

# **CONSOLIDATED PILLAR 3 REPORT**

**FOR THE SIX MONTHS ENDED  
30 JUNE 2024**

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## Introduction – General Information

### 1. Introduction – General Information

Eurobank Ergasias Services and Holdings S.A. (the Company or Eurobank Holdings), which is the parent company of Eurobank S.A. (the Bank) and its subsidiaries (the Group), consisting mainly of Eurobank S.A. Group are active in retail, corporate and private banking, asset management, treasury, capital markets and other services. The Group operates mainly in Greece and in Bulgaria, Cyprus and Luxembourg. The Company is incorporated in Greece and its shares are listed on the Athens Stock Exchange.

Eurobank Holdings is supervised on a consolidated basis and Eurobank S.A. is supervised on a standalone basis by the European Central Bank (ECB) and the Bank of Greece (BoG).

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

#### 1.1 Highlights

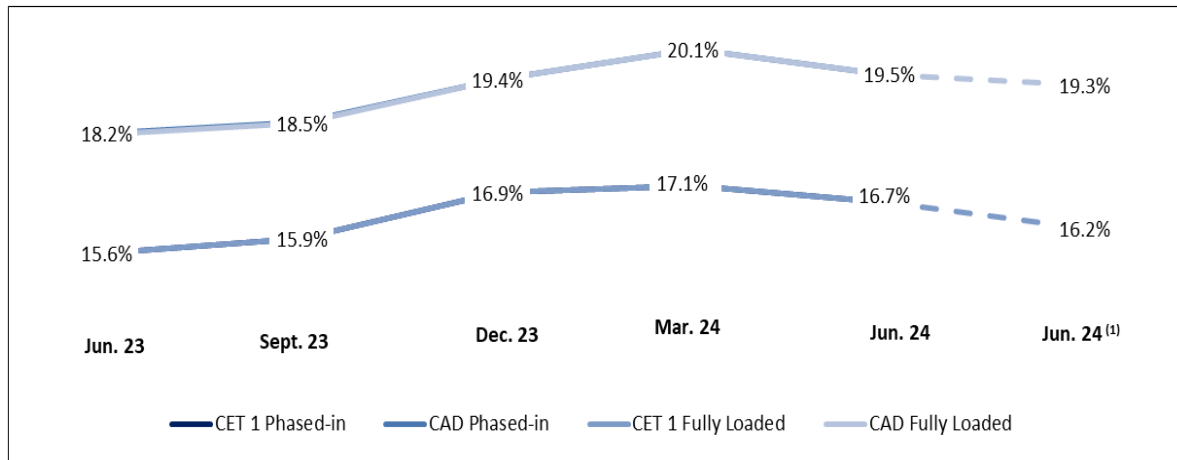
	<b>Risk profile</b>			
	<b>30 June 2024 <sup>(1) &amp; (2)</sup></b>	<b>30 June 2024 <sup>(1)</sup></b>	<b>31 March 2024 <sup>(1)</sup></b>	<b>30 June 2023</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
<b>Available own funds</b>				
Common Equity Tier 1 (CET1) capital	<b>8,079</b>	7,670	7,598	6,871
Tier 1 capital	<b>8,179</b>	7,670	7,598	6,871
Total capital	<b>9,644</b>	8,958	8,924	8,020
<b>Risk-weighted exposure amounts</b>				
Total risk-weighted exposure amount	<b>50,021</b>	45,884	44,463	43,976
<b>Capital ratios</b>				
Common Equity Tier 1 ratio (%)	<b>16.2%</b>	16.7%	17.1%	15.6%
Tier 1 ratio (%)	<b>16.4%</b>	16.7%	17.1%	15.6%
Total capital ratio (%)	<b>19.3%</b>	19.5%	20.1%	18.2%
<b>Leverage ratio</b>				
Leverage ratio		9.1%	9.0%	8.1%
<b>Liquidity Ratio</b>				
Liquidity coverage ratio (%)		181.7%	179.0%	174.0%
Net Stable Funding Ratio (%)		127.1%	127.7%	129.7%

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

<sup>(2)</sup> Pro-forma with the completion of Projects "Solar" and "Leon", a new synthetic securitization (Project "Wave V"), the distribution of dividend to shareholders for FY2023 profits and the consolidation of Hellenic Bank and its subsidiaries.

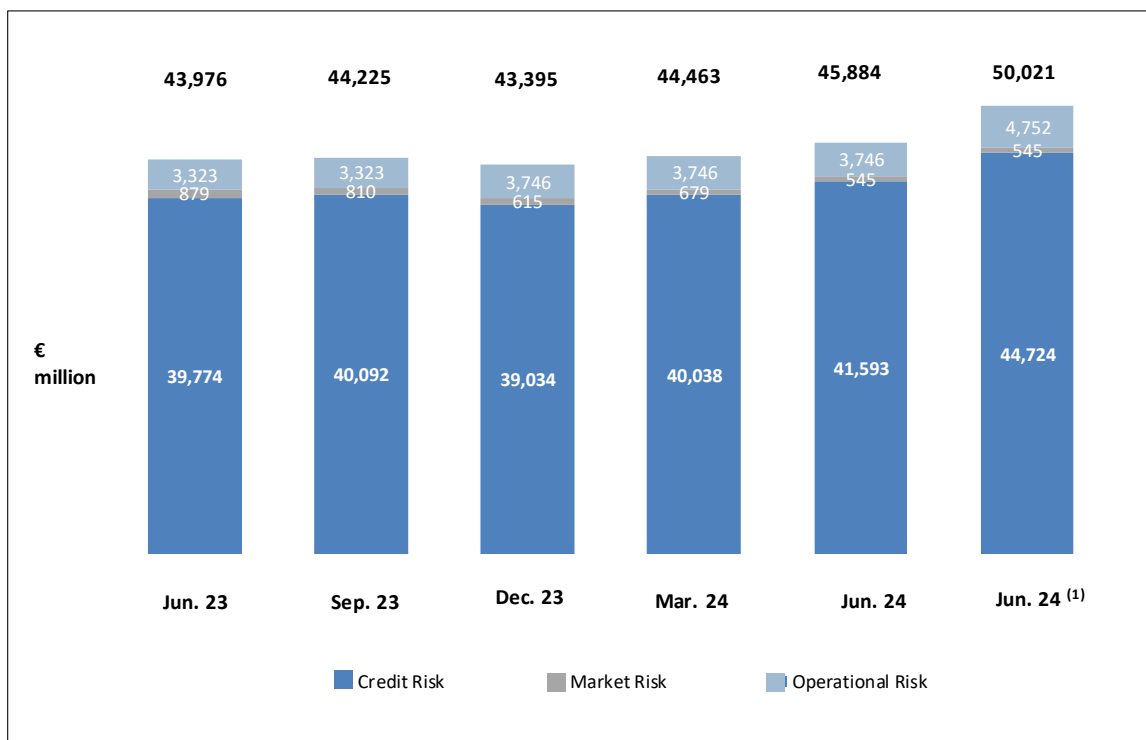
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### Evolution of Capital Ratio



<sup>(1)</sup> Pro-forma with the completion of Projects "Solar" and "Leon", a new synthetic securitization (Project "Wave V"), the distribution of dividend to shareholders for FY2023 profits and the consolidation of Hellenic Bank and its subsidiaries.

### Evolution of Risk Weighted Exposure Amount



<sup>(1)</sup> Pro-forma with the completion of Projects "Solar" and "Leon", a new synthetic securitization (Project "Wave V"), the distribution of dividend to shareholders for FY2023 profits and the consolidation of Hellenic Bank and its subsidiaries.

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### 1.2 Non-Performing exposures (NPE) Operational targets

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

As at 30 June 2024 the Group's NPE stock and the NPE ratio decreased to € 1.3 billion (31 December 2023: € 1.5 billion) and 3.1% (31 December 2023: 3.5%) respectively. The NPE coverage ratio improved to 93.2% (31 December 2023: 86.4%).

### 1.3 Project "Solar"

In the context of its NPE management strategy, the Group has structured another NPE securitization transaction (project "Solar"), as part of a joint initiative with the other Greek systemic banks initiated since 2018. The Group targets to the prudential and accounting derecognition of the underlying corporate loan portfolio from its balance sheet by achieving a Significant Risk Transfer (SRT) and including "Solar" securitization under the Hellenic Asset Protection Scheme (HAPS), thus the senior note of the securitization to become entitled to the Greek State's guarantee. Out of the notes to be issued by the SPV, in the context of 'Solar' securitization, the Banks will hold 100% of the Senior notes as well as the 5% of the Mezzanine and Junior notes and will proceed with the disposal of the remaining stake of the subordinated tranches. The completion of the transaction is subject to the fulfillment of customary conditions for such transactions, including, among others, the HAPS guarantee and SRT approval mentioned above.

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

As at 30 June 2024, the carrying amount of the aforementioned loan portfolio reached € 47 million, comprising loans with gross carrying amount of € 244 million, which carried an impairment allowance of € 197 million. Furthermore, the impairment allowance of the letters of guarantee included in the underlying portfolio reached € 1 million.

For further details, please refer to Interim Consolidated Financial Statements, Note 15.

### 1.4 Project "Leon"

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

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

on 8 July 2024, the Group proceeded to a securitization transaction for gross loans of € 0.59 billion that complied with the requirements of HAPS law. The Group, as holder of the notes issued by "LEON CAPITAL FINANCE, intends to proceed with the disposal of the 95% of the mezzanine and junior tranches. The envisaged transaction, expected to be completed within 2024, will result in the accounting derecognition of loans within the project's "Leon" perimeter.

For further details, please refer to Interim Consolidated Financial Statements, Note 15.

### 1.5 Hellenic Bank Public Company Ltd, Cyprus

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



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The Bank has entered into agreements with certain of the Hellenic Bank's shareholders since August 2023 for the acquisition of an additional total holding of 26.1% in the entity and the relevant transactions were completed on 3 June 2024. On the same date, following the Transaction, pursuant to the Takeover Bids Law of 2007 of the Republic of Cyprus, L.41(I)/2007 as amended, the Bank also announced the submission of a Mandatory Takeover Bid ("Takeover Bid") to all shareholders of Hellenic Bank for the acquisition of up to 100% of the issued share capital of Hellenic Bank.

As of 30 June 2024, the Bank's participation percentage in Hellenic Bank reached 55.48%. Despite being the holder of over 50% of Hellenic Bank's shares, until the expiration of the time allowed for the acceptance of the Takeover Bid, and pursuant to the Law, Eurobank as the offeror, its nominees and persons acting in concert with it could not be appointed to the Board of Directors (BoD) of Hellenic Bank, nor they could exercise, or procure the exercise of, the votes attaching to any shares they held in Hellenic Bank. The above restrictions were lifted upon the expiration of the Takeover Bid acceptance period. As a result, as of 30 June 2024, the Group assessed that it has not obtained control over Hellenic Bank, which continued being accounted for as an associate under the equity method of accounting.

For further details, please refer to Interim Consolidated Financial Statements, Note 18.

On 30 July 2024 the acceptance period for the aforementioned Takeover Bid expired, therefore the restrictions imposed by the Law on the Bank's ability to exercise its voting rights no longer apply, and Eurobank is able to exercise its rights in full. Upon the expiration of the Takeover Bid acceptance period, the Group's shareholding in Hellenic Bank reached 55.962%.

### 1.6 Dividends

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

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

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

### 1.7 Tier 2 Capital instruments

In January 2018, Eurobank Ergasias S.A. issued Tier 2 capital instruments of face value of € 950 million, in replacement of the preference shares which had been issued in the context of the first stream of Hellenic Republic's plan to support liquidity in the Greek economy under Law 3723/2008. The aforementioned instruments have a maturity of ten years (until 17 January 2028) and pay fixed nominal interest rate of 6.41%, that shall be payable semi-annually.

On 30 November 2022, the Company announced the issuance of a € 300 million subordinated Tier 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.

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### 1.8 Regulatory framework

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

- Pillar 1 defines the minimum regulatory capital requirements, based on principles, rules and methods specifying and measuring credit, market and Operational Risk. These requirements are covered by regulatory own funds, according to the rules and specifications of CRR.
- Pillar 2 addresses the internal processes for assessing overall capital and liquid asset holdings are adequate in relation to risk profile (Internal Capital Adequacy Assessment Process - ICAAP and Internal Liquidity Assessment Process - ILAAP). Moreover, Pillar 2 introduces the Supervisory Review & Evaluation Process (SREP), which assesses the risks banks face and checks that banks are equipped to manage those risks properly.
- Pillar 3 intends to enhance market discipline by developing a set of quantitative and qualitative disclosure requirements, which allow market participants to assess key pieces of information on the scope of application, capital, risk exposures, risk assessment processes and hence the capital adequacy and the internal liquidity adequacy of credit institutions.

According to the CRD IV provisions:

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

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

As a result, the minimum ratios which must be met, including the CCB and which shall apply from 1 January 2019 are:

- Minimum CET1 capital ratio 7% and
- Total capital adequacy ratio 10.5%.

Additional capital buffers that CRD IV introduces are the following:

- a) Countercyclical buffer (CCyB). The purpose of this buffer is to counteract the effects of the economic cycle on banks' lending activity, thus making the supply of credit less volatile and possibly even reduce the probability of credit bubbles or crunches. Credit institutions may be required under the CRD IV to build up an additional buffer up to 2.5% of CET1 capital during periods of excess credit growth, according to national circumstances. According to BoG Executive Committee Act No 202/1/11.03.2022, which lays down the procedure for applying the CCyB rate in Greece and the relevant calibration methodology, BoG assesses, on a quarterly basis, the intensity of cyclical systemic risk and the appropriateness of the CCyB rate, taking into account the standardised credit-to-GDP (Gross Domestic Product) gap, the buffer guide and, in particular, additional indicators for monitoring the build-up of cyclical systemic risk. On 20 June 2024, BoG announced that would keep the countercyclical capital buffer rate for Greece unchanged at "zero percent" (0%) in the third quarter of 2024, with effect from 1 July 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

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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.

- d) Systemic Risk Buffer (SyRB). According to article 133 of CRD, SyRB can be used to address a broad range of systemic risks, which may also stem from exposures to specific sectors, as long as they are not already covered by the Capital Requirements Regulation or by the CCyB or the G-SII/O-SII buffers. The level of the SyRB may vary across institutions or sets of institutions as well as across subsets of exposures. There is no maximum limit for this buffer. Competent authority is in charge of setting the SyRB and of identifying the sets of institutions to which it applies. According to BoG Executive Committee Act No 197/2/21.12.2021, BoG decided to adopt the European Banking Authority (EBA) guidelines on the appropriate subsets of exposures to which the competent authority or the designated authority may apply a SyRB buffer based on paragraph 5 of article 133 of CRD.

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.

### 1.8.1 Regulatory Developments

On 29 May 2020, EBA published its Guidelines on loan origination and monitoring that expect banks to develop robust and prudent standards to ensure newly originated loans are assessed properly. The Guidelines set requirements for assessing the borrowers' creditworthiness together with the handling of information and data for the purposes of such assessments. In these requirements, the Guidelines bring together the EBA's prudential and consumer protection objectives. The application of the Guidelines for newly originated loans took place within Q2 2021, while gradually and until Q2 2024 the application of the Guidelines will be expanded to existing loans that have been renegotiated and to the stock of existing loans.

On 24 January 2022, EBA published its final draft ITS on Pillar 3 disclosures on Environmental, Social and Governance (ESG) risks. The final draft ITS put forward tables, templates and associated instructions that specify the requirement in Article 449a of Regulation (EU) No 575/2013 to disclose prudential information on ESG risks, including transition and physical risk, addressed to large institutions with securities traded on a regulated market of any Member State. The Pillar 3 framework on prudential disclosures on ESG risks supports institutions in the public disclosure of meaningful and comparable information on how ESG-related risks and vulnerabilities, and in particular climate change, may exacerbate other risks in their balance sheet. Disclosure of information on ESG risks is a vital tool to promote market discipline, allowing stakeholders to assess banks' ESG related risks and sustainable finance strategy.

Large institutions disclose information on ESG risks from 28 June 2022. For the first year this information is disclosed on an annual basis and semi-annually thereafter. An overview of the qualitative and quantitative information is depicted below:

- Three tables for qualitative information on ESG risks. Under each risk category, the disclosure requirements target three aspects: governance, business model and strategy, and risk management. First disclosure reference date is 31.12.2022.
- Ten templates for quantitative disclosures, specifically:
  - a. four templates on climate change transition risk that are disclosed with reference date 31.12.2022, except for disclosures on institutions' scope 3 emissions and alignment metrics which have phase-in period until June 2024;
  - b. one template on climate change physical risks with first disclosure date on 31.12.2022;
  - c. five templates on the actions that institutions are putting in place to mitigate climate-change-related risks, including information on Taxonomy-aligned activities (Green Asset Ratio - GAR and Banking Book Taxonomy

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Alignment Ratio -BTAR) and on other mitigating actions. The disclosure of information on the GAR applies from 31.12.2023, the additional and separate information on the BTAR apply from 30.06.2024.

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

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

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

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

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

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

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

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implementation of the EU banking package.

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

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

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

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

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

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

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

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

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

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

## Introduction – General Information

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

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

### 1.9 Minimum Requirements for Eligible Own Funds and Eligible Liabilities (MREL)

Under the Bank Recovery and Resolution Directive and Single Resolution Mechanism Regulation, European banks are required to meet the MREL. SRB has determined Eurobank S.A. as the Group's resolution entity and a Single Point of Entry strategy for resolution purposes. Based on the latest SRB's communication, the fully calibrated MREL (final target) to be met by Eurobank S.A. on a consolidated basis until the end of 2025 is set at 27.86% of its total Risk Weighted Exposure Amounts (RWEAs), including a fully-loaded combined buffer requirement (CBR) of 4.29%. The final MREL target is updated by the SRB on an annual basis. The 2024 interim non-binding MREL target, applicable from January 2024, stands at 23.28% of RWEAs, including a CBR of 4.23%.

As of 30 June 2024, the Bank's MREL ratio at consolidated level stood at 25.21% of RWEAs including profits for the period ended 30 June 2024 (31 March 2024: 24.40%), which is higher than the aforementioned interim non-binding MREL target of 23.28%, including a CBR of 4.23%. In terms of Leverage Ratio Exposure, the Bank's MREL ratio as of 30 June 2024 stood at 13.60%, significantly above the relevant MREL target of 5.91%.

On 8 July 2024, Eurobank Holdings announced that the Bank successfully completed, through a private placement, a tap of € 100 million to the senior preferred notes of € 650 million issued in April 2024. As at 30 June 2024, the Bank's MREL ratio at consolidated level, pro forma for the aforementioned tap issuance, stands at 25.43% of RWA including profit for the period ended 30 June 2024.

### 1.10 Fit-for-55 Climate Risk Scenario Analysis

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

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

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

### 1.11 Scope of Pillar 3

The purpose of Pillar 3 report is to provide updated information on the Group's risk management practices, risk assessment processes and regulatory capital adequacy ratios.

Pillar 3 disclosures consist of both qualitative and quantitative information and are provided on a consolidated basis. They have been prepared in accordance with Part 8 of the Capital Requirements Regulation within CRD IV (Regulation 2013/575/EU) and according to the regulatory consolidation framework, which is described in the following section.

## Introduction – General Information

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In December 2016, EBA published EBA/GL/2016/11 guidelines on revised Pillar 3 disclosures requirements to improve the consistency and comparability of institutions' regulatory disclosures. These guidelines harmonised the frequency of disclosures and updated the list of requirements to be considered for more frequent disclosures.

According to the above guidelines, for templates that require the disclosure for current and previous reporting periods, the previous reporting period is always referred to as the last data disclosed according to the frequency of the template. When the disclosure is being reported for the first time, the data of the previous period is not required.

In December 2018 EBA published EBA/GL/2018/10 guidelines, which include enhanced disclosure formats for credit institutions for disclosures related to non-performing exposures, forborne exposures and foreclosed assets. Some templates are applicable to significant credit institutions that have a gross NPL ratio of 5% or above. Group. Although the Group's NPE ratio stands at 3.1% for 30 June 2024, it continues to report the aforementioned information following article 4 of Regulation 680/2014. Based on this article, Group may stop reporting information subject to thresholds from the next reporting reference date where it has fallen below the relevant thresholds on three consecutive reporting reference dates.

In June 2019 the EP and the Council published the Regulation (EU) No 876/2019 or CRR2 amending the CRR, regarding among others the reporting and disclosure framework. The CRR2 rules follow a phased implementation with significant elements entering into force in 2021.

In addition to the CRR 'quick fix', EBA issued EBA/GL/2020/12 guidelines, which amend the EBA/GL/2018/01 on uniform disclosures under Article 473a of Regulation (EU) No 575/2013 (CRR) as regards the transitional period for mitigating the impact of the introduction of IFRS 9 (International Financial Reporting Standards) on own funds, to provide clarity to institutions and users of information on the implementation of part of the disclosure requirements included in the CRR 'quick fix' and how institutions should disclose the information required.

In June 2020, EBA published new ITS on public disclosures by institutions and revised final draft ITS on supervisory reporting that implements changes introduced in the revised CRR2 and the Prudential Backstop Regulation. The two ITS aim to promote market discipline through enhanced and comparable public disclosures for stakeholders and to keep the reporting requirements in line with the evolving needs for Supervisory Authorities' risk assessments.

On 6 August 2021, EBA published an updated tool, which specifies the mapping between quantitative disclosure data points and the relevant supervisory reporting data points. This tool aims at facilitating institutions' compliance with disclosure requirements and improving the consistency and quality of the information disclosed.

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

On 19 December 2022, the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 was published in the Official Journal. The ITS amending the ITS laid down in Implementing Regulation (EU) 2021/637 as regards the uniform disclosure formats for the disclosure of ESG risks. This Implementing Regulation was entered into force on 8 January 2023.

### 1.12 Location, timing and frequency of disclosures

Pillar 3 disclosures are provided on a quarterly basis in electronic format, after taking into consideration the relevant recommendation of EBA Guidelines 2016/11, which include the list of requirements to be considered for more frequent, than annual basis, disclosures.

## Introduction – General Information

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Pillar 3 disclosures are provided with reference date (corresponding period) the close of the previous quarter and in conjunction with the date of publication of the financial statements. Equivalent disclosures made by the Group under accounting, listing or other requirements are deemed to constitute compliance with the requirements of the aforementioned Regulation (EU) No 575/2013 (Part Eight) taking into consideration any existing relevant implementing Regulations as well as the EBA guidelines.

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

Pillar 3 disclosures are a standalone document that provides a readily accessible source of prudential information for users and is available on a designated location on the Company's website <https://www.eurobankholdings.gr/en/investor-relations/financial-results> in chronological order and cover both quantitative and qualitative information.

Quantitative information, which is included in the Group's Consolidated Financial Statements, is also provided at the above location. In this way, the Company secures easy access of the market participants to continuous and complete information without cross-reference to other locations or media of communication.

Regarding the timing of disclosures, CRR clarifies that disclosures shall be published on the same date as the date on which the institution publishes its financial reports or as soon as possible thereafter. The Group's Pillar 3 disclosures will be published the latest either within one month from the publication of the financial statements or within the deadline of relevant Financial statements publication, as defined in Law 3556/2007.

The information contained in the Pillar 3 Disclosures has been verified by the Audit Committee and was approved by the BoD on 25 September 2024 prior to their publication on the Group's website.



## Introduction – General Information

### 1.13 Regulatory versus accounting consolidation

There is no difference between regulatory and accounting consolidation.

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

The table below shows the Group's regulatory and accounting Balance Sheet as at 30 June and 31 March 2024.

**Table 1:** Regulatory and accounting Balance Sheet

	30 June 2024	31 March 2024
Ref.	€ million	€ million
<b>Assets</b>		
Cash and Balances with central banks	10,706	10,697
Due from credit institutions	1,824	2,095
Securities held for trading	256	358
Derivative financial instruments	860	858
Loans and advances to customers	42,244	41,561
Investment securities	15,655	14,658
Investments in associates and joint ventures	a 1,005	587
Property, plant and equipment	795	782
Investment property	1,322	1,340
Intangible assets	b 358	345
Deferred tax asset	3,886	3,949
of which deferred tax assets that rely on future profitability and do not arise from temporary differences	c -	-
of which deferred tax assets that do not rely on future profitability	3,118	3,165
of which deferred tax assets that rely on future profitability and arise from temporary differences	d 768	784
Other assets	2,011	1,798
Assets of disposal group classified as held for sale	334	328
<b>Total assets</b>	<b>81,256</b>	<b>79,356</b>
<b>Liabilities</b>		
Due to central banks	3,077	3,049
Due to credit institutions	2,940	3,320
Derivative financial instruments	1,326	1,326
Due to customers	58,624	57,274
Debt securities in issue	5,162	4,487
of which tier 2 instruments	e 1,584	1,571
Other liabilities	1,513	1,717
<b>Total liabilities</b>	<b>72,642</b>	<b>71,173</b>
<b>Equity</b>		
Ordinary share capital	f 818	818
Share premium	g 1,161	1,161
Reserves and retained earnings	6,635	6,204
of which cash flow hedge reserves	h (15)	(15)
Non controlling interests	-	-
<b>Total equity</b>	<b>8,614</b>	<b>8,183</b>
<b>Total equity and liabilities</b>	<b>81,256</b>	<b>79,356</b>

## Capital Management

### 2. Capital Management

The amount and quality of the capital held by the Group is subject to certain rules and guidelines. The composition of the Group's available regulatory capital under Pillar 1 is as follows:

#### 2.1 Key Metrics

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

**Table 2: EU KM1 - Key Metrics template**

	a		b		c		d		e		
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 March 2024 <sup>(1)</sup>	31 December 2023	30 September 2023	30 June 2023					
	€ million	€ million	€ million	€ million	€ million	€ million					
<b>Available own funds (amounts)</b>											
1	Common Equity Tier 1 (CET1) capital	7,670	6,896	7,598	7,348	7,047	6,871				
2	Tier 1 capital	7,670	6,896	7,598	7,348	7,047	6,871				
3	Total capital	8,958	8,185	8,924	8,422	8,169	8,020				
<b>Risk-weighted exposure amounts</b>											
4	Total risk exposure amount	45,884	45,527	44,463	43,395	44,225	43,976				
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>											
5	Common Equity Tier 1 ratio (%)	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
6	Tier 1 ratio (%)	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
7	Total capital ratio (%)	19.5%	18.0%	20.1%	19.4%	18.5%	18.2%				
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>											
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.75%	2.75%	2.75%	2.75%	2.75%	2.75%				
EU 7b	of which: to be made up of CET1 capital (percentage points)	1.55%	1.55%	1.55%	1.55%	1.55%	1.55%				
EU 7c	of which: to be made up of Tier 1 capital (percentage points)	2.06%	2.06%	2.06%	2.06%	2.06%	2.06%				
EU 7d	Total SREP own funds requirements (%)	10.75%	10.75%	10.75%	10.75%	10.75%	10.75%				
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>											
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%				
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%				
9	Institution specific countercyclical capital buffer (%)	0.48%	0.48%	0.43%	0.43%	0.27%	0.25%				
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%	1.00%	1.00%	1.00%				
11	Combined buffer requirement (%)	4.23%	4.23%	4.18%	3.93%	3.77%	3.75%				
EU 11a	Overall capital requirements (%)	14.98%	14.98%	14.93%	14.68%	14.52%	14.50%				
12	CET1 available after meeting the total SREP own funds requirements (%)	8.66%	7.09%	8.82%	8.66%	7.73%	7.49%				
<b>Leverage ratio</b>											
13	Leverage ratio total exposure measure	84,679	84,539	84,233	84,402	84,942	84,994				
14	Leverage ratio	9.1%	8.2%	9.0%	8.7%	8.3%	8.1%				
<b>Additional own funds requirements to address risks of excessive leverage (as a percentage of leverage ratio total exposure amount)</b>											
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%				
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>											
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%				

## Capital Management

		a	b	c	d	e	
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 March 2024 <sup>(1)</sup>	31 December 2023	30 September 2023	30 June 2023	
	€ million	€ million	€ million	€ million	€ million	€ million	
<b>Liquidity Coverage Ratio</b>							
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	17,658	17,658	17,472	17,177	16,850	16,074
EU 16a	Cash outflows - Total weighted value	11,391	11,391	11,310	11,047	10,828	10,413
EU 16b	Cash inflows - Total weighted value	1,287	1,287	1,227	1,118	1,071	1,049
16	Total net cash outflows (adjusted value)	10,104	10,104	10,083	9,929	9,757	9,364
	Liquidity coverage ratio (%) (adjusted value) <sup>(2)</sup>	174.9%	174.9%	173.4%	173.1%	172.8%	171.5%
17	Liquidity coverage ratio (%)	181.7%	181.7%	179.0%	178.6%	170.6%	174.0%
<b>Net Stable Funding Ratio</b>							
18	Total available stable funding	59,353	59,353	59,034	59,007	60,606	60,104
19	Total required stable funding	46,703	46,703	46,223	46,079	46,828	46,354
20	NSFR ratio (%)	127.1%	127.1%	127.7%	128.1%	129.4%	129.7%

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

<sup>(2)</sup> Average figures based on previous monthly data points.

<sup>(3)</sup> Pro-forma CET1 and Total Capital Adequacy ratios as at 30 June 2024 with the completion of Projects "Solar" and "Leon, a new synthetic securitization (Project "Wave V"), the distribution of dividend to shareholders for FY2023 profits and the consolidation of Hellenic Bank and its subsidiaries would be 16.2% and 19.3%, respectively.

## Capital Management

### 2.2 Regulatory capital

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

The table below shows the composition of the Group's regulatory capital as at 30 June and 31 March 2024 which is calculated according to CRD IV as amended.

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

	c	a & b		
		30 June 2024 <sup>(1)</sup>	30 June 2024	31 March 2024 <sup>(1)</sup>
Ref.		€ million	€ million	€ million
Total equity	i	8,614	8,614	8,183
<b>Regulatory adjustments</b>				
Interim or year-end profit not eligible <sup>(2)</sup>		-	(635)	-
Minority interest not allowed in CET1		-	-	-
Cash flow hedge reserves	h	15	15	15
Adjustments due to IFRS 9 transitional arrangements		-	-	-
Temporary treatment of unrealised losses measured at FVTOCI in accordance with Article 468 of the CRR		-	-	-
Intangible assets	b	(246)	(246)	(253)
of which Goodwill		(42)	(42)	(42)
Deferred tax assets that rely on future profitability and do not arise from temporary differences	c	-	-	-
Deferred tax assets that rely on future profitability and arise from temporary differences (amount above 10% threshold)	d	-	-	-
Prudent Valuation Adjustments <sup>(3)</sup>		(5)	(5)	(6)
Other regulatory adjustments		(325)	(387)	(169)
Amount exceeding the 17.65% threshold	a & d	(383)	(460)	(172)
<b>Common Equity Tier I capital</b>		<b>7,670</b>	<b>6,896</b>	<b>7,598</b>
<b>Regulatory adjustments</b>		-	-	-
<b>Total Tier I capital</b>		<b>7,670</b>	<b>6,896</b>	<b>7,598</b>
Tier II capital - subordinated debt	e	1,288	1,288	1,326
<b>Total Regulatory Capital</b>		<b>8,958</b>	<b>8,185</b>	<b>8,924</b>
<b>Risk Weighted Assets</b>		<b>45,884</b>	<b>45,527</b>	<b>44,463</b>
<b>Ratios</b>				
Common Equity Tier I		<b>16.7%</b>	<b>15.1%</b>	17.1%
Tier I		<b>16.7%</b>	<b>15.1%</b>	17.1%
Total Capital Adequacy Ratio		<b>19.5%</b>	<b>18.0%</b>	20.1%

<sup>(1)</sup> Including profits € 721 million for the 1H 2024, and € 287 million for the 1Q 2024.

<sup>(2)</sup> Excludes 1H 2024 and year ended 31 December 2023 maximum dividend according to the dividend policy, approved by the BoD, based on requirements of Decision ECB/2015/6561 for permission of profits inclusion in regulatory capital.

<sup>(3)</sup> 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.

<sup>(4)</sup> CET1 and Total Capital Adequacy ratios decreased mainly due to the increase of RWEAs from asset growth and Hellenic Bank increased participation.

<sup>(5)</sup> The pro-forma CET1 and Total Capital Adequacy ratios as at 30 June 2024 with the completion of Projects "Solar" and "Leon", a new synthetic securitization (Project "Wave V"), the distribution of dividend to shareholders for FY2023 profits and the consolidation of Hellenic Bank and its subsidiaries would be 16.2% and 19.3%, respectively.

## Capital Management

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

As at 30 June 2024, pursuant to the Law 4172/2013, as in force, the Bank's eligible Deferred Tax Assets/Deferred Tax Credits (DTCs) against the Greek State amounted to € 3,117 million (31 March 2024 € 3,165 million). DTCs are accounted for on: (a) the unamortised losses from the Private Sector Involvement and the Greek State Debt Buyback Program, which are subject to amortization over a thirty-year period and (b) on the sum of (i) the unamortised part of the DTC eligible crystallized tax losses arising from write-offs and disposals of loans, which are subject to amortization over a twenty-year period, (ii) the accounting debt write-offs and (iii) the remaining accumulated provisions and other losses in general due to credit risk recorded up to 30 June 2015. The DTCs will be converted into directly enforceable claims (tax credit) against the Greek State provided that the Bank's after tax accounting result for the year is a loss.

For further details, please refer to Interim Consolidated Financial Statements, Note 12.

According to Regulation (EU) No. 575/2013, article 39, deferred tax assets that can be replaced with a tax credit, shall not be deducted from CET1, but instead be risk weighted by 100%.

### 2.3 IFRS 9 and temporary measures capital impact

According to the CRR 'quick fix' relief package, the IFRS 9 transitional arrangements have been extended by two years and a new calculation has been introduced where 100% relief is applied in 2020 and 2021 for increases in stage 1 and stage 2 provisions from 1 January 2020. Accordingly, the relief which is applicable for 2024 is 25%. The full impact is expected as of 1 January 2025.

