necessary for performing valuations, the minimum functionalities expected for Data Repositories for resolution, as well as establishing expectations on the content and structure of the valuation playbooks (consultation ended on 2 July 2025).



On 4 November 2025, EBA released several updates to ensure consistency with the latest regulatory and reporting framework developments. These include an updated Mapping Tool reflecting recent amendments to the Pillar 3 disclosure and supervisory reporting frameworks.

1.14 2025 EU - wide stress test

The EU-wide stress test exercise was carried out on a sample of banks covering broadly 75% of the banking sector in the euro area, each non-euro area EU Member State and Norway, as expressed in terms of total consolidated assets as of end 2023. To be included in the sample, banks have to have a minimum of € 30 billion total assets.

As per the 2025 EU-Wide Stress Test Methodological Note (published on 11 November 2024, footnote 92), Eurobank Holdings has been excluded from the sample of the EU-wide stress test exercise because of a major acquisition (Hellenic Bank).

The results of the 2025 EU-wide stress test were published on 1 August 2025.

1.15 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 prudential 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. Considering that Group's NPEs ratio remained consistently below 5% for five consecutive quarters, templates CQ2, CQ6, CQ8 and CR2a of the EBA Disclosure ITS are not published from 31 December 2024 and onwards.

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.

On 20 June 2024, EBA published a new draft ITS on Pillar 3 framework in order to cover all disclosures requirements for institutions under the new legislative CRR3 which is applicable from 01 January 2025. As the relevant disclosures are published for the first time in their entirety, the data of the previous periods are not reported as the templates are not comparable.

1.16 Pillar 3 Written attestation

Pursuant to article 431(3) of Part Eight of CCR2, 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, as these have been specified in the existing regulatory framework.

The Pillar 3 governance process ensures that both the Group's Management and the Board are given sufficient opportunity to debate and challenge the disclosures before their publication, hence, to examine that these have been subject to adequate verification, and they comply with applicable regulatory framework.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee and was approved by the BoD on 26 November 2025 prior to their publication on the Group's website.

It should be noted that:

- data refers to the prudential (regulatory) scope of consolidation;
- the amounts reported are consistent with the recent submissions of the regulatory reporting for each period.

1.17 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.

Based on the internal "Consolidated Pillar 3 Disclosures Policy" the Group ensures 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 report will be published in accordance with EBA expectations the latest, as follows:

- Year-end Pillar 3 reports (reference date December): by end-June, with the exception of the remuneration policies information that would be expected by end-August;
- Quarterly and Semi- annual Pillar 3 reports: by "reference date + 4 months".

1.18 Prudential consolidation

The prudential consolidation applied for reporting to regulatory authorities follows the principles used for the accounting consolidation with the following difference: participation in insurance companies is excluded from prudential consolidation and are accounted for using the equity method.

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%.

The following table presents a list of the Group's subsidiaries at 30 September 2025 for which prudential consolidation is different compared to the accounting consolidation:

Table 1: Group's insurance subsidiaries

Name of the entity	Method of accounting consolidation	Method of prudential consolidation	Description of the entity
Pancyprian Insurance Ltd (1)	Full consolidation	Equity consolidation	General Insurance
Hellenic Life Insurance Company Ltd (1)	Full consolidation	Equity consolidation	Life Insurance
Hellenic Bank Insurance Holding Ltd ⁽¹⁾	Full consolidation	Equity consolidation	Insurance services
ERB Cyprus Insurance Holdings Ltd (2)	Full consolidation	Equity consolidation	Holding company
Cyprialife Greece Single Member S.A. ⁽³⁾	Full consolidation	Equity consolidation	Life Insurance
ERB Cyprialife Ltd ⁽³⁾	Full consolidation	Equity consolidation	Life Insurance
ERB Asfalistiki Ltd ⁽²⁾	Full consolidation	Equity consolidation	General Insurance
Cyprialife Insurance Brokers Ltd ⁽²⁾	Full consolidation	Equity consolidation	Insurance Brokerage
Laiki Brokers (Insurance & Consultancy Services) Ltd ⁽²⁾	Full consolidation	Equity consolidation	Insurance Brokerage
Laiki Insurance Agencies Ltd ⁽²⁾	Full consolidation	Equity consolidation	Insurance agency services

⁽¹⁾ Entities of Hellenic Bank group, which were consolidated as of the third quarter of 2024.

⁽²⁾ CNP Cyprus Insurance Holdings Limited and its subsidiaries (former "CNP Cyprus subgroup") were acquired by Hellenic Bank in April 2025 (note 1.7).

⁽³⁾ Merger of Group's Cypriot insurance companies: In October 2025, the merger of the Group's Cypriot insurance companies was completed. This involved the transfer of all insurance portfolios, assets, and liabilities of Hellenic Life Insurance Company Ltd and Pancyprian Insurance Ltd to ERB Cyprialife Ltd and ERB Asfalistiki Ltd, respectively.



The following table shows a comparison between the Balance Sheet included in the Consolidated Financial Statements and the Balance Sheet prepared under the prudential scope of consolidation as at 30 September 2025.

