



**INTERNAL GOVERNANCE CONTROL MANUAL
SUMMARY**

JUNE 2021

Introduction

On 20 March 2020, the demerger of Eurobank Ergasias S.A. (Eurobank Ergasias) through the business banking sector's hive down and its transfer to a new credit institution that has been established under the corporate name Eurobank S.A. was completed. Eurobank Ergasias S.A. renamed to Eurobank Ergasias Services and Holdings S.A. (for the purposes of this manual Company, Eurobank Holdings or HoldCo), became the shareholder of Eurobank S.A. by acquiring all the shares issued by Eurobank S.A. (for the purposes of this manual Bank), while Eurobank S.A. substituted Eurobank Ergasias S.A. by way of universal succession, to all the transferred assets and liabilities. Finally, for the purposes of this manual, Eurobank S.A. with its subsidiaries is defined as the Bank's Group while Eurobank Holdings with its subsidiaries is defined as Eurobank or Eurobank Group or Group.

Purpose and Scope

1. The Internal Governance Control Manual (IGCM) describes the overall framework by which Eurobank is directed and controlled. It includes a formal record of the high level internal control principles in operation and is intended to meet the requirements laid down by regulators and internal governance policies. The content of the manual has been discussed in the Bank's Executive Board (ExBo), reviewed by the Company's Audit Committee and approved by the Company's Board of Directors (Board).
2. The policies and controls outlined in this manual are designed to minimize the possibility of error or financial loss to Eurobank and to protect the interest of shareholders and depositors as well as to ensure that the requirements of the relevant regulatory authorities are complied with at all times.
3. This manual provides an outline of high level control policies, whilst detailed operating procedures are set out in individual procedures, manuals maintained by each division. Subsidiaries are required to have their own IGCMs and/or procedures, manuals and adopt Eurobank's policies as required. The principles of the IGCM apply fully to all divisions and subsidiaries, unless this is prohibited by local circumstances or regulations.
4. All the policies and controls described in this manual and all the detailed procedures contained in the individual procedures manuals of each division and subsidiary adhere to Eurobank's standards on matters of routine, operational or business nature, which have been enhanced to take into account factors such as local legal, regulatory, operating and other requirements relevant to Eurobank.
5. Individual manuals kept by divisions and subsidiaries are supplementary to the IGCM and not part of it.

6. A high-level organization chart and a brief description of the key responsibilities of the main control functions of Eurobank are included in this manual.
7. The IGCM, supplemented by the procedures manuals of individual divisions and subsidiaries, includes a written description of the uppermost levels of Eurobank's System of Internal Controls.
8. This manual is in line with the provisions of Greek Law on Corporate Governance, as in force.

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