The Group has elected to apply the phase in approach for mitigating the impact of IFRS 9 transition on the regulatory capital.

## Capital Management

**Table 4: EU IFRS - FL - Template on the comparison of Institutions' own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs**

	a		b		c		d		e	
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 March 2024 <sup>(1)</sup>	31 December 2023	30 September 2023	30 June 2023				
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
<b>Available capital</b>										
1 CET1 capital	7,670	6,896	7,598	7,348	7,047	6,871				
2 CET1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,670	6,896	7,598	7,348	7,047	6,871				
2a CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied										
Fully Loaded CET1 capital	7,670	6,896	7,598	7,348	7,043	6,866				
3 Tier 1 capital	7,670	6,896	7,598	7,348	7,047	6,871				
4 Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,670	6,896	7,598	7,348	7,047	6,871				
4a Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied										
Fully Loaded Tier 1 capital	7,670	6,896	7,598	7,348	7,043	6,866				
5 Total capital	8,958	8,185	8,924	8,422	8,169	8,020				
6 Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	8,958	8,185	8,924	8,422	8,169	8,020				
6a Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied										
Fully Loaded Total capital	8,958	8,185	8,924	8,422	8,165	8,014				
<b>Risk weighted assets</b>										
7 Total risk-weighted assets	45,884	45,527	44,463	43,395	44,225	43,976				
8 Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	45,884	45,527	44,463	43,395	44,225	43,976				
Fully Loaded Total risk-weighted assets	45,884	45,527	44,463	43,395	44,225	43,976				
<b>Capital ratios</b>										
9 CET1 (as a percentage of risk exposure amount)	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
10 CET1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
10a CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied										
Fully Loaded CET1 (as a percentage of risk exposure amount)	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
11 Tier 1 (as a percentage of risk exposure amount)	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
12 Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
12a Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied										
Fully Loaded Tier 1 (as a percentage of risk exposure amount)	16.7%	15.1%	17.1%	16.9%	15.9%	15.6%				
13 Total capital (as a percentage of risk exposure amount)	19.5%	18.0%	20.1%	19.4%	18.5%	18.2%				
14 Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	19.5%	18.0%	20.1%	19.4%	18.5%	18.2%				
14a Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied										
Fully Loaded Total capital (as a percentage of risk exposure amount)	19.5%	18.0%	20.1%	19.4%	18.5%	18.2%				

## Capital Management

	a		b		c		d	
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 March 2024 <sup>(1)</sup>	31 December 2023	30 September 2023	30 June 2023		
	€ million	€ million	€ million	€ million	€ million	€ million		
<b>Leverage ratio</b>								
15 Leverage ratio total exposure measure	84,679	84,539	84,233	84,402	84,942	84,994		
16 Leverage ratio	9.1%	8.2%	9.0%	8.7%	8.3%	8.1%		
17 Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	9.1%	8.2%	9.0%	8.7%	8.3%	8.1%		
Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied								
Fully Loaded Leverage ratio	9.1%	8.2%	9.0%	8.7%	8.3%	8.1%		

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

<sup>(2)</sup> Pro-forma CET1 and Total Capital Adequacy ratios as at 31 March 2024 with the completion of Projects "Solar" and "Leon", a new synthetic securitization (Project "Wave V"), the distribution of dividend to shareholders for FY2023 profits and the consolidation of Hellenic Bank and its subsidiaries would be 16.2% and 19.3%, respectively.

### 2.4 Countercyclical buffer

The CCyB will be applied when the authorities deem that lending growth is giving rise to an unacceptable accumulation of systemic risks. This buffer is specifically calculated for each bank or group and consists of the weighted average of percentages of countercyclical buffers applied in regions in which the bank's credit exposures are located.

The table below presents the geographical distribution of the Group's credit exposures relevant for the calculation of its countercyclical capital buffer, which includes all private sector exposures according to Regulation (EU) 1152/2014.

**Table 5: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of countercyclical buffer**

	a	b	c	d	e	f	g	h	i	j	k	l	m
	30 June 2024												
	General credit exposures	Relevant credit exposures – Market risk		Securitisation exposures	Total exposure value	Own funds requirements				Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate	
Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book		Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total				
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
010 Breakdown by country:													
Greece	29,900	-	10	-	4	29,914	1,806	1	-	1,807	22,588	67%	0.00%
Romania	120	-	-	-	-	120	6	-	-	6	75	0.2%	1.00%
Bulgaria	7,166	-	1	-	-	7,167	385	-	-	385	4,813	14%	2.00%
United Kingdom	682	-	-	-	142	824	45	-	2	47	588	2%	2.00%
Cyprus <sup>(2)</sup>	2,123	-	-	-	54	2,177	174	-	5	179	2,238	7%	1.00%
Luxemburg	99	-	-	-	180	279	17	-	2	19	238	1%	0.50%
Ireland <sup>(2)</sup>	8	-	-	-	7,020	7,028	1	-	113	114	1,425	4%	1.50%
Other Countries	1,695	-	-	-	1,343	3,038	102	-	23	125	1,563	5%	0.48%
020 Total	41,793	-	11	-	8,743	50,547	2,536	1	145	2,682	33,528	100%	0.48%

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	a	b	c	d	e	f	g	h	i	j	k	l	m
	31 December 2023												
	General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures	Total exposure value	Own funds requirements				Risk-weighted exposure amounts	Own funds requirements weights	Counter-cyclical capital buffer rate
	Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposure for internal models	Exposure value for non-trading book		Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures - Securitisation positions in the non-trading book	Total	€ million	(%)	(%)
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	(%)	(%)
010 Breakdown by country:													
Greece	30,212	-	7	-	5	30,224	1,644	-	-	1,644	20,550	66%	0.00%
Romania	129	-	-	-	-	129	7	-	-	7	88	0.3%	1.00%
Bulgaria	6,777	-	1	-	-	6,778	364	-	-	364	4,550	15%	2.00%
United Kingdom	654	-	-	-	104	758	43	-	2	45	563	2%	2.00%
Cyprus <sup>(2)</sup>	1,921	-	-	-	64	1,985	150	-	6	156	1,950	6%	0.50%
Luxemburg	231	-	-	-	285	516	18	-	3	21	263	1%	0.50%
Ireland <sup>(2)</sup>	8	-	-	-	8,203	8,211	1	-	130	131	1,638	5%	1.00%
Other Countries	1,644	-	-	-	1,390	3,034	97	-	24	121	1,513	5%	0.35%
020 Total	41,576	-	8	-	10,051	51,635	2,324	-	165	2,489	31,115	100%	0.43%

<sup>(1)</sup> The tables above exclude exposures on Central governments or Central banks, Regional governments or local authorities, Public sector entities, Multilateral development banks, International organisations and Institutions asset classes.

<sup>(2)</sup> The Countercyclical capital rate in Cyprus and Ireland increased from 0.50% and 1.0% to 1.0% and 1.5% respectively.

The table below presents an overview of Group's specific countercyclical capital risk exposure and buffer requirements.

**Table 6: EU CCyB2 - Amount of institution-specific countercyclical capital buffer**

	a	a
	30 June 2024	31 December 2023
1 Total risk exposure amount (€ million)	45,527	43,241
2 Institution specific countercyclical capital buffer rate	0.48%	0.43%
3 Institution specific countercyclical capital buffer requirement (€ million)	219	186

<sup>(1)</sup> The specific countercyclical capital buffer rate increases mainly due to Cyprus and Ireland buffer from 0.50% and 1.00% to 1.0% and 1.5% respectively.

### 2.5 Supervisory Review and Evaluation Process (SREP) capital requirements

According to the 2023 SREP decision, from January 2024 the P2R for the Group remains at 2.75% in terms of total capital (or at 1.55% in terms of CET1 capital). Thus, as of 30 June 2024, the Group was required to meet a CET1 ratio of at least 12.29% (including Additional Tier 1 (AT1) shortfall) and a Total Capital Adequacy Ratio of at least 14.98% (Overall Capital Requirements - OCR) including Combined Buffer Requirement of 4.23%, which is covered with CET1 capital and sits on top of the Total SREP Capital Requirement (TSCR).

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



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The table below shows the capital requirements of the Group for 30 June 2024.

**Table 7: Pillar 2 Requirements**

	30 June 2024	
	CET1 Capital Requirements	Total Capital Requirements
<b>Minimum regulatory requirement</b>	4.50%	8.00%
Pillar 2 Requirement (P2R)	1.55%	2.75%
<b>Total SREP Capital Requirement (TSCR)</b>	<b>6.05%</b>	<b>10.75%</b>
<u>Combined Buffer Requirement (CBR)</u>		
Capital conservation buffer (CCB)	2.50%	2.50%
Countercyclical capital buffer (CCyB)	0.48%	0.48%
Other systemic institutions buffer (O-SII)	1.25%	1.25%
<b>Overall Capital Requirement (OCR)</b>	<b>10.28%</b>	<b>14.98%</b>
AT1 and Tier 2 capital shortfall	2.01%	-
<b>Overall Capital Requirement (OCR), including shortfall</b>	<b>12.29%</b>	<b>14.98%</b>

The above CET1 capital requirement of 12.29% takes into account that the Group had no AT1 capital as of 30 June 2024, compared to the portion of 2.01% for AT1 capital allowed by the legislation to cover part of the TSCR. Assuming that the Group had fully utilized the AT1 capital capacity as of 30 June 2024, the CET1 requirement would stand at 10.28%.

At consolidated level, the Pillar 2 Requirement was set at 2.75% for 2024 and part of that (1.55%) must be held in the form of CET1 capital while the Group may use AT1 and Tier 2 capital, where available, for the remaining part. The amount of additional own funds required to be met with CET1 capital on a consolidated basis was € 922 million (based on RWEAs of € 45,884 million).

As at 30 June 2024, Eurobank's consolidated CET1 ratio and Total Capital ratio, including profit of € 721 million for the period ended 30 June 2024, were 16.7% and 19.5% respectively, which exceeded the 2024 minimum requirements of 10.28% and 14.98%.

## Capital Management

### 2.6 Capital requirements under Pillar 1

The table below shows the Group's RWEAs and capital requirements as at 30 June and 31 March 2024. The minimum capital requirements under Pillar 1 are calculated as 8% of RWEAs.

**Table 8: EU OV1 - Overview of risk weighted exposure amounts**

	a		b		c	
	Risk weighted exposure amounts (RWEAs)				Total own funds requirements	
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 March 2024 <sup>(1)</sup>	31 March 2024	30 June 2024	
	€ million	€ million	€ million	€ million	€ million	
1	<b>Credit risk (excluding CCR)</b>	<b>36,189</b>	<b>36,189</b>	34,621	34,621	<b>2,895</b>
2	Of which the standardised approach <sup>(2)</sup>	36,189	36,189	34,621	34,621	2,895
3	Of which the foundation IRB (FIRB) approach	-	-	-	-	-
4	Of which: slotting approach	-	-	-	-	-
EU 4a	Of which: equities under the simple riskweighted approach	-	-	-	-	-
5	Of which the advanced IRB (AIRB) approach	-	-	-	-	-
6	<b>Counterparty credit risk - CCR</b>	<b>611</b>	<b>611</b>	629	629	<b>49</b>
7	Of which the standardised approach	212	212	214	214	17
8	Of which internal model method (IMM)	-	-	-	-	-
EU 8a	Of which exposures to a CCP	7	7	9	9	1
EU 8b	Of which credit valuation adjustment - CVA	196	196	180	180	16
9	Of which other CCR	196	196	226	226	16
15	<b>Settlement risk</b>	-	-	-	-	-
16	<b>Securitisation exposures in the non-trading-book (after the cap)</b>	<b>1,811</b>	<b>1,811</b>	1,900	1,900	<b>145</b>
17	Of which SEC-IRBA approach	-	-	-	-	-
18	Of which SEC-ERBA (including IAA)	306	306	307	307	24
19	Of which SEC-SA approach	1,505	1,505	1,593	1,593	120
EU 19a	Of which 1250%/ deduction	-	-	-	-	-
20	<b>Position, foreign exchange and commodities risks (Market risk)</b>	<b>545</b>	<b>545</b>	679	679	<b>44</b>
21	Of which the standardised approach	112	112	106	106	9
22	Of which IMA	433	433	573	573	35
EU 22a	Large exposures	-	-	-	-	-
23	<b>Operational risk</b>	<b>3,746</b>	<b>3,746</b>	3,746	3,746	<b>300</b>
EU 23a	Of which basic indicator approach	-	-	-	-	-
EU 23b	Of which standardised approach	3,746	3,746	3,746	3,746	300
EU 23c	Of which advanced measurement approach	-	-	-	-	-
24	<b>Amounts below the thresholds for deduction (subject to 250% risk weight)</b>	<b>2,982</b>	<b>2,625</b>	2,888	2,608	<b>210</b>
29	<b>Total</b>	<b>45,884</b>	<b>45,527</b>	44,463	44,181	<b>3,642</b>

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 and € 287 million for the 1Q 2024.

<sup>(2)</sup> The increase of the credit risk RWEAs compared to 31 March 2024 is mainly due to the new production of loans and investment securities, synthetic securitizations' amortization (due to underlying loans repayment) and the temporary effect of Hellenic Bank increased participation accounted for as an associate.

## Credit Risk

### 3. Credit Risk

#### 3.1 Definition of credit risk

Credit risk is the risk that a counterparty will be unable to fulfill its payment obligations in full when due. Credit risk is also related with country risk and settlement risk specified below:

- a) Country risk is the risk of losses arising from cross-border lending and investment activities and refers to the uncertainty associated with exposure in a particular country. This uncertainty may relate to a number of factors including the risk of losses following nationalization, expropriation and debt restructuring and foreign exchange rates' movement.
- b) Settlement risk is the risk arising when payments are settled, for example for trades in financial instruments, including derivatives and currency transactions. The risk arises when the Group remits payments before it can ascertain that the counterparties' payments have been received.

Credit risk arises principally from the wholesale and retail lending activities of the Group, including from credit enhancement provided, such as financial guarantees and letters of credit. The Group is also exposed to credit risk arising from other activities such as investments in debt securities, trading activities, capital markets and settlement activities. Taking into account that credit risk is the principal risk the Group is exposed to, it is very closely managed and monitored by specialised risk units, reporting to the Group Chief Risk Officer.

#### 3.2 Credit exposures

##### 3.2.1 Maturity analysis

The following table presents a breakdown of net exposures by residual maturity and exposure classes as at 30 June 2024 and 31 December 2023.

**Table 9: EU CR1-A - Maturity analysis of exposures**

	a	b	c	d	e	f
	<b>30 June 2024</b>					
	<b>Net exposure value</b>					
	<b>On demand</b>	<b>&lt;= 1 year</b>	<b>&gt; 1 year &lt;= 5 years</b>	<b>&gt; 5 years</b>	<b>No stated maturity</b>	<b>Total</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Loans and advances <sup>(1)&amp;(2)</sup>	-	11,349	10,306	28,425	6,279	56,359
2 Debt securities <sup>(3)</sup>	-	1,106	5,370	9,052	-	15,528
3 Total	-	<b>12,455</b>	<b>15,676</b>	<b>37,477</b>	<b>6,279</b>	<b>71,887</b>
	<b>31 December 2023</b>					
	<b>Net exposure value</b>					
	<b>On demand</b>	<b>&lt;= 1 year</b>	<b>&gt; 1 year &lt;= 5 years</b>	<b>&gt; 5 years</b>	<b>No stated maturity</b>	<b>Total</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Loans and advances	-	12,324	9,591	27,249	6,087	55,251
2 Debt securities	-	800	5,347	8,555	-	14,702
3 Total	-	<b>13,124</b>	<b>14,938</b>	<b>35,804</b>	<b>6,087</b>	<b>69,953</b>

<sup>(1)</sup> The table above includes off-balance sheet items.

<sup>(2)</sup> The increase in line Loans and advances is mainly due to the new production of loans and loan commitments.

<sup>(3)</sup> The increase in debt securities is mainly due to the increased position in Sovereign and Financial bonds.

## Credit Risk

### 3.2.2 Credit quality of financial assets

The Group recognizes allowance for expected credit losses (ECL) that reflect changes in credit quality since initial recognition to financial assets that are measured at Amortised Cost (AC) and Fair Value through Other Comprehensive Income (FVOCI), including loans, securitised notes issued by special purpose vehicles established by the Group, lease receivables, debt securities, financial guarantee contracts, and loan commitments.

**Table 10: EU CQ1 - Credit quality of forborne exposures**

	a	b	c	d	e	f	g	h
30 June 2024								
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Non-performing forborne				On performing forborne exposures	On non-performing forborne exposures	Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures	
Performing forborne		Of which defaulted	Of which impaired	€ million			€ million	€ million
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits	-	-	-	-	-	-	-	-
010 Loans and advances	822	582	579	582	(49)	(265)	970	296
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	16	19	19	19	-	(10)	25	9
060 Non-financial corporations	495	378	378	378	(24)	(149)	647	219
070 Households	311	185	182	185	(25)	(106)	298	68
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	822	582	579	582	(49)	(265)	970	296

	a	b	c	d	e	f	g	h
31 December 2023								
	Gross carrying amount/nominal amount with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collaterals received and financial guarantees received on forborne exposures	
	Non-performing forborne				On performing forborne exposures	On non-performing forborne exposures	Of which: Collateral and financial guarantees received on non-performing exposures with forbearance measures	
Performing forborne		Of which defaulted	Of which impaired	€ million			€ million	€ million
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
Cash balances at central banks and other demand	-	-	-	-	-	-	-	-
005 deposits	-	-	-	-	-	-	-	-
010 Loans and advances	889	620	616	620	(49)	(257)	1,070	344
020 Central banks	-	-	-	-	-	-	-	-
030 General governments	-	-	-	-	-	-	-	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	10	23	23	23	-	(12)	21	11
060 Non-financial corporations	536	397	397	397	(25)	(143)	708	247
070 Households	343	200	196	200	(24)	(102)	341	86
080 Debt Securities	-	-	-	-	-	-	-	-
090 Loan commitments given	-	-	-	-	-	-	-	-
100 Total	889	620	616	620	(49)	(257)	1,070	344

The following templates provide an overview of the credit quality of performing and non-performing exposures and related impairments, provisions and valuation adjustments by portfolio and exposure class, by geography and industry as at 30 June 2024 and 31 December 2023.

## Credit Risk

**Table 11: EU CR1 - Performing and non-performing exposures and related provisions**

	30 June 2024														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures <sup>(4)</sup>			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	of which: stage 1		of which: stage 2	of which: stage 2		of which: stage 3	of which: stage 1		of which: stage 2	of which: stage 2		of which: stage 3			
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits	10,240	10,240	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	43,921	39,132	4,769	1,338	-	1,324	(502)	(163)	(339)	(696)	-	(692)	(1,033)	28,631	564
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	15	15	-	-	-	-	-	-	-	-	-	-	-	-	-
040 Credit institutions	1,700	1,700	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
050 Other financial corporations	5,944	5,904	30	34	-	34	(8)	(8)	-	(18)	-	(18)	(63)	5,197	16
060 Non-financial corporations <sup>(1)</sup>	23,176	21,378	1,789	849	-	838	(185)	(76)	(109)	(399)	-	(397)	(349)	14,276	402
070 Of which: SMEs	8,040	6,730	1,310	642	-	635	(117)	(38)	(79)	(316)	-	(314)	(276)	6,001	313
080 Households	13,086	10,135	2,950	455	-	452	(308)	(78)	(230)	(279)	-	(277)	(621)	9,158	146
090 Debt Securities <sup>(2)</sup>	15,386	15,305	54	34	-	34	(22)	(19)	(2)	(8)	-	(8)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	10,606	10,606	-	-	-	-	(8)	(8)	-	-	-	-	-	-	-
120 Credit institutions	1,757	1,730	-	-	-	-	(6)	(6)	-	-	-	-	-	-	-
130 Other financial corporations	1,623	1,623	-	-	-	-	-	-	-	-	-	-	-	-	-
140 Non-financial corporations	1,400	1,346	54	34	-	34	(8)	(5)	(2)	(8)	-	(8)	-	-	-
150 Off-balance sheet exposures <sup>(3)</sup>	12,525	11,981	302	66	-	66	(54)	(21)	(3)	(28)	-	(28)	-	1,496	21
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	288	46	-	19	-	19	(30)	-	-	(18)	-	(18)	-	39	-
180 Credit institutions	244	244	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	947	938	9	1	-	1	(1)	-	-	-	-	-	-	157	-
200 Non-financial corporations	8,559	8,381	178	44	-	44	(10)	(8)	(2)	(10)	-	(10)	-	1,195	20
210 Households	2,487	2,372	115	2	-	2	(13)	(13)	(1)	-	-	-	-	105	1
220 Total	82,072	76,658	5,125	1,438	-	1,424	(578)	(203)	(344)	(732)	-	(728)	(1,033)	30,127	585

	31 December 2023														
	Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures - Accumulated impairment and provisions			Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	of which: stage 1		of which: stage 2	of which: stage 2		of which: stage 3	of which: stage 1		of which: stage 2	of which: stage 2		of which: stage 3			
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
005 Cash balances at central banks and other demand deposits	10,441	10,441	-	-	-	-	-	-	-	-	-	-	-	-	-
010 Loans and advances	43,631	38,691	4,914	1,512	-	1,494	(501)	(171)	(329)	(758)	-	(751)	(1,127)	28,402	694
020 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
030 General governments	18	18	-	-	-	-	-	-	-	-	-	-	-	1	-
040 Credit institutions	2,117	2,117	-	-	-	-	(1)	(1)	-	-	-	-	-	-	-
050 Other financial corporations	6,786	6,748	28	40	-	40	(7)	(7)	-	(17)	-	(17)	(63)	5,848	23
060 Non-financial corporations	21,741	19,830	1,896	929	-	918	(213)	(90)	(122)	(423)	-	(421)	(423)	13,404	467
070 of which SMEs	8,004	6,587	1,417	735	-	728	(144)	(51)	(93)	(346)	-	(344)	(345)	5,990	375
080 Households	12,969	9,978	2,990	543	-	536	(280)	(73)	(207)	(318)	-	(313)	(641)	9,149	204
090 Debt Securities	14,451	14,368	57	32	-	32	(19)	(17)	(2)	(7)	-	(7)	-	-	-
100 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
110 General governments	9,914	9,914	-	-	-	-	(7)	(7)	-	-	-	-	-	-	-
120 Credit institutions	1,542	1,517	-	-	-	-	(5)	(5)	-	-	-	-	-	-	-
130 Other financial corporations	1,643	1,636	7	-	-	-	(1)	-	(1)	-	-	-	-	-	-
140 Non-financial corporations	1,352	1,301	50	32	-	32	(6)	(5)	(1)	(7)	-	(7)	-	-	-
150 Off-balance sheet exposures	11,601	11,049	311	57	-	56	(53)	(18)	(4)	(26)	-	(26)	-	1,414	20
160 Central banks	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
170 General governments	290	48	-	19	-	19	(31)	-	-	(18)	-	(18)	-	-	-
180 Credit institutions	171	171	-	-	-	-	-	-	-	-	-	-	-	-	-
190 Other financial corporations	765	756	9	-	-	1	-	-	-	-	-	-	-	71	-
200 Non-financial corporations	7,966	7,785	181	35	-	35	(11)	(8)	(3)	(8)	-	(8)	-	1,254	20
210 Households	2,409	2,289	121	3	-	1	(11)	(10)	(1)	-	-	-	-	89	-
220 Total	80,124	74,549	5,282	1,601	-	1,582	(573)	(206)	(335)	(791)	-	(784)	(1,127)	29,816	714

<sup>(1)</sup> The increase in Non-Financial Corporations is mainly due to new corporate loans.

<sup>(2)</sup> The increase in debt instruments is mainly due to increased position in Sovereign and Financial Bonds

<sup>(3)</sup> The increase in Off-balance sheet exposures is mainly due to new production of loan commitments in corporate loans.

<sup>(4)</sup> The decrease in Non-performing exposures is mainly due to enlargement of HFS perimeter associated to Leon NPE transaction, the performed write-offs and the better than the budget performance of the asset quality.

## Credit Risk

**Table 12: EU CQ4 - Quality of non-performing exposures by geography**

	a	b	c	d	e	f	g		
	30 June 2024								
	Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures		
	of which: non-performing		of which: subject to impairment	€ million				€ million	€ million
	€ million	€ million	€ million						
<b>010 On balance sheet exposures</b>	<b>60,679</b>	<b>1,372</b>	<b>1,369</b>	<b>60,642</b>	<b>(1,227)</b>		-		
020 Greece <sup>(1)</sup>	32,918	1,066	1,066	32,918	(922)		-		
030 Romania	280	7	4	280	(15)		-		
040 Bulgaria <sup>(2)</sup>	7,782	185	185	7,782	(197)		-		
050 United Kingdom	1,031	-	-	1,031	(3)		-		
060 Cyprus	2,749	82	82	2,721	(71)		-		
070 Other countries <sup>(3)</sup>	15,919	32	32	15,910	(19)		-		
<b>080 Off balance sheet exposures<sup>(4)</sup></b>	<b>12,591</b>	<b>66</b>	<b>66</b>			<b>(81)</b>			
090 Greece	9,140	49	49			(78)			
100 Romania	-	-	-			-			
110 Bulgaria	1,488	10	10			(1)			
120 United Kingdom	83	-	-			-			
130 Cyprus	732	7	7			(2)			
140 Other countries	1,148	-	-			-			
<b>150 Total</b>	<b>73,270</b>	<b>1,438</b>	<b>1,435</b>	<b>60,642</b>	<b>(1,227)</b>	<b>(81)</b>	-		

	a	b	c	d	e	f	g		
	31 December 2023								
	Gross carrying/nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures		
	of which: non-performing		of which: subject to impairment	€ million				€ million	€ million
	€ million	€ million	€ million						
010 On balance sheet exposures	59,626	1,544	1,541	59,585	(1,285)		-		
020 Greece	32,632	1,255	1,255	32,631	(995)		-		
030 Romania	270	7	4	270	(16)		-		
040 Bulgaria	7,112	168	168	7,112	(189)		-		
050 United Kingdom	1,071	-	-	1,071	(3)		-		
060 Cyprus	2,685	84	84	2,659	(64)		-		
070 Other countries	15,856	30	30	15,842	(18)		-		
080 Off balance sheet exposures	11,658	57	57			(79)			
090 Greece	8,554	49	49			(74)			
100 Romania	-	-	-			-			
110 Bulgaria	1,353	2	2			(1)			
120 United Kingdom	82	-	-			-			
130 Cyprus	725	6	6			(4)			
140 Other countries	944	-	-			-			
<b>150 Total</b>	<b>71,284</b>	<b>1,601</b>	<b>1,597</b>	<b>59,585</b>	<b>(1,285)</b>	<b>(79)</b>	-		

<sup>(1)</sup> The increase in Greece gross amount is mainly due to corporate loans and debt securities.

<sup>(2)</sup> The increase in Bulgaria is mainly due to new loans to Households and Non-financial corporations.

<sup>(3)</sup> The increase in Other countries is mainly due to nostro and placements.

<sup>(4)</sup> The increase in Off-balance sheet exposures is mainly due to new production of loan commitments in corporate loans.

## Credit Risk

The table below presents an overview of the credit quality of loans and advances to non-financial corporations as at 30 June 2024 and 31 December 2023.

**Table 13: EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry**

	a	b	c	d	e	f
	30 June 2024					
	Gross carrying/nominal amount				of which loans and advances subject to impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which: non-performing	of which defaulted		Accumulated impairment		
€ million	€ million	€ million	€ million	€ million	€ million	
010 Agriculture, forestry and fishing	374	108	108	374	(59)	-
020 Mining and quarrying	33	3	3	33	(2)	-
030 Manufacturing	3,903	140	140	3,903	(102)	-
040 Electricity, gas, steam and air conditioning supply <sup>(1)</sup>	2,526	5	5	2,526	(7)	-
050 Water supply	45	1	1	45	(1)	-
060 Construction	939	51	51	939	(40)	-
070 Wholesale and retail trade <sup>(2)</sup>	4,509	261	261	4,509	(179)	-
080 Transport and storage <sup>(1)</sup>	4,524	22	22	4,524	(19)	-
090 Accommodation and food service activities	2,524	103	103	2,524	(46)	-
100 Information and communication	356	15	15	356	(20)	-
110 Financial and insurance activities	49	1	1	49	(1)	-
120 Real estate activities	2,200	53	53	2,200	(30)	-
130 Professional, scientific and technical activities	448	51	51	448	(48)	-
140 Administrative and support service activities	356	9	9	356	(7)	-
150 Public administration and defense, compulsory social security	1	-	-	1	-	-
160 Education	31	5	5	31	(3)	-
170 Human health services and social work activities <sup>(1)</sup>	561	5	5	561	(5)	-
180 Arts, entertainment and recreation	465	4	4	465	(3)	-
190 Other services	181	12	12	184	(12)	-
<b>200 Total</b>	<b>24,025</b>	<b>849</b>	<b>849</b>	<b>24,028</b>	<b>(584)</b>	<b>-</b>

	a	b	c	d	e	f
	31 December 2023					
	Gross carrying/nominal amount				of which loans and advances subject to impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which: non-performing	of which defaulted		Accumulated impairment		
€ million	€ million	€ million	€ million	€ million	€ million	
010 Agriculture, forestry and fishing	415	107	107	415	(50)	-
020 Mining and quarrying	35	3	3	35	(2)	-
030 Manufacturing	3,929	150	150	3,929	(107)	-
040 Electricity, gas, steam and air conditioning supply	2,320	4	4	2,320	(9)	-
050 Water supply	52	-	-	52	-	-
060 Construction	996	71	71	996	(50)	-
070 Wholesale and retail trade	4,051	287	287	4,051	(193)	-
080 Transport and storage	4,282	21	21	4,277	(24)	-
090 Accommodation and food service activities	2,388	112	112	2,388	(55)	-
100 Information and communication	370	16	16	370	(20)	-
110 Financial and insurance activities	50	1	1	50	(1)	-
120 Real estate activities	2,030	49	49	2,030	(33)	-
130 Professional, scientific and technical activities	514	59	59	514	(53)	-
140 Administrative and support service activities	231	9	9	231	(6)	-
150 Public administration and defense, compulsory social security	9	-	-	9	-	-
160 Education	35	6	6	35	(3)	-
170 Human health services and social work activities	273	8	8	273	(8)	-
180 Arts, entertainment and recreation	509	8	8	509	(5)	-
190 Other services	181	18	18	181	(17)	-
<b>200 Total</b>	<b>22,670</b>	<b>929</b>	<b>929</b>	<b>22,665</b>	<b>(636)</b>	<b>-</b>

<sup>(1)</sup> The increase in sectors "Electricity, gas, steam and air conditioning supply" "Transport and storage" and "Human health services and social work activities" is mainly due to new corporate loans in Greece.

<sup>(2)</sup> The increase in sector "Wholesale and retail trade" is mainly due to new loans in Bulgaria.

## Credit Risk

The table below presents an overview of the credit quality of loans and advances to non-financial corporations as at 30 June 2024 and 31 December 2023.

**Table 14: EU CQ2 - Quality of forbearance**

	a	a
	30 June 2024	31 December 2023
	Gross carrying amount of forborne exposures € million	Gross carrying amount of forborne exposures € million
010 Loans and advances that have been forborne more than twice	285	340
Non-performing forborne loans and advances that failed to meet	207	277
020 the non-performing exit criteria		

The table below presents an analysis of collateral valuation and other information on loans and advances as at 30 June 2024 and 31 December 2023.

**Table 15: EU CQ6 - Collateral valuation - Loans and advances**

	a	b	c	d	e	f	g	h	i	j	k	l					
	30 June 2024																
	Loans and advances																
	Performing			Non Performing													
				Past due > 90 days													
				Unlikely to pay that are not past due or past due <=90 days													
	of which past due > 30 days <= 90 days					of which Past due > 90 days <=		of which Past due > 180 days <=		of which Past due > 1 year <= 2		of which Past due > 2 years <=		of which Past due > 5 years <=		of which Past due > 7 years	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Gross carrying amount	45,260	43,921	133	1,338	638	700	141	210	87	194	28	40					
020 Of which: secured	33,147	32,109	82	1,039	505	534	100	141	73	168	25	27					
030 Of which: secured with immovable property	16,859	16,061	68	799	423	376	85	77	52	121	21	20					
040 of which: instruments with LTV higher than 60% and lower or equal to 80%	4,436	4,255		181	124	56											
050 of which: instruments with LTV higher than 80% and lower or equal to 100%	2,961	2,802		159	82	77											
060 of which: instruments with LTV higher than 100%	2,870	2,607		263	107	156											
070 Accumulated impairment for secured assets	(761)	(313)	(17)	(448)	(168)	(279)	(42)	(56)	(37)	(98)	(24)	(23)					
080 Collateral																	
090 of which value capped at the value of exposure <sup>(1)</sup>	24,812	24,301	65	511	317	194	54	44	31	62	1	3					
100 of which immovable property	15,625	15,175	59	450	280	171	50	39	27	51	1	3					
110 Of which value above the cap <sup>(1)</sup>	21,734	20,728	62	1,007	471	535											
120 of which immovable property	12,877	12,103	54	775	406	369											
130 Financial guarantees received <sup>(2)</sup>	4,383	4,331	5	52	10	42	4	24	4	8	-	1					
140 Accumulated partial write-off	(1,033)	(3)	-	(1,030)	(580)	(451)	(1)	(39)	(20)	(242)	(16)	(132)					

	a	b	c	d	e	f	g	h	i	j	k	l					
	31 December 2023																
	Loans and advances																
	Performing			Non Performing													
				Past due > 90 days													
				Unlikely to pay that are not past due or past due <=90 days													
	of which past due > 30 days <= 90 days					of which Past due > 90 days <=		of which Past due > 180 days <=		of which Past due > 1 year <= 2		of which Past due > 2 years <=		of which Past due > 5 years <=		of which Past due > 7 years	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
010 Gross carrying amount	45,144	43,631	109	1,512	723	789	123	179	108	294	34	51					
020 Of which: secured	33,821	32,564	68	1,258	595	662	94	142	90	267	29	41					
030 Of which: secured with immovable property	16,933	15,942	50	990	468	522	59	121	79	204	25	34					
040 of which: instruments with LTV higher than 60% and lower or equal to 80%	4,762	4,561		202	129	73											
050 of which: instruments with LTV higher than 80% and lower or equal to 100%	2,577	2,402		176	77	98											
060 of which: instruments with LTV higher than 100%	3,172	2,770		402	146	256											
070 Accumulated impairment for secured assets	(833)	(296)	(15)	(537)	(197)	(340)	(34)	(64)	(43)	(142)	(24)	(32)					
080 Collateral																	
090 of which value capped at the value of exposure	24,372	23,732	53	640	361	279	40	69	46	112	4	7					
100 of which immovable property	15,527	14,947	45	580	323	257	37	67	42	100	4	6					
110 Of which value above the cap	20,915	19,732	53	1,183	660	522											
120 of which immovable property	12,641	11,780	46	861	413	448											
130 Financial guarantees received	4,724	4,670	5	54	24	30	8	8	1	11	-	1					
140 Accumulated partial write-off	(1,127)	(3)	-	(1,123)	(627)	(497)	(2)	(6)	(27)	(307)	(17)	(138)					



## Credit Risk

<sup>(1)</sup> The increase in Collateral/"of which value capped at the value of exposure" as well as "Of which value above the cap", is mainly due to new corporate loans.