Table 2: Prudential and accounting Balance Sheet

		30 September 2025				
	<i>(</i> 4)	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	<u>€ million</u>	<u>€ million</u>		
Assets						
Cash and Balances with central banks		13,339	- (4.45)	13,339		
Due from credit institutions (2)		2,250	(146)	2,104		
Securities held for trading		364	-	364		
Derivative financial instruments		785	125	785		
Loans and advances to customers (2)		52,881	125	53,006		
Investment securities	_	24,270	(880)	23,390		
Investments in associaties and joint ventures	а	237	321	558		
Property, plant and equipment		1,047	(33)	1,014 1,273		
Investment property Intangible assets	b	1,327 484	(54) (8)	1,273 476		
Deferred tax asset	b	3,633	(2)	3,631		
of which deferred tax assets that rely on future profitability		3,033	(2)	3,031		
and do not arise from temporary differences	С	1		1		
of which deferred tax assets that do not rely on future profitability		2,880	-	2,880		
of which deferred tax assets that rely on future profitability		752	(2)	750		
and arise from temporary differences	d		(-/			
Other assets		2,039	(56)	1,983		
Assets of disposal group classified as held for sale		313	-	313		
Total assets		102,969	(733)	102,236		
Liabilities						
Due to central banks		-	-	-		
Due to credit institutions (2)		3,073	(284)	2,789		
Derivative financial instruments		976	-	976		
Due to customers (2)		78,999	324	79,323		
Debt securities in issue		7,423	-	7,423		
of which tier 2 instruments	е	1,234	-	1,234		
Other liabilities		2,590	(773)	1,817		
Total liabilities		93,061	(733)	92,328		
Equity				<u> </u>		
Ordinary share capital	f	811	-	811		
Share premium	g	1,145	-	1,145		
Reserves and retained earnings	h	7,457	-	7,457		
of which cash flow hedge reserves	i	(16)	-	(16)		
AT1 Capital Instruments	j	495	-	495		
Total equity		9,908	-	9,908		
Total equity and liabilities		102,969	(733)	102,236		

⁽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 2.5 "EU CC2 - Reconciliation of regulatory own funds to balance sheet in the prudential consolidation Balance sheet".

⁽²⁾ According to Annex V "Reporting on Financial Information", specific amounts are categorised as Credit Institutions in Financial Statements while in Regulatory scope of consolidation as Other Financial Corporations (Loans and advances to customers or Due to customers).



2. Capital Management

2.1 Basel 4 implementation

On 19 June 2024, Regulation 2024/1623/EU and Directive 2024/1619/EU of the European Parliament and of the Council of 31 May 2024, amending Regulation 575/2013/EU and Directive 2013/36/EU, respectively, were published in the Official Journal of the European Union. The revised CRR (CRR3 Basel IV) became, in general, applicable from 1 January 2025, with a transitional period envisaged for certain rules set out therein.

The main changes that affect the Group's RWAs under the new framework are described below:

2.1.1 Credit risk

- Unconditionally cancellable limits previously at 0% CCF will gradually receive a 10% CCF (transition period 2030-2032);
- Exposures to natural persons with unhedged currency mismatch (i.e. CHF mortgage loans) are penalized with an RWAs multiplier of 1.5x;
- Acquisition of Land, Development & Construction (ADC) loans are distinguished from the secured by real estate asset class and receive 150% Risk Weighting Factor (RWF) (or 100% under specific conditions for RRE property);
- In the secured by real estate exposures class, the RWF/LTV mapping is changing, providing benefit to the very low LTVs of loans secured by RRE and increased RWAs for the remaining exposure. Income Producing Real Estate (IPRE) exposures are also distinguished from the secured by real estate asset class and their risk weight factor is linked to the LTV and the collateral type (RRE/CRE) resulting in more punitive risk weights;
- For externally rated corporates/institutions the Credit Quality Step (CQS)/RWF mapping is changing, providing a lower RW in certain cases;
- Unrated Project Finance clients are categorized in 3 segments based on the project phase (pre-operational at 130%; operational at 100%) and specific conditions (high quality operational at 80% RWF);
- Shipping clients may benefit of 80% RWF subject to specific conditions; and
- Retail asset class is segmented to transactors (revolving accounts acting as a transactional rather than a credit facility)
 which receive a lower risk weight (45% instead of 75%) and to non-transactors.

2.1.2 Counterparty and Issuer Risk

- Change of the applicable risk weights on exposures from Corporates and Financial Institutions (subordinated, senior preferred / non-preferred);
- Revised treatment on exposures from unrated Institutions and impact from the application of original maturity (removal of the residual maturity);
- Change in the calculation of exposure from SFTs under master netting agreements concerning the Financial Collateral Comprehensive Method;
- Revision of the credit valuation adjustment (CVA) framework, including the removal of the existing exceptions
 following specific criteria (mainly corporate clients) and the application of the reduced version of the basic approach
 (BA-CVA); and
- Change of the applicable risk weight for Equities (new prevailing RWF mainly at 250% vs 100%-150%-250%), subject to transition period (full application from 2030).

2.1.3 Market Risk

In light of ongoing delays in the international implementation of the Basel FRTB standards—particularly by the United States and the United Kingdom—the European Commission adopted a Delegated Regulation to defer by one year the application of the revised market risk capital requirements under Regulation (EU) No 575/2013. This decision, supported by the majority of stakeholders during a public consultation held between March and April 2025, aims to preserve a level



playing field for EU institutions. According to this Regulation the FRTB framework is scheduled to apply from 1 January 2027.

2.1.4 Operational Risk

Basel IV introduces a new Standardised Approach (SA) for calculating operational risk capital requirements. This method is a single, non-model-based approach and replaces all previous methods, including the Basic Indicator, Standardised, and Advanced Measurement Approaches.

The capital requirement is now based on a Business Indicator (BI) reflecting the scale of business operations through income and expense components. BI is calculated as the average over the past three years.

2.2 Key Metrics

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

Table 3: EU KM1 - Key Metrics template

			a	b	С	d	e
		30 September 2025 ⁽¹⁾	30 September 2025 ⁽²⁾	30 June 2025 ⁽²⁾	31 March 2025 ⁽²⁾	31 December 2024 (2)	30 September 2024 ⁽²⁾
		<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	€ million	<u>€ million</u>
	Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	8,049	7,874	7,932	7,692	7,718	7,813
2	Tier 1 capital	8,544	8,369	8,427	7,692	7,718	7,911
3	Total capital	9,775	9,600	10,132	9,444	9,093	9,331
	Risk-weighted exposure amounts						
4	Total risk exposure amount	51,836	51,756	51,720	51,471	49,977	48,235
4a	Total risk exposure pre-floor	51,836	51,756	51,720	51,471		
	Capital ratios (as a percentage of risk-weighted exposure amount)						
5	Common Equity Tier 1 ratio (%)	15.5%	15.2%	15.3%	14.9%	15.4%	16.2%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	15.5%	15.2%	15.3%	14.9%		
6	Tier 1 ratio (%)	16.5%	16.2%	16.3%	14.9%	15.4%	16.4%
6b	Tier 1 ratio considering unfloored TREA (%)	16.5%	16.2%	16.3%	14.9%		
7	Total capital ratio (%)	18.9%	18.5%	19.6%	18.3%	18.2%	19.3%
7b	Total capital ratio considering unfloored TREA (%)	18.9%	18.5%	19.6%	18.3%		
	$\label{lem:continuous} Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)$						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.85%	2.85%	2.85%	2.85%	2.85%	2.75%
EU 7e	of which: to be made up of CET1 capital (percentage points)	1.60%	1.60%	1.60%	1.60%	1.60%	1.55%
EU 7f	of which: to be made up of Tier 1 capital (percentage points)	2.14%	2.14%	2.14%	2.14%	2.14%	2.06%
EU 7g	Total SREP own funds requirements (%)	10.85%	10.85%	10.85%	10.85%	10.85%	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%
511.0	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member						
EU 8a	State (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Institution specific countercyclical capital buffer (%)	0.55%	0.55%	0.55%	0.54%	0.56%	0.56%
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%	1.25%	1.25%
11	Combined buffer requirement (%)	4.30%	4.30%	4.30%	4.29%	4.31%	4.31%
EU 11a	Overall capital requirements (%)	15.15%	15.15%	15.15%	15.14%	15.16%	15.06%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.01%	7.70%	8.15%	7.32%	7.30%	8.34%
	Leverage ratio						
13	Leverage ratio total exposure measure	108,327	108,295	107,100	105,673	106,049	105,284
14	Leverage ratio	7.9%	7.7%	7.9%	7.3%	7.3%	7.5%
	Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b	of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	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%



			a	a	b	С	d
		30 September	30 September	30 June	31 March	31 December	30 September
		2025	2025	2025	2025	2024	2024
		<u>€ million</u>	€ million	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
Liquidity Co	verage Ratio						
Tot	tal high-quality liquid assets (HQLA) (Weighted value - average)	22,674	22,674	22,191	21,259	20,159	18,502
(Cash outflows - Total weighted value	14,055	14,055	13,643	12,968	12,324	11,660
	Cash inflows - Total weighted value	2,073	2,073	1,963	1,717	1,546	1,388
	Total net cash outflows (adjusted value)	11,982	11,982	11,680	11,251	10,778	10,272
	Liquidity coverage ratio (%) (adjusted value) (2)	189.3%	189.3%	190.1%	188.7%	186.6%	180.1%
	Liquidity coverage ratio (%)	180.4%	180.4%	194.4%	182.8%	188.2%	187.1%
١	let Stable Funding Ratio						
Ī	otal available stable funding	80,021	80,021	79,366	77,797	77,562	75,020
1	Total required stable funding	56,067	56,067	55,301	54,452	53,612	52,680
NSF	Rratio (%)	142.7%	142.7%	143.5%	142.9%	144.7%	142.4%

⁽¹⁾ Figures and ratios include 9M 2025 profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

2.3 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 Group.

The following table shows the composition of the Group's regulatory capital as at 30 September 2025 and 30 June 2025 which is calculated according to CRD IV as amended.

⁽²⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission granted by the Supervisory Authorities.

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

⁽⁴⁾ Pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 30 September 2025 with the completion of project "Sun (ex-Solar)" would be 15.5%, 16.5% and 18.9%, respectively.



Table 4: EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements

	С	a & b	a & b	
		30 September 2025 ⁽¹⁾	30 September 2025 ⁽²⁾	30 June 2025 ⁽²⁾
	Ref.	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
Total equity Regulatory adjustments	f, g, h	9,413	9,413	9,148
Interim or year-end profit not eligible (1) & (2)		(633)	(815)	(555)
Minority interest not allowed in CET1		-	-	-
Cash flow hedge reserves	i	16	16	17
Intangible assets	b	(379)	(379)	(353)
of which Goodwill		(42)	(42)	(42)
Deferred tax assets that rely on future profitability and do not arise from temporary differences	С	(1)	(1)	-
Deferred tax assets that rely on future profitability and arise from temporary differences (amount above 10% threshold)	d	-	-	-
Prudent Valuation Adjustments (3)		(4)	(4)	(5)
Other regulatory adjustments		(338)	(299)	(307)
Amount exceeding the 17.65% threshold	a, d	(24)	(56)	(13)
Common Equity Tier I capital ⁽⁴⁾		8,049	7,874	7,932
Additional Tier I capital	j .	495	495	495
Total Tier I capital		8,544	8,369	8,427
Tier II capital - subordinated debt ⁽⁵⁾	e .	1,231	1,231	1,705
Total Regulatory Capital	:	9,775	9,600	10,132
Risk Weighted Assets	:	51,836	51,756	51,720
Ratios (6)				
Common Equity Tier I		15.5%	15.2%	15.3%
Tier I		16.5%	16.2%	16.3%
Total Capital Adequacy Ratio		18.9%	18.5%	19.6%

⁽¹⁾ Figures and ratios include 9M 2025 profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), subject to Supervisory Authorities' approval.

⁽²⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission granted by the Supervisory Authorities.

⁽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 increased mainly due to the Group's organic profitability, which is offset by payout accrual, DTC acceleration and the new production of loans.

⁽⁵⁾ Total Capital Adequacy ratio decreased mainly due to the early redemption of the Tier 2 capital instruments in September 2025.

⁽⁶⁾ The pro-forma CET1, Tier 1 and Total Capital Adequacy ratios as at 30 September 2025 with the completion of project "Sun (ex-Solar)" would be 15.5%, 16.5% and 18.9%, respectively.



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 2025, 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 € 2,880million (30 June 2025 € 2,927million). 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.

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%.

In line with the Bank's initiative to enhance the quality of its regulatory capital, the amortisation of DTC has been accelerated for regulatory purposes starting from 01.01.2025, by an amount equal to 29% of accrued shareholders remuneration, aiming at its elimination by 2033. Following this, the DTC included in the calculation of the Group's capital ratios stands at € 2,738 million (30 June 2025 € 2,832 million) accounting for 34.0% of CET 1 capital.