<sup>(2)</sup> The decrease in Financial Guarantees received is due to Greece corporate (mainly senior note reductions and loans repayment).

The table below presents an overview of the movements (inflows and outflows) of non performing loans and advances as at 30 June 2024.

**Table 16: EU CR2 - Changes in the stock of non-performing loans and advances**

	a
	30 June 2024
	Gross carrying amount € million
<b>010 Initial stock of non-performing loans and advances</b>	1,512
020 Inflows to non-performing portfolios	388
030 Outflows from non-performing portfolios	(562)
040 Outflows due to write-offs	(36)
050 Outflow due to other situations <sup>(1)</sup>	(526)
<b>060 Final stock of non-performing loans and advances</b>	<b>1,338</b>

<sup>(1)</sup> It represents mainly the outflow: i) to performing portfolio, mainly retail ii) due to loan repayment, partial or total iii) of loans that have been reclassified as HFS.

**Table 17: EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries**

	a	b
	30 June 2024	
	Gross carrying amount € million	Related net accumulated recoveries € million
<b>010 Initial stock of non-performing loans and advances</b>	1,512	
020 Inflows to non-performing portfolios	388	
030 Outflows from non-performing portfolios	(562)	
040 Outflow to performing portfolio	(130)	
050 Outflow due to loan repayment, partial or total	(91)	
060 Outflow due to collateral liquidations	(15)	15
070 Outflow due to taking possession of collateral	(8)	-
080 Outflow due to sale of instruments	-	-
090 Outflow due to risk transfers	-	-
100 Outflows due to write-off	(36)	
110 Outflow due to other Situations	(39)	
120 Outflow due to reclassification as held for sale	(242)	
<b>130 Final stock of non-performing loans and advances</b>	<b>1,338</b>	

The table below presents an overview of collateral obtained by taking possession by type, by time since date of foreclosure as at 30 June 2024 and 31 December 2023.

**Table 18: EU CQ7 - Collateral obtained by taking possession and execution processes**

	a	b	a	b
	30 June 2024		31 December 2023	
	Collateral obtained by taking possession		Collateral obtained by taking possession	
	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million
010 Property Plant and Equipment (PP&E)	-	-	-	-
020 Other than PP&E	588	(97)	608	(99)
030 Residential immovable property	237	(42)	242	(44)
040 Commercial immovable property	338	(54)	348	(55)
050 Movable property (auto, shipping, etc.)	3	-	2	-
060 Equity and debt instruments	7	-	13	-
070 Other collateral	3	-	3	-
<b>080 Total</b>	<b>588</b>	<b>(97)</b>	<b>608</b>	<b>(99)</b>

## Credit Risk

**Table 19: EU CQ8 - Collateral obtained by taking possession and execution processes – Vintage breakdown**

	a	b	c	d	e	f	g	h	i	j	k	l
	30 June 2024											
	Debt balance reduction		Total collateral obtained by taking possession									
	Gross carrying amount € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Foreclosed <= 2 years		Foreclosed >= 2 years <= 5 years		Foreclosed > 5 years		Of which: Non-current assets held-for-sale	
Value at initial recognition € million					Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	
010 Collateral obtained by taking possession classified as PP&E	-	-	-	-	-	-	-	-	-	-	-	-
020 Collateral obtained by taking possession other than that classified as PP&E	58	(24)	588	(97)	31	(2)	104	(8)	454	(87)	12	(5)
030 Residential immovable property	21	(5)	237	(42)	8	-	43	(2)	186	(40)	3	(3)
040 Commercial Immovable property	27	(12)	338	(54)	20	(2)	60	(6)	258	(47)	8	(3)
050 Movable property (auto, shipping, etc.)	-	-	3	-	2	-	-	-	-	-	-	-
060 Equity and debt instruments	-	-	7	-	-	-	-	-	7	-	-	-
070 Other collateral	10	(7)	3	-	-	-	-	-	3	-	-	-
<b>080 Total</b>	<b>58</b>	<b>(24)</b>	<b>588</b>	<b>(97)</b>	<b>31</b>	<b>(2)</b>	<b>104</b>	<b>(8)</b>	<b>454</b>	<b>(87)</b>	<b>12</b>	<b>(5)</b>

	a	b	c	d	e	f	g	h	i	j	k	l
	31 December 2023											
	Debt balance reduction		Total collateral obtained by taking possession									
	Gross carrying amount € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Foreclosed <= 2 years		Foreclosed >= 2 years <= 5 years		Foreclosed > 5 years		Of which: Non-current assets held-for-sale	
Value at initial recognition € million					Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	Value at initial recognition € million	Accumulated negative changes € million	
010 Collateral obtained by taking possession classified as PP&E	-	-	-	-	-	-	-	-	-	-	-	-
020 Collateral obtained by taking possession other than classified as PP&E	42	(24)	608	(99)	35	(16)	159	(9)	414	(74)	12	(5)
030 Residential immovable property	11	(5)	242	(44)	10	(4)	56	(2)	176	(38)	4	(3)
040 Commercial Immovable property	22	(12)	348	(55)	24	(12)	97	(7)	228	(36)	8	(2)
050 Movable property (auto, shipping, etc.)	-	-	2	-	2	-	-	-	-	-	-	-
060 Equity and debt instruments	-	-	13	-	-	-	7	-	7	-	-	-
070 Other collateral	9	(7)	3	-	-	-	-	-	3	-	-	-
<b>080 Total</b>	<b>42</b>	<b>(24)</b>	<b>608</b>	<b>(99)</b>	<b>35</b>	<b>(16)</b>	<b>159</b>	<b>(9)</b>	<b>414</b>	<b>(74)</b>	<b>12</b>	<b>(5)</b>

### 3.3 Standardised approach

On 1 March 2023, the Group received approval from ECB to revert to the STD for all credit risk exposures. The Group's decision to move to a less sophisticated method for capital requirements calculation was based on the fact that the historical data and performance on which Internal Ratings Based models are calibrated is considered to be of limited representativeness taking into account the recent economic developments. The Bank continues utilizing its advanced risk management capabilities for internal purposes such as credit approvals, risk adjusted pricing, IFRS9 provisions where applicable and risk monitoring. To that end, the Group is applying since Q1 2023 the Common Reports requirements of EU Regulation 575/2013 ('CRR') under Title II, Chapter 2 ('Standardised approach') and its subsequent amendments and has aligned respectively the Pillar III disclosures.

## Credit Risk

Credit ratings are retrieved from External Credit Assessment Institutions, such as Moody's or Standard & Poor's or Fitch or ICAP. In the cases where more than one rating is available, the second better rating is used.

The table below presents Standardised exposures on two different basis (before Credit Conversion Factor (CCF) and Credit Risk Mitigation (CRM) and after CCF and CRM) as at 30 June 2024 and 31 December 2023.

**Table 20: EU CR4 - Standardised approach – Credit risk exposure and CRM effects**

Exposure classes	30 June 2024					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet amount	RWAs	RWAs density
	€ million	€ million	€ million	€ million	€ million	%
1 Central governments or central banks	24,064	-	27,383	6	4,902	18%
2 Regional government or local authorities	16	1	15	-	3	20%
3 Public sector entities	693	-	950	-	287	30%
4 Multilateral development banks	63	-	766	10	23	3%
5 International organisations	-	-	-	-	-	0%
6 Institutions	3,554	270	3,582	201	2,041	54%
7 Corporates	17,751	8,118	16,599	2,394	16,663	88%
8 Retail	6,301	3,475	5,484	191	3,995	70%
9 Secured by mortgages on immovable property	11,207	171	11,207	114	4,162	37%
10 Exposures in default	934	40	878	20	959	107%
11 Exposures associated with particularly high risk	372	224	364	109	709	150%
12 Covered bonds	298	-	298	-	30	10%
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
14 Collective investment undertakings	93	-	93	-	93	100%
15 Equity	713	-	713	-	1,514	212%
16 Other items	4,146	-	4,147	-	3,433	83%
<b>17 Total</b>	<b>70,205</b>	<b>12,299</b>	<b>72,479</b>	<b>3,045</b>	<b>38,814</b>	<b>51%</b>

Exposure classes	31 December 2023					
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On Balance sheet amount	Off Balance sheet amount	On Balance sheet amount	Off Balance sheet amount	RWAs	RWAs density
	€ million	€ million	€ million	€ million	€ million	%
1 Central governments or central banks	23,916	-	27,402	-	5,037	18%
2 Regional government or local authorities	18	1	18	-	4	22%
3 Public sector entities	489	-	866	-	286	33%
4 Multilateral development banks	33	-	811	15	26	3%
5 International organisations	-	-	-	-	-	0%
6 Institutions	3,742	204	3,763	146	1,953	50%
7 Corporates	16,036	7,321	14,633	2,361	14,504	85%
8 Retail	6,153	3,394	5,305	195	3,886	71%
9 Secured by mortgages on immovable property	10,955	209	10,955	153	4,064	37%
10 Exposures in default	928	32	848	19	928	107%
11 Exposures associated with particularly high risk	433	208	425	90	773	150%
12 Covered bonds	289	-	289	-	29	10%
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	0%
14 Collective investment undertakings	86	-	86	-	81	94%
15 Equity	619	-	620	-	1,286	207%
16 Other items	4,090	-	4,090	-	3,339	82%
<b>17 Total</b>	<b>67,787</b>	<b>11,369</b>	<b>70,111</b>	<b>2,979</b>	<b>36,196</b>	<b>50%</b>

<sup>(1)</sup> Exposures subject to counterparty credit risk are not included in the table.

<sup>(2)</sup> The table above does not include securitisations.

<sup>(3)</sup> The increase of the exposures is mainly due to the new production of loans.

## Credit Risk

The table below presents the credit exposures post conversion factor and post risk mitigation techniques (i.e. collaterals), broken down to different credit quality steps as at 30 June 2024 and 31 December 2023.

**Table 21: EU CR5 – Standardised approach**

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
	Risk weightings - 30 June 2024																Of which
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Total	unrated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Central governments or central banks	21,927	-	-	220	277	-	178	-	-	3,172	-	516	-	-	1,099	27,389	3,749
2 Regional government or local authorities	-	-	-	-	15	-	-	-	-	-	-	-	-	-	-	15	15
3 Public sector entities	664	-	-	-	-	-	-	-	-	286	-	-	-	-	-	950	285
4 Multilateral development banks	731	-	-	-	-	-	45	-	-	-	-	-	-	-	-	776	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	484	-	-	-	1,411	-	351	-	-	1,443	94	-	-	-	-	3,783	578
7 Corporates	-	-	-	-	23	-	3,466	-	-	15,089	415	-	-	-	-	18,993	9,019
8 Retail exposures	-	-	-	-	-	-	-	-	5,675	-	-	-	-	-	-	5,675	5,666
9 Secured by mortgages on immovable property	-	-	-	-	-	8,735	2,586	-	-	-	-	-	-	-	-	11,321	10,543
10 Exposures in default	-	-	-	-	-	-	-	-	-	773	125	-	-	-	-	898	896
11 Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	473	-	-	-	-	473	466
12 Covered bonds	-	-	-	298	-	-	-	-	-	-	-	-	-	-	-	298	-
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Unit or shares in collective investment undertakings	-	-	-	-	-	-	-	-	-	93	-	-	-	-	-	93	-
15 Equity exposures	-	-	-	-	-	-	-	-	-	179	-	534	-	-	-	713	534
16 Other items	678	-	-	-	44	-	-	-	-	3,425	-	-	-	-	-	4,147	4,147
<b>17 Total</b>	<b>24,484</b>	<b>-</b>	<b>-</b>	<b>518</b>	<b>1,770</b>	<b>8,735</b>	<b>6,626</b>	<b>-</b>	<b>5,675</b>	<b>24,460</b>	<b>1,107</b>	<b>1,050</b>	<b>-</b>	<b>-</b>	<b>1,099</b>	<b>75,524</b>	<b>35,898</b>

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
	Risk weightings - 31 December 2023																Of which
	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Total	unrated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Central governments or central banks	21,921	-	211	1,012	193	-	188	-	-	3,266	-	611	-	-	-	27,402	3,889
2 Regional government or local authorities	-	-	-	-	18	-	-	-	-	-	-	-	-	-	-	18	18
3 Public sector entities	581	-	-	-	-	-	-	-	-	285	-	-	-	-	-	866	284
4 Multilateral development banks	773	-	-	-	-	-	53	-	-	-	-	-	-	-	-	826	-
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	860	-	-	-	1,267	-	346	-	-	1,256	180	-	-	-	-	3,909	562
7 Corporates	-	-	-	-	28	-	3,816	-	-	12,823	327	-	-	-	-	16,994	8,873
8 Retail exposures	-	-	-	-	-	-	-	-	5,500	-	-	-	-	-	-	5,500	5,500
9 Secured by mortgages on immovable property	-	-	-	-	-	8,726	2,382	-	-	-	-	-	-	-	-	11,108	10,390
10 Exposures in default	-	-	-	-	-	-	-	-	-	743	124	-	-	-	-	867	867
11 Exposures associated with particularly high risk	-	-	-	-	-	-	-	-	-	-	515	-	-	-	-	515	509
12 Covered bonds	-	-	-	289	-	-	-	-	-	-	-	-	-	-	-	289	-
13 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Unit or shares in collective investment undertakings	-	-	-	-	-	-	-	-	20	66	-	-	-	-	-	86	-
15 Equity exposures	-	-	-	-	-	-	-	-	-	175	-	445	-	-	-	620	445
16 Other items	725	-	-	-	33	-	-	-	-	3,332	-	-	-	-	-	4,090	4,090
<b>17 Total</b>	<b>24,860</b>	<b>-</b>	<b>211</b>	<b>1,301</b>	<b>1,539</b>	<b>8,726</b>	<b>6,785</b>	<b>-</b>	<b>5,520</b>	<b>21,946</b>	<b>1,146</b>	<b>1,056</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>73,090</b>	<b>35,427</b>

<sup>(1)</sup> Exposures subject to counterparty credit risk are not included in the table.

<sup>(2)</sup> Credit exposures shown in the above table do not include goodwill, intangible assets and deferred tax, which are deducted from own funds.

## Credit Risk

### 3.4 Credit risk mitigation

A key component of the Group's business strategy is to reduce risk by utilizing various risk mitigating techniques. The most important risk mitigating means are collaterals' pledges, guarantees and netting arrangements in master agreements for derivatives.

#### 3.4.1 Analysis of collaterals

The following table shows the volume of unsecured and secured exposures including all collateral, financial guarantees and credit derivatives used as credit risk mitigants and are eligible under the respective regulatory approach.

**Table 22: EU CR3 - CRM techniques – Overview: Disclosure of the use of credit risk mitigation techniques**

	a	b	c	d	e
<b>30 June 2024</b>					
	<b>Unsecured carrying amount</b>	<b>Secured carrying amount</b>			
			<b>Of which secured by collateral</b>	<b>Of which secured by financial guarantees</b>	<b>Of which secured by credit derivatives</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Loans and advances	25,107	29,195	24,812	4,383	-
2 Debt securities <sup>(1)</sup>	15,419	-	-	-	-
<b>3 Total</b>	<b>40,526</b>	<b>29,195</b>	<b>24,812</b>	<b>4,383</b>	<b>-</b>
4 <i>Of which non-performing exposures</i>	808	564	512	52	-
EU-5 <i>Of which defaulted</i>	805	563			
<b>31 December 2023</b>					
	<b>Unsecured carrying amount</b>	<b>Secured carrying amount</b>			
			<b>Of which secured by collateral</b>	<b>Of which secured by financial guarantees</b>	<b>Of which secured by credit derivatives</b>
	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>	<b>€ million</b>
1 Loans and advances	25,229	29,096	24,372	4,724	-
2 Debt securities	14,482	-	-	-	-
<b>3 Total</b>	<b>39,711</b>	<b>29,096</b>	<b>24,372</b>	<b>4,724</b>	<b>-</b>
4 <i>Of which non-performing exposures</i>	850	694	640	54	-
EU-5 <i>Of which defaulted</i>	847	693			

<sup>(1)</sup> The increase in debt securities is mainly due to increased position in Sovereign and Financial Bonds.

<sup>(2)</sup> The value of collaterals and the amount of financial guarantees shown above are the allocated values after regulatory haircuts.

<sup>(3)</sup> For real estate properties the lower between the market value and the pledged amount is considered.

## Credit Risk

### 3.5 Securitised exposures

The following table presents the risk weights of the purchased securitised exposures of the Group, as at 30 June 2024 and 31 December 2023.

**Table 23: EU SEC1 - Securitisation exposures in the non-trading book**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o			
	30 June 2024																	
	Institution acts as originator						Institution acts as sponsor				Institution acts as investor							
	Traditional		Synthetic		Sub-total		Traditional		Synthetic		Sub-total		Traditional		Synthetic		Sub-total	
	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS
	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	-	-	999	999	2,617	2,617	3,616	-	-	-	-	-	-	1,544	-	1,544	-	-
2 Retail (total)	-	-	994	994	-	-	994	-	-	-	-	-	-	30	-	30	-	-
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	30	-	30	-	-
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 other retail exposures	-	-	994	994	-	-	994	-	-	-	-	-	-	-	-	-	-	-
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Wholesale (total)	-	-	5	5	2,617	2,617	2,622	-	-	-	-	-	-	1,514	-	1,514	-	-
8 loans to corporates	-	-	5	5	2,617	2,617	2,622	-	-	-	-	-	-	1,514	-	1,514	-	-
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o			
	31 December 2023																	
	Institution acts as originator						Institution acts as sponsor				Institution acts as investor							
	Traditional		Synthetic		Sub-total		Traditional		Synthetic		Sub-total		Traditional		Synthetic		Sub-total	
	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS	STS	Non-STS
	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT	of which SRT
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	-	-	1,034	1,035	3,606	3,606	4,641	-	-	-	-	-	-	1,562	-	1,562	-	-
2 Retail (total)	-	-	1,029	1,030	-	-	1,029	-	-	-	-	-	-	32	-	32	-	-
3 residential mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	32	-	32	-	-
4 credit card	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 other retail exposures	-	-	1,029	1,030	-	-	1,029	-	-	-	-	-	-	-	-	-	-	-
6 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Wholesale (total)	-	-	5	5	3,606	3,606	3,612	-	-	-	-	-	-	1,530	-	1,530	-	-
8 loans to corporates	-	-	5	5	3,606	3,606	3,612	-	-	-	-	-	-	1,530	-	1,530	-	-
9 commercial mortgage	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 lease and receivables	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 other wholesale	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

**Credit Risk**

**Table 24: EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as originator or as sponsor**

	30 June 2024																EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap				
	>20% to		>50% to	>100% to	1250%	SEC-ERBA		1250%	SEC-ERBA		1250%	SEC-ERBA		1250%	SEC-ERBA			
	≤20% RW	50% RW	100% RW	<1250% RW	RW/	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Total exposures	2,615	-	989	12	-	-	-	3,616	-	-	-	1,440	-	-	-	115	-	
2 Traditional transactions	-	-	989	10	-	-	-	999	-	-	-	1,055	-	-	-	84	-	
3 Securitisation	-	-	989	10	-	-	-	999	-	-	-	1,055	-	-	-	84	-	
4 Retail	-	-	989	5	-	-	-	994	-	-	-	1,002	-	-	-	80	-	
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6 Wholesale	-	-	-	5	-	-	-	5	-	-	-	53	-	-	-	4	-	
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Synthetic transactions	2,615	-	-	2	-	-	-	2,617	-	-	-	385	-	-	-	31	-	
10 Securitisation	2,615	-	-	2	-	-	-	2,617	-	-	-	385	-	-	-	31	-	
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 Wholesale	2,615	-	-	2	-	-	-	2,617	-	-	-	385	-	-	-	31	-	
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

	31 December 2023																EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap				
	>20% to		>50% to	>100% to	1250%	SEC-ERBA		1250%	SEC-ERBA		1250%	SEC-ERBA		1250%	SEC-ERBA			
	≤20% RW	50% RW	100% RW	<1250% RW	RW/	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Total exposures	3,604	-	1,025	12	-	-	-	4,641	-	-	-	1,671	-	-	-	134	-	
2 Traditional transactions	-	-	1,025	10	-	-	-	1,035	-	-	-	1,100	-	-	-	88	-	
3 Securitisation	-	-	1,025	10	-	-	-	1,035	-	-	-	1,100	-	-	-	88	-	
4 Retail	-	-	1,025	5	-	-	-	1,030	-	-	-	1,046	-	-	-	84	-	
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6 Wholesale	-	-	-	5	-	-	-	5	-	-	-	54	-	-	-	4	-	
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Synthetic transactions	3,604	-	-	2	-	-	-	3,606	-	-	-	572	-	-	-	46	-	
10 Securitisation	3,604	-	-	2	-	-	-	3,606	-	-	-	572	-	-	-	46	-	
11 Retail underlying	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 Wholesale	3,604	-	-	2	-	-	-	3,606	-	-	-	572	-	-	-	46	-	
13 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

**Table 25: EU SEC4 - Securitisation exposures in the non-trading book and associated capital requirements - institution acting as investor**

	30 June 2024																EU-p	EU-q
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap				
	>50% to		100%	>100% to	1250%	SEC-ERBA		1250%	SEC-ERBA		1250%	SEC-ERBA		1250%	SEC-ERBA			
	≤20% RW	50% RW	RW	<1250% RW	RW/	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA	deductions	SEC-IRBA	(including IAA)	SEC-SA		
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Total exposures	1,463	23	4	54	-	-	1,490	54	-	-	306	65	-	-	24	5	-	
2 Traditional securitisation	1,463	23	4	54	-	-	1,490	54	-	-	306	65	-	-	24	5	-	
3 Securitisation	1,463	23	4	54	-	-	1,490	54	-	-	306	65	-	-	24	5	-	
4 Retail underlying	3	23	4	-	-	-	30	-	-	-	14	-	-	-	1	-	-	
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
6 Wholesale	1,460	-	-	54	-	-	1,460	54	-	-	292	65	-	-	23	5	-	
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	

## Credit Risk

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	EU-p	EU-q
	31 December 2023																
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				RWEA (by regulatory approach)				Capital charge after cap			
	<=20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total exposures	1,467	27	4	64	-	-	1,498	64	-	-	309	79	-	-	25	6	-
2 Traditional securitisation	1,467	27	4	64	-	-	1,498	64	-	-	309	79	-	-	25	6	-
3 Securitisation	1,467	27	4	64	-	-	1,498	64	-	-	309	79	-	-	25	6	-
4 Retail underlying	1	27	4	-	-	-	32	-	-	-	16	-	-	-	2	-	-
5 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Wholesale	1,466	-	-	64	-	-	1,466	64	-	-	293	79	-	-	23	6	-
7 Of which STS	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Synthetic securitisation	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

**Table 26: EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments**

	30 June 2024			31 December 2023		
	Exposures securitised by the institution - Institution acts as originator or as sponsor			Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Total amount of specific credit risk		Total outstanding nominal amount	Total amount of specific credit risk	
	Of which exposures in default	adjustments made during the period		Of which exposures in default	adjustments made during the period	
	€ million	€ million	€ million	€ million	€ million	€ million
<b>Total exposures<sup>(1)</sup></b>	<b>12,848</b>	<b>8,811</b>	<b>5,467</b>	14,794	9,636	5,935
Retail (total)	7,810	6,778	3,942	8,640	7,589	4,395
residential mortgage	5,988	5,197	2,892	6,535	5,732	3,158
credit card	-	-	-	-	-	-
other retail exposures	1,822	1,581	1,050	2,105	1,857	1,237
re-securitisation	-	-	-	-	-	-
Wholesale (total)	5,038	2,033	1,525	6,154	2,047	1,540
loans to corporates	5,038	2,033	1,525	6,154	2,047	1,540
commercial mortgage	-	-	-	-	-	-
lease and receivables	-	-	-	-	-	-
other wholesale	-	-	-	-	-	-
re-securitisation	-	-	-	-	-	-

<sup>(1)</sup> The decrease in exposures is mainly attributed to the amortization of Wave synthetic securitizations and sales of assets under Cairo securitizations.

For securitization exposures the Group uses one or more of the following external rating agencies: Moody's, Standard & Poor's and Fitch.



## Market Risk

### 4. Market Risk

The Bank uses its own internal Value at Risk (VaR) model to calculate capital requirements for market risk in its trading book, for the Bank's activities in Greece. The Bank received the official validation of its model for market risk by the BoG in July 2005. The model is subject to periodic review by the regulator.

In 2011, the Bank updated its models and systems in order to fully comply with the BoG Governor's Act 2646/2011 for the trading book capital. The Bank calculates the capital for stressed VaR and 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.

#### 4.1 Internal model - Value at Risk (VaR) model & Credit Risk (IRC)

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

The following two tables summarize the components of the capital requirement, under the IMA approach applied by the Bank as at 30 June 2024 and 31 December 2023.

**Table 27: EU MR2-A - Market risk under IMA**

	30 June 2024		31 December 2023	
	a RWEAs € million	b Own funds requirements € million	a RWEAs € million	b Own funds requirements € million
<b>1 VaR</b> (higher of values a and b)	110	9	110	9
(a) Previous day's VaR (VaRt-1)		1		2
(b) Multiplication factor (mc) x average of previous 60 working days (VaRavg)		9		9
<b>2 SVaR</b> (higher of values a and b)	188	15	202	16
(a) Latest available SVaR (SVaRt-1)		4		4
(b) Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		15		16
<b>3 IRC</b> (higher of values a and b)	135	11	193	15
(a) Most recent IRC measure		6		7
(b) 12 weeks average IRC measure		11		15
<b>4 Comprehensive risk measure</b> (higher of values a, b and c)	-	-	-	-
(a) Most recent risk measure of comprehensive risk measure		-		-
(b) 12 weeks average of comprehensive risk measure		-		-
(c) Comprehensive risk measure - Floor		-		-
<b>5 Other</b>	-	-	-	-
<b>6 Total</b> <sup>(1)</sup>	<b>433</b>	<b>35</b>	<b>505</b>	<b>40</b>

<sup>(1)</sup> The decrease observed in the H1 2024 RWEAs is mainly stemming from the decreased trading activity, mostly associated with items contributing to the IRC, i.e. fixed income securities.

## Market Risk

**Table 28: EU MR2-B - RWEAs flow of market risk exposures under IMA**

	a	b	c	d	e	f	g
	30 June 2024						
	VaR	SVaR	Comprehensive risk measure		Other	Total RWEAs	Total own funds requirements
	€ million	€ million	IRC	€ million	€ million	€ million	€ million
1 RWEAs at 1 April 2024 <sup>1</sup>	107	175	290	-	-	573	46
1a Regulatory adjustment <sup>2</sup>	(76)	(115)	-	-	-	(191)	(15)
1b RWEAs at the previous quarter-end (end of the day) <sup>3</sup>	31	60	290	-	-	382	31
2 Movement in risk levels	3	13	(155)	-	-	(139)	(11)
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) <sup>3</sup>	16	55	70	-	-	141	11
8b Regulatory adjustment <sup>2</sup>	94	133	65	-	-	292	23
<b>8 RWEAs at 30 June 2024<sup>1</sup></b>	<b>110</b>	<b>188</b>	<b>135</b>	<b>-</b>	<b>-</b>	<b>433</b>	<b>35</b>

<sup>(1)</sup> RWEAs at previous and current reporting period (quarter end).

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

<sup>(3)</sup> 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).

The table below shows the values resulting from the different types of internal models approved to use for computing the regulatory capital charge as at 30 June 2024 and 31 December 2023.

**Table 29: EU MR3 – IMA values for trading portfolios**

	a	a
	30 June 2024	31 December 2023
	€ million	€ million
<b>VaR (10 day 99%)</b>		
1 Maximum value	4	3
2 Average value	2	2
3 Minimum value	1	1
4 Period end	1	2
<b>SVaR (10 day 99%)</b>		
5 Maximum value	6	9
6 Average value	4	6
7 Minimum value	4	4
8 Period end	5	4
<b>IRC (99.9%)</b>		
9 Maximum value	24	46
10 Average value	13	18
11 Minimum value	6	6
12 Period end	6	7
<b>Comprehensive risk measure (99.9%)</b>		
13 Maximum value	-	-
14 Average value	-	-
15 Minimum value	-	-
16 Period end	-	-

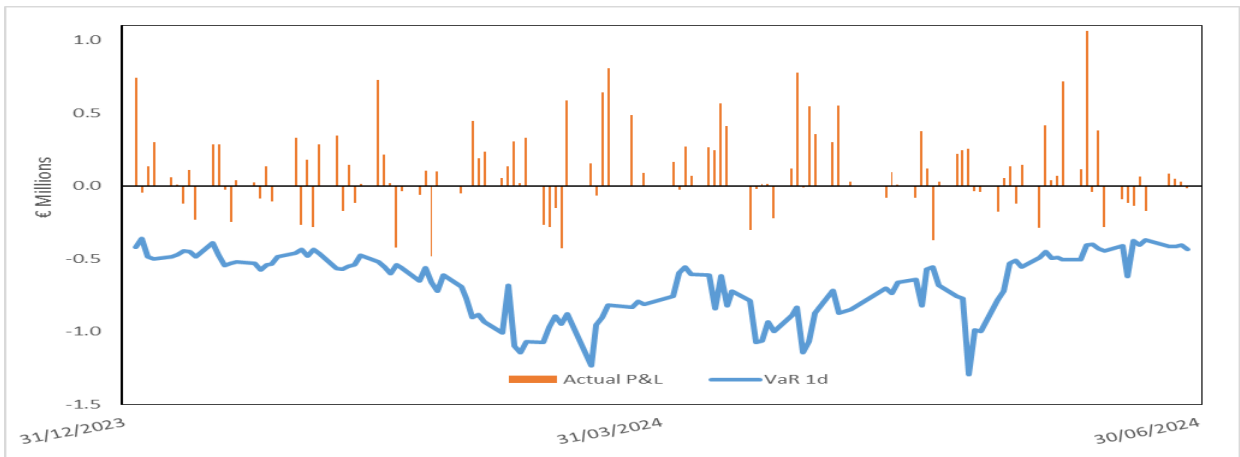
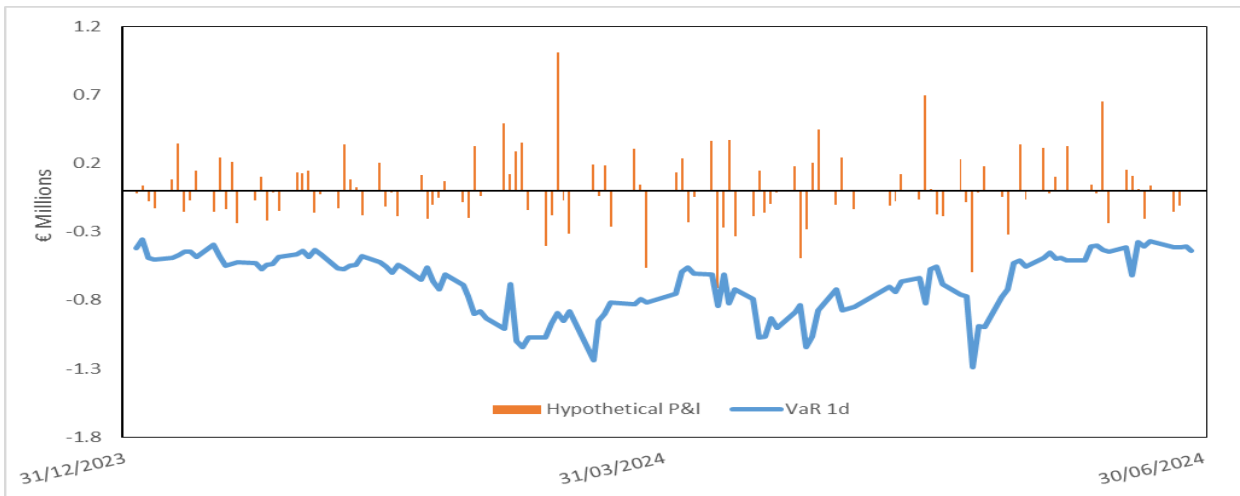
### 4.2 Back testing

Back testing for H1 2024 has revealed, as shown in the graphs below, no overshootings out of a total of 120 working days, when comparing the VaR forecast both to the Hypothetical P&L and the Actual P&L. During the last 250 working days period, the total amount of backtesting overshootings is reduced on Hypothetical P&L (no overshootings as of H1 2024, compared to (1) as of H2 2023) and remained stable on Actual P&L ((1) both as of H1 2024 and as of H2 2023). The absence of new overshootings mainly relates to the low levels of volatility observed in the markets during the said period.