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

2.4 Supervisory Review and Evaluation Process (SREP) capital requirements

According to the 2024 SREP decision, from December 2024 the P2R for the Group is set at 2.85% in terms of total capital (or at 1.60% in terms of CET1 capital). The change in the P2R is the outcome of the consolidation of Hellenic Bank. Based on the ECB's 'Guide on the supervisory approach to consolidation in the banking sector', in case of M&As, the P2R of the combined entity/group is determined based on the weighted average of the P2R (based on RWAs) of the two entities (i.e. Eurobank Group: 2.75%, Hellenic Bank: 3.45%).

Thus, as of 30 September 2025, the Group is required to meet a CET1 ratio of at least 11.82% (including Additional Tier 1 (AT1) and Tier 2 shortfall) and a Total Capital Adequacy Ratio of at least 15.15% (Overall Capital Requirements - OCR) including Combined Buffer Requirement of 4.30%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

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 15 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, applicable from 30 September 2025, is presented in the following table:



Table 5: Pillar 2 Requirements

	30 September 2025		
	CET1 Capital	Total Capital	
	Requirements	Requirements	
Minimum regulatory requirement	4.50%	8.00%	
Pillar 2 Requirement (P2R)	1.60%	2.85%	
Total SREP Capital Requirement (TSCR)	6.10%	10.85%	
Combined Buffer Requirement (CBR)			
Capital conservation buffer (CCB)	2.50%	2.50%	
Countercyclical capital buffer (CCyB)	0.55%	0.55%	
Other systemic institutions buffer (O-SII)	1.25%	1.25%	
Overall Capital Requirement (OCR)	10.40%	15.15%	
AT1 capital shortfall	1.08%	-	
Tier 2 capital shortfall	0.34%	<u>-</u>	
Overall Capital Requirement (OCR), including shortfall	11.82%	15.15%	

The above CET1 capital requirement of 11.82% takes into account i) that the Group issued in June 2025 an AT1 instrument of € 500 million, partially utilizing its capacity to issue AT1, as well as ii) the redemption, in September 2025, of the Tier 2 instrument of € 950 million issued to the Hellenic Republic. Assuming the Group had fully utilized the AT1 and Tier 2 capital capacity, the CET1 requirement would stand at 10.40% as of September 2025.

As at 30 September 2025, Eurobank's consolidated CET1 ratio and Total Capital ratio, including profit attributable to the Company's shareholders for the period amounting to €1,033 million and adjusted with the payout accrual of € 144 million from 2024 profits and of € 489 million from the third quarter of 2025 profits, were 15.5% and 18.9% respectively, which exceeded the 2024 OCR of 11.82% and 15.15%.

2.5 Minimum Requirement for 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 MREL. The Single Resolution Board (SRB) has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry strategy for resolution purposes. The applicable MREL target for Eurobank S.A. on a consolidated basis is set at 27.79% of its total Risk Weighted Exposure Amounts (RWEAs), including a combined buffer requirement (CBR) of 4.30%. The MREL target is updated by the SRB on an annual basis.

As of 30 September 2025, the Bank's MREL ratio at consolidated level stands at 29.20% of RWEAs including profits for the period ended 30 September 2025, after deducting payout accrual (30 June 2025:29.41%), while the Bank's MREL ratio at consolidated level, including profit for the period, after deducting payout accrual, pro-forma with the completion of project "Sun (ex-Solar)", stands at 29.21% of RWEAs (30 June 2025:30.73%, pro-forma with the completion of project "Sun (ex-Solar)", "Leon", "Wave VI" and the € 500 million senior preferred notes issued in July 2025), exceeding the binding MREL target, as stated above.

In July 2025, the Company announced that the Bank successfully completed the issuance of €500 million senior preferred notes. Furthermore, in September 2025, the Company announced that the Bank successfully completed, through a private placement, a tap of € 200 million to the aforementioned senior preferred notes of € 500 million, issued in July 2025. The proceeds from the issues will support the Group's strategy to ensure ongoing compliance with its MREL requirements.



2.6 Capital requirements under Pillar 1

The following table shows the Group's RWEAs and capital requirements as at 30 September 2025 and 30 June 2025. The minimum capital requirements under Pillar 1 are calculated as 8% of RWEAs.

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

Risk weighted exposure amounts (RWEAs) 30 september amounts (RWEAs) 30 september 2025 2025			а	b	С
1 Credit risk (excluding CCR) 39,714 39,521 3,177 2 Of which the standardised approach 39,714 39,521 3,177 3 Of which the standardised approach 4 Of which: slotting approach 5 Of which: equities under the simple riskweighted approach 5 Of which: equities under the simple riskweighted approach 6 Counterparty credit risk - CCR 462 485 37 7 Of which the standardised approach 264 283 21 8 Of which the standardised approach 264 283 21 8 Of which exposures to a CCP 12 7 1 9 Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) 10 Of which the standardised approach (SA) 10 Of which the standardised approach (F-BA and R-BA) 161 157 13 EU 10b Of which the simplified approach (F-BA and R-BA) 161 157 13 EU 10c Of which the simplified approach 15 Settlement risk 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-IRBA approach 1,500 1,415 120 EU 19a Of which SEC-IRBA approach 1,500 1,415 120 EU 19a Of which SEC-IRBA approach - 20 Position, foreign exchange and commodities risks (Market risk) 723 917 58 21 Of which the simplified standardised approach (S-SA) 127 152 10 22 Of which the simplified standardised approach (S-SA) 127 152 10 23 Reclassifications between the trading and non-trading books - - 24 Exposures to crypto-assets - - 25 Anounts below the thresholds for deduction (subject to 250% risk weight) 0,725 0,725 26 Output floor applicd (%) 70 70 70 70 27 Floor adjustment (before application of transitional cap)					-
2 Of which the standardised approach 39,714 39,521 3,177 3 Of which the foundation IRB (FIRB) approach - - - 6 Of which: slottling approach - - - 5 Of which the advanced IRB (AIRB) approach - - - 6 Counterparty credit risk - CCR 462 485 37 7 Of which the standardised approach 264 283 21 8 Of which internal model method (IMM) - - - 8 Of which exposures to a CCP 12 7 1 9 Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the basic approach (FA) - - - EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10a Of which SEC-IRBA approach - - - 15 Settlement risk -			<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
3 Of which the foundation IRB (FIRB) approach - <td>1</td> <td>Credit risk (excluding CCR)</td> <td>39,714</td> <td>39,521</td> <td>3,177</td>	1	Credit risk (excluding CCR)	39,714	39,521	3,177
4 Of which: slotting approach - - - EU 4a Of which tequities under the simple riskweighted approach - - - 5 Of which the advanced IRB (AIRB) approach - - - 6 Counterparty credit risk - CCR 462 485 37 7 Of which the standardised approach 264 283 21 8 Of which the standardised approach 12 7 1 EU 8a Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) - - - - EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10b Of which stee Shad approach - - - EU 10c Of which Stee Shad approach - - - 15 Settlement risk - - - - 16 Secu	2	Of which the standardised approach	39,714	39,521	3,177
4 Of which: slotting approach - - - EU 4a Of which tequities under the simple riskweighted approach - - - 5 Of which the advanced IRB (AIRB) approach - - - 6 Counterparty credit risk - CCR 462 485 37 7 Of which the standardised approach 264 283 21 8 Of which the standardised approach 12 7 1 EU 8a Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) - - - - EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10b Of which stee Shad approach - - - EU 10c Of which SEC-BRA approach - - - 17 Of which SEC-BRA approach - - - - 19	3	Of which the foundation IRB (FIRB) approach	_	_	-
5 Of which the advanced IRB (AIRB) approach -	4		_	-	-
5 Of which the advanced IRB (AIRB) approach -	EU 4a	Of which: equities under the simple riskweighted approach	_	_	-
6 Counterparty credit risk - CCR 462 485 37 7 Of which the standardised approach 264 283 21 8 Of which internal model method (IMM) - - - EU 8a Of which exposures to a CCP 12 7 1 9 Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) - - - EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10b Of which the simplified approach - - - - 15 Settlement risk - - - - - 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-IRBA approach - - - - - 18 Of which SEC-SRA approach 1,500 1,415	5	· · · · · · · · · · · · · · · · · · ·	_	_	-
7 Of which the standardised approach 264 283 21 8 Of which internal model method (IMM) - - - EU 8a Of which exposures to a CCP 12 7 1 9 Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) - - - - EU 10b Of which the simplified approach (F-BA and R-BA) 161 157 13 EU 10c Of which the simplified approach - - - - 15 Settlement risk - - - - - 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-RBA (including IAA) 370 373 30 18 Of which SEC-RBA (including IAA) 370 373 30 19 Of which SEC-SA approach 1,500 1,415 <	6	, , , , ,	462	485	37
EU 8a Of which exposures to a CCP 12 7 1 9 Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) - - - - EU 10b Of which the simplified approach (F-BA and R-BA) 161 157 13 EU 10c Of which the simplified approach - - - - 15 Settlement risk - - - - - 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-IRBA approach - - - - - 18 Of which SEC-IRBA (including IAA) 370 373 30 30 30 19 1,500 1,415 120 120 1,500 1,415 120 120 1,500 1,415 120 120 120 1,500 1,415 120 <td>7</td> <td></td> <td>264</td> <td>283</td> <td>21</td>	7		264	283	21
9 Of which other CCR 186 195 15 10 Credit valuation adjustments risk - CVA risk 161 157 13 EU 10a Of which the standardised approach (SA) EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10b Of which the simplified approach EU 10b Of which the simplified approach 15 Settlement risk 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-IRBA approach 18 Of which SEC-IRBA (including IAA) 370 373 30 <t< td=""><td>8</td><td>• • • • • • • • • • • • • • • • • • • •</td><td>_</td><td>-</td><td>-</td></t<>	8	• • • • • • • • • • • • • • • • • • • •	_	-	-
10	EU 8a	Of which exposures to a CCP	12	7	1
EU 10a Of which the standardised approach (SA) - - - EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10c Of which the simplified approach - - - - 15 Settlement risk - - - - 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-IRBA approach - - - - 18 Of which SEC-IRBA (including IAA) 370 373 30 19 Of which SEC-SA approach 1,500 1,415 120 EU 19a Of which 1250%/ deduction - - - - 20 Position, foreign exchange and commodities risks (Market risk) 723 917 58 21 Of which the alternative standardised approach (A-SA) 127 152 10 22 Of which Alternative Internal Model Approach (S-SA) 127 152 10 22 Of which Alternative Internal M	9	Of which other CCR	186	195	15
EU 10b Of which the basic approach (F-BA and R-BA) 161 157 13 EU 10c Of which the simplified approach - - - 15 Settlement risk - - - 16 Securitisation exposures in the non-trading-book (after the cap) 1,870 1,788 150 17 Of which SEC-IRBA approach - - - - 18 Of which SEC-SRA (including IAA) 370 373 30 19 Of which SEC-SA approach 1,500 1,415 120 EU 19a Of which 1250%/ deduction - - - - 20 Position, foreign exchange and commodities risks (Market risk) 723 917 58 21 Of which the alternative standardised approach (A-SA) 127 152 10 21 Of which Alternative Internal Model Approach (S-SA) 127 152 10 22 Of which Alternative Internal Model Approach (A-IMA) 5,794 5,794 464 24 Operational risk 5,794	10	Credit valuation adjustments risk - CVA risk	161	157	13