## Market Risk

According to the regulatory framework, which takes into account a 250 working days period, the multiplier is equal to 3.00 (currently in the green zone, with no overshootings when comparing the VaR forecast to Hypothetical P&L and one (1) overshooting when comparing to Actual P&L), regarding capital charge calculations for market risk. The calculation for the H1 2024 RWAs (VaR, SVaR) takes into account the amended multiplication factor (3.25), following the ECB’s Decision on the additional supervisory measures, regarding the use of the internal models approach for calculating OFR for market risk, remaining stable at the end of H2 2023 level).

**Table 30: EU MR4 – Comparison of VaR estimates with gains/losses**



## Market Risk

### 4.3 Standardised approach for market risk

The Bank uses the STD for the measurement of market risk exposure and capital requirements of its subsidiaries in Greece and in International operations. The following table summarises the capital requirements for market risk per risk factor, based on the STD, as at 30 June 2024 and 31 December 2023.

**Table 31: EU MR1 – Market risk under the standardised approach**

	a	a
	30 June 2024	31 December 2023
	RWEAs € million	RWEAs € million
<b>Outright products</b>		
1 Interest rate risk (general and specific)	21	37
2 Equity risk (general and specific)	19	10
3 Foreign exchange risk	72	64
4 Commodity risk	-	-
<b>Options</b>		
5 Simplified approach	-	-
6 Delta-plus approach	-	-
7 Scenario approach	-	-
8 Securitisation (specific risk)	-	-
<b>9 Total</b>	<b>112</b>	<b>110</b>

### 4.4 Interest rate risk in the Banking Book (IRRBB)

With regards to the estimation of the IRRBB, the Bank uses methodologies for the estimation of risk from positions at fair value (VaR approach), along with methodologies for the estimation of risk on EVE (Economic Value of Equity) and on NII (Net Interest Income), taking into account all Banking Book positions (including portfolios measured at amortised cost).

Regarding positions at fair value, the Bank calculates and monitors the interest rate risk for the Bank's operations in Greece, and for its Subsidiary Banks on a daily basis, using the internal VaR model. The perimeter of the calculation includes the FVOCI portfolio; VaR provides an estimation of the potential losses from FVOCI positions measured at fair value, that will directly affect the Bank's Capital (income statement or equity).

The VaR that the Group measures for positions measured at fair value is based on a 99% confidence level and a holding period of 1 day. The methodology used for the calculation is Monte Carlo simulation (full re-pricing approach).

In addition to the VaR estimation, the Bank uses internal reports for the monitoring of the IRRBB taking into account FVOCI and AC portfolios (loans, deposits, debt securities and derivatives), including: Interest rate repricing analysis, sensitivity of NII and sensitivity of Bank's EVE on multiple scenarios of interest rates. For the calculation of these sensitivities, specific assumptions are made regarding the applicable duration (for EVE delta calculations) and pass-through rate (for NII delta calculations) on specific parts of the Group's Balance Sheet (for example for sight deposits and other Non-Maturing Deposits). These assumptions are based on historical observations processed using statistical analysis.

The disclosure has been prepared using the information referred to in Article 448(1), points (a) and (b), of Regulation (EU) No 575/2013 by using template EU IRRBB1 set out in Annex XXXVII of Regulation (EU) No 631/2022 of 13 April 2022 and by following the instructions set out in Annex XXXVIII to the same Regulation.

The analysis takes into account all assets, liabilities and off-balance sheet items, which are sensitive to interest rates.

## Market Risk

**Table 32: EU IRRBB1 - Interest rate risks of non-trading book activities**

Supervisory shock scenarios	a	b	c	d
	30 June 2024			
	Changes of the economic value of equity		Changes of the net interest income	
	Current period € million	Last period € million	Current period € million	Last period € million
1 Parallel up	(606)	20	72	96
2 Parallel down	275	(191)	(263)	(404)
3 Steeper	(145)	(88)		
4 Flattener	(4)	53		
5 Short rates up	(177)	7		
6 Short rates down	43	(188)		

Supervisory shock scenarios	a	b	c	d
	31 December 2023			
	Changes of the economic value of equity		Changes of the net interest income	
	Current period € million	Last period € million	Current period € million	Last period € million
1 Parallel up	20	(590)	96	(162)
2 Parallel down	(191)	351	(404)	(236)
3 Steeper	(88)	(126)		
4 Flattener	53	(14)		
5 Short rates up	7	(181)		
6 Short rates down	(188)	88		

The sensitivities to the Supervisory Shock scenarios are calculated as defined in EBA/GL/2022/14 which came into force on the 30<sup>th</sup> of June 2023.

The measurement of Economic value of Equity and of Net Interest Income is based on the Commission Delegated Regulation (EU) 2024/856. The application of Article 3 paragraph 8 of the Commission Delegated Regulation (EU) 2024/856 contributes to the asymmetry of the results. The change in the Interest Rate Risk profile between the reporting periods is mainly attributed to adjustments of the hedging strategy, changes on rates and on the balance sheet structure of the Group. It is worth noting, that the Bank in response to the regulatory developments and requirements (EBA/GL/2022/14), has further enhanced its infrastructure, governance and limit structure accordingly, so as to measure and monitor its Credit Spread Risk in the Banking Book.

## Counterparty Risk

### 5. Counterparty risk

#### 5.1 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).

#### 5.2 Mitigation of counterparty risk

To reduce the exposure towards single counterparties, risk mitigation techniques are used. The most common is the use of closeout netting agreements (usually based on standardised 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.

#### 5.3 Credit derivatives

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

As of 31 March 2024, the Group had a number of positions on CDS Indices (protection bought € 200 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 47: 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.

**Table 33: EU CCR6 – Credit derivatives exposures**

	a	b	a	b
	30 June 2024		31 December 2023	
	Protection bought € million	Protection sold <sup>(1)</sup> € million	Protection bought € million	Protection sold € million
<b>Notionals</b>				
1 Single-name credit default swaps	-	-	-	-
2 Index credit default swaps	703	178	200	-
3 Total return swaps	-	-	-	-
4 Credit options	-	-	-	-
5 Other credit derivatives	-	-	-	-
<b>6 Total notionals</b>	<b>703</b>	<b>178</b>	<b>200</b>	<b>-</b>
<b>Fair values</b>				
7 Positive fair value (asset)	-	1	-	-
8 Negative fair value (liability)	(42)	-	(34)	-

<sup>(1)</sup> The sold protection position (€178 million) is fully netted with an equivalent bought protection position, resulting to a net overall position: protection bought € 525 million.

## Counterparty Risk

### 5.4 Counterparty risk based on the calculation methodology employed

The following table shows the exposure to counterparty credit risk based on the calculation methodology employed as at 30 June 2024 and 31 December 2023.

**Table 34: EU CCR1 – Analysis of CCR exposure by approach**

	a	b	c	d	e	f	g	h
	30 June 2024							
	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
	€ million	€ million	€ million	exposure value	€ million	€ million	€ million	€ million
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	180	190		1.4	828	519	517	212
2 IMM (for derivatives and SFTs)				1.2	-	-	-	-
2a Of which securities financing transactions netting sets					-	-	-	-
2b Of which derivatives and long settlement transactions netting sets					-	-	-	-
2c Of which from contractual cross-product netting sets					-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					4,405	3,175	3,175	196
5 VaR for SFTs					-	-	-	-
6 Total					5,233	3,694	3,692	408

	a	b	c	d	e	f	g	h
	31 December 2023							
	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
	€ million	€ million	€ million	exposure value	€ million	€ million	€ million	€ million
EU-1 EU - Original Exposure Method (for derivatives)	-	-		1.4	-	-	-	-
EU-2 EU - Simplified SA-CCR (for derivatives)	-	-		1.4	-	-	-	-
1 SA-CCR (for derivatives)	205	189		1.4	912	551	549	230
2 IMM (for derivatives and SFTs)				1.2	-	-	-	-
2a Of which securities financing transactions netting sets					-	-	-	-
2b Of which derivatives and long settlement transactions netting sets					-	-	-	-
2c Of which from contractual cross-product netting sets					-	-	-	-
3 Financial collateral simple method (for SFTs)					-	-	-	-
4 Financial collateral comprehensive method (for SFTs)					4,269	3,180	3,180	199
5 VaR for SFTs					-	-	-	-
6 Total					5,181	3,731	3,729	429

### 5.5 CVA capital charge

The following table shows the CVA capital charge, which is calculated through the STD as at 30 June 2024 and 31 December 2023.

**Table 35: EU CCR2 - Transactions subject to own funds requirements for CVA risk**

	a	b	a	b
	30 June 2024		31 December 2023	
	Exposure value	RWEA	Exposure value	RWEA
	€ million	€ million	€ million	€ million
1 Total transactions subject to the Advanced method	-	-	-	-
2 (i) VaR component (including the 3x multiplier)		-		-
3 (ii) stressed VaR component (including the 3x multiplier)		-		-
4 Transactions subject to the Standardised method	176	196	181	184
EU-4 Transactions subject to the Alternative approach (Based on the Original Exposure Method)	-	-	-	-
5 Total transactions subject to own funds requirements for CVA risk	176	196	181	184

## Counterparty Risk

### 5.6 Exposures to CCPs

The following table shows the exposures to Central Counterparties (CCPs) and the corresponding RWEAs as at 30 June 2024 and 31 December 2023.

**Table 36: EU CCR8 – Exposures to CCPs**

	a		b		a		b	
	30 June 2024				31 December 2023			
	Exposure value € million	RWEA € million	Exposure value € million	RWEA € million	Exposure value € million	RWEA € million	Exposure value € million	RWEA € million
<b>1 Exposures to QCCPs (total)</b>		7		12				
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	93	2	157	3				
3 (i) OTC derivatives	93	2	157	3				
4 (ii) Exchange-traded derivatives	-	-	-	-				
5 (iii) SFTs	-	-	-	-				
6 (iv) Netting sets where cross-product netting has been approved	-	-	-	-				
7 Segregated initial margin	-		-					
8 Non-segregated initial margin	232	5	431	9				
9 Prefunded default fund contributions	-	-	-	-				
10 Unfunded default fund contributions	-	-	-	-				
<b>11 Exposures to non-QCCPs (total)</b>		-		-				
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	-	-	-	-				
13 (i) OTC derivatives	-	-	-	-				
14 (ii) Exchange-traded derivatives	-	-	-	-				
15 (iii) SFTs	-	-	-	-				
16 (iv) Netting sets where cross-product netting has been approved	-	-	-	-				
17 Segregated initial margin	-		-					
18 Non-segregated initial margin	-	-	-	-				
19 Prefunded default fund contributions	-	-	-	-				
20 Unfunded default fund contributions	-	-	-	-				

### 5.7 Standardised approach – CCR exposures by regulatory portfolio and risk

The following table shows the CCR exposures by regulatory portfolio and risk as at 30 June 2024 and 31 December 2023.

**Table 37: EU CCR3 - Standardised approach – CCR exposures by regulatory exposure class and risk weights**

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
	30 June 2024											
	Risk weight											Total exposure value € million
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	€ million
1 Central governments or central banks	2,180	-	-	-	-	-	-	-	-	-	-	2,180
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	66	-	-	-	-	-	-	-	-	-	-	66
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	307	17	-	1,269	14	-	-	2	-	-	1,609
7 Corporates	-	-	-	-	-	34	-	-	123	4	-	161
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-
<b>11 Total exposure value</b>	<b>2,246</b>	<b>307</b>	<b>17</b>	<b>-</b>	<b>1,269</b>	<b>48</b>	<b>-</b>	<b>-</b>	<b>125</b>	<b>4</b>	<b>-</b>	<b>4,016</b>



## Counterparty Risk

Exposure classes	a	b	c	d	e	f	g	h	i	j	k	l
	31 December 2023											
	Risk weight											Total exposure value
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	€ million
1 Central governments or central banks	2,248	-	-	-	-	-	-	-	-	-	-	2,248
2 Regional government or local authorities	-	-	-	-	-	-	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-	-	-	-	-	-	-
4 Multilateral development banks	1	-	-	-	-	-	-	-	-	-	-	1
5 International organisations	-	-	-	-	-	-	-	-	-	-	-	-
6 Institutions	-	587	-	-	1,282	16	-	-	2	-	-	1,887
7 Corporates	-	-	-	-	-	41	-	-	134	5	-	180
8 Retail	-	-	-	-	-	-	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-	-	-	-	-	-	-
11 Total exposure value	2,249	587	-	-	1,282	57	-	-	136	5	-	4,316

### 5.8 RWEAs flow statements of CCR exposures under IMM

**Table 38: 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.

### 5.9 Composition of collateral for exposures to CCR

The following table shows the composition of collateral for exposures to CCR, as at 30 June 2024 and 31 December 2023.

**Table 39: EU CCR5** - Composition of collateral for CCR exposures

Collateral type	a	b	c	d	e	f	g	h
	30 June 2024							
	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated <sup>(1)</sup>	Segregated	Unsegregated <sup>(2)</sup>
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Cash – domestic currency	-	663	-	480	-	17	-	21
2 Cash – other currencies	-	3	-	25	-	-	-	2
3 Domestic sovereign debt	-	-	-	-	-	95	-	156
4 Other sovereign debt	-	-	-	-	-	548	-	87
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	856	-	3,977
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	4,785
9 Total	-	666	-	505	-	1,515	-	9,027

Collateral type	a	b	c	d	e	f	g	h
	31 December 2023							
	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Cash – domestic currency	-	443	-	740	-	15	-	37
2 Cash – other currencies	-	2	-	29	-	5	-	-
3 Domestic sovereign debt	-	-	-	-	-	286	-	304
4 Other sovereign debt	-	-	-	-	-	23	-	187
5 Government agency debt	-	-	-	-	-	-	-	-
6 Corporate bonds	-	-	-	-	-	1,078	-	4,539
7 Equity securities	-	-	-	-	-	-	-	-
8 Other collateral	-	-	-	-	-	-	-	5,058
9 Total	-	444	-	769	-	1,406	-	10,125

<sup>(1)</sup> The increase of the collaterals received in Securities Financing Transactions (SFTs) is mainly due to new transactions (Reverse Repo) with interbank counterparties.

<sup>(2)</sup> The decrease of the collaterals posted in Securities Financing Transactions (SFTs) is mainly due to the decrease of the posted collateral in Eurosystem (TLTRO)

## Leverage Ratio

### 6. Leverage Ratio

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

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

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

The level of the leverage ratio with reference date 30 June 2024, including profits, was at 9.1% (31 December 2023: 8.7%), according to the transitional definition of Tier 1 capital, significantly over the proposed minimum threshold of 3%.

The below table includes the summary of the Group's leverage ratio with reference dates 30 June 2024 and 31 December 2023.

**Table 40: EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures**

	a		a
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 December 2023
	€ million	€ million	€ million
<b>1 Total assets as per published financial statements</b>	<b>81,256</b>	<b>81,256</b>	<b>79,781</b>
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	-	-	-
3 (Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-	-
4 (Adjustment for temporary exemption of exposures to central bank (if applicable))	-	-	-
5 (Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	-	-	-
6 Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-	-	-
7 Adjustment for eligible cash pooling transactions	-	-	-
8 Adjustments for derivative financial instruments	(325)	(325)	(249)
9 Adjustment for securities financing transactions (SFTs)	2,034	2,034	1,900
10 Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2,750	2,750	3,775
11 (Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-	-	-
EU-11a (Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-	-
EU-11b (Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-	-
12 Other adjustments	(1,036)	(1,176)	(805)
<b>13 Total exposure measure</b>	<b>84,679</b>	<b>84,539</b>	<b>84,402</b>

<sup>(1)</sup> Including profits € 721 million for the 1H 2024.

## Leverage Ratio

**Table 41: EU LR2 - LRCom: Leverage ratio common disclosure**

	a		a
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 December 2023
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
<b>On - balance sheet exposures (excluding derivatives and SFTs)</b>			
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	80,328	80,328	78,817
2 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-	-
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(238)	(238)	(359)
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-	-
5 (General credit risk adjustments to on-balance sheet items)	-	-	-
6 (Asset amounts deducted in determining Tier 1 capital)	(850)	(990)	(452)
<b>7 Total on-balance sheet exposures (excluding derivatives and SFTs)</b>	<b>79,239</b>	<b>79,099</b>	<b>78,006</b>
<b>Derivative exposures</b>			
8 Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	93	93	136
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-	-
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	442	442	496
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	-	-	-
EU-9b Exposure determined under Original Exposure Method	-	-	-
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-	-
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-	-
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	-	-	-
11 Adjusted effective notional amount of written credit derivatives	-	-	-
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-	-
<b>13 Total derivatives exposures</b>	<b>535</b>	<b>535</b>	<b>633</b>
<b>Securities financing transaction exposures</b>			
14 Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	1,381	1,381	1,298
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	(1)	(1)	(1)
16 Counterparty credit risk exposure for SFT assets	775	775	691
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e(5) and 222 CRR	-	-	-
17 Agent transaction exposures	-	-	-
EU-17a (Exempted CCP leg of client-cleared SFT exposure)	-	-	-
<b>18 Total securities financing transaction exposures</b>	<b>2,155</b>	<b>2,155</b>	<b>1,988</b>
<b>Other off-balance sheet exposures</b>			
19 Off-balance sheet exposures of gross notional amount	12,352	12,352	11,418
20 (Adjustments for conversion to credit equivalent amounts)	(9,602)	(9,602)	(7,643)
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-	-
<b>22 Off-balance sheet exposures</b>	<b>2,750</b>	<b>2,750</b>	<b>3,775</b>
<b>Excluded exposures</b>			
EU-22k (Total exempted exposures)	-	-	-
<b>Capital and total exposure measure</b>			
<b>23 Tier 1 capital</b>	<b>7,670</b>	<b>6,896</b>	<b>7,348</b>
<b>24 Total exposure measure</b>	<b>84,679</b>	<b>84,539</b>	<b>84,402</b>
<b>Leverage ratio</b>			
<b>25 Leverage ratio %</b>	<b>9.1%</b>	<b>8.2%</b>	<b>8.7%</b>
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	9.1%	8.2%	8.7%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	9.1%	8.2%	8.7%
26 Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%	3.00%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%
EU-26b of which: to be made up of CET1 capital	0.00%	0.00%	0.00%
27 Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%
EU-27a Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%
<b>Choise on transitional arrangements and relevant exposures</b>			
EU-27b Choise on transitional arrangements for the definition of capital measure	Transitional	Transitional	Transitional

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 .

<sup>(2)</sup> Total off-balance sheet items exposures presented in accordance with Article 111 (1) of Regulation (EU) No 575/2013 (STD).

## Leverage Ratio

**Table 42: EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)**

	a		a
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 December 2023
	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million	CRR leverage ratio exposures € million
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	80,090	80,090	78,458
EU-2 Trading book exposures	257	257	380
EU-3 Banking book exposures, of which:	79,833	79,833	78,078
EU-4 Covered bonds	298	298	289
EU-5 Exposures treated as sovereigns	29,368	29,368	29,264
EU-6 Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	-	-	-
EU-7 Institutions	3,371	3,371	3,430
EU-8 Secured by mortgages of immovable properties	11,207	11,207	10,955
EU-9 Retail exposures	5,793	5,793	5,591
EU-10 Corporates	17,590	17,590	15,856
EU-11 Exposures in default	882	882	855
EU-12 Other exposures (eg equity, securitisations, and other non-credit obligation assets)	11,324	11,324	11,838

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 .

## Liquidity Risk

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### 7. Liquidity Risk

The Group is exposed to daily calls on its available cash resources due to deposits withdrawals, maturity of medium or long-term notes and maturity of secured or unsecured funding (interbank repos and money market takings), loan drawdowns and forfeiture of guarantees. Furthermore, margin calls on secured funding transactions (with ECB and the market) and on risk mitigation contracts (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.

#### 7.1 Liquidity Coverage Ratio (LCR) calculations

LCR as of 30 June 2024 is equal to 181.7% (31 March 2024: 179.0%). The corresponding High Quality Liquid Assets as of 30 June 2024 as defined by the regulation for the calculation of LCR are € 18,059 million.

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

## Liquidity Risk

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

**Table 43: LIQ1 - Quantitative information of LCR**

EU 1a	Quarter ending on	Total unweighted value (average)				Total weighted value (average)			
		a	b	c	d	e	f	g	h
		30 June 2024	31 March 2024	31 December 2023	30 September 2023	30 June 2024	31 March 2024	31 December 2023	30 September 2023
		€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>									
	1 Total high-quality liquid assets (HQLA)					17,658	17,472	17,177	16,850
<b>CASH-OUTFLOWS</b>									
	2 Retail deposits and deposits from small business customers, of which:	34,252	34,126	33,935	33,672	2,441	2,424	2,368	2,286
	3 Stable deposits	21,388	21,432	22,039	23,006	1,069	1,072	1,102	1,150
	4 Less stable deposits	12,863	12,694	11,897	10,666	1,372	1,352	1,266	1,136
	5 Unsecured wholesale funding	15,392	15,381	15,225	15,178	7,316	7,288	7,040	6,837
	6 Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,211	1,304	1,515	1,691	298	321	372	414
	7 Non-operational deposits (all counterparties)	14,132	14,036	13,710	13,488	6,969	6,926	6,669	6,423
	8 Unsecured debt	49	41	-	-	49	41	-	-
	9 Secured wholesale funding					101	93	96	101
	10 Additional requirements	5,951	5,602	5,442	5,076	1,168	1,152	1,214	1,275
	11 Outflows related to derivative exposures and other collateral requirements	665	686	771	878	665	686	771	878
	12 Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
	13 Credit and liquidity facilities	5,286	4,916	4,671	4,198	503	466	443	397
	14 Other contractual funding obligations	67	83	86	97	53	70	74	86
	15 Other contingent funding obligations	4,841	4,303	3,753	3,538	311	283	254	242
	16 TOTAL CASH OUTFLOWS					11,391	11,310	11,047	10,828
<b>CASH-INFLOWS</b>									
	17 Secured lending (eg reverse repos)	210	203	160	120	47	31	17	11
	18 Inflows from fully performing exposures	1,163	1,089	962	903	1,001	928	806	747
	19 Other cash inflows	1,108	1,244	1,373	1,475	239	267	296	313
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
	20 TOTAL CASH INFLOWS	2,481	2,535	2,495	2,498	1,287	1,227	1,118	1,071
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows Subject to 90% Cap	-	-	-	-	-	-	-	-
EU-20c	Inflows Subject to 75% Cap	2,481	2,535	2,495	2,498	1,287	1,227	1,118	1,071
<b>TOTAL ADJUSTED VALUE</b>									
EU-21	LIQUIDITY BUFFER					17,658	17,472	17,177	16,850
	22 TOTAL NET CASH OUTFLOWS					10,104	10,083	9,929	9,757
	23 LIQUIDITY COVERAGE RATIO (%)					174.9%	173.4%	173.1%	172.8%

## Liquidity Risk

### 7.2 Net Stable Funding Ratio (NSFR) calculations

NSFR as of 30 June 2024 is equal to 127.1% (31 March 2024: 127.7%). The minimum regulatory threshold for NSFR is set at 100%.

**Table 44: LIQ2 - Net Stable Funding Ratio**

	a	b	c	d	e
	30 June 2024				
	Unweighted value by residual maturity				Weighted value
	No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	
	€ million	€ million	€ million	€ million	€ million
<b>Available stable funding (ASF) Items</b>					
1 Capital items and instruments	8,614	-	-	1,584	10,198
2 Own funds	8,614	-	-	1,584	10,198
3 Other capital instruments	-	-	-	-	-
4 Retail deposits		33,888	3,982	1,194	36,492
5 Stable deposits		22,708	1,602	656	23,751
6 Less stable deposits		11,180	2,380	537	12,741
7 Wholesale funding:		22,964	1,001	1,132	9,267
8 Operational deposits		1,108	-	-	554
9 Other wholesale funding		21,856	1,001	1,132	8,713
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	134	1,612	166	3,314	3,397
12 NSFR derivative liabilities	134				
13 All other liabilities and capital instruments not included in the above categories		1,612	166	3,314	3,397
14 Total available stable funding (ASF)					59,353
<b>Required stable funding (RSF) Items</b>					
15 Total high-quality liquid assets (HQLA)					350
J-15a Assets encumbered for a residual maturity of one year or more in a cover pool		114	88	3,834	3,430
16 Deposits held at other financial institutions for operational purposes		144	-	-	72
17 Performing loans and securities:		4,613	2,155	34,104	31,814
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,146	46	1,242	1,377
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,068	1,775	22,982	26,496
21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		125	8	15	1,572
22 Performing residential mortgages, of which:		182	134	5,477	-
23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		77	77	2,182	-
24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		216	200	4,403	3,941
25 Interdependent assets		-	-	-	-
26 Other assets:		2,437	-	10,459	10,553
27 Physical traded commodities					
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	286	243
29 NSFR derivative assets		-			-
30 NSFR derivative liabilities before deduction of variation margin posted		756			38
31 All other assets not included in the above categories		1,681	-	10,173	10,272
32 Off-balance sheet items		7,973	443	690	484
33 Total RSF					46,703
<b>NSFR</b>					
34 Net Stable Funding Ratio (%)					127.1%

## Liquidity Risk

	a	b	c	d	e
	31 March 2024				
	Unweighted value by residual maturity				Weighted value
Available stable funding (ASF) Items	No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	€ million
1 Capital items and instruments	8,183	-	-	1,571	9,755
2 Own funds	8,183	-	-	1,571	9,755
3 Other capital instruments		-	-	-	-
4 Retail deposits		33,879	3,269	1,332	35,989
5 Stable deposits		23,461	1,007	364	23,608
6 Less stable deposits		10,419	2,262	969	12,381
7 Wholesale funding:		19,504	3,940	1,216	10,485
8 Operational deposits		1,190	-	-	595
9 Other wholesale funding		18,314	3,940	1,216	9,890
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	119	1,813	27	2,792	2,805
12 NSFR derivative liabilities	119				
13 All other liabilities and capital instruments not included in the above categories		1,813	27	2,792	2,805
14 Total available stable funding (ASF)					59,034

	a	b	c	d	e
	31 March 2024				
	Unweighted value by residual maturity				Weighted value
Required stable funding (RSF) Items	No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	€ million
15 Total high-quality liquid assets (HQLA)					341
I-15a Assets encumbered for a residual maturity of one year or more in a cover pool		112	87	3,749	3,356
16 Deposits held at other financial institutions for operational purposes		267	-	-	134
17 Performing loans and securities:		5,071	2,179	34,032	32,003
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		-	-	-	-
19 Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions		1,166	118	1,478	1,651
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:		3,515	1,759	22,808	26,611
21 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		121	10	19	1,514
22 Performing residential mortgages, of which:		175	127	5,525	-
23 With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk		84	66	2,094	-
24 Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		216	175	4,221	3,741
25 Interdependent assets		-	-	-	-
26 Other assets:		2,391	5	9,823	9,918
27 Physical traded commodities					-
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		-	-	352	299
29 NSFR derivative assets		-			-
30 NSFR derivative liabilities before deduction of variation margin posted		747			37
31 All other assets not included in the above categories		1,644	5	9,471	9,582
32 Off-balance sheet items		7,937	443	651	470
33 Total RSF					46,223

	31 March 2024	
NSFR		
34 Net Stable Funding Ratio (%)		127.7%



## Liquidity Risk

	a	b	c	d	e
	31 December 2023				
	No maturity[1] € million	< 6 months € million	6 months to < 1yr € million	≥ 1yr € million	Weighted value € million
<b>Available stable funding (ASF) Items</b>					
1 Capital items and instruments	7,899	-	-	1,296	9,194
2 <i>Own funds</i>	7,899	-	-	1,296	9,194
3 <i>Other capital instruments</i>		-	-	-	-
4 Retail deposits		35,054	2,500	1,205	36,296
5 <i>Stable deposits</i>		24,763	1,091	658	25,219
6 <i>Less stable deposits</i>		10,291	1,409	547	11,077
7 Wholesale funding:		20,076	3,739	1,351	10,613
8 <i>Operational deposits</i>		1,189	-	-	594
9 <i>Other wholesale funding</i>		18,887	3,739	1,351	10,018
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	296	1,892	100	2,854	2,904
12 <i>NSFR derivative liabilities</i>	296				
13 <i>All other liabilities and capital instruments not included in the above categories</i>		1,892	100	2,854	2,904
14 Total available stable funding (ASF)					59,007
<b>Required stable funding (RSF) Items</b>					
15 Total high-quality liquid assets (HQLA)					312
J-15a Assets encumbered for a residual maturity of one year or more in a cover pool		116	93	3,904	3,496
16 Deposits held at other financial institutions for operational purposes		202	-	-	101
17 Performing loans and securities:		4,762	2,270	33,793	31,805
18 <i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		-	-	-	-
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		889	100	1,506	1,643
20 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3,485	1,894	22,636	26,379
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		117	12	17	1,458
22 <i>Performing residential mortgages, of which:</i>		160	127	5,363	-
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		74	60	2,022	-
24 <i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		228	149	4,287	3,783
25 Interdependent assets		-	-	-	-
26 Other assets:		2,270	3	9,848	9,937
27 <i>Physical traded commodities</i>					-
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	254	216
29 <i>NSFR derivative assets</i>		-			-
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		708			35
31 <i>All other assets not included in the above categories</i>		1,562	3	9,594	9,686
32 Off-balance sheet items		7,117	362	687	428
33 Total RSF					46,079
<b>NSFR</b>					
31 December 2023					
34 Net Stable Funding Ratio (%)					128.1%

## Liquidity Risk

	a	b	c	d	e
	30 September 2023				
	Unweighted value by residual maturity				Weighted
	No maturity[1]	< 6 months	6 months to < 1yr	≥ 1yr	value
	€ million	€ million	€ million	€ million	€ million
<b>Available stable funding (ASF) Items</b>					
1 Capital items and instruments	7,643	-	-	1,258	8,901
2 <i>Own funds</i>	7,643	-	-	1,258	8,901
3 <i>Other capital instruments</i>		-	-	-	-
4 Retail deposits		34,850	3,258	1,061	36,600
5 <i>Stable deposits</i>		23,882	958	263	23,861
6 <i>Less stable deposits</i>		10,968	2,300	798	12,739
7 Wholesale funding:		20,959	725	4,248	12,265
8 <i>Operational deposits</i>		1,250	-	-	625
9 <i>Other wholesale funding</i>		19,709	725	4,248	11,640
10 Interdependent liabilities		-	-	-	-
11 Other liabilities:	759	1,432	99	2,790	2,839
12 <i>NSFR derivative liabilities</i>	759				
13 <i>All other liabilities and capital instruments not included in the above categories</i>		1,432	99	2,790	2,839
14 Total available stable funding (ASF)					60,606
<b>Required stable funding (RSF) Items</b>					
15 Total high-quality liquid assets (HQLA)					284
15a Assets encumbered for a residual maturity of one year or more in a cover pool		112	82	3,825	3,416
16 Deposits held at other financial institutions for operational purposes		180	-	-	90
17 Performing loans and securities:		5,089	2,476	34,094	32,744
18 <i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		-	-	-	-
19 <i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		934	128	877	1,032
20 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		3,747	2,177	23,590	28,034
21 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		212	101	498	1,929
22 <i>Performing residential mortgages, of which:</i>		166	116	5,410	-
23 <i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		82	68	2,113	-
24 <i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		242	54	4,217	3,678
25 Interdependent assets		-	-	-	-
26 Other assets:		2,880	11	9,726	9,857
27 <i>Physical traded commodities</i>				-	-
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		-	-	276	234
29 <i>NSFR derivative assets</i>		-			-
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		981			49
31 <i>All other assets not included in the above categories</i>		1,899	11	9,450	9,574
32 Off-balance sheet items		6,965	365	739	437
33 Total RSF					46,828
<b>NSFR</b>					
34 Net Stable Funding Ratio (%)					129.4%

## Environmental, Social and Governance (ESG) Risks

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### 8. Environmental, Social and Governance (ESG) Risks

#### 8.1 Qualitative Information on Environmental Risks

##### 8.1.1 Business Strategy and Processes

###### 8.1.1.1 Alignment of Our Business Strategy with Environmental Risk Management Expectations

###### Business Strategy & Business Model

The Group supports the transition towards a sustainable economy and considers sustainability and climate change as an opportunity. A key strategic objective is to adapt the Group's business and operations in a way that address climate change challenges, accommodate social needs within its business model and safeguard prudent governance for itself and its counterparties, in accordance with supervisory initiatives and following international standards and best practices.

To this end, Eurobank has designed, approved and is currently implementing the Group's Sustainability Strategy, including targets and commitments, along two key pillars.

The Group's Sustainability Strategy:

- Operational Impact Strategy: Impact arising from the Organisation's operational activities and footprint;
- Financed Impact Strategy: Impact arising from the Organisation's lending and investing activities to specific sectors and clients.

Eurobank has expressed the Sustainability aspect of its business through the lens of Impact generation. This aims to capture the essence of the Bank's business effect on the climate, the protection of the natural environment, its contribution to addressing societal challenges at large, the prosperity of its own people, its contribution to raising business capacity in the markets where the Bank operates and the internal processes that build and secure the confidence of its stakeholders.

The Operational and Financed pillars of the Sustainability Strategy are combined to address Eurobank's path towards Net Zero by 2050. In line with Eurobank's commitment to the UNEP FI Principles for Responsible Banking, the development of the Sustainability Strategy aims, among others, to identify the most significant impacts on the societies and environment where it operates, capitalizing on the positive ones while minimizing the negative impacts.