EU 10cOf which the simplified approach15Settlement risk16Securitisation exposures in the non-trading-book (after the cap)1,8701,78815017Of which SEC-IRBA approach18Of which SEC-ERBA (including IAA)3703733019Of which SEC-SA approach1,5001,415120EU 19aOf which 1250%/ deduction20Position, foreign exchange and commodities risks (Market risk)7239175821Of which the alternative standardised approach (A-SA)22Of which the Simplified standardised approach (S-SA)1271521022Of which Alternative Internal Model Approach (A-IMA)EU 22aLarge exposures23Reclassifications between the trading and non-trading books24Operational risk5,7945,79446424aExposures to crypto-assets25Amounts below the thresholds for deduction (subject to 250% risk weight)3,0323,05824326Output floor applied (%)0.7250.72527Floor adjustment (before application of transitional cap)28Floor adjustment (after application of transitional cap)	EU 10a	Of which the standardised approach (SA)		-	
EU 10cOf which the simplified approach15Settlement risk16Securitisation exposures in the non-trading-book (after the cap)1,8701,78815017Of which SEC-IRBA approach18Of which SEC-ERBA (including IAA)3703733019Of which SEC-SA approach1,5001,415120EU 19aOf which 1250%/ deduction20Position, foreign exchange and commodities risks (Market risk)7239175821Of which the alternative standardised approach (A-SA)22Of which the Simplified standardised approach (S-SA)1271521022Of which Alternative Internal Model Approach (A-IMA)EU 22aLarge exposures23Reclassifications between the trading and non-trading books24Operational risk5,7945,79446424aExposures to crypto-assets25Amounts below the thresholds for deduction (subject to 250% risk weight)3,0323,05824326Output floor applied (%)0.7250.72527Floor adjustment (before application of transitional cap)28Floor adjustment (after application of transitional cap)	EU 10b	Of which the basic approach (F-BA and R-BA)	161	157	13
16 Securitisation exposures in the non-trading-book (after the cap) 1 Of which SEC-IRBA approach 1 Of which SEC-IRBA (including IAA) 370 373 30 19 Of which SEC-SA approach 1,500 1,415 120 EU 19a Of which 1250%/ deduction 20 Position, foreign exchange and commodities risks (Market risk) 21 Of which the alternative standardised approach (A-SA) EU 21a Of which the Simplified standardised approach (S-SA) 22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures 23 Reclassifications between the trading and non-trading books 24 Operational risk 25 Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 3 Of which SEC-IRBA approach 3 1,578 1,788 1,789 1,780	EU 10c		-	-	-
17 Of which SEC-IRBA approach - - - 18 Of which SEC-ERBA (including IAA) 370 373 30 19 Of which SEC-SA approach 1,500 1,415 120 EU 19a Of which 1250%/ deduction - - - 20 Position, foreign exchange and commodities risks (Market risk) 723 917 58 21 Of which the alternative standardised approach (A-SA) - - - - 21 Of which Alternative Internal Model Approach (A-IMA) - <td>15</td> <td>Settlement risk</td> <td>-</td> <td>-</td> <td>-</td>	15	Settlement risk	-	-	-
18 Of which SEC-ERBA (including IAA) 370 373 30 19 Of which SEC-SA approach 1,500 1,415 120 EU 19a Of which 1250%/ deduction	16	Securitisation exposures in the non-trading-book (after the cap)	1,870	1,788	150
19 Of which SEC-SA approach EU 19a Of which 1250%/ deduction 20 Position, foreign exchange and commodities risks (Market risk) 21 Of which the alternative standardised approach (A-SA) EU 21a Of which the Simplified standardised approach (S-SA) 22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures 23 Reclassifications between the trading and non-trading books 24 Operational risk 25 Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 20 Of which 1250%/ deduction 21 T23 P152 P152 22 10 23 Reclassifications between the trading and non-trading books 24 Operational risk 25 Show a policion (subject to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 29 Common P150 P172 P173 P173 P173 P173 P173 P173 P173 P173	17	Of which SEC-IRBA approach	-	-	-
EU 19a Of which 1250%/ deduction 20 Position, foreign exchange and commodities risks (Market risk) 21 Of which the alternative standardised approach (A-SA) EU 21a Of which the Simplified standardised approach (S-SA) 22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures 23 Reclassifications between the trading and non-trading books 24 Operational risk 25 Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 20 Operational risk	18	Of which SEC-ERBA (including IAA)	370	373	30
Position, foreign exchange and commodities risks (Market risk) 21 Of which the alternative standardised approach (A-SA) EU 21a Of which the Simplified standardised approach (S-SA) 22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures 23 Reclassifications between the trading and non-trading books 24 Operational risk 25 Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 29 Of which the alternative standardised approach (A-SA) 127 152 100 127 152 100 127 152 100 128 917 58 917	19	Of which SEC-SA approach	1,500	1,415	120
21 Of which the alternative standardised approach (A-SA) EU 21a Of which the Simplified standardised approach (S-SA) 22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures 23 Reclassifications between the trading and non-trading books 24 Operational risk 25 Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 29 Of which the alternative standardised approach (A-SA) 127 152 10 127 152 10 127 152 10 127	EU 19a	Of which 1250%/ deduction	-	-	-
EU 21a Of which the Simplified standardised approach (S-SA) 127 152 10 22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures 23 Reclassifications between the trading and non-trading books 24 Operational risk 5,794 5,794 464 24a Exposures to crypto-assets 25 Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 0.725 0.725 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap)	20	Position, foreign exchange and commodities risks (Market risk)	723	917	58
22 Of which Alternative Internal Model Approach (A-IMA) EU 22a Large exposures	21	Of which the alternative standardised approach (A-SA)			
EU 22a Large exposures	EU 21a	Of which the Simplified standardised approach (S-SA)	127	152	10
Reclassifications between the trading and non-trading books Operational risk Exposures to crypto-assets Amounts below the thresholds for deduction (subject to 250% risk weight) Output floor applied (%) Floor adjustment (before application of transitional cap) Floor adjustment (after application of transitional cap)	22	Of which Alternative Internal Model Approach (A-IMA)			
24Operational risk5,79446424aExposures to crypto-assets25Amounts below the thresholds for deduction (subject to 250% risk weight)3,0323,05824326Output floor applied (%)0.7250.72527Floor adjustment (before application of transitional cap)28Floor adjustment (after application of transitional cap)	EU 22a	Large exposures	-	-	-
Exposures to crypto-assets Amounts below the thresholds for deduction (subject to 250% risk weight) Output floor applied (%) Floor adjustment (before application of transitional cap) Floor adjustment (after application of transitional cap)	23	Reclassifications between the trading and non-trading books	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight) 26 Output floor applied (%) 70 Floor adjustment (before application of transitional cap) 70 Floor adjustment (after application of transitional cap) 71 Floor adjustment (after application of transitional cap)	24	Operational risk	5,794	5,794	464
to 250% risk weight) 26 Output floor applied (%) 27 Floor adjustment (before application of transitional cap) 28 Floor adjustment (after application of transitional cap) 29 The control of transitional cap of transitional c	24a	Exposures to crypto-assets		-	
Output floor applied (%) 70.725 O.725 O.725 Floor adjustment (before application of transitional cap) Floor adjustment (after application of transitional cap) O.725 O.725	25	· ·	3,032	3,058	243
28 Floor adjustment (after application of transitional cap)	26		0.725	0.725	
	27	Floor adjustment (before application of transitional cap)	-	-	
29 Total 51,756 51,720 4,140	28	Floor adjustment (after application of transitional cap)			
	29	Total	51,756	51,720	4,140