###### A. Operational Impact Strategy

The Operational Impact Strategy (OIS) defines the Bank's operational sustainability priorities and objectives. In this context, Operational Impact Strategy is deployed through milestones and KPIs that support the annual and long-term targets set across multiple project streams, spanning over the next decade. The Operational Impact Strategy is developed and deployed along the following 3 pillars and corresponding corporate objectives:

- Environmental Impact: Minimising negative impact in its operations to promote environmental stewardship and attain climate neutrality.
- Societal Impact: Providing a diverse and inclusive environment for its people and clients, while fostering sustainable development and prosperity for the benefit of society.
- Governance & Business Impact: Focusing on building ESG awareness, internally and across its value chain, while intensifying its efforts for ethics and transparency.

The OIS is supported by a governance structure of project streams (one per each commitment) and the supervisory ESG/OIS Committee. Progress is regularly reviewed at the ESG Management Committee.

Each project stream is planned with milestones, KPIs, annual targets and long-term interim targets, serving the declared commitments. Links are established with "ERB 2030 Transformation" streams, as well as corresponding ISO management

## Environmental, Social and Governance (ESG) Risks

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system standards, to ensure substantiation and certification of activities, validate target setting and measured performance, as well as systematically monitoring progress through internal reviews and external assurance.

### B. Financed Impact Strategy

Eurobank endeavors to foster favorable economic, social, and environmental outcomes across all facets and sectors of its financing activities, with a commitment to sustainability and responsible stewardship. To achieve this objective, the Bank's Financed Impact strategy is structured around the following 4 strategic pillars:

- Clients' engagement and awareness to adapt their business to address climate change challenges.
- Actions for supporting clients in their transition efforts towards a more sustainable economic environment.
- Enablers and tools, such as frameworks and products, to underpin sustainable financing.
- Assessment and management of climate-related material exposures and risks.

Making progress along the two pillars of the Sustainability Strategy, the Bank aims to maximize its contribution towards achieving the Paris Climate Agreement's targets and the UN Sustainable Development Goals (SDGs). Through a set of actions with measurable targets, the Sustainability Strategy reflects the Group's vision in the short, medium and long term in relation to the environment, its social footprint, with focus on its people, and the Sustainability impact on the market and its portfolio.

### **The Pathway to Net-Zero**

In line with its commitment to address climate change, Eurobank Holdings has joined the Net-Zero Banking Alliance (NZBA), a bank-led, UN-convened alliance of banks worldwide, reinforcing its dedication to aligning its loan and investment portfolios with the objective of achieving net-zero emissions targets by 2050 or sooner, in line with the most ambitious targets set by the Paris Climate Agreement.

In alignment with the NZBA's guidelines, Eurobank pledges to undertake a multifaceted approach to bring its portfolios in line with limiting global warming to a 1.5°C scenario and support the transition to a net-zero economy by 2050. The Bank's key enablers to advance decarbonisation are listed below:

- Transition pathways: Transition pathways for corporate clients, to achieve climate targets for the Bank's portfolio.
- Focused Climate Risk Assessment: Focused Client Climate Risk Assessment, supplemented by climate transition scenario analysis, to support the effective implementation of its Net Zero Strategy
- Enhanced Risk Management Framework: Introduction of additional Risk Appetite Statements related to Sustainability/ CR&E risks.
- Sustainability/ CR&E risks Datamart: Initiation of the preparation for a dedicated Sustainability/ CR&E risk Datamart analysis and framework.

The Bank has started developing sectoral, financed emissions reduction targets based on the NZBA framework, for some of the most carbon-intensive and, therefore, most relevant and impactful sectors and portfolios. The Bank applies established industry standards (e.g. NZBA, PCAF) and accredited science-based decarbonisation scenarios, in line with a 1.5 degree Celsius objective by 2050.

### **Business Environment**

In 2021 Eurobank launched a dedicated Group-wide initiative, namely "Program Field", with an aim to develop and implement its Sustainability Strategy, integrate and effectively manage climate risks, fulfil its UNEP FI PRB signatory commitments and ensure readiness to comply with sustainability-related regulations (i.e. EU Green Deal, ECB Guide on climate-related and environmental risks, EU Taxonomy Regulation, Corporate Sustainability Reporting Directive (CSRD), etc.). Through this initiative, the Group has identified, assessed and implements relevant action plans addressing Sustainability/ CR&E risks within the three Lines of Defense.

## Environmental, Social and Governance (ESG) Risks

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Eurobank's strategy as regards environmental risk management is continuously updated, taking into account, inter alia, market, regulatory, as well as technological developments. In particular, the Bank's approach with respect to the financing of clients' green transition takes into account the changing regulatory environment and the transition risk that borrowers are subject to.

In this context, the applicable provisions defined by the Bank in this respect, as well as its relevant documents/ policies/ frameworks are updated periodically, accounting for emerging best market practices in Sustainability/ CR&E risk management. In addition, stakeholders' (e.g. consumers', borrowers', investors' and issuers') sustainability priorities and targets are accounted for in the Group's Sustainable Finance Framework, the Green Bond Framework and the Sustainable Investment Framework, allowing the Bank to conduct its relevant financing/ investment/ funding activities while ensuring compliance with regulatory expectations.

The Bank continuously monitors the implications from changes in the physical environment and is prepared to adjust its business strategy through the establishment of additional safeguards to mitigate potential threats deriving from physical risk events. Recognizing that climate change presents new challenges and unique opportunities, we strive to be at the forefront of enabling our clients develop and reap these opportunities to support their low carbon transition.

### Financed Impact Strategy - Commitments & Targets

The Group is committed to specific Financed Impact targets which include both qualitative and quantitative elements and evolve based on the following key components:

- Sustainable Financing: Development of strategies that will promote the green transition of the Bank's clients through sustainable financing.
- Portfolio alignment: Gradual alignment of the Bank's portfolio with sectoral transition pathways that are aligned with the 1.5°C climate transition scenario.
- Net-Zero strategy: Sectoral decarbonisation targets covering the Bank's lending portfolios, with phased target-setting up to 2050.

More specifically, the following targets have been set regarding sustainable financing disbursements in the following years:

#### Portfolio targets

##### Disbursements

- €2 billion in new green disbursements to corporates by 2025
- 20% of the annual new Corporate & Investment Banking (CIB) portfolio disbursements to be classified as green/ environmentally sustainable

##### Green stock/ Exposure evolution

- 20% stock of green exposures by 2027 for the CIB portfolio

##### Recovery and Resilience Facility (RRF)

- Mobilize €2.25 billion total green RRF funds in the Greek economy by 2026

##### Retail Banking

- Maintain the same growth in absolute terms for Retail Banking new green disbursements (or more than 50% increase vs. 2023)

#### Sectoral targets

##### Renewable energy

- 35% of new disbursements in the energy sector to be directed to Renewable Energy Sources (RES) financing

##### Green buildings

- 80% of disbursements related to the construction of new buildings to be allocated to green buildings

## Environmental, Social and Governance (ESG) Risks

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### Other Targets

New exposure to high emitters

- No new investments in fixed income securities (excluding exposures in sustainability/ green bonds) towards the top 20 most carbon-intensive corporates worldwide

Increase Sustainability-Linked Loans

- Double annual disbursements of Sustainability-Linked Loans for the CIB portfolio

Aiming to continuously enhance its Financed Impact Strategy and within the scope of its Net-Zero commitment, the Bank included additional targets that will enable it to deliver its “Portfolio alignment” and “Net Zero” strategic pillars:

- Align loan portfolio and investments with a net zero carbon footprint by 2050 by developing a robust action plan and roadmap, including intermediate targets to net zero and commitment.
- Actively support clients’ climate transition journey with an ambition to further increase sustainable financing going forward.
- Implement the ESG Risk Assessment supported by the roll out of the Hellenic Bank Association initiative (Interbank ESG Questionnaire), ensuring a harmonized assessment approach for Bank’s clients.
- Further integrate climate risk regulatory requirements into its business strategy and risk management framework, leveraging on key initiatives: a) Governance, policies, and control framework, b) Climate risk modelling and data management and c) Commercial strategies/ sector policies.
- Continue to contribute to the residential green lending sector through the state subsidized Exoikonomo programs.

### **8.1.1.2 Green Financing**

#### **Objectives**

Eurobank understands that sustainable growth is key to prosperity. To this end, its commitment to support the transition to a greener economy, by offering financing solutions that foster growth and sustainable development, is at the core of its Financed Impact strategy.

As a signatory of the Principles for Responsible Banking (PRB), Eurobank has been developing targets that will enable the mitigation of the negative and the amplification of the positive impacts arising from its financing activities. In this context, the Bank will continue to work with its current and future clientele to support them with sustainable financing solutions and facilitate their transition journey. Leveraging on tools and enablers, such as the climate & environmental risk assessment exercises and the Sustainable Finance Framework, the Bank’s strategic approach is to support the achievement of the climate and environmental objectives, through financing and advisory solutions to current and potential clientele.

The Bank participates, inter alia, in the following national and international associations, organizations, and initiatives:

- Climate Action in Financial Institutions: Participant in the Climate Action in Financial Institutions initiative for mainstreaming climate change considerations throughout FI operations;
- Corporate Social Responsibility (CSR) Hellas: Member of the CSR Hellas network since 2003;
- Energy Efficiency Financial Institutions Group (EEFIG): Member of the EC’s EEFIG since 2013;
- Priceless Planet Coalition: The only Greek Bank participating in the Priceless Planet Coalition since 2020;
- International Capital Markets Association (ICMA): Member of the ICMA since 2020;
- Hellenic Bank Association (HBA): Eurobank is member of the Coordinating Committee for Sustainable, Development, Green Banking and Corporate Governance;
- Task Force on Climate-related Financial Disclosures (TCFD): Eurobank published its first TCFD Climate-related & Environmental Risk Report in 2023;

## Environmental, Social and Governance (ESG) Risks

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- Eco-Management and Audit Scheme (EMAS): Participant in the EMAS register for following the EC Regulation on eco-management. The annual EMAS Report is a comprehensive record of the Bank's operational environmental performance and is submitted to the Ministry of Environment and Energy;
- UN Environment Programme Finance Initiative (UNEP FI): UNEP FI participant since 2005; signatory to the Principles for Responsible Banking since 2019;
- UN Global Compact: Signatory to the 10 Principles of the UN Global Compact since 2008. Member of the Global Compact Network Greece;
- UN Principles for Responsible Investment (PRI): Eurobank Asset Management subsidiary is a signatory to the UN PRI since 2018;
- UN SDGs (Sustainable Development Goals): Active supporter of the UN SDGs (in line with the UN Global Compact signatory commitment above); and
- Global Sustain: A member of Global Sustain since 2011, we have been offering innovative services linked to sustainability and corporate responsibility.
- Net-Zero Banking Alliance (NZBA): Eurobank Holdings joined UN-Convened Net-Zero Banking Alliance in 2024.

### Sustainable financing and investments for corporate clients (CIB portfolio)

Eurobank finances robust business plans, growth strategies, investment programmes and export activities in strategic sectors. The Bank provides financing for landmark initiatives in the areas of renewable energy sources (RES), sustainable infrastructure and environmentally friendly solutions.

### Sustainable financing for individuals and businesses

The Bank currently offers several consumer and small business financing solutions that are aiming to be compliant with the EU Taxonomy Regulation with the objective to delivering positive environmental impacts.

### Asset and wealth management products with ESG criteria

In 2018, the Group launched the LF FoF – ESG Focus, a mutual fund that invests in shares and bonds factoring in ESG criteria. The Fund has a diversified portfolio of equities and bonds that adopt ESG criteria. In addition to the LF FoF – ESG Focus, the Group also manufactured and manages the LF FoF Global Megatrends and the GF Greek Equities ESG Domestic Equity Mutual Fund, that also promote environmental and/or social characteristics.

### Deposit solutions with ESG criteria

Since 2021, the Bank has been pioneer in the Greek banking sector, through the launch of the ESG Deposits to its corporate clients. The ESG Deposits is an innovative deposit solution that supports the clients' sustainability agenda, by investing liquidity in sustainable projects and allowing them to demonstrate their commitment towards a low-carbon and sustainable environment. The Bank uses the funds raised to provide wholesale lending that meets the criteria set out in the its Sustainable Finance Framework.

For more details, please refer to: <https://www.eurobank.gr/en/group/esg-environment-society-governance/sustainable-financing>.

## Guiding Frameworks

Committed to being transparent about its approach and to ensure that decision-making is in line with leading practices, Eurobank has developed the following three guiding frameworks, defining the approach and criteria for classifying its financing and investing activities as sustainable.

### Sustainable Finance Framework

Through its Sustainable Finance Framework (SFF), the Group is able to classify sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing

## Environmental, Social and Governance (ESG) Risks

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(eligible green and social assets). The SFF scope encompasses a wide range of sustainable lending products covering both wholesale and retail banking portfolios. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing. Eurobank has drawn on internationally recognized industry guidelines and principles for the development of the SFF and is fully committed to being transparent about its Sustainability approach.

Specifically, the SFF has been developed based on the following standards and principles:

- Green Bond Principles (2021), published by the International Capital Market Association (ICMA)
- Green Association Loan Principles (2021), published by the Loan Market (LMA)
- Social Bond Principles (2020), published by the ICMA
- Sustainability-Linked Bond Principles (2020), published by the ICMA
- Sustainability-Linked Loan Principles (2021), published by the LMA
- The EU Taxonomy Regulation

The SFF defines two levels of alignment:

- SFF alignment – Fulfilment of criteria dictated by best market practice
- EU Taxonomy alignment – Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, Do No Significant Harm (DNSH), minimum social safeguards).

The SFF defines four classification approaches:

### 1. Dedicated-purpose – Green/ Social Loans

Project-specific loans or financing instruments whose use of proceeds is 100% directed towards eligible green/ social activities. The SFF defines the eligible activities (for both wholesale and retail portfolios) along with the applicable eligibility and exclusionary criteria that need to be fulfilled.

### 2. General-purpose – Company Business Mix

Financing to companies that fulfil the eligibility green/ social criteria and derive their revenue from eligible activities. Specifically, companies are eligible under the business mix category when:

- They derive a minimum predefined percentage of their total revenue from eligible activities.
- None of their activities are among the excluded ones (as described in Eurobank’s Environmental and Social Policy).

### 3. General-purpose – Sustainability-Linked Loans/ Facilities

The second type of general-purpose lending adopted relates to Sustainability Linked Loans (SLL). The purpose of SLLs is to enable and accelerate the transition of clients’ businesses to more sustainable activities. Through SLLs, Eurobank provides ESG related incentives to its clients, by offering products (loans, bond loans, etc.) with terms linked to ambitious and predefined Sustainability Performance Targets (SPTs). The client commits to achieve the SPTs during the loan repayment period and as such, the SPTs are also included in the loan agreement (i.e. in the form of non-financial covenants). The accomplishment of the relevant targets is monitored using specific KPIs which are selected according to the client’s activity sector/ industry. The SFF outlines the methodology for defining SPTs and proposes overarching, as well as industry-specific targets.

### 4. Recovery and Resilience Facility-based Approach

Activities approved through the Greek Recovery and Resilience Facility, contributing to the Green pillar.

For further details, please refer to the Annual Report 2023 Business & Sustainability: <https://www.eurobank.gr/-/media/holding/omilos/annual-reports/etisios-apologismos-2023/annual-report-2023.pdf>, as well as the TCFD Climate-related & Environmental Risk Report: <https://www.eurobank.gr/-/media/eurobank/omilos/etairiki-koinoniki- euthuni/peribalon-kai-aeiforos-anaptiksi/i-desmeusi-mas/erb-tcf-d-cr-e-risk-report.pdf>.



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### Green Bond Framework

Eurobank's Green Bond Framework assists the Bank in meeting its environmental/ sustainability commitments and finance projects that will deliver environmental benefits to the economy and support the Bank's business strategy and vision.

The Green Bond Framework has been developed in accordance with global best practices and standards and considers EU Taxonomy eligibility criteria to classify potential investments as green. The Framework defines the eligible assets and associated criteria, the use of proceeds, the process for project evaluation and selection, the management of proceeds, as well as the relevant reporting obligations. The eligible green projects contribute to the UN SDGs, the EU environmental objectives and the eligibility criteria align, on a best effort basis, with the Technical Screening Criteria of the EU Taxonomy Climate Delegated Act. In addition, EU Taxonomy DNSH principles and minimum social safeguards are considered for specific projects where relevant information can be provided by the clients.

For further details, please refer to Eurobank's Green Bond Framework: <https://www.eurobank.gr/-/media/eurobank/omilos/enimerosi-ependuton/enimerosi-metoxon-eurobank/pistotikoi-titloi/green-bond-framework/green-bond-framework.pdf>

### Sustainable Investment Framework (SIF)

The Bank has developed its Sustainable Investment Framework (SIF) for the assessment and classification of investments as sustainable based on criteria observed in international market practices, frameworks and guidelines. Eurobank's SIF describes the Bank's potential sustainable investment approaches/ strategies, the process for the selection of eligible investments, as well as the monitoring frequency regarding the sustainable portfolio (part of the Bank's investment portfolio). It is noted that the sustainability assessment based on the criteria of the SIF, irrespective of the eligibility outcome, does not prevent the Bank from including non-eligible sustainable investments in its investment portfolio.

The classification approaches used by the Bank in the context of its SIF are presented below:

- Value-based and Risk Appetite exclusions: Exclusion of companies, sectors, or countries whose behaviors do not align with basic societal values and the Bank's Risk Appetite.
- Norm-based exclusions: Exclusion of issuers who do not comply with basic standards of business and international norms.
- Avoid harm: A combination of value-based and norm-based exclusions, with additional activities with negative impacts excluded.
- Sustainable bonds: Selection of bonds that follow sustainable, green or social standards (i.e. selection of bonds that have been labelled as Green, Social or Sustainable and Sustainability-linked labeled (SLB) bonds).
- Best-in-class: Selection of bonds from issuers making the most effort to adhere to ESG practices among their peers.
- Thematic Investments: Selection of bonds from issuers whose business activity focuses on selected ESG thematic areas.

#### **8.1.1.3 Engagement with Our Counterparties for Environmental Risk Mitigation**

To facilitate the green transition of its clients, Eurobank has developed a dedicated approach to increase client engagement and awareness regarding Sustainability/ CR&E risks. Besides the initiatives launched aiming to build Sustainability literacy and capacity among its clients (e.g., online events, articles and webinars, digital academy for businesses), the Bank also utilizes the following tools in order to engage with its counterparties in the context of its credit granting and asset management activities, so as to understand their strategies and mitigate their Sustainability/ CR&E risks exposures.

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### Engagement in the context of Credit Granting Activities

Eurobank has implemented a set of tools for the identification, measurement and management of Sustainability/ CR&E risks, including the credit granting and monitoring processes. These are utilized by the involved Units across both the 1st and 2nd Line of Defense:

- A. Moody's Risk Analyst (MRA) Model
- B. Environmental & Social Management System (ESMS)
- C. Climate Risk Scorecard
- D. Interbank ESG Questionnaire
- E. ESG Risk Assessment
- F. Sustainable Finance Framework Tool
- G. Collateral Valuation

For more details on the above tools, please refer to the Sustainability Risk Management Tools & Processes in the Qualitative Information on Environmental Risks, Risk Management section.

### Engagement in the context of Asset Management Activities

For Eurobank Asset Management M.F.M.C., engagement and dialogue represent an integral and crucial part of responsible investing. In this context, as per its Responsible Investment Policy, Eurobank Asset Management M.F.M.C. is committed at two levels, as regards the environmental risk assessment of the Greek investee companies in which the Company's Funds and Portfolios invest:

1. Company engagement: The aim is to encourage companies to achieve the highest possible standards in terms of environmental responsibility and to support them in this process.
2. Voting engagement: The use of voting rights at general meetings is one of the cornerstones of the strategy of continuous dialogue with the companies concerned implemented by Eurobank Asset Management M.F.M.C. and also an integral part of its investment process.

For more details on the Responsible investment Policy, please refer to: <https://www.eurobankam.gr/en/politikes>

## 8.1.2 Governance

### 8.1.2.1 Climate-Related and Environmental (CR&E) Risks Management Framework

Eurobank has incorporated Sustainability and CR&E risks aspects across all pillars of its Risk Management Framework, through the establishment of comprehensive policies and processes. It is among the Group's priorities to identify, assess, manage and mitigate relevant risks, with a view towards ensuring alignment with its business strategy, as well as regulatory and industry developments.

In addition, Eurobank has updated its Sustainability Governance structure by introducing and defining specific roles & responsibilities in order to support the roll-out of the Sustainability Strategy and the integration of the Sustainability and climate related & environmental risks, through the involvement of various key stakeholders (e.g. Business & Risk Units, Committees etc.), embedding regulatory guidelines and market practices.

In this context and taking into account the significant impact of CR&E risks both on financial institutions and on the global economy, Eurobank developed a CR&E Risks Management Policy which aims at fostering a holistic understanding of the effects of CR&E risks on its business model, as well as support decision-making regarding these matters and provide a robust governance under its Risk Management Framework.

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The CR&E Risks Management Policy encompasses, among others, information on the following areas:

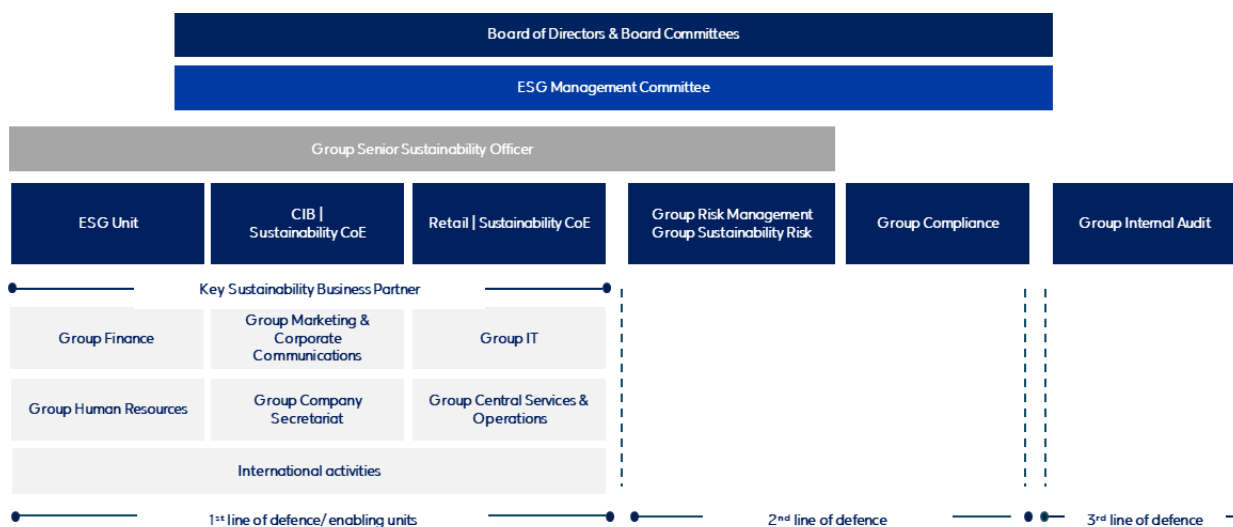
- CR&E Risks Governance: Definition of the Group’s main CR&E risks management pillars and summary of the responsibilities of the Group’s Management/ Board Committees and the three Lines of Defense regarding the management of CR&E risks.
- CR&E Risks Definitions, Drivers & Transmission Channels: Detailed presentation of the CR&E risks definitions and drivers identified by the Group, including the transmission channels through which these risks impact Group’s traditional risk types.
- CR&E Risks Management Tools: Indication of the main tools utilised by the Group for the identification, measurement and management of CR&E risks.

### 8.1.2.2 Overview of governance structure for the oversight and management of sustainability and climate related & environmental matters

Sustainability at Eurobank is deployed across a Sustainability Governance structure that addresses both regulatory requirements and voluntary commitments. Board oversight with respect to the Sustainability Strategy is addressed through the inclusion of sustainability items in the Board Meetings agenda, as per international best practice.

The Group applies the elements of the Three Lines of Defense (3LoD) model for the management of climate-related and environmental (CR&E) risks and sustainability aspects. The Three Lines of Defense Model enhances risk management and control by clarifying roles and responsibilities within the organization. Eurobank’s Sustainability Governance model ensures that the management of relevant Sustainability/ CR&E risks is integrated into the Bank’s Three Lines of Defense.

The updated Sustainability Governance structure aims to further enhance the effective oversight of sustainability matters at Management/ Board level with direct reporting lines as described below.



### Enhanced Sustainability Governance Structure and Committees

- A Board Member is responsible for climate-related and environmental risks.
- Appointment of a Group Senior Sustainability Officer (GSSO) to lead the sustainability initiatives.
- Oversight of Sustainability/ CR&E risks at Management body level through allocation of responsibilities to Board and Management Committees.
- Establishment of two Committees that supplement the governance arrangements in Sustainability/ CR&E risks (i.e. ESG Management Committee and Climate Risk Stress Test Committee).

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### Integration of Sustainability/ CR&E Risk Management across the Three Lines of Defense

- Dedicated teams within CIB and Retail for overseeing sustainable financing activities.
- Automated process established to assess and classify sustainable financing opportunities.
- ESG Unit responsible for designing and monitoring the Operational Impact Strategy (OIS), monitoring the Operational sustainability performance and coordinating sustainability-linked operational activities that enhance the Bank's Impact. In this context, the Unit is responsible for collecting, calculating and reviewing data related to the operational impact, in line with the associated certified management systems (ISO 14001/ EMAS, ISO 50001, ISO 14064)..
- Group Sustainability Risk responsible for managing and monitoring Sustainability and CR&E risks, PMO office for the implementation of the Climate-related and Environmental risks roadmap, designing, along with Business and Risk Units, the Financed Impact Strategy and monitoring of its implementation thereof.
- Comprehensive training on ESG, Sustainable Finance and Sustainability/ CR&E risk topics to Bank personnel.

### **8.1.2.3 Role of Board, BRC, Management committees and GSSO on the supervision of sustainability and climate related & environmental matters**

The Group's Sustainability Governance structure has been updated to ensure that Sustainability and CR&E risks are appropriately monitored and managed, aiming to further enhance their effective oversight at management/ Board level, as follows:

#### Eurobank Holdings/ Eurobank Board of Directors (Boards/BoDs)

The Eurobank Holdings/ Eurobank Boards' role is to offer entrepreneurial leadership to the Group in the context of prudent and effective controls facilitating the assessment and management of risks. The Boards establish the Group's strategic objectives, ensure the availability of essential financial and human resources for the Group to fulfill its purpose and evaluate management performance. The Boards define the Group's values and standards, ensuring that their responsibilities to shareholders and other stakeholders are acknowledged and fulfilled. All members of the Boards are required to act in the best interests of the Group, aligning with their legal duties. The Eurobank Holdings/ Eurobank Boards have designated an executive member of the Boards as the Board Member responsible for climate-related and environmental risks. This designated Board Member updates, at least on a semi-annual basis, the Eurobank Holdings/ Eurobank Board Risk Committees (BRC), which, in accordance with their Terms of Reference, are responsible for oversee (among others) the climate-related and environmental risks. As per international best practices, effective Board oversight with respect to the Group's Sustainability Strategy is also safeguarded through the regular inclusion of Sustainability items in the agendas of Board Meetings.

#### Eurobank Holdings/ Eurobank BRC

The Eurobank Holdings/ Eurobank Board Risk Committee, among others, oversees the implementation of the strategies for capital and liquidity management, as well as for all material risks of the Group, including climate-related and environmental risks, as identified through the Risk Identification and Materiality Assessment (RIMA) process and listed in the relevant RIMA report, to assess their adequacy against the approved risk appetite and strategy. In addition, the BRC determines, among others, the principles which govern risk management (including climate-related and environmental risks) across the Bank and the Group in terms of identifying, measuring, monitoring, controlling, and mitigating risks. To this end, the BRC approves risk principles, risk policies, risk procedures and risk methodologies and Specific Risk Management Frameworks and Policies (e.g. Climate and Environmental Risk).

#### Eurobank Management Risk Committee (MRC)

The Eurobank Management Risk Committee (MRC) is responsible for overseeing the risk management framework of Eurobank. As part of its responsibilities, the MRC facilitates the reporting to the BRC on a wide range of risk-related topics under its purview, including Sustainability/ CR&E risks. The MRC ensures that material risks are identified and promptly

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escalated to the BRC and that the necessary policies and procedures are in place to prudently manage risk and comply with regulatory requirements.

### Eurobank Environmental, Social & Governance Management Committee (ESG ManCo)

The Eurobank Environmental, Social & Governance Management Committee (ESG ManCo) provides strategic direction on Sustainability initiatives, reviews the Sustainability Strategy prior to approval, integrates the elements of the Sustainability Strategy into Eurobank's business model and operations, approves eligible assets based on the Green Bond Framework, regularly measures and analyses the progress of sustainable goals and performance targets and ensures the proper implementation of Sustainability-related policies and procedures, in accordance with supervisory requirements and voluntary commitments. It is chaired by the Board Member responsible for Sustainability/ CR&E risks.

### Eurobank Climate Risk Stress Test Committee (CRSTC)

The Eurobank Climate Risk Stress Test Committee (CRST) is responsible for designing and executing the Group's CRST Programme, as well as for coordinating all activities relating to Climate Risk Stress Testing including risk identification, scenario design and stress test execution and reviewing & challenging the output at each stage of the process prior to escalating to the Executive Board.

### Products & Services Committee

The Products & Services Committee is responsible for creating and supervising the governance framework for the products and services offered to Eurobank's clients in Greece through the physical and alternative channels, in accordance with the supervisory and regulatory requirements. Products/ services are also evaluated to ensure alignment with the Group's Sustainable Finance Framework, enabling their classification as green or social.

### Green Bond Working Group (GBWG)

The Eurobank Green Bond Working Group (GBWG) is mainly responsible to review the proposed eligible assets (based on the eligible categories and criteria as defined in the Green Bond Framework), to propose the loans to be excluded in case they no longer meet the eligibility criteria (including the qualifying substitution assets), as well as to review the annual Green Bond Report.

### Group Senior Sustainability Officer (GSSO)

The Group Senior Sustainability Officer (GSSO) is responsible for leading and coordinating the Group's sustainability initiatives, for both Operational and Financed impact. GSSO manages ESG Unit, co-manages, as a secondary reporting line, along with the Senior Risk Executive Officer the Group Sustainability Risk, coordinates Sustainability Center of Excellence of CIB and Retail and oversees the sustainability programs of international subsidiaries.

The role of the GSSO is to foster a deep understanding of sustainability principles and practices across the organization by building a culture of sustainability and collaborating together with senior management to embed sustainability into the Group's strategic decision-making processes. GSSO secures and allocates resources effectively to support the Group's sustainability initiatives and advocates for necessary investments in sustainability projects and technologies. GSSO serves as the liaison between the Group and Market/ External Stakeholders, closely monitoring industry trends, regulatory changes and best practices in sustainability and ensuring that the Group remains at the forefront of sustainability innovation and compliance.

#### **8.1.2.4 Dedicated functions for integrating sustainability and climate change matters into the operating model**

##### **Integration of Sustainability/ CR&E Risk Management across the three lines of defense**

Eurobank addresses short-term, medium-term and long-term effects of Sustainability/ CR&E risks for the purposes of risk management by integrating them in its business environment and strategy. In this context, the Bank has defined the following time horizons as follows:

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- Short term: <3 years aligned with budget - The Bank conducts a materiality assessment of all identified risk drivers and key risks. This assessment considers the Bank's operating environment, business model and emphasizes the achievement of its short-term strategic goals with regards to the budget.
- Medium term: 3-10 years aligned with business planning - To assess medium term risks, the Bank has defined a longer period to understand Sustainability/ CR&E risks and evaluate how its business model can handle different future scenarios.
- Long term: >10 years aligned with strategic planning - The Bank has defined a longer horizon, to conduct long term assessments. Additionally, the Bank aims to include the impact of climate change and environmental factors in its strategic targets and decision-making processes, as these risks are expected to have a greater impact in the long term.

The Group applies a model of defined roles and responsibilities regarding the management of Sustainability/ CR&E risks across the 3 Lines of Defense, considering all relevant guidelines and regulatory requirements:

### 1st Line of Defense

The Business Units (CIB and Retail Banking) are responsible for assessing, managing and monitoring risk levels in all risk categories, including Sustainability/ CR&E risks. Dedicated functions within CIB and Retail namely, the Sustainability Centre of Excellence are being formed. In the meantime, the CIB ESG coordinator is responsible for overseeing sustainable financing activities. Regarding the Retail Banking Unit, the Bank has introduced 2 ESG coordinators, for Retail, Business and Individual clients respectively, who are responsible for organizing and supporting sustainable-related activities. In addition, the role of the ESG Unit in the 1<sup>st</sup> line of defense includes the responsibility for designing and monitoring the implementation of the Operational Impact Strategy, as well as Sustainability Reporting, Environmental & Energy Reporting (EMAS Report, Greenhouse Gases Emissions Report per ISO 14064) and Sustainability ratings.

### 2nd Line of Defense

The Group Risk Management (GRM) is independent from the Business Units and is responsible for setting the risk strategy and risk appetite framework, including Sustainability/ CR&E risks. Within the GRM, a dedicated Group Sustainability Risk has been established, with the overall responsibility for overseeing, monitoring and managing Sustainability/ CR&E risks and sustainable financing activities, in cooperation with the other GRM Units.

### 3<sup>rd</sup> Line of Defense

The Internal Audit Group (IAG) independently reviews the adequacy and effectiveness of the internal control framework in place regarding Sustainable/ CR&E risk management, following a risk-based approach in line with its Risk Assessment and Audit Planning Methodology.