The following table presents a comparison of modelled and standardised risk weighted exposure amounts at risk level as at 30 September 2025 and 30 June 2025.

Table 7: EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

	a	b	С	d	EU d				
		30 September 2025							
		Risk weighted exposure amounts (RWEAs)							
	RWEAs for modelled approaches that banks have supervisory approval to use € million	RWEAs for portfolios where standardised approaches are used € million	Total actual RWEAs (a + b) € million	RWEAs calculated using full standardised approach € million	RWEAs that is the base of the output floor € million				
Credit risk (excluding counterparty credit risk)	-	42,746	42,746	42,746	42,746				
2 Counterparty credit risk	-	462	462	462	462				
3 Credit valuation adjustment		161	161	161	161				
4 Securitisation exposures in the banking book	-	1,870	1,870	1,870	1,870				
5 Market risk	596	127	723	1,912	1,912				
6 Operational risk		5,794	5,794	5,794	5,794				
7 Other risk weighted exposure amounts		-	-	-	-				
8 Total	596	51,160	51,756	52,945	52,945				

	a	b	С	d	EU d						
		30 June 2025									
	Risk weighted exposure amounts (RWEAs)										
	RWEAs for modelled		Total actual								
	approaches that banks	RWEAs for portfolios where	RWEAs	RWEAs calculated using	RWEAs that is the						
	have supervisory approval	standardised approaches		full standardised	base of the output						
	to use	are used	(a + b)	approach	floor						
	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>						
1 Credit risk (excluding counterparty credit risk)	-	42,579	42,579	42,579	42,579						
2 Counterparty credit risk	-	485	485	485	485						
3 Credit valuation adjustment		157	157	157	157						
Securitisation exposures in the banking book	-	1,788	1,788	1,788	1,788						
5 Market risk	766	152	917	1,597	1,597						
6 Operational risk		5,794	5,794	5,794	5,794						
7 Other risk weighted exposure amounts		-	-	-	-						
8 Total	766	50,955	51,720	52,400	52,400						



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).

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

	a	b	С	d	е	f	g
	30 September 2025						
	V-D	CVAD	Takal DINITA	Total own funds			
	VaR € million	SVaR	IRC € million	risk measure	Other	Total RWEAs € million	requirements
1 RWEAs at 1 July 2025 ⁽¹⁾	<u>€ million</u> 153	€ million 326	<u>€ millon</u> 287	<u>€ million</u>	<u>€ million</u>	<u>€ million</u> 766	€ million 61
1a Regulatory adjustment ⁽²⁾	(124)	(243)	-	-	-	(367)	(29)
1b RWEAs at the previous quarter-end (end of the day) (3)	29	82	287	-	-	398	32
2 Movement in risk levels	(42)	(30)	(98)	-	-	(170)	(14)
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	19	59	159	-	-	237	19
8b Regulatory adjustment ⁽²⁾	92	236	30	-	-	359	29
8 RWEAs at 30 September 2025 ⁽¹⁾	111	295	189			596	48

⁽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 2025, the Group held a number of positions mainly on CDS Indices (protection bought € 475 million) and single name CDS (protection bought € 10 million).

As of 30 June 2025, the Group held a number of positions on CDS Indices (protection bought € 681 million) and single name CDS (protection bought € 5 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 2025 was at 7.9% (30 June 2025: 7.9%), significantly over the proposed minimum threshold of 3%. In addition, based on the latest SREP Decision, the Group is not subject to a P2R or P2G in relation to the leverage ratio.

The following table includes the summary of the Group's leverage ratio with reference dates 30 September 2025 and 30 June 2025.

Table 10: EU LR - Leverage Ratio

	30 September	30 September	30 June
	2025 (1)	2025 (2)	2025 (2)
	€ million	€ million	<u>€ million</u>
Tier 1 capital - transitional definition	8,544	8,369	8,427
Total Leverage Ratio exposure measure - using a transitional definition of Tier 1 capital	108,327	108,295	107,100
Leverage Ratio - using a transitional definition of Tier 1 capital	7.9%	7.7%	7.9%

⁽¹⁾ Figures and ratios include 9M 2025 profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy) subject to Supervisory Authorities' approval.

⁽²⁾ Figures and ratios presented are as per the final regulatory reporting submissions which include semi-annual and year-end audited profits, as well as the payout accrual (in accordance with the Group shareholders' remuneration policy), following permission granted by the Supervisory Authorities.



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 2025 is equal to 180.4% (30 June 2025: 194.4%). The decrease is mainly driven by the early redemption of €950 million Tier 2 capital instruments. The corresponding High Quality Liquid Assets (HQLA) as of 30 September 2025 as defined by the regulation for the calculation of LCR are € 22,556 million (30 June 2025: € 22,560 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 following table shows the level and components of the LCR.