## **Dedicated roles in existing Units on sustainability and climate related & environmental matters**

### Business Units

Business Units, – Corporate & Investment Banking and Retail Banking – are primarily involved in executing of portfolio-related sustainable activities, including the implementation of the Financed Impact Strategy. Key responsibilities are classified, inter alia, under the following three main categories:

#### 1. Sustainability Strategy

- Defining, in coordination with other Units, executing and monitoring financed and specific operational sustainable goals and performance targets in line with the Net Zero Strategy.

#### 2. Sustainable Financing/ Funding and Investments

- Identifying sustainable financing opportunities and designing relevant solutions and sustainable products.
- Performing the sustainable financing assessment, in line with the Sustainable Finance Framework.
- Implementing and monitoring the Sustainable Investment and Green Bond Frameworks.

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### 3. Sustainability and CR&E Risk Management

- Performing the overall ESG Risk Assessment.
- Identifying and implementing mitigation action plans for Sustainability and CR&E risks.

#### **Group Sustainability Risk (GSR)**

The GSR has the overall responsibility for overseeing, monitoring and managing sustainability risks. More specifically, the GSR prepares and maintains the Bank's Sustainability risk, including CR&E risks, management policies, processes and methodologies, in collaboration with the ESG Unit, and the Business and Risk Units. In addition, it leads the development and implementation of the Sustainability risk-related frameworks, policies and processes, as well as acts, monitors and reports the progress of the implementation of the developed Climate Risk action plan and reports to the Board for Sustainability risks matters.

In addition, the GSR reviews and challenges the involved stakeholders as to setting the Financed Impact Strategy (including Net Zero action plan), as well as monitors the Financed Impact Strategy and reports financial targets and KPIs. The GSR also is responsible for the 2nd line of defense independent sustainable lending re-assessment process against the Sustainable Finance criteria, including the characterisation of products of the Retail Portfolio as sustainable. Furthermore, the GSR develops and maintains the Climate Risk Stress Testing Framework, as well as the Scenario Analysis and Stress Test methodologies, and coordinates the performance of CR&E risk scenario analysis and relevant stress test exercises at Group level.

#### **ESG Unit**

The ESG Unit acts as a custodian of Sustainability Principles and Culture to enhance the Bank's Operational Impact, and as a cross-functional coordinator to ensure alignment on sustainability issues and interdependencies, as well as compliance with relevant existing and upcoming operational impact related regulations. Specifically, the ESG Unit is responsible for leading the design/ update of the Operational Impact Strategy and monitoring its implementation, with a leading role in selected areas, also providing support to international subsidiaries. Furthermore, the ESG Unit coordinates and prepares ESG operational impact-related reports in line with applicable standards/ regulations, in cooperation with involved subject-matter responsible Units, while it is responsible for the UNEP FI PRB implementation.

Being responsible for the oversight of the Bank's overall ESG operational performance, its key roles include the centralized management of Sustainability Ratings, seeking continuous improvement in related scores. The ESG Unit also manages the ISO Management Systems under the related provisions of equivalent policies and the Operational Impact Strategy. The ESG Unit collects, calculates and reviews data related to the operational impact, in line with the associated certified management systems, while it also ensures implementation of corresponding initiatives (e.g. operational net zero transition, energy self-production, energy and emission monitoring, green building certifications, recycling and circular economy management).

#### **Group Compliance**

Group Compliance is an independent function reporting to the Board of Directors through the Audit Committee and its mission of is to promote, within the Group, an organizational culture that encourages ethical conduct through integrity and a commitment to compliance with laws and regulations as well as the application of international governance standards.

Group Compliance's key roles and responsibilities include:

##### 1. Regulatory capturing

- Monitors the regulatory environment and emerging trends, including the sustainability framework, and informs the Bank of the respective changes/ enhancements to the regulatory framework that may impact the Bank's relevant policies and documents;
- Communicates to relevant stakeholder regulatory developments through the issuance of a regulatory bulletin;

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- Monitors the alignment of the Bank's activities with applicable laws, rules, regulations and standards, including sustainable finance regulatory aspects.
2. Compliance Risk Assessment
    - Designs appropriate risk assessment methodologies for compliance risk and provides the framework for effective monitoring of compliance risk from the Bank's activities in alignment with the Eurobank OpRisk Framework, as this is defined in the Group Compliance Policy. It performs the compliance risk assessment for the areas within its mandate and maintains an overlay role on the compliance risk assessments of other responsible Bank Units, including the respective elements of the sustainability framework;
    - Ensures that compliance monitoring in the areas of its responsibility is carried out through a structured and well-defined compliance monitoring programme;
    - Monitors and test whether staff effectively applies the internal processes and procedures aimed at achieving regulatory compliance and compliance with the Bank's Code of Conduct and Ethics;
    - Provides guidance to staff on the appropriate implementation of applicable laws, rules and standards, through the issuance of policies and procedures and the design of training programs;
    - Is the theme coordinator for compliance related risk themes in the Bank's Risk Appetite Framework.
  3. Policy Updates
    - Maintains the Bank's AML/ CFT and conduct-related policies (e.g. Code of Conduct and Ethics, Conflicts of Interest, Anti-Bribery and Corruption, etc.), including their sustainability components.
  4. Product offering monitoring
    - Provides advice and recommends controls over the Bank's sustainability product offerings, through its participation in the Products and Services Committee and related processes, while it also checks that promotional statements do not misrepresent products or services offered to clients.

### **Internal Audit Group (IAG)**

The role of the 3rd Line of Defense within Eurobank's governance and organizational structure is allocated to the IAG for the independent review of the adequacy and effectiveness of the internal control framework. The IAG mandate covers all processes, risks, and mechanisms for all business lines and internal Units. In recent years, the IAG has recognised Sustainability/ CR&E internal controls and the risk management framework as areas of focus, and has taken several initiatives and actions within its strategy. These aim to ensure adequate coverage of the area, in line with the Bank's strategy, as well as industry and regulatory developments.

Specifically, the IAG strategically focuses on the Sustainability/ CR&E risks, building on the following pillars:

- **Methodology/ Infrastructure:** The Management of Sustainability/ CR&E risks and the Bank's initiatives are recognized as a separate auditable area, subject to risk assessment. Furthermore, climate risk is recognized as a separate risk category, assessed in all relevant areas of the audit universe, in line with the Bank's risk taxonomy. This category will be extended to cover the entire spectrum of Sustainability risks, in line with respective developments in the Bank's risk definitions.
- **Resources:** The IAG has extended its pool of professional qualifications/ certificates to the area of sustainability, with one staff member certified in Sustainability and Climate Risk, and with more auditors in the pipeline to obtain relevant industry professional body certifications. This comes simultaneously with other initiatives in place, aimed at further upskilling through dedicated training sessions, on-the-job upskilling (participation in and consultation on the Bank's projects and initiatives around sustainability) and increased awareness (e.g. IAG ESG Focus Group focused at sharing knowledge on sustainable practices and regulatory initiatives). At this stage, the IAG has opted to embed the right mix of skills and knowledge within its existing organizational structure, given the multifaceted nature of Sustainability risks, affecting all businesses and operations of the Bank, to a siloed approach, aiming at a holistic consideration of the Bank's Sustainability risks.



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- ESG – Audit Universe Coverage and Audit Planning: Following the infrastructure steps described above, since 2021, the IAG has been carrying out several assignments around sustainability, along with monitoring the Bank’s initiatives in this area on a risk-based approach. Key areas of focus include risk materiality, governance and strategy, C&E risk management framework, product design and offering, reporting disclosures, etc. These initiatives come in addition to the existing coverage by IA in sustainability areas, such as consideration of AML perspectives in loan origination (governance-social financing practices), review of compliance with the code of conduct or market practice codes (governance operational and financing practices) and relevant non-recurring and forensic audit work.

### 8.1.2.5 Sustainability awareness and capacity building

Eurobank is placing great emphasis on building capacity among its employees so they are able to support its clients on their sustainability journey and their green transition. To this end, in addition to launching sustainability initiatives for its clients, Eurobank implements a Sustainability upskilling plan for its employees. During the past years, Eurobank has conducted dedicated sessions tailored to the requirements of specific business units and functions, to enhance their understanding around Sustainability, CR&E risks and Sustainable financing, crucial for delivering its Sustainability Strategy. Eurobank’s internal awareness sessions regarding Sustainability and CR&E matters cover both members of the management body and other stakeholders across the Bank (e.g. Business & Risk Units). Additionally, the Bank has offered trainings to stakeholders from all 3 Lines of Defense regarding the SFF in order to enhance their understanding of sustainable financing criteria.

For further details, please refer to the Annual Report 2023 Business & Sustainability: <https://www.eurobank.gr/-/media/holding/omilos/annual-reports/etisios-apologismos-2023/annual-report-2023.pdf>

### 8.1.2.6 Lines of Reporting and Frequency of Reporting relating to Environmental Risk

The Bank has adequate monitoring and reporting mechanisms in place to ensure appropriate management of the Sustainability/ CR&E risks generated by its business activities. For this purpose, the Bank has developed appropriate Key Performance Indicators (KPIs) and Key Risk Indicators (KRIs) that are reported to the senior management and management body in order to effectively oversee Sustainability/ CR&E risks across the Bank, leveraging on the insights gained from the 2022 ECB Climate Risk Stress Test, ECB’s Report on CR&E Risk Good Practices, on the Group’s internal exercises (e.g. scenario analysis/ materiality assessment processes for transition and physical risk), as well as taking into account best market practices.

In this context, the Bank has established a Sustainability/ CR&E Risks Monitoring Dashboard with appropriate Sustainability/ CR&E risks KPIs/ KRIs that are reported to the senior management and management body on a semi-annual basis, while RAS and Sustainability Strategy targets are reported quarterly, to enable the efficient oversight of Sustainability/ CR&E risks through selected metrics. Additionally, the Bank’s Business Units maintain and update appropriate templates and mechanisms to monitor respective sustainable financing disbursement amounts (e.g. Green and Social Loans), in line with the provisions of the Group’s SFF. The ongoing and timely monitoring of sustainable loans allows senior management to assess the evolution of sustainable financing volumes and trends, considering Bank’s relevant targets and facilitates internal reporting. Going forward, the Bank aims to implement further systemic enhancements in its IT and data infrastructure, support the standardization of the monitoring of pertinent information, as well as safeguard data availability and accuracy.

For more details please refer to Eurobank’s TCFD Climate-related & Environmental Risk Report: <https://www.eurobank.gr/-/media/eurobank/omilos/etairiki-koinoniki-euthuni/peribalon-kai-aeiforos-anaptiksi/i-desmeusi-mas/erb-tcdf-cr-e-risk-report.pdf>

### 8.1.2.7 Alignment of the Remuneration Policy with the Bank’s CR&E risks objectives

The Bank has established a Remuneration Policy that is applicable to all Bank employees and covers their total remuneration. The Remuneration Policy forms an integral part of the Bank’s corporate governance practice. It is

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developed in accordance with its operational model, business strategy, objectives and long-term interests and incorporates measures to avoid conflict of interest.

The Remuneration Policy promotes sound and effective risk management. It is consistent with the objectives of the Bank's business and risk strategy, corporate culture and values and risk culture, with regard to sustainability risk factors, including long-term interests of the Bank and the measures used to avoid conflicts of interest and should not encourage excessive risk-taking on behalf of the Bank. The Bank ensures that remuneration practices are aligned with the overall risk appetite, taking into account all risks, including climate-related & environmental risks, reputational risks, as well as risks resulting from the mis-selling of products or services.

More specifically, the Remuneration Policy has been designed to (a) be consistent with and to promote sound and effective risk management, (b) stimulate behavior consistent with climate-related, and environmental and sustainability risks approach, as well as (c) comply with Bank's voluntary commitments. Its basic principles are to (a) be gender neutral and non-discriminatory in any aspect of its implementation, (b) safeguard that remuneration is sufficient to retain and attract executives with appropriate skill and experience, (c) monitor that internal equity between all Units is applied, (d) avoid excessive risk-taking with respect to direct or indirect sustainability risks and (e) link remuneration with long-term performance.

### 8.1.2.8 Sustainability Ratings

Eurobank actively participates in internationally renowned sustainability ratings to highlight the continuous improvement in its environmental, social and governance performance, upgrade the relevant disclosures, and further enhance investor confidence in its practices.

In 2023, Eurobank demonstrated significant improvements in key sustainability ratings, including Sustainalytics, MSCI, S&P, CDP, and Moody's, surpassing its 2022 standings. Specially with respect to Sustainalytics, the Bank achieved the international ESG Regional Top Rated distinction, the ESG Industry Top Rated distinction for the 2nd consecutive year and has been included in the Morningstar Sustainalytics' 2024 Top-Rated ESG Companies List. These distinctions are a strong demonstration of Eurobank's commitment to sustainability practices and rank it among the best performing banks globally. This recognition reflects our outstanding performance and management of Sustainability impacts including Human Capital, Data Protection and Security, Business Ethics, Corporate Governance, Product Governance, and Integration of sustainability criteria into financial activities.

For further details, please refer to the Annual Report 2023 Business & Sustainability: <https://www.eurobank.gr/-/media/holding/omilos/annual-reports/etisios-apologismos-2023/annual-report-2023.pdf>

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### 8.1.3 Risk Management

#### 8.1.3.1 Integration of Environmental Factors in Our Risk Management Framework

Eurobank has incorporated Sustainability and CR&E risks aspects across all pillars of its Risk Management Framework, while it identifies, assesses, manages and mitigates relevant risks, with a view to ensuring alignment with its Business Strategy.

#### Group Risk Management Framework and CR&E Risk Management Framework

The Group Risk Management Framework defines the roles and responsibilities of the Group Risk Management (GRM), which is independent from the Business Units as a 2<sup>nd</sup> Line of Defense, having full responsibility for the establishment of the Group's Risk Strategy and Risk Appetite Framework, as well as for monitoring all risks assessed as material through the Risk Identification & Materiality Assessment (RIMA) process, including CR&E risks undertaken by the Group.

In accordance with relevant supervisory expectations and the Group's enhanced Sustainability Governance operating model for the incorporation of CR&E risks across the three lines of defense (described in the Sustainability Governance section), new roles and responsibilities regarding climate-related & environmental risk management have been embedded into the Group Risk Management Framework. In addition, Eurobank has developed its CR&E Risks Management Policy which aims at fostering a holistic understanding of the effects of CR&E risks on its business model, as well as support decision making regarding these matters and providing a robust governance under its Risk Management Framework.

#### Risk Appetite

The Group articulates its Risk Appetite through a set of qualitative and quantitative statements with respect to, inter alia, solvency, liquidity, profitability, asset quality and other areas related to material risks. The purpose of these indicators and thresholds is to facilitate the assessment of whether the Group is operating within its defined risk appetite levels. The outcome of this process is the Risk Appetite Statements (RAS) document, whereas the principles, process and governance aspects related to the RAS are outlined in the Risk Appetite Framework (RAF). The RAS are complemented by a set of Business Line Statements (BLS) which constitute operational metrics (and limits) at the business level where the risks are undertaken.

Based on the above, the Bank has established relevant Risk Appetite Statements, both quantitative and qualitative, related to Sustainability/ CR&E Risks to effectively manage these risks, in line with the Bank's monitoring and escalation processes. Within this framework, the Bank has set a RAS for at least 20% of the annual new CIB disbursements to be classified as green/ environmentally sustainable loans, by applying the criteria set in the Group's Sustainable Finance Framework, which also includes RRF green tagging classification. This target was reached during 2023, demonstrating the Bank's commitment towards green transition. In addition, Eurobank has set a RAS whereby, the Group shall make no new investments in fixed income securities (ESG/ Green Bonds are excluded) issued by the top 20 most carbon-intensive corporates worldwide. Furthermore, the Bank has introduced a qualitative RAS in relation to the environmental risk posed to biodiversity. Based on its exclusion list, the Bank shall refrain from financing activities prohibited by host country legislation or international conventions relating to the protection of biodiversity resources.

#### Risk Identification & Materiality Assessment

The Risk Identification & Materiality Assessment (RIMA) process sets the appropriate mechanisms to identify, measure and monitor risks at an early stage, as well as to manage their potential impact on the achievement of the Group's objectives. In this context, RIMA is an essential part of the overall risk appetite process, enabling the Group to build its risk inventory, identify the risks that the Group is or might be exposed to, assess their relevance and materiality and define appropriate risk appetite metrics for the monitoring of the material risks. Eurobank has established respective definitions of climate-related risks and has performed materiality assessment exercises regarding the impacts arising from these risks, the results of which are included in the Group's RIMA Report, Risk Library and Risk Inventory.

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For more details please refer to Eurobank's TCFD Climate-related & Environmental Risk Report: <https://www.eurobank.gr/-/media/eurobank/omilos/etairiki-koinoniki-euthuni/peribalon-kai-aeiforos-anaptiksi/i-desmeusi-mas/erb-tcf-d-cr-e-risk-report.pdf>.

### 8.1.3.2 Climate & Environmental Risk Definitions

The Bank has defined Climate & Environmental Risks, leveraging on key regulatory and market guidelines (e.g. ECB Guide on Climate and Environmental Related Risks, EBA implementing technical standards on prudential disclosures on ESG risks, Task Force on Climate related Financial Disclosures), as well as on related internal exercises (e.g. scenario analysis/ materiality assessment processes for transition and physical risk).

**Climate Related and Environmental risks:** Climate-related and environmental risks are defined as the risks deriving from potential loss or negative impact to the Group, including loss/ damage to physical assets, disruption of business or system failures, transition expenditures and reputational effects from the adverse consequences of climate change and environmental degradation.

**Climate risk also includes the following risks:**

**Climate related physical risk:** Physical risk refers to the financial impact of a changing climate, including more frequent extreme weather events and gradual changes in climate, as well as the impact of environmental degradation, such as air, water and land pollution, water stress, biodiversity loss and deforestation.

**Climate related transition risk:** Transition risk refers to financial loss that can result, directly or indirectly, from the process of adjustment towards a lower- carbon and more environmentally sustainable economy.

**Environmental risk:** Risk of actual or potential threat associated with the dependency on nature and nature impacts and/ or the misalignment between the Group's strategy and the changing regulatory, policy, or societal landscape in which it operates, with regards to environmental risks management. Environmental risk excludes the impacts from climate change.

### 8.1.3.3 Climate-related & Environmental Risk Drivers and Transmission Channels

The Group identifies and assesses CR&E risks within the context of the Risk Identification and Materiality Assessment (RIMA) process, which is performed at least on an annual basis, or ad-hoc, if necessary. Through the RIMA process, the Group identifies material risks that could potentially have a significant adverse impact on its financials, capital base, liquidity position or business model, as well as any exposure to possible emerging risks. In this context, the Group takes into consideration several different sources for the identification of emerging risks, such as the SSM's Supervisory Priorities, the European Union & national legislation updates and regulatory developments/ reports etc.

As CR&E risks interact with other risks and result in direct distributional impacts and indirect macroeconomic impacts, the Group understands that careful consideration of the cross-cutting nature thereof is necessary to ensure the optimal implementation of adaptation activities. As such, the Group considers CR&E risks as drivers of existing risk types, undertaking a holistic and systemic approach when examining the complex links between CR&E risks and both financial and non-financial risks. Eurobank has integrated CR&E risks elements into its existing risk management processes, creating additional procedures, policies and tools so that these risks can be properly identified and measured. In this context, the Group has identified the risk drivers related to climate change and environmental degradation that are most relevant to the business environment in which it operates.

From an internal perspective, the Group has placed great emphasis on building capacity among its employees and increasing overall awareness on CR&E matters. To this end, a dedicated Unit (Group Sustainability Risk) has been established with the overall responsibility for overseeing, monitoring, and managing sustainability risks, in line with the provisions of the CR&E Risks Management Policy. In parallel, the Group considers various external sources of information, including, inter alia, the cooperation with external advisors and the consultation of public sources (e.g. ThinkHazard!,

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ENCORE, World Resources Institute etc.) to determine the key risk drivers that could potentially have a significant adverse impact on its operations.

In this context, the Group has identified the following list of CR&E risk drivers:

Climate-Related Risk		Environmental Risk
Transition Risk	Physical Risk	
Behavioural Changes	Acute Hazards (floods, wildfires)	Water Scarcity
Policy & Regulatory Changes	Chronic Hazards (droughts, heat waves)	Biodiversity loss
Technological Changes		

### Sectoral Analysis

To inform the materiality assessment process, the Group performed a heatmap exercise to determine how CR&E risks affect certain sectors that the Group is exposed to, and subsequently to interpret the impact on the overall Bank's risk profile and operations in terms of financial losses, business disruptions, legal claims and/or reputational damages. Traditional economic variables such as demand, prices, and productivity may be impacted by CR&E risks. With this exercise, the Group sought to take into account the unique characteristics of each sector, while also leveraging on the pertinent analysis for the transmission channels through which CR&E risks may manifest for the Group. For the sectoral analysis, the Group integrated both qualitative and quantitative aspects. Under climate-related transition risk and environmental risk, all identified CR&E risk drivers were assessed, namely Behavioural Changes, Policy & Regulatory Changes, Technological Changes for the former, as well as Water Scarcity and Biodiversity Loss for the latter, while under climate-related physical risk the following risk drivers were selected due to their relevance to the Greek geographical area (where the core operations of the Group are located), as well as pertinent data availability:

- Acute Hazards: Floods, wildfires
- Chronic Hazards: Droughts, heat waves

In this context, the sectors that were designated for the assessment are considered to significantly contribute to climate change and environmental degradation. Each sector received a severity score for each of the determined risk drivers. The scores had the following dimensions: 1-Minor Impact, 2-Low Impact, 3-Medium Impact, 4-High Impact.

For more details, please refer to Eurobank's TCFD Climate-related & Environmental Risk Report: <https://www.eurobank.gr/-/media/eurobank/omilos/etairiki-koinoniki-euthuni/peribalon-kai-aeiforos-anaptiksi/i-desmeusi-mas/erb-tcdf-cr-e-risk-report.pdf>.

### Materiality Assessment per Risk

The Group has carried out a number of actions to ensure that there is a concrete procedure via which CR&E risks are fully taken into consideration and afterwards evaluated in order to conduct a solid materiality assessment. A proportionate method has been used in the evaluation of the materiality of the CR&E risks, concentrating only on those that are considered to be able to have the most detrimental effects. In parallel, it should also be noted that the materiality assessment process follows the "gross approach". In other words, without considering specific techniques designed to mitigate the underlying risks. In this year's RIMA, the Bank further enhanced its CR&E materiality assessment by incorporating the biodiversity loss. In this context, the Bank conducted a thorough loan portfolio analysis to determine the sectors most vulnerable to biodiversity loss by analysing sector-specific dependencies and impacts based on the ENCORE tool. The results of the materiality assessment exercise are included in the Group's RIMA Report, Risk Library and Risk Inventory. The risks identified as material form the basis for the Internal Capital Adequacy Assessment Process

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(ICAAP) and Internal Liquidity Adequacy Assessment Process (ILAAP) exercises, in the context of which the Group identifies mitigating actions to ensure that it remains adequately capitalized and maintains sufficient liquidity buffers to support its business strategy.

### Materiality Assessment Results

The aggregated results of the CR&E materiality assessment are shown in the table below along with the approach and criteria that were used to evaluate each type of risk:

		Risk	Approach	Materiality Result
Climate Risk	Physical Risk	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Material
		Liquidity Risk	Scenario analysis	Non-Material
	Transition Risk	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Material
		Market Risk	Concentration (trading exposures) / Heatmapping analysis	Non-Material
		Liquidity Risk	Scenario analysis / Heatmapping analysis	Non-Material
		Business Risk and Strategic Risk	Concentration (gross interest income) / Heatmapping analysis / Qualitative assessment	Material
Environmental Risk	Water Scarcity	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Non-Material
	Biodiversity Loss	Credit Risk	Concentration (credit exposures) / Heatmapping analysis	Material

### CR&E Risks Scenario Analysis

The Bank utilizes a scenario analysis, aligned with the TCFD recommendations, to comprehensively assess climate change transition and physical risks. The scenario analysis is an important tool that is used in its strategic planning process, as well as a key component that enables Eurobank to evaluate its resilience and adaptability in different climate-related scenarios.

The methodological approach adopted allows the measurement of impacts, based on different scenarios and time horizons (2030, 2040 and 2050). This forward-looking approach enhances the Bank's understanding on climate-related risks, informs strategic decision-making and facilitates the integration of climate considerations into its Risk Management Framework. By doing so, Eurobank proactively identifies vulnerabilities, seizes opportunities and aligns business strategies with the transition to a low-carbon economy. The Network for Greening the Financial System (NGFS) scenarios that the Bank has adopted, provide a common starting point for analysing climate risks across the economy and financial system. The set of scenarios that are utilized by the Bank, include four representative scenarios that cover different dimensions.

The results of the scenario analysis provide a comparison of financial evolutions by sectors and geographies over a range of scenarios and time horizons, reinforcing the fact that the Bank's strategy remains adaptive.

More specifically, the NGFS scenarios are:

1. Orderly: Net zero 2050; where climate policies involve early, ambitious action and the impacts are low for both physical and transition Risks
2. Disorderly: Delayed transition; in which climate policies are not introduced until 2030 and the outcome has a higher impact on transition risk
3. Hot house world: Current Policies; with limited climate policies and severe physical risks and irreversible changes, including higher sea level
4. Too-little-too-late: Fragmented world; in which delayed and divergent climate policy ambition globally, leads to elevated transition risks due to the overall ineffectiveness of the transition.

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The table below illustrates the impact in sectoral production, comparing Orderly Net Zero 2050 to Current Policies:

Sector	2030	2040	2050
Agriculture	Moderate Negative	Moderate Negative	Moderate Negative
Manufacturing	Moderate Negative	Moderate Negative	Moderate Negative
Electricity Supply	Strong Positive	Strong Positive	Strong Positive
Water Supply	Same Level	Same Level	Same Level
Construction	Moderate Positive	Moderate Positive	Positive
Wholesale & Retail Trade	Same Level	Same Level	Same Level
Transporting and Storage	Negative	Negative	Strong Negative
Real estate activities	Same Level	Same Level	Same Level
Oil and Gas	Strong Negative	Strong Negative	Strong Negative
Renewable Energy Sources (RES)	Strong Positive	Strong Positive	Strong Positive

Additionally, the Bank assesses the physical impacts on its strategy utilizing two scenarios:

1. RCP2.6: that incorporates strong climate policies and limit the increase in average global temperature to below 2°C.
2. RCP8.5: implying strong climate changes and the necessity of strong adaptation to the new conditions.

Additionally, the following table illustrates the impact of sectoral production under RCP 2.6:

Sector	2030	2040	2050
Agriculture	High	Very high	Very high
Construction	Negligible	Low	Low
Electricity Supply	Low	Low	Medium
Manufacturing	Low	Low	Low
Oil and Gas	Negligible	Negligible	Negligible
Real estate activities	Negligible	Negligible	Negligible
RES	Negligible	Negligible	Negligible
Transporting and Storage	Low	Low	Low
Water supply	Low	Low	Low
Wholesale and retail	Negligible	Negligible	Negligible

The integration of scenario analysis, as recommended by the TCFD, plays a crucial role in shaping Eurobank's business strategy, by providing valuable insights into the potential impacts of climate-related risks and opportunities on its financial performance and long-term sustainability.

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For more details, please refer to Eurobank's TCFD Climate-related & Environmental Risk Report: <https://www.eurobank.gr/-/media/eurobank/omilos/etairiki-koinoniki-euthuni/peribalon-kai-aeiforos-anaptiksi/i-desmeusi-mas/erb-tcdf-cr-e-risk-report.pdf>

### 8.1.3.4 Sustainability Risk Management Tools & Processes

Eurobank has put in place a set of tools for identifying, measuring and managing Sustainability/ CR&E risks, including the credit granting and monitoring processes across the Group's both 1st and 2nd Lines of Defense.

#### A) Collateral Insurance Requirements

At the point of loan origination, the Bank requires that borrowers provide insurance policies for real estate properties accepted as collateral, excluding plots of land. Compulsory coverage includes protection against physical risks such as fire and earthquake for all borrowers whereas flood coverage which is compulsory for corporates will also become mandatory for retail borrowers in 2024. Desirable coverages vary based on real estate type and circumstances, such as properties under construction or proximity to protected areas. These coverages encompass, among others, damages from smoke, vehicle collision and civil liability. In cases of Real Estate construction financing, the Bank requires from its clients an insurance contract against every risk during the construction phase, which indicatively should cover physical risks such as fire, earthquake, flood etc. **B) Incorporation of Environmental Risk Factors in the Creditworthiness Assessment**

#### Moody's Risk Analyst (MRA) models

The Group's MRA Models assess the CIB borrowers' credit profile based on qualitative and quantitative criteria. Specifically, the "Risk of Adverse Events" criterion assesses a client's vulnerability to adverse developments or business interruptions, fines, litigation and negative publicity, stemming among others, from environmental and social parameters (e.g. health and safety of customers).

#### Environmental & Social Management System (ESMS)

When integrating Environmental and Social (E&S) issues into its business model, the Group implements an Environmental and Social Management System (ESMS) to assess direct and indirect environmental and social aspects, aiming to mitigate potential credit risks arising from the operation of businesses that are financed. In this context, the Group has developed an Environmental and Social Policy that sets the framework of general principles and requirements for managing environmental and social issues. Through the Environmental and Social Policy, the Group achieves and maintains compliance with existing national and international environmental and social legislation/ regulations, as well as with its commitments, through a standardised E&S assessment approach. Furthermore, the objective of the Policy is, inter alia, to ensure timely and accurate reporting to the European Bank for Reconstruction and Development (EBRD) concerning the management of the Group ESMS. As part of its Environmental and Social Policy, Eurobank maintains a list of activities that are excluded from financing, in line with the exclusion lists of the EBRD. For all financing transactions, the Group ensures that its clients demonstrate an organized and systematic approach to E&S risk management that complies with applicable local, national and international environmental, health and safety, and labour legislation and standards, relevant permits, as well as public disclosure requirements. The ESMS process consists of client/ activity environmental and social risk screening, risk assessment process, decision of risk control approach and ongoing performance monitoring.

For further details, please refer to the Annual Report 2023 Business & Sustainability: <https://www.eurobank.gr/-/media/holding/omilos/annual-reports/etisios-apologismos-2023/annual-report-2023.pdf>

#### Climate Risk Scorecard

In line with best market practices, as well as taking into account supervisory requirements/ expectations with regard to establishing an approach for further assessing clients with higher climate risk exposure, the Bank has developed the Climate Risk Scorecard for considering climate-related and environmental risks. In this context, an assessment process based on the Climate Risk Scorecard is to be performed for all new financing transactions, limit increases and limit



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renewals (existing and new clients), initially applied to the Bank's Corporate & Investment Banking (CIB) portfolio. The Climate Risk Scorecard comprises a modular questionnaire which includes targeted climate risk and sustainable financing related questions, both qualitative and quantitative, capturing the following key dimensions: Transition risk, Taxonomy Aligned Activities, Physical risk, Sustainable financing, Emissions, Strategy, Climate & environmental incidents, Transition - Green technology. In addition, the questions of the Climate Risk Scorecard have been developed in order to examine climate risk and sustainable financing aspects both at client and at transaction level. The output of the Climate Risk Scorecard is one of the following three scores: (a) High Risk, (b) Medium Risk and (c) Low Risk. Mitigating actions and/ or monitoring based on the client's Climate Risk scoring has also been designed.

### Interbank ESG Questionnaire

In recent years, increased regulatory focus has been placed on ESG aspects in the banking sector. Based on the regulatory framework, institutions are expected to enhance their credit risk classification procedures in order to identify and evaluate climate-related and environmental risks, as well as integrate ESG aspects in the creditworthiness assessment process. Based on this, an interbank initiative in the Greek banking market was jointly launched, by the Hellenic Bank Association (HBA) and the major Greek Banks, in order to design a common Interbank ESG Questionnaire for their clients. The objective is to develop a comprehensive ESG Questionnaire to be used by the Greek Banks, ensuring a harmonized assessment approach and a level-playing field, in order to incorporate a holistic assessment of client ESG factors. The ESG Questionnaire ensures the alignment with supervisory expectations/ requirements (e.g. meeting obligations regarding the EBA Guidelines on Loan Origination and Monitoring and the ECB Guide on Climate-Related and Environmental Risks), the applicable international standards/ guidelines (e.g. Task Force on Climate-related Financial Disclosures), as well as the Banks' operational needs, and best market practices. Upon full roll out of the ESG Questionnaire, the ESMS scorecard will be phased out.

### ESG Risk Assessment

By combining the Climate Risk Scorecard and the Interbank ESG Questionnaire, Eurobank has developed the ESG Risk Assessment, a holistic approach which assists in assessing and classifying the Bank's clients in terms of ESG criteria, as per the relevant regulatory framework. More specifically, Eurobank's ESG Risk Assessment assesses its Corporate & Investment Banking (CIB) clients both at obligor, as well as at transaction level, along with the Sustainable Finance Framework classification. In this context, Eurobank has developed an internal ESG Risk Scoring methodological approach for the ESG Risk Assessment in order to facilitate the final ESG Risk scoring assessment and classification of the client. The output of the ESG Risk Assessment is one of the following three scores: (a) High ESG Risk, (b) Medium ESG Risk and (c) Low ESG Risk. During the credit decision/ granting process, Eurobank uses the ESG Risk Assessment to consider the client's ESG risk scoring and profile, the possible mitigating actions, as well as the due diligence assessment performed on selected cases. Overall, the ESG Risk Assessment aligns with Eurobank's business strategy, enhances ESG risk awareness, promotes sustainable financing and ensures adherence to the Group's risk appetite and credit policies.

### Sustainable Finance Framework Assessment Tool

The Group's Sustainable Finance Framework (SFF) provides a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financial products. The SFF sets out the eligible assets to be financed, presented separately for the portfolios of Wholesale and Retail (i.e. presentation of the scope, sustainable financing classification and applicable regulatory frameworks). If a potentially eligible financing fulfils the criteria outlined for each classification category, then, upon following the necessary evaluation and approval verification process, it can be classified as sustainable financing. In this context, the Group has developed a web-based Sustainable Finance Framework (SFF) Assessment Tool for the Corporate & Investment Banking (CIB) portfolio to underpin the classification and evaluation of sustainable/ green financing opportunities in a structural manner, as part of the loan origination process. The SFF Assessment Tool is delivered through an online platform, a workflow-based application which automates the process of assessing the Group's financing solutions against the criteria defined in the SFF.

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### Collateral Valuation

The Bank acknowledges that collateral valuation should account for physical locations, as physical risks may affect the value of collateral (e.g. increased flood risks). Recognizing the potential impact of physical risks on collateral value, the Bank is incorporating climate-related risks into its Collateral Valuation Policy and procedures, aiming to mitigate risks associated with properties vulnerable to environmental hazards, in alignment with the regulatory standards.

In this context, the Bank updated its Collateral Valuation Policy (CVP) to specify accepted collateral types and valuation procedures, as well as integrated assessments of climate-related and environmental risks. This involves collecting pertinent information such as Energy Performance Certificates (EPCs) and incorporating forward-looking estimates of natural hazards. The updated Policy also considers broader climate-related and environmental factors, such as waste management and accessibility, enhancing valuation accuracy and risk management.

### **8.1.3.5 Asset Management Activities**

The Bank has outsourced investment advice and portfolio management services to Eurobank Asset Management M.F.M.C., which is the investment arm of the Eurobank Group. Thus, due diligence, research and investment decision processes when selecting or recommending financial instruments are conducted based on the applicable policies of Eurobank Asset Management M.F.M.C., which was the first asset management company in Greece to join the global Principles for Responsible Investment (PRI) initiative.

The Responsible Investment Policy specifies Eurobank Asset Management MFMC efforts to integrate Environmental, Social & Governance (ESG) information/ criteria into the investment processes, and outlines the foundation, ownership, and oversight mechanisms that support Eurobank Asset Management MFMC's approach. ESG integration is the practice of incorporating material ESG information/ criteria into the investment process with the objective of improving financial outcomes and/or mitigating risks over the long-term for UCITS, AIFs, and portfolios under management.

The Responsible Investment Policy is also in line with the requirements set by Regulations (EU) 2019/2088 and (EU) 2020/852 on sustainability-related disclosures in the financial services sector and on the establishment of a framework to facilitate sustainable investment.

### Overview of Approaches & Processes

As per the Responsible Investment Policy document of Eurobank Asset Management M.F.M.C., the Company integrates ESG factors into the investment process. In particular, the ESG analysis includes the assessment of environmental criteria (e.g. emissions of greenhouse gases, exposure to fossil fuel) at the level of the companies in which the Funds and Portfolios invest. The events or conditions that may be responsible for a negative impact on the return of the Fund/ Portfolio include environmental aspects (e.g. carbon emissions). The specific sustainability factors considered may vary, as they depend on the specific investment strategy followed by each Fund/ Portfolio.

The Investment Management & Corporate Strategy division of the Company pays close attention to investments in sensitive sectors. The sectors concerned include, but are not limited to, thermal coal exposure, thermal coal power generation, oil & gas production, oil sands extraction, off-shore Arctic Oil & Gas Exploration. Companies from these sensitive sectors may be excluded from the Investment Management & Corporate Strategy division of the Company. The effect of ESG factors on the investments of a Fund/ Portfolio is considered throughout the whole investment lifecycle. The Investment Management & Corporate Strategy of the Company aims via active ownership to reduce risks and encourage improvement in ESG practices and performance where they are material to long-term shareholder value creation.

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Eurobank Asset Management uses the Sustainable Investment Strategies described below:

1. **ESG Integrated:** Integration of ESG metrics in the analysis, selection, and composition of managed portfolios. Securities of issuers with high sustainability risks and/ or principal adverse impacts may be purchased and retained in the portfolio.
2. **Best in Class:** Preferences towards securities with low or medium sustainability risks and/ or decreases the weight of securities with high sustainability risks, as defined by ESG scores, without excluding entire industries.
3. **Best in Class Plus:** Seeks to invest in securities of issuers with low sustainability risks compared to their peers within the respective industry/ sector, while: a) Excluding those with high sustainability risks (ESG risk classified as “severe”), b) In addition, a negative screen is used to exclude the 20% worst ESG scoring stocks from the investable universe.
4. **Sustainable Investing:** Seeks to invest mainly in issuers that contribute to making a positive environmental and/or social impact, as measured by third party ESG vendors, UN SGD contribution and PAI consideration and address. In addition, the Best in Class Plus process as above is applied in this strategy.

The Responsible Investment Policy also presents the applicable Investee company exclusions based on Controversial Activities and Revenue Thresholds. Also, the Policy sets out Investee company exclusions based on breaches of International Norms i.e. companies in severe breach of UN Global Compact Principles on human rights, labor standards, environmental protection, and anti-corruption.

For more details on the Responsible investment Policy please refer to: <https://www.eurobankam.gr/en/politikes>

### 8.1.3.6 Scenario Analysis & Stress Testing

#### A) Climate Stress Test Scenario Analysis in the 2024 ICAAP

As part of ICAAP 2024, the Group introduced a short-term climate transition risk scenario and a scenario for acute physical risk in the Normative Perspective, while a long-term climate risk scenario embedding both transition and chronic physical risk was used in the Economic Perspective. In this context, the following applies:

**Economic Perspective:** The Bank assessed forward-looking climate risk using targeted Climate Stress Test scenarios to quantify the impacts of climate-related risks on its credit risk exposures. These impacts were integrated into the economic perspective as an indicative internal capital requirement. More specifically, the Bank utilized a long-term climate scenario to assess sectoral Gross Value Added (GVA) impact, considering both transition and chronic risks. The scenario is based on the NGFS’s ‘Orderly Scenario’, which aligns with EU and Greece’s Net Zero 2050 targets, anticipating that climate policies are introduced early and become gradually more stringent precise. The scenario provides GDP and GVA projections extending up to 2050, which incorporate the impact from both the transition and chronic risk.

**Normative Perspective:** The Group assessed its vulnerabilities to climate-related risks and their transmission channels to credit risk through targeted Climate Stress Test scenario analyses. For this purpose, the Bank designed and developed relevant Climate Stress Test scenarios capturing both transition risks and physical risks. The analysis quantified the credit risk impact in the Bank’s loan portfolios by examining two sensitivity scenarios:

- **Transition Risk:** The Group performed an individual assessment of the Bank’s Top 20 Clients of CIB (for the sectors identified as most sensitive to transition risk) under a short-term disorderly climate scenario, in line with Network for Greening the Financial System (NGFS) scenarios. The analysis reflected the effects at macroeconomic, sectoral and counterparty level through a dedicated climate scenario model, developed by an external provider.
- **Physical Risk:** The Group applied a sensitivity shock on the CRE and RRE price indices, in line with the dedicated climate scenario, which examines acute risks under the RCP8.5, resulting from a flood event.

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### B) Group Climate Risk Stress Test (CRST) Framework

The Group Climate Risk Stress Test (CRST) Framework accommodates a dedicated governance structure and defines the minimum requirements for designing, executing, approving, and applying the climate risk stress test. The Framework provides a transparent and repeatable process for designing and executing the climate risk stress test, as well as for reporting and evaluating stress test outcomes and determining management actions.

The CRST Framework has been developed as per the overall Stress Testing Policy of the Group, also taking into account the provisions of the ECB Guide on CR&E risks and the requirements of the 2022 ECB Climate Risk Stress Test. Additionally, the Framework complies with other best practices and supervisory requirements, such as the EBA Guidelines on institutions' stress testing (EBA/GL/2018/04).

#### 8.1.3.7 Non-Financial Risk Management Policies & Processes

The Bank has implemented policies and processes to evaluate and manage its exposure to operational and non-financial risk events arising from sustainability risk. In particular, the Bank considers how its business continuity could be adversely impacted due to sustainability events, as well as whether its activities could result in reputational damage and liability risks (e.g. as a consequence of cooperation with counterparties associated with environmental controversies and/ or owing to inappropriate business practices such as "greenwashing").

The Bank aims to safeguard business continuity, and to assess the risks undertaken in the context of outsourcing services and IT activities (e.g. exposure of service providers to environmental vulnerabilities).

In this context, in the direction of embedding/ integrating sustainability drivers into the non-financial risk management framework, the following are applied at Group level:

- **Operational Risk Management**

The Bank has identified climate risk (physical risk and transition risk) drivers affecting each of its 12 Operational Risk Themes. Risk Themes are bespoke risk classification structures that represent a thematic view of the operational risk sub-types.

In this context, operational risk events are classified according to the Operational Risk Taxonomy's Risk Themes. Detailed instructions have been prepared for the relevant staff, regarding the determination of the scope and the rules for capturing sustainability-driven operational risk events. The Group's Operational Risk Events Management Guideline describes the approach and methodology for the classification and the ongoing management, until final closure, of operational risk events (including those driven by sustainability drivers), as well as their analysis and the initiation of corrective actions where necessary. Such events arise from both physical and transition risk drivers and may include damages to Bank's premises, disruptions in systems and utility outages, conduct-related issues (such as alleged greenwashing), regulatory non-compliance, significant deterioration in services provided by vendors, etc. The effects of adverse events on the Bank are captured, including their relevant financial (e.g. damages to assets, restitutions), efficiency (e.g. business disruption) or reputational impact. For the purposes of risk measurement, certain climate-related and environmental drivers are included in the standard operational risk scenarios. As part of ICAAP, CR&E drivers are incorporated in the scenario assessment process, including a dedicated scenario of physical impacts from extreme weather events, also assessing the relevant reputational risk impact.

For the purposes of risk identification and mitigation, operational risks connected with sustainability drivers are identified through the Risk & Control Self-Assessment (RCSA) process and corrective action plans are established where necessary.

In the event of an emergency, including environmental incidents, the Bank implements a Business Continuity Plan, which includes planning and preparations to ensure that the Bank can continue to operate in the event of a serious incident or disaster, and that it will be in a position to restore normal operations within a reasonably short time when

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responding to typical disastrous events involved in ongoing business activity (natural disasters such as fires or flooding, accidents, server crashes or virus infections, insolvent key suppliers, negative media campaigns, market disruptions and others). The plan includes organizational and technical measures to ensure the continuation of key business operations, and progressively all business operations.

The Bank is progressively enhancing management reports with information relating to sustainability-driven operational and non-financial risks.

- **Reputational Risk Management**

The Group Reputational Risk Management Framework embodies the Group's governance structure and approach for the identification, assessment, proactive mitigation, avoidance, management, and reporting of the key sources and causes of reputational risk for the Group. In this context, the Group identifies various sources of reputational risk, including environmental and social issues. In addition, when a reputational crisis situation is identified, it is escalated in accordance with the Group's Crisis Management Policy.

### 8.1.3.8 ESG and CR&E Data

The Group recognizes the importance of relevant and reliable data for the provision of meaningful insights, suitable for decision-making purposes. Having already performed an assessment of ESG and CR&E data availability in its internal systems against regulatory requirements/ expectations, the Group continues to enhance its environmental risk data aggregation capabilities and IT infrastructure accordingly, while also using appropriate controls and safeguards to ensure the accuracy and completeness of the compiled information. The Group seeks to further improve environmental risk data granularity through allocating detailed roles and responsibilities, for the purposes of ESG and CR&E data management, and implementing approaches for remediation of identified data gaps (i.e., engaging with external data providers, developing methodological approaches for estimating required information).

The ESG Unit is responsible for the collection, calculation and review of ESG data related to the operational impact, in line with the associated certified management systems (ISO 14001/EMAS, ISO 50001, ISO 14064). The Group Sustainability Risk is responsible for establishing internal reporting and disclosure processes for the financed impact, as well as the oversight of the associated data collection, in line with the Group's data governance framework.

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### 8.2 Qualitative Information on Social Risks

#### 8.2.1 Business strategy and processes

##### 8.2.1.1 Adjustment of Our Business Strategy to Integrate Social Factors and Risks

Eurobank understands that social risk management is crucial to ensure an effective and sustainable business model and has, therefore, taken actions to adjust its business model, strategy and processes, as well as its financial planning to account for risks arising from social matters, planning to further enhance such activities in the foreseeable future.

The Bank recognises the importance of managing social risk and has ensured that its lending activities do not support actions that harm society. In parallel, through the implementation of existing policies (e.g. Group Environmental and Social Policy) and the establishment of new processes and tools (e.g. ESG Risk Assessment), the Bank continues to strengthen its capacity to identify and manage social risk stemming from client operations, also determining relevant mitigating actions, if deemed necessary.

For the identification of Sustainability topics relevant to its business model and strategy, the Bank has taken into consideration the following:

- Sustainability-related EU and national regulatory context
- Sustainability-related sectoral and Eurobank-specific priorities as identified through:
  - a) UNEP FI Principles for Responsible Banking and impact radar;
  - b) International and sectoral Sustainability disclosure standards, frameworks and initiatives, such as the Sustainability Accounting Standards Board, the GRI Standards for Sustainability Reporting, the Athens Stock Exchange ESG Reporting Guide, the SASB Commercial Banks Standard and the Accountability AA1000 2018 Principles;
  - c) Sustainability ratings, such as the MSCI, Sustainalytics, S&P, Moody's, Refinitiv, FTSE4Good, ISS ESG and CDP; and
  - d) Sustainability topics best practices addressed by peer banks in Greece and abroad.
- Sustainability cross sector megatrends and global accords, such as the UN SDGs, the Paris Agreement on Climate Change, the Principles of the United Nations Global Compact and the EU Green Deal
- Corporate Sustainability Reporting Directive (CSRD)

#### Sustainable Products and Services

Eurobank has established and operates a robust governance framework for all products and services, throughout their lifecycle, where material financial and non-financial risks are assessed by the related Group Risk Management Units and other 2<sup>nd</sup> Line of Defence Units. Alignment with the Sustainable Finance Framework for products and services is also assessed.

The Bank offers products and services tailored to specific sectors and client segments, promoting sustainable practices among its clients, aiming to alleviate the social risk stemming from its operations. The products/ initiatives demonstrate that the Bank has effectively integrated social risk considerations in its practices in different stages of the credit granting and monitoring process. Furthermore, investment Products/ Services that do not meet the Group's sustainability standards are not offered to clients.

For further details, please refer to the Annual Report 2023 Business & Sustainability: <https://www.eurobank.gr/-/media/holding/omilos/annual-reports/etisios-apologismos-2023/annual-report-2023.pdf>

#### Sustainable Finance Framework (SFF)

The Group has developed the SFF, which defines the eligible activities to access sustainable financing (green and social assets).

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Social risk considerations are integrated in the SFF as follows:

- Corporate Portfolio: Dedicated-purpose –Social Loans

Eligible social activities aim to promote positive social outcomes and are classified as follows: Employment generation and access to financing, Equitable access to and control over assets, services, resources, and opportunities, Road Networks, Transportation Infrastructure, Community inclusion, Energy, Healthcare and Education.

- Corporate Portfolio: General-purpose – Sustainability-Linked Loans & Facilities

For Social Risk, overarching Sustainability Performance Targets (SPTs) aim to promote positive performance on material social areas, inter alia, to:

- (i) Diversity: Promotion of gender diversity throughout the organization
- (ii) Link of ESG target to compensation: Incorporation of ESG targets in performance management/LTIP (Long Term Incentive Program)
- (iii) Community support: Reinforcement of local community through Corporate Social Responsibility initiatives

In addition, the SFF specifies industry-specific SPTs which target sector-specific areas, inter alia, to: Health & Safety, Labor Management, Privacy & Data Security, Access to communications, Product Safety & Quality and Supply Chain Labor Standards.

- Retail Portfolio: Dedicated-purpose –Social Loans:

i) The Framework specifies activities that promote positive social outcomes for small businesses and individuals, with a focus, among others, on the following areas:

- Access to essential services (Education)
- Affordable housing

ii) Small Business:

Eligible social assets are organized per eligible areas:

- Employment generation & Access to financing
- Agricultural productivity and promote sustainable land use

It is noted that the Bank's approach towards addressing borrowers' compliance with social risk mitigation requirements for loans that integrate social factors, is aligned with the process followed as regards green lending.

### 8.2.1.2 Objectives, Targets and Limits to Assess and Address Social Risk

#### Bank's approach towards Sustainable Development

Committed to actively contributing to the achievement of the United Nations SDGs and the 2030 Agenda goals, the Bank is a signatory of the UN Global Compact since 2008. In September 2019, Eurobank signed the UNEP FI Principles for Responsible Banking (PRB), affirming its commitment to play an active role in implementing the SDGs and the Paris Agreement on Climate Change. In full compliance with its obligations relating to implementing the Principles, the Bank issued its 4<sup>th</sup> PRB Progress Report as part of the Annual Report 2023 – Business and Sustainability. In this context, in line with UNEP-FI requirements, Eurobank engaged, an external third party to perform independent limited assurance of the UNEP FI 4<sup>th</sup> PRB Progress Report in accordance with International Standard on Assurance Engagements (ISAE 3000).

The Bank has identified Social Impact Financing focus areas. Social impact financing relates to activities such as education, upskilling health care, financial inclusion, social cohesion and gender equality.

The Bank understands that social risk management is crucial to ensure an effective and sustainable business model and has, therefore, taken actions to adjust its business model, strategy and processes, as well as its financial planning to account for risks arising from social matters, planning to further enhance such activities in the foreseeable future.

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The Bank's efforts have led to a significant reduction in social risk incidents relating to its cooperation with the clients, as well as to significant positive impacts to society, through the development of a range of sustainable products (e.g. student loans) and the adoption of socially responsible practices.

As new social issues arise, the strategy of the Bank will be frequently updated to incorporate new developments, taking into account stakeholder expectations, as well as regulatory requirements and best practices in the market landscape.

### 8.2.1.3 Engagement with Our counterparties for Social Risk Mitigation

The following policies and processes facilitate the Bank's engagement with its clients, with a view to mitigate their social risks:

#### 1. Sustainable Finance Framework

Eurobank aspires to play a key role in the financing of landmark projects that are necessary for pursuing economic growth in line with sustainability criteria. The SFF encompasses a wide range of sustainable lending activities, including social financing. The operationalization of the SFF assessment for the CIB Portfolio is implemented through the web-based tool.

The Bank leverages on the results of the above evaluation process to determine the integration of sustainability considerations in the business model and strategy of its clients, aiming to identify social financing opportunities.

#### 2. Environmental and Social Management System (ESMS)

The Bank has incorporated environmental and social risk management mechanisms into its financing and investment evaluation process. In this context, the Bank implements an ESMS, to mitigate potential credit risk arising from the operations of businesses that it finances. The Bank defines specific measures to mitigate/ reduce clients' risks associated with social factors, as part of an Action Plan agreed with the borrowers at the point of loan origination, as per the provisions of the Bank's Environmental & Social (E&S) Policy.

#### 3. Interbank ESG Questionnaire

An interbank initiative in the Greek banking market was jointly launched, by the Hellenic Bank Association (HBA) and the major Greek Banks, in order to design a common Interbank ESG Questionnaire for their clients. The objective was to develop a comprehensive ESG Questionnaire to be used by the Greek Banks, ensuring a harmonized assessment approach and a level-playing field, in order to incorporate a holistic assessment of client ESG factors. The ESG Questionnaire includes a variety of environmental, social and governance questions to facilitate the assessment of the overall ESG profile of the Banks' clients.

#### 4. ESG Risk Assessment

Eurobank's ESG Risk Assessment assesses its Corporate & Investment Banking (CIB) clients both at obligor, as well as at transaction level. The Interbank ESG Questionnaire is part of the ESG Risk Assessment, forming a robust assessment of client's overall ESG profile by incorporating specific social aspects. During the credit decision/ granting process, Eurobank uses the ESG Risk Assessment to consider the client's ESG risk scoring and profile through relevant ESG factors, the possible mitigating actions, as well as the due diligence assessment performed on selected cases. For more details on Sustainability Risk Management Tools & Processes, please refer to the Risk Management section of the Qualitative Information on Environmental Risks.

### 8.2.2 Governance

Eurobank has given priority to managing and mitigating any underlying social risks arising as an integral part of developing products and services, while complying with the applicable regulatory framework. Furthermore, it develops and improves mechanisms to identify, measure and communicate impact, across the entire range of its activities. In this context, the assessment of counterparty's social risk is embedded in the risk management process as provided in the next section, Risk Management.



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The BoD and the relevant Board Committees are responsible for the approval of the Group policies and strategies and the supervision of their application, including strategy and policies on social matters and corporate sustainability policies.

For more details on governance arrangements, please refer to the Governance section of the Qualitative Information on Environmental Risks.

### 8.2.3 Risk Management

#### 8.2.3.1 Integration of Social Risk in Our Risk Management Framework

The Bank maintains a list of activities that are excluded from financing, based on its Environmental and Social Policy, in line with the exclusion lists of the EBRD. For all financing transactions, the Bank ensures that its clients demonstrate an organised and systematic approach to ESMS that complies with applicable local, national and international environmental, health and safety and labour legislation and standards, relevant permits, as well as public disclosure requirements.

More specifically, social matters have been integrated in the Bank's risk management framework through the following policies and processes:

##### 1. Environmental and Social Management System (ESMS)

The ESMS has been fully integrated into the approval and monitoring processes that the Bank applies in its financing operations. For more details, please refer to the Business Strategy and Processes paragraph of the Qualitative Information on Social Risks section.

##### 2. ESG Risk Assessment

Social Risk Assessment is enhanced following the roll out of the ESG Questionnaire that is used for assessing the client's ESG Risk profile, capturing among others: Occupational Health & Safety, Community relations and Diversity & Inclusion aspects. As part of the ESG Risk Assessment, the client's ESG risk score incorporates social aspects, aiming to understand the client's sustainability performance and potential social risks, by fostering a more responsible approach to decision-making.

For more details on Sustainability Risk Management Tools & Processes, please refer to the Risk Management section of the Qualitative Information on Environmental Risks.

##### 3. Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) Policies & Processes

Eurobank has established Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) policies and standards, which are designed to provide safeguards against, inter alia, cooperation with clients with increased financial crime risk (i.e. risk of involvement in money laundering and terrorist financing). Within the scope of customer KYC profiling, Eurobank applies Enhanced Due Diligence measures upon establishing a business relationship and when carrying out transactions with natural or legal persons/ entities who are categorized as High Risk as per Eurobank's relevant internal processes, and through the ongoing monitoring activities has systems in place to identify potential adverse publicity relevant to its customers, also covering sustainability aspects.

##### 4. MRA models

The Bank uses the MRA Borrower Rating System where client's risks that arise from social matters are evaluated in terms of the following:

- Risk of Adverse Events including social issues (health and safety of customers)
- Reputation: The Bank assesses the client's reputation with customers, employees, vendors.

## Environmental, Social and Governance (ESG) Risks

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### 8.3 Qualitative Information on Governance Risks

#### Integration of Governance Factors in Our Governance and Risk Management Framework

Eurobank assesses its exposure to governance risk on an ongoing basis, given that unsuitable governance practices of its counterparties could have adverse impacts. To this end, the Bank has established effective internal governance arrangements to manage such risks, and processes and to better evaluate the governance performance of its clients.

The Bank has placed great emphasis in strengthening its risk management processes to evaluate its clients' ESG performance. Specifically, the borrowers' exposure to governance risk is assessed as follows:

#### MRA Models

The Bank's credit rating models for Corporate clients takes into account borrowers' management quality and governance, which are evaluated in terms of the following:

- Management character: The Bank assesses the integrity of the senior management of the client
- Management organization: The Bank evaluates elements including information quality, leadership, planning and structure
- Management skill: The Bank examines the financial, marketing and operations skills of the client's management.
- Management succession: The Bank takes into account the clients' succession plan and the preparation of successors.

#### Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) Policies & Processes

Eurobank has established Know-Your-Customer (KYC) and Anti-Money Laundering/ Terrorist Financing (AML/ TF) policies and standards which provide safeguards against, inter alia, cooperation with clients with increased financial crime risk (i.e. risk of involvement in money laundering and terrorist financing).

#### Sustainable Finance Framework (SFF) – Sustainability Performance Targets (SPTs)

In the context of the Group's SFF, for Sustainability-Linked Loans, the Group performs an assessment on clients assuming specific incentives to achieve defined measurable ESG targets, based on predefined and pre-agreed SPTs. SPTs constitute ESG targets which the clients aim to meet by utilizing respective KPIs to quantify their performance.

#### Interbank ESG Questionnaire

The ESG Questionnaire includes a variety of Environmental, Social and Governance questions in order to facilitate the assessment of the overall ESG profile of the Banks' clients.

#### ESG Risk Assessment

Governance Risk Assessment is enhanced following the roll out of the ESG Questionnaire that is used for assessing the client's ESG Risk profile, capturing among others: Policies, Sustainability Governance, Accountability, Reporting & Transparency, Corporate Governance, Remuneration, Business Ethics & Anti-corruption and Sustainable Procurement aspects.

For more details, please refer to the Qualitative Information on Environmental Risks section.

## Environmental, Social and Governance (ESG) Risks

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### 8.4 Quantitative Information on ESG Risks

#### 8.4.1 Template 1: Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

The objective of this template is to present information about the Group's banking book exposure towards non-financial corporates operating in carbon-related sectors, and on the quality of those exposures including non-performing status, stage 2 classification, the corresponding provisions, and exposures' maturity.

Regarding the disclosures in column b ("of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation"), as per Article 12.1 and Article 12.2 of Commission Delegated Regulation (EU) 2020/1818 the counterparties are identified based on the following criteria:

- companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- companies that derive 10% or more of their revenues from exploration, extraction, distribution or refining of oil fuels;
- companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels; and
- companies that derive 50% or more of their revenues from electricity generation with a Greenhouse Gas (GHG) intensity of more than 100g CO<sub>2</sub> e/kWh.

The identification of counterparties subject to the aforementioned exclusion criteria was conducted by mapping the relevant counterparties' activities based on NACE and other internally available information.

Concerning column c ("of which environmentally sustainable (CCM)"), the disclosure was in line with the Taxonomy-aligned exposures that contribute to Climate Change Mitigation (CCM), as also reported in Template 7.

The financed scope 1, 2 and 3 GHG emissions attributed to the Group have been estimated based on the methodology of the Partnership for Carbon Accounting Financials (PCAF). Specifically, the following approaches were employed to calculate the counterparty's emissions, which are then used as a basis for calculating the financed emissions attributed to the Group:

- a. GHG emissions published by the counterparty were collected through multiple sources including inter alia counterparty's sustainability report, Carbon Disclosure Project (CDP) and EU-ETS Registry;
- b. GHG emissions were calculated based on physical activity data collected from the counterparty when emissions information was not published by the counterparty;
- c. GHG emissions were calculated based on the economic activity data of the counterparty by applying appropriate emission factors per economic activity. The aforementioned emission factors per economic activity were derived based on a multiregional input-output analysis that relied on the Input-Output tables of Organization for Economic Cooperation and Development (OECD).

For the calculation of GHG emissions the Group prioritized approaches (a) and (b) since they are based on information provided by the counterparty and are considered more accurate.

It should be noted that the reduction in the Group's financed emissions was influenced by the Scope 3 financed GHG emissions of a specific counterparty operating in sector C.27 – Manufacture of Electrical Equipment. This counterparty temporarily excluded Category 11 (use of sold products) Scope 3 emissions from their reporting as these emissions are currently under recalculation.

## Environmental, Social and Governance (ESG) Risks

**Table 45:** Banking book – Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity

Sector/subsector	30 June 2024							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation					Of which Stage 2 exposures	Of which non-performing exposures	Of which non-performing exposures
	€ million	€ million	Of which environmentally sustainable (CCM) € million	Of which stage 2 exposures € million	Of which non-performing exposures € million	€ million	€ million	€ million
1 Exposures towards sectors that highly contribute to climate change <sup>(1)</sup>	22,807	2,479	1,593	1,530	779	(497)	(81)	(349)
2 <b>A - Agriculture, forestry and fishing</b>	374	-	-	43	108	(59)	(4)	(53)
3 <b>B - Mining and quarrying</b>	115	39	1	1	25	(8)	-	(7)
4 B.05 - Mining of coal and lignite	-	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	38	38	-	-	22	(5)	-	(5)
6 B.07 - Mining of metal ores	52	-	1	-	1	(1)	-	(1)
7 B.08 - Other mining and quarrying	24	-	-	1	2	(1)	-	(1)
8 B.09 - Mining support service activities	1	-	-	-	-	-	-	-
9 <b>C - Manufacturing</b>	4,404	1,035	89	256	151	(107)	(18)	(73)
10 C.10 - Manufacture of food products	881	-	-	66	41	(25)	(3)	(19)
11 C.11 - Manufacture of beverages	101	-	-	7	8	(3)	-	(3)
12 C.12 - Manufacture of tobacco products	33	-	-	1	-	-	-	-
13 C.13 - Manufacture of textiles	139	-	1	2	3	(2)	-	(1)
14 C.14 - Manufacture of wearing apparel	49	-	-	7	13	(6)	(1)	(6)
15 C.15 - Manufacture of leather and related products	11	-	-	2	2	(1)	-	(1)
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	37	-	-	13	4	(4)	(2)	(3)
17 C.17 - Manufacture of pulp, paper and paperboard	168	-	-	5	9	(4)	-	(3)
18 C.18 - Printing and service activities related to printing	30	-	-	2	5	(3)	-	(2)
19 C.19 - Manufacture of coke oven products	1,030	1,030	12	9	7	(2)	-	(1)
20 C.20 - Production of chemicals	152	5	4	17	10	(6)	(2)	(3)
21 C.21 - Manufacture of pharmaceutical preparations	159	-	-	1	-	(1)	-	-
22 C.22 - Manufacture of rubber products	136	-	-	12	2	(2)	-	(1)
23 C.23 - Manufacture of other non-metallic mineral products	204	-	5	29	4	(7)	(4)	(2)
24 C.24 - Manufacture of basic metals	391	-	24	11	-	(1)	-	-
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	106	-	-	11	16	(14)	(1)	(13)
26 C.26 - Manufacture of computer, electronic and optical products	82	-	-	3	5	(3)	-	(2)
27 C.27 - Manufacture of electrical equipment	379	-	39	32	7	(11)	(1)	(4)
28 C.28 - Manufacture of machinery and equipment n.e.c.	70	-	-	3	11	(6)	-	(5)
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	144	-	4	1	1	(1)	-	(1)
30 C.30 - Manufacture of other transport equipment	22	-	-	2	1	(1)	-	-
31 C.31 - Manufacture of furniture	40	-	-	10	3	(2)	(1)	(1)
32 C.32 - Other manufacturing	24	-	-	8	1	(1)	(1)	(1)
33 C.33 - Repair and installation of machinery and equipment	16	-	-	1	-	-	-	-