Liquidity Risk

Table 11: LIQ1 - Quantitative information of LCR

	a	b	C	d	e	f	g	h
	Total unweighted value (average) Total weighted value (average)							
EU 1a Quarter ending on	30 September	30 June	31 March	31 December	30 September	30 June	31 March	31 December
Lo 1a Quarter enume on	2025	2025	2025	2024	2025	2025	2025	2024
	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>	<u>€ million</u>
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)					22,674	22,191	21,259	20,159
ASH-OUTFLOWS								
$2 \ \mbox{Retail deposits and deposits from small business customers, of which:}$	45,501	43,331	40,512	37,731	3,201	3,058	2,871	2,681
3 Stable deposits	29,469	27,827	25,756	23,814	1,473	1,391	1,288	1,191
4 Less stable deposits	16,032	15,504	14,757	13,917	1,727	1,667	1,583	1,491
5 Unsecured wholesale funding	18,745	18,090	17,252	16,439	9,015	8,665	8,226	7,820
6 Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,222	1,242	1,201	1,156	299	304	294	284
7 Non-operational deposits (all counterparties)	17,504	16,834	16,035	15,234	8,698	8,347	7,916	7,487
8 Unsecured debt	18	14	17	49	18	14	17	49
9 Secured wholesale funding					71	151	172	182
10 Additional requirements Outflows related to derivative exposures and other collateral	7,630	7,344	7,073	6,739	1,231	1,197	1,178	1,168
requirements	516	518	537	569	516	518	537	569
12 Outflows related to loss of funding on debt products 13 Credit and liquidity facilities	- 7,114	6,825	6,536	6,169	715	678	641	- 598
14 Other contractual funding obligations	132	182	148	115	713 94	149	120	93
15 Other contingent funding obligations	6,987	6,676	6,329	6,057	444	424	401	381
16 TOTAL CASH OUTFLOWS		5,010	5,525	3,551	14,055	13,643	12,968	12,324
CASH-INFLOWS								
17 Secured lending (eg reverse repos)	98	146	180	208	80	88	94	93
18 Inflows from fully performing exposures	1,761	1,651	1,505	1,366	1,563	1,459	1,321	1,193
19 Other cash inflows	1,495	1,437	1,247	1,131	430	417	302	260
(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	3,354	3,234	2,932	2,705	2,073	1,963	1,717	1,546
EU-20a Fully exempt inflows					<u> </u>	-	-	-
EU-20b Inflows Subject to 90% Cap		-	-			-	-	-
EU-20c Inflows Subject to 75% Cap	3,354	3,234	2,932	2,705	2,073	1,963	1,717	1,546
EU-21 LIQUIDITY BUFFER					22,674	TOTAL ADJUS 22,191	TED VALUE 21,259	20,159
22 TOTAL NET CASH OUTFLOWS					11,982	11,680	11,251	10,778
23 LIQUIDITY COVERAGE RATIO (%)					189.3%	190.1%	188.7%	186.6%

6.2 Net Stable Funding Ratio (NSFR) calculations

NSFR as of 30 September 2025 is equal to 142.7% (30 June 2025: 143.5%). The minimum regulatory threshold for NSFR is set at 100%.



Appendix 1: List of Abbreviations

Appendix 1: List of Abbreviations

Abbreviation	Definition
AC .	Amortised Cost
ADC	Acquisition of Land, Development & Construction
\PS	Asset Protection Scheme
AT1	Additional Tier 1
NVA	Additional Value Adjustments
31	Basic Indicator
BLS	Business Line Statements
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
CBR	Combined Buffer Requirement
СВ	Capital Conservation Buffer
CCF	Credit Conversion Factor
CCP	Central Counterparty
CCR	Counterparty Credit Risk
Сув	Counter Cyclical Buffer
COREDO	Common Panarts
COREPS	Capital Requirements Directive
RM	Capital Requirements Directive
CRR	Credit Risk Mitigation
	Capital Requirements Regulation
CVA	Credit Value Adjustment
OTC	Deferred Tax Credit
ВА	European Banking Authority
:C	European Commission
СВ	European Central Bank
Р	European Parliament
sg	Enviromental, Social and Governance
RTB	Fundamental Review of the Trading Book
VOCI	Fair Value through Other Comprehensive Income
MRA	Global Master Repurchase Agreement
6-SIIs	Global Systemic Institution Buffer
1APS	Hellenic Asset Protection Scheme
НВА	Hellenic Bank Association
······································	Held For Sale
IQLA	High Quality Liquid Assets
CAAP	Internal Capital Adequacy Assessment Process
FRS	International Financial Reporting Standards
LAAP	Internal Liquidity Adequacy Assessment Process
MA	Internal Model Approach
TS	Implementing Technical Standards
RRBB	Interest Rate risk in the Banking Book
.CR	
VREL	Liquidity Coverage Ratio Minimum Requirement for own funds and Eligible Liabilities
NPE	Non-Performing exposures
NSFR	Non-Performing exposures Net Stable Funding Ratio
DCR	
	Overall Capital Requirement
) Sile	Operational Impact Strategy Other Systemically Impact and Institution
D-SIIs	Other Systemically Important Institution
2G	Pillar 2 Guidance
2R	Pillar 2 Requirement
AF	Risk Appetite Framework
AS	Risk Appetite Statements
RTS	Regulatory Technical Standards
RWEAs	Risk Weighted Exposure Amounts
FTs	Securities Financing Transactions
RB	Single Resolution Board
REP	Supervisory Review and Evaluation Process
RT	Significant Risk Transfer
SM	Single Supervisory Mechanism
STD	Standardised Approach
yRB	Systemic Risk Buffer
SCR	Total SREP Capital Requirement



Appendix 2: Guidelines and Regulations mapping on Disclosures Requirements

Appendix 2: Guidelines and Regulations mapping on Disclosures Requirements

	EBA/GL/2016/11 & EBA/ITS/2024/05	
OV1	Overview of risk weighted exposure amounts	Table 6
CMS1	Comparison of modelled and standardised risk weighted exposure amounts at risk level	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