## Environmental, Social and Governance (ESG) Risks

	a	b	c	d	e	f	g	h
	30 June 2024							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation							
		Of which environmentally sustainable (CCM)	Of which stage 2	Of which non-performing exposures		Of which Stage 2 exposures	Of which non-performing exposures	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
<b>D - Electricity, gas, steam and air conditioning supply</b>	<b>2,884</b>	<b>230</b>	<b>1,217</b>	<b>11</b>	<b>5</b>	<b>(7)</b>	<b>(1)</b>	<b>(2)</b>
D35.1 - Electric power generation, transmission and distribution	2,654	-	1,217	11	5	(7)	(1)	(2)
D35.11 - Production of electricity	1,483	-	1,172	7	5	(5)	-	(2)
D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	230	230	-	-	-	-	-	-
D35.3 - Steam and air conditioning supply	-	-	-	-	-	-	-	-
<b>E - Water supply; sewerage, waste management and remediation activities</b>	<b>58</b>	<b>-</b>	<b>-</b>	<b>1</b>	<b>1</b>	<b>(1)</b>	<b>-</b>	<b>-</b>
<b>F - Construction</b>	<b>975</b>	<b>-</b>	<b>218</b>	<b>119</b>	<b>51</b>	<b>(40)</b>	<b>(8)</b>	<b>(26)</b>
F.41 - Construction of buildings	351	-	-	55	27	(20)	(3)	(16)
F.42 - Civil engineering	480	-	218	44	17	(13)	(3)	(6)
F.43 - Specialised construction activities	144	-	-	20	7	(7)	(2)	(4)
<b>G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	<b>4,574</b>	<b>-</b>	<b>11</b>	<b>424</b>	<b>261</b>	<b>(180)</b>	<b>(31)</b>	<b>(127)</b>
<b>H - Transportation and storage</b>	<b>4,629</b>	<b>1,175</b>	<b>11</b>	<b>67</b>	<b>22</b>	<b>(20)</b>	<b>(4)</b>	<b>(11)</b>
H.49 - Land transport and transport via pipelines	281	88	7	32	14	(12)	(3)	(8)
H.50 - Water transport	3,205	1,087	-	5	2	(2)	-	(1)
H.51 - Air transport	85	-	-	3	-	-	-	-
H.52 - Warehousing and support activities for transportation	1,038	-	4	16	4	(3)	(1)	-
H.53 - Postal and courier activities	20	-	-	10	2	(2)	-	(2)
<b>I - Accommodation and food service activities</b>	<b>2,535</b>	<b>-</b>	<b>-</b>	<b>399</b>	<b>103</b>	<b>(46)</b>	<b>(11)</b>	<b>(30)</b>
<b>L - Real estate activities</b>	<b>2,260</b>	<b>-</b>	<b>45</b>	<b>210</b>	<b>53</b>	<b>(30)</b>	<b>(3)</b>	<b>(21)</b>
Exposures towards sectors other than those that highly contribute to climate change <sup>(1)</sup>	2,727	-	3	322	103	(101)	(31)	(58)
<b>K - Financial and insurance activities</b>	<b>131</b>	<b>-</b>	<b>-</b>	<b>15</b>	<b>1</b>	<b>(1)</b>	<b>(1)</b>	<b>-</b>
Exposures to other sectors (NACE codes J, M - U)	2,596	-	3	307	102	(100)	(30)	(58)
<b>TOTAL</b>	<b>25,535</b>	<b>2,479</b>	<b>1,596</b>	<b>1,852</b>	<b>883</b>	<b>(599)</b>	<b>(111)</b>	<b>(407)</b>

	i	j	k	l	m	n	o	p
	30 June 2024							
Sector/subsector	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	GHG emissions (column i): gross carrying amount	percentage of the portfolio derived from company-specific reporting	Ageing				Average weighted maturity
				<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	
	Of which Scope 3 financed emissions		%	€ million	€ million	€ million	€ million	
<b>Exposures towards sectors that highly contribute to climate change <sup>(1)</sup></b>	<b>17,315,125</b>	<b>10,959,940</b>	<b>19.5%</b>	<b>13,073</b>	<b>6,429</b>	<b>2,622</b>	<b>683</b>	<b>6</b>
<b>A - Agriculture, forestry and fishing</b>	286,425	106,652	0.0%	267	94	9	5	4
<b>B - Mining and quarrying</b>	60,003	19,312	0.0%	89	23	1	2	5
B.05 - Mining of coal and lignite	-	-	0.0%	-	-	-	-	12
B.06 - Extraction of crude petroleum and natural gas	2,988	1,524	0.0%	38	-	-	-	4
B.07 - Mining of metal ores	47,785	15,457	0.0%	29	22	-	0	5
B.08 - Other mining and quarrying	8,360	2,067	0.0%	20	1	1	2	4
B.09 - Mining support service activities	870	264	0.0%	1	-	-	0	2
<b>C - Manufacturing</b>	<b>5,662,240</b>	<b>3,561,350</b>	<b>8.5%</b>	<b>3,322</b>	<b>812</b>	<b>228</b>	<b>42</b>	<b>4</b>
C.10 - Manufacture of food products	851,729	522,470	0.6%	634	229	14	4	4
C.11 - Manufacture of beverages	56,486	35,015	0.0%	68	26	7	0	4
C.12 - Manufacture of tobacco products	9,088	8,812	0.1%	32	-	1	0	1
C.13 - Manufacture of textiles	24,909	18,685	0.0%	27	3	109	0	11
C.14 - Manufacture of wearing apparel	14,714	10,565	0.0%	28	14	4	4	6
C.15 - Manufacture of leather and related products	3,088	2,259	0.0%	8	1	1	1	6
C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	20,712	13,743	0.0%	25	6	3	3	7
C.17 - Manufacture of pulp, paper and paperboard	129,905	89,133	0.1%	126	30	11	1	3
C.18 - Printing and service activities related to printing	13,989	9,614	0.0%	23	5	1	1	5
C.19 - Manufacture of coke oven products	1,621,637	998,070	4.0%	1,015	12	3	1	4
C.20 - Production of chemicals	249,193	140,108	0.2%	131	20	0	0	2
C.21 - Manufacture of pharmaceutical preparations	42,772	27,780	0.1%	72	67	20	0	5
C.22 - Manufacture of rubber products	131,013	87,562	0.0%	98	32	5	1	4
C.23 - Manufacture of other non-metallic mineral products	483,471	86,405	0.5%	163	23	16	2	4
C.24 - Manufacture of basic metals	1,244,013	845,452	1.3%	284	104	1	1	3
C.25 - Manufacture of fabricated metal products, except machinery and equipment	87,603	64,659	0.0%	79	18	5	4	4
C.26 - Manufacture of computer, electronic and optical products	32,357	20,571	0.0%	48	32	1	1	4
C.27 - Manufacture of electrical equipment	532,876	485,132	1.4%	216	150	13	0	4
C.28 - Manufacture of machinery and equipment n.e.c.	26,370	23,304	0.1%	64	3	3	1	4
C.29 - Manufacture of motor vehicles, trailers and semi-trailers	51,446	43,741	0.0%	119	25	0	0	3
C.30 - Manufacture of other transport equipment	6,905	5,351	0.0%	19	1	2	0	3
C.31 - Manufacture of furniture	12,370	10,306	0.0%	21	5	5	10	11
C.32 - Other manufacturing	7,401	6,222	0.0%	8	4	5	6	12
C.33 - Repair and installation of machinery and equipment	8,193	6,391	0.0%	14	2	-	0	3

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	30 June 2024							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting					Average weighted maturity
	Of which Scope 3 financed emissions	%	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years		
							€ million	€ million
34 <b>D - Electricity, gas, steam and air conditioning supply</b>	1,450,219	221,227	4.0%	921	698	1,176	89	10
35 D35.1 - Electric power generation, transmission and distribution	1,434,599	211,102	4.0%	909	698	957	89	10
36 D35.11 - Production of electricity	243,841	41,879	0.0%	198	303	895	87	13
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	14,655	10,036	0.0%	11	-	219	-	10
38 D35.3 - Steam and air conditioning supply	965	89	0.0%	-	-	-	-	1
39 <b>E - Water supply; sewerage, waste management and remediation activities</b>	335,506	66,764	0.0%	45	12	1	0	4
40 <b>F - Construction</b>	773,021	683,902	0.3%	541	332	57	45	5
41 F.41 - Construction of buildings	306,779	278,030	0.0%	246	73	19	12	5
42 F.42 - Civil engineering	329,085	280,862	0.3%	217	230	13	20	5
43 F.43 - Specialised construction activities	137,157	125,010	0.0%	78	29	24	13	7
44 <b>G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	6,342,644	5,166,059	1.3%	3,507	715	208	144	4
45 <b>H - Transportation and storage</b>	1,967,621	796,761	3.9%	2,307	1,533	502	287	6
46 H.49 - Land transport and transport via pipelines	346,146	85,430	0.4%	144	101	13	22	7
47 H.50 - Water transport	1,046,551	262,785	0.2%	1,913	1,292	0	1	5
48 H.51 - Air transport	77,349	22,044	0.0%	55	0	0	30	9
49 H.52 - Warehousing and support activities for transportation	487,559	420,411	3.2%	180	135	488	234	12
50 H.53 - Postal and courier activities	10,016	6,091	0.0%	16	4	0	0	3
51 <b>I - Accommodation and food service activities</b>	378,411	294,084	0.6%	1,045	1,107	325	58	6
52 <b>L - Real estate activities</b>	59,035	43,829	1.0%	1,029	1,102	117	11	5
53 Exposures towards sectors other than those that highly contribute to climate change <sup>(1)</sup>				1,617	777	158	175	6
54 <b>K - Financial and insurance activities</b>				56	13	1	60	11
55 Exposures to other sectors (NACE codes J, M - U)				1,560	764	157	115	5
56 <b>TOTAL</b>	17,315,125	10,959,940	19.5%	14,690	7,206	2,781	858	6

<sup>(1)</sup> In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation – Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

Sector/subsector	31 December 2023							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation		Of which environmentally sustainable (CCM)	Of which non-stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
1 Exposures towards sectors that highly contribute to climate change	21,658	2,091	1,421	1,629	835	(535)	(91)	(364)
2 <b>A - Agriculture, forestry and fishing</b>	415	-	-	49	107	(50)	(3)	(45)
3 <b>B - Mining and quarrying</b>	121	41	-	2	24	(6)	-	(6)
4 B.05 - Mining of coal and lignite	0	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	41	41	-	-	21	(4)	-	(4)
6 B.07 - Mining of metal ores	46	-	-	-	1	(1)	-	(1)
7 B.08 - Other mining and quarrying	33	-	-	1	2	(1)	-	(1)
8 B.09 - Mining support service activities	1	-	-	0	-	-	-	-
9 <b>C - Manufacturing</b>	4,426	713	67	234	161	(112)	(21)	(75)
10 C.10 - Manufacture of food products	962	-	-	87	43	(31)	(5)	(21)
11 C.11 - Manufacture of beverages	89	-	-	2	6	(3)	-	(2)
12 C.12 - Manufacture of tobacco products	51	-	-	0	-	-	-	-
13 C.13 - Manufacture of textiles	103	-	1	2	2	(2)	-	(2)
14 C.14 - Manufacture of wearing apparel	46	-	-	7	17	(8)	(1)	(7)
15 C.15 - Manufacture of leather and related products	13	-	-	3	1	(1)	-	(1)
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	38	-	-	10	4	(4)	(1)	(3)
17 C.17 - Manufacture of pulp, paper and paperboard	153	-	-	3	10	(4)	-	(4)
18 C.18 - Printing and service activities related to printing	34	-	-	3	5	(3)	-	(2)
19 C.19 - Manufacture of coke oven products	708	708	4	-	7	(1)	-	(1)
20 C.20 - Production of chemicals	381	5	-	17	7	(5)	(2)	(3)
21 C.21 - Manufacture of pharmaceutical preparations	185	-	-	2	-	(1)	-	-
22 C.22 - Manufacture of rubber products	147	-	3	17	2	(4)	(1)	(1)
23 C.23 - Manufacture of other non-metallic mineral products	225	-	5	29	4	(9)	(6)	(2)
24 C.24 - Manufacture of basic metals	415	-	16	2	1	(1)	-	-
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	133	-	-	18	15	(11)	(1)	(9)
26 C.26 - Manufacture of computer, electronic and optical products	72	-	-	3	2	(2)	-	(1)
27 C.27 - Manufacture of electrical equipment	339	-	35	2	6	(5)	-	(4)
28 C.28 - Manufacture of machinery and equipment n.e.c.	77	-	-	4	12	(7)	-	(6)
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	126	-	3	1	2	(2)	-	(1)
30 C.30 - Manufacture of other transport equipment	31	-	-	3	1	(1)	-	(1)
31 C.31 - Manufacture of furniture	45	-	-	10	7	(2)	(1)	(1)
32 C.32 - Other manufacturing	38	-	-	9	5	(3)	(1)	(2)
33 C.33 - Repair and installation of machinery and equipment	15	-	-	0	0	-	-	-

## Environmental, Social and Governance (ESG) Risks

	a	b	c	d	e	f	g	h
	31 December 2023							
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation					Of which non-performing exposures		
	€ million	€ million	Of which environmentally sustainable (CCM) € million	Of which stage 2 exposures € million	Of which non-performing exposures € million	Of which Stage 2 exposures € million	Of which non-performing exposures € million	
34 D - Electricity, gas, steam and air conditioning supply	2,655	213	1,124	5	4	(10)	(1)	(2)
35 D35.1 - Electric power generation, transmission and distribution	2,442	-	1,124	5	4	(9)	(1)	(2)
36 D35.11 - Production of electricity	1,413	-	1,087	4	4	(7)	-	(2)
D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	213	213	-	-	-	-	-	-
37 D35.3 - Steam and air conditioning supply	0	-	-	-	-	-	-	-
38 E - Water supply; sewerage, waste management and remediation activities	65	-	-	1	0	-	-	-
39 F - Construction	1,032	-	209	115	71	(50)	(7)	(39)
40 F.41 - Construction of buildings	411	-	-	62	36	(26)	(3)	(21)
41 F.42 - Civil engineering	487	-	208	29	26	(16)	(2)	(13)
42 F.43 - Specialised construction activities	134	-	-	23	9	(7)	(2)	(5)
43 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	4,110	-	2	468	287	(194)	(36)	(133)
44 H - Transportation and storage	4,365	1,124	17	73	21	(25)	(4)	(12)
45 H.49 - Land transport and transport via pipelines	278	93	8	35	15	(12)	(3)	(8)
46 H.50 - Water transport	3,004	1,031	-	6	2	(3)	-	(1)
47 H.51 - Air transport	95	-	-	10	-	(1)	-	-
48 H.52 - Warehousing and support activities for transportation	969	-	9	13	2	(8)	(1)	(1)
49 H.53 - Postal and courier activities	18	-	-	10	2	(2)	-	(2)
50 I - Accommodation and food service activities	2,402	-	-	470	112	(55)	(14)	(34)
51 L - Real estate activities	2,068	-	2	212	49	(33)	(5)	(19)
52 Exposures towards sectors other than those that highly contribute to climate change	2,470	-	12	327	125	(114)	(34)	(66)
53 K - Financial and insurance activities	131	-	9	15	1	(1)	-	(1)
54 Exposures to other sectors (NACE codes J, M - U)	2,339	-	3	312	124	(112)	(34)	(65)
55 TOTAL	24,128	2,091	1,434	1,956	961	(649)	(125)	(430)

	i	j	k	l	m	n	o	p
	31 December 2023							
Sector/subsector	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	GHG emissions (column l): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity	
	Of which Scope 3 financed emissions	%	€ million	€ million	€ million	€ million		
1 Exposures towards sectors that highly contribute to climate change	30,987,188	24,313,029	18.2%	8,761	5,587	2,437	4,873	6
2 A - Agriculture, forestry and fishing	409,285	165,764	0.0%	159	94	9	153	4
3 B - Mining and quarrying	68,192	27,176	0.1%	89	20	1	11	5
4 B.05 - Mining of coal and lignite	16	4	0.0%	-	-	-	-	10
5 B.06 - Extraction of crude petroleum and natural gas	8,941	2,629	0.0%	41	0	-	-	4
6 B.07 - Mining of metal ores	47,813	21,637	0.1%	26	19	-	1	5
7 B.08 - Other mining and quarrying	10,561	2,664	0.0%	22	1	1	10	4
8 B.09 - Mining support service activities	861	242	0.0%	1	-	-	0	3
9 C - Manufacturing	21,899,575	19,614,839	8.7%	2,057	853	197	1,317	4
10 C.10 - Manufacture of food products	915,375	560,973	0.6%	493	141	26	302	3
11 C.11 - Manufacture of beverages	50,856	31,728	0.0%	35	21	1	33	3
12 C.12 - Manufacture of tobacco products	20,643	19,056	0.2%	27	-	1	23	1
13 C.13 - Manufacture of textiles	23,376	17,351	0.0%	21	3	66	13	10
14 C.14 - Manufacture of wearing apparel	15,249	10,757	0.0%	12	6	4	24	6
15 C.15 - Manufacture of leather and related products	3,476	2,521	0.0%	7	1	1	4	6
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting	21,662	14,002	0.0%	15	6	3	14	7
17 C.17 - Manufacture of pulp, paper and paperboard	102,802	69,926	0.1%	48	31	4	71	3
18 C.18 - Printing and service activities related to printing	18,752	12,948	0.0%	18	6	1	9	5
19 C.19 - Manufacture of coke oven products	655,978	228,787	2.9%	455	157	3	92	3
20 C.20 - Production of chemicals	798,466	603,744	1.3%	195	23	1	163	1
21 C.21 - Manufacture of pharmaceutical preparations	92,351	45,530	0.1%	49	62	13	62	4
22 C.22 - Manufacture of rubber products	129,609	87,251	0.0%	59	28	5	55	4
23 C.23 - Manufacture of other non-metallic mineral products	568,771	101,986	0.6%	115	73	16	21	4
24 C.24 - Manufacture of basic metals	1,516,863	946,382	1.5%	127	120	18	150	3
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	133,771	96,072	0.0%	46	16	7	64	4
26 C.26 - Manufacture of computer, electronic and optical products	17,570	11,996	0.0%	9	39	1	23	5
27 C.27 - Manufacture of electrical equipment	16,696,943	16,655,899	1.3%	113	91	11	124	4
28 C.28 - Manufacture of machinery and equipment n.e.c.	33,558	29,010	0.1%	53	4	3	17	4
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	23,639	20,205	0.0%	113	7	1	5	3
30 C.30 - Manufacture of other transport equipment	8,813	6,999	0.0%	18	8	2	3	4
31 C.31 - Manufacture of furniture	15,446	12,851	0.0%	14	4	5	22	11
32 C.32 - Other manufacturing	24,785	20,464	0.0%	10	7	5	16	9
33 C.33 - Repair and installation of machinery and equipment	10,821	8,401	0.0%	8	1	0	6	3

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	i	j	k	l	m	n	o	p
	31 December 2023							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount	percentage of the portfolio derived from company-specific reporting				Average weighted maturity
				<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	
			Of which Scope 3 financed emissions	%	€ million	€ million	€ million	€ million
34 D - Electricity, gas, steam and air conditioning supply	1,598,654	302,023	3.8%	831	523	1147	154	9
35 D35.1 - Electric power generation, transmission and distribution	1,595,360	301,139	3.8%	831	523	935	153	9
36 D35.11 - Production of electricity	200,889	63,707	0.1%	86	289	890	148	13
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	1,770	744	0.0%	-	-	212	0	11
38 D35.3 - Steam and air conditioning supply	1,524	140	0.0%	0	-	-	0	1
39 E - Water supply; sewerage, waste management and remediation activities	193,032	48,904	0.0%	35	9	1	20	3
40 F - Construction	982,877	892,154	0.1%	306	333	43	350	5
41 F.41 - Construction of buildings	432,492	390,796	0.0%	188	81	13	129	4
42 F.42 - Civil engineering	417,873	380,806	0.1%	89	219	15	163	5
43 F.43 - Specialised construction activities	132,512	120,552	0.0%	28	33	15	59	8
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,322,171	2,292,768	1.3%	1,511	486	286	1,826	4
45 H - Transportation and storage	2,172,395	711,839	4.1%	2,026	1451	441	447	7
46 H.49 - Land transport and transport via pipelines	404,557	98,153	0.4%	109	78	14	75	7
47 H.50 - Water transport	1,354,928	413,985	0.3%	1,753	1217	-	33	4
48 H.51 - Air transport	196,544	59,471	0.0%	40	18	-	37	9
49 H.52 - Warehousing and support activities for transportation	205,870	133,914	3.3%	110	133	426	300	13
50 H.53 - Postal and courier activities	10,496	6,316	0.0%	12	4	-	1	4
51 I - Accommodation and food service activities	293,021	224,711	0.0%	576	1,079	226	520	6
52 L - Real estate activities	47,986	32,851	0.1%	1,169	738	86	75	5
53 Exposures towards sectors other than those that highly contribute to climate change				1,118	439	226	686	6
54 K - Financial and insurance activities				17	19	2	93	11
55 Exposures to other sectors (NACE codes J, M - U)				1,102	420	224	593	6
56 TOTAL	30,987,188	24,313,029	18.2%	9,879	6,027	2,663	5,559	6

### 8.4.2 Template 2: Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

This template reports the gross carrying amount of loans collateralised by immovable property and of collaterals obtained by taking possession along with information about the energy efficiency of the immovable property in terms of kWh/m2 energy consumption and Energy Performance Certificate (EPC).

The reporting perimeter is in line with other regulatory reporting of the Group and includes collaterals that are eligible for EPC, while a breakdown between EU area and non-EU area based on collateral's location is presented. The Group's immovable property collaterals are located mainly in EU-area and more specifically Greece, Cyprus, Bulgaria and Romania, while a relatively smaller proportion is located in United Kingdom.



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As per the Directive 2010/31/EU, energy performance certificate is defined as a certificate recognised by a Member State or by a legal person designated by it, which indicates the energy performance of a building or building unit, calculated according to a methodology adopted in accordance with Article 3 of the Directive.

For the purposes of the present template, the Group considered only actual EPC labels based on internally available information, while for energy consumption (kWh/m<sup>2</sup>) both actual and estimated consumption are reported. For collaterals that real consumption information was not available, the Group proceeded with the estimation of consumption in collaboration with an independent external provider. The methodological approach that was followed is a model-based estimation of consumption based on the collateral's characteristics.

The gross carrying amount of exposures that are linked to more than one collateral is allocated and disclosed separately under energy efficiency levels based on the collateral value.

**Table 46:** Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral

Counterparty sector	30 June 2024														Without EPC label of collateral Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	%
	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)							Level of energy efficiency (EPC label of collateral)								
	Total gross carrying amount amount															
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G			
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total EU area	13,297	422	5,406	2,810	1,741	1,651	1,267	371	643	275	190	104	138	93	11,482	100%
2 Of which Loans collateralised by commercial immovable property	4,083	119	143	302	1,070	1,334	1,116	355	622	198	72	12	86	3	2,735	100%
3 Of which Loans collateralised by residential immovable property	8,752	291	5,132	2,429	521	266	114	16	19	40	47	34	26	59	8,511	100%
4 possession: residential and commercial immovable properties	462	12	132	80	150	51	37	-	2	37	70	57	27	32	237	100%
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	12,818	306	5,291	2,691	1,679	1,619	1,232								11,472	100%
6 Total non-EU area	193	2	12	26	28	11	113	9	25	19	28	4	-	-	108	100%
7 Of which Loans collateralised by commercial immovable property	187	2	12	25	28	6	113	9	24	18	24	4	-	-	107	100%
8 Of which Loans collateralised by residential immovable property	6	-	1	1	-	5	-	-	-	-	5	-	-	-	1	100%
9 Of which Collateral obtained by taking possession: residential and commercial	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	100%
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	131	-	9	13	-	-	109								108	100%

Counterparty sector	31 December 2023														Without EPC label of collateral Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	%
	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)							Level of energy efficiency (EPC label of collateral)								
	Total gross carrying amount amount															
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	A	B	C	D	E	F	G			
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 Total EU area	12,925	587	5,517	2,900	1,522	1,375	1,023	239	437	220	121	89	139	67	11,611	100%
2 Of which Loans collateralised by commercial immovable property	3,469	108	170	340	894	1,077	880	230	421	159	15	7	98	2	2,538	100%
3 Of which Loans collateralised by residential immovable property	9,020	468	5,220	2,479	489	254	110	9	13	24	30	22	15	34	8,872	100%
4 possession: residential and commercial immovable properties	436	11	127	81	140	44	33	-	3	37	76	61	27	30	201	100%
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	12,413	478	5,377	2,771	1,455	1,345	988								11,611	100%
6 Total non-EU area	191	2	48	46	5	7	82	6	3	50	50	3	-	-	78	100%
7 Of which Loans collateralised by commercial immovable property	168	2	29	43	5	6	82	6	1	44	44	3	-	-	70	100%
8 Of which Loans collateralised by residential immovable property	23	-	19	3	1	-	-	-	3	6	6	1	-	-	9	100%
9 Of which Collateral obtained by taking possession: residential and commercial	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0	100%
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	125	-	43	3	1	-	78								78	100%

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### 8.4.3 Template 3: Banking book – Climate change transition risk: Alignment metrics

This template provides information on alignment metrics related to the Paris Agreement, focusing on key carbon-intensive sectors. Eurobank has committed to aligning its portfolios with the objective of limiting global warming to 1.5°C and supports the transition to a net-zero economy by 2050, following the guidelines set by the Net-Zero Banking Alliance (NZBA). The Bank's approach is based on disclosures published by counterparties and is guided by industry standards such as the Partnership for Carbon Accounting Financials (PCAF) and other accredited science-based decarbonization scenarios.

To achieve these commitments, Eurobank Holdings in June 2024 has joined the Net-Zero Banking Alliance (NZBA) and started developing sector-specific targets for financed emissions and emission intensity reductions, with a focus on sectors that have the highest carbon impact. The pathways to decarbonization follow the International Energy Agency's (IEA) Net Zero Emissions by 2050 Scenario (NZE2050).

Key steps in setting sectoral targets begin with determining portfolio emissions intensity, which is defined as financed emissions per unit of activity data (e.g., kgCO<sub>2</sub>e/m<sup>2</sup>, kgCO<sub>2</sub>e/kWh, kgCO<sub>2</sub>e/ton cement). The process involves three main steps:

- Measuring the absolute greenhouse gas (GHG) emissions of each investment or loan within a specific asset class, including scope 1 and 2 emissions of borrowers and, where relevant, scope 3 emissions.
- Calculating the share of the borrowers' or investees' emissions attributable to the financial institution (i.e., financed emissions).
- Dividing the total financed emissions by the total attributed activity data of all investments or loans in the specific sector

The resulting emission intensity metrics include data from counterparties that account for the majority of sectoral financed emissions and exposures in the prioritized sectors.

With regard to the information on targets, as well as the remaining sectors included in the portfolio alignment table, this will be published progressively as per the Group's Net-Zero action plan.

**Table 47:** Banking book – Climate change transition risk: Alignment metrics

Sector	NACE Sectors (a minima)	Portfolio gross carrying amount € million	Alignment metric**	Year of reference	Distance to IEA NZE2050 in % ***	Target (year of reference + 3 years)
Power	D.35	2,342	163.2 kgCO <sub>2</sub> e / MWh	2023	-12%	
	D.35.1					
	D.35.1.1					
	D.35.1.4					
	B.06					
Fossil fuel combustion	B.09.1	1,387	440.9 tCO <sub>2</sub> e	2023	40%	
	C.19					
	C.19.2					
	D.35.2					
	D.35.2.1					
Automotive	D.35.2.2					
	H.49.5.0					
Aviation						
Maritime transport						
Cement, clinker and lime production	C.23.5	143	0.69 tCO <sub>2</sub> e / t cement	2023	47%	
	C.23.5.1					
	C.23.6					
	C.23.6.1					
	C.23.6.3					
	C.23.6.4					
	C.24					
	C.24.1					
	C.24.1.0					
	C.24.2					
	C.24.2.0					
	C.24.4.2					
	Iron and steel, coke, and metal ore production					
C.24.5.1						
C.24.5.2						
C.25						
C.25.0						
Chemicals	C.25.1					
	C.25.1.1					
	G.46.7.2					

... potential additions relevant to the business model of the institution

\*\*\* PIT distance to 2030 NZE2050 scenario in % (for each metric)

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### 8.4.4 Template 4: Banking book – Climate change transition risk: Exposure to top 20 carbon-intensive firms

The template presents aggregated and anonymized information on the Group’s exposure towards the top 20 most carbon-intensive counterparties globally. The identification of the top 20 most carbon-intensive corporates in the world is based on the list of the top-20 carbon emitting companies published in 2021 by Carbon Majors Database.

Column c (“of which environmentally sustainable (CCM)”) the disclosure is in line with the Taxonomy-aligned exposures that contribute to Climate Change Mitigation (CCM), as also reported in Template 7.

**Table 48:** Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms

	a	b	c	d	e
<b>30 June 2024</b>					
	<b>Gross carrying amount towards the counterparties compared to total</b>		<b>Of which environmentally sustainable (CCM) <sup>(2)</sup></b>		<b>Number of top 20 polluting firms included</b>
	<b>Gross carrying amount (aggregate)</b>	<b>gross carrying amount (aggregate) <sup>(1)</sup></b>	<b>environmentally sustainable (CCM) <sup>(2)</sup></b>	<b>Weighted average maturity</b>	
	<b>€ million</b>	<b>%</b>	<b>€ million</b>		
1	38	0.06%	0	5.0	3
<b>31 December 2023</b>					
	<b>Gross carrying amount towards the counterparties compared to total</b>		<b>Of which environmentally sustainable (CCM)</b>		<b>Number of top 20 polluting firms included</b>
	<b>Gross carrying amount (aggregate)</b>	<b>amount (aggregate)</b>	<b>environmentally sustainable (CCM)</b>	<b>Weighted average maturity</b>	
	<b>€ million</b>	<b>%</b>	<b>€ million</b>		
1	48	0.08%	-	4.4	5

<sup>(1)</sup> For counterparties among the top 20 carbon emitting companies in the world.

### 8.4.5 Template 5: Banking book – Indicators of potential climate change physical risk: Exposures subject to physical risk

This template reports information on exposures in the banking book, including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale, towards non-financial corporates, on loans collateralized with immovable property and on repossessed real estate collaterals, exposed to chronic and acute climate-related hazards.

The geographical breakdown of the present template is aggregated (Greece and Rest of the World) in line with the Group’s main activities’ location. It should be noted that Group’s exposure is mainly concentrated in counterparties operating/residing in Southeast Europe and more specifically Greece, Cyprus, Bulgaria and Romania.

The Group considers as chronic climate change events those that arise from a progressive shift in climate conditions and their effect is long lasting, while acute climate change events are defined as those that originate from extreme events in a short period of time.

The climate-related hazards were assessed based on physical risks scenarios developed by an external provider. The analysis was based on RCP 8.5 climate scenario and spanned from short to medium-term, in line with the average maturity

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of the Group's portfolio. Climate data and indices were derived from Copernicus Climate Data Store database and GFDRR – ThinkHazard!. Historical values were calculated by using ERA5 Reanalysis data, while future projections derived from climate model simulations with general circulation and regional climate model pairs under the EURO-CORDEX program. A total of 4 to 8 model combinations (depending on the climate index and variable) at a horizontal resolution of 0.11 x 0.11 degrees (approximately 11.5 x 11.5 km) were used. Multi-model mean values were used in order to minimize the range of uncertainty in climate model simulations while both historical data and future projections are bias-adjusted versus the ERA5 Reanalysis data.

The methodological approach developed was applied at the appropriate level of spatial analysis (i.e., at NUTS 2 level for chronic physical events and at NUTS 3 level for acute effects) and considered the different levels of vulnerability that economic activities and real estate properties have to these phenomena (the analysis was performed at NACE code 2-digits level and property characteristics, respectively). The results were categorized on a 5-point RAG scale, indicating from negligible to very high sensitivity.

### Chronic Climate Change Events

The Group identified as chronic climate change events those that arise from a progressive shift in climate conditions and which affect companies' revenue or operating costs. The analysis utilized climate indicators source from European and International databases (e.g., Copernicus) and results of European programs (e.g., COACCH project, CLIMPACT I and JRC studies). More specifically, the Group utilized:

- The outcomes of research projects as regards the impact of climate change on the yield / revenue of the primary sector (i.e., agriculture, fishery, and forestry).
- The outcomes of research projects as regards the impact of climate change on the productivity of the mining, manufacturing, and construction sectors.
- The outcomes of research projects as regards the impact of climate change on the productivity of different power generation technologies (both renewables and fossil-fueled)
- The number of heating and cooling degree days attributed to various climatic scenarios in order to assess the changes in heating and cooling needs of the non-residential buildings, which usually affect the operating costs of the companies of the services sector
- The changes on the Tourism Climate Index associated with the different climatic scenarios that affect tourism activity and associated companies.

The above-mentioned climate indicators are considered as the drivers of the potential chronic impacts of climate change on the companies of the respective economic sectors, affecting either their operating costs or their revenues. In the context of the analysis, these effects either directly (due to the structure of the climate indicators used) or indirectly (through the input-output tables of the respective economies or other econometric models) were expressed as percentage changes in the turnover of the respective businesses.

### Acute Climate Change Events

For the analysis of acute climate change events the Group took into consideration several extreme phenomena such as:

- fluvial floods (high-water levels in river channels, causing dike breach)
- pluvial floods (rainfall intensity exceeding infiltration capacity)
- coastal floods
- extreme heat
- wildfires
- water scarcity

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- landslides

The analysis was performed at NUTS 3 level as well as at NACE code 2- digits level and considered the following three main dimensions:

- Climate Hazards:** utilizing data and indicators from European databases (i.e., Copernicus and EPSO) the severity of the 7 extreme phenomena in each NUTS 3 region under consideration was assessed, assigning a risk score according to the 5-point RAG scale;
- Exposure:** utilizing data and indicators (e.g., population in settlements exposed to coastal hazard) from European databases (i.e., RESIN, EPSO, and the Hellenic Statistical Authority - ELSTAT) the exposure of the NUTS 3 regions in question to the above hazards was assessed and categorized in the 5-point RAG scale;
- Vulnerability:** utilizing expert judgements the vulnerability of the various economic activities to the extreme events in question was assessed. Specifically, the assessment was performed at sector level and separately for the buildings using a 4-point qualitative scale.

The product of the resulted scores from the three aforementioned dimensions formulated the sensitivity to each extreme event per economic activity / property type and geographical location. Following, the resulted score was categorized in the 5-point RAG scale. It should be noted that the reported gross carrying amount sensitive to climate-related hazards does not take into account mitigating measures, such as insurance coverages, that are in place. A considerable proportion of the Group's collateralised exposures is secured by insurance contracts and as such it is expected that the impact of physical risk events on the Group's portfolio is reduced.

**Table 49:** Banking book - Climate change physical risk: Exposures subject to physical risk

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o		
	30 June 2024																
	Gross carrying amount																
	of which exposures sensitive to impact from climate change physical events																
Greece	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events					of which exposures sensitive to impact both from chronic and acute climate change events		Of which Stage 2 performing exposures		Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions	
	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity	of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 performing exposures	Of which non-performing exposures	of which Stage 2 exposures	Of which non-performing exposures	of which Stage 2 exposures	Of which non-performing exposures	of which Stage 2 exposures	Of which non-performing exposures	
	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 A - Agriculture, forestry and fishing	257	183	60	9	5	4	89	2	166	30	106	(56)	(4)	(51)			
2 B - Mining and quarrying	46	-	-	-	-	5	-	-	-	-	-	-	-	-			
3 C - Manufacturing	3,379	43	23	2	3	5	-	71	-	2	17	(12)	-	(11)			
4 D - Electricity, gas, steam and air conditioning supply	2,518	709	603	1,085	89	10	1,371	1,115	-	5	4	(5)	(1)	(2)			
5 E - Water supply; sewerage, waste management and remediation activities	27	1	-	-	-	4	-	1	-	1	-	-	-	-			
6 F - Construction	671	1	1	1	1	11	-	4	-	2	1	(1)	-	-			
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,353	124	69	4	8	6	-	206	-	9	4	(2)	(1)	(1)			
8 H - Transportation and storage	1,200	3	-	-	1	7	-	4	-	1	2	(1)	-	(1)			
9 L - Real estate activities	866	-	1	-	-	9	-	1	-	1	-	-	-	-			
10 Loans collateralised by residential immovable property <sup>(1)</sup>	6,681	21	54	133	165	18	-	372	-	111	17	(14)	(5)	(8)			
11 Loans collateralised by commercial immovable property <sup>(1)</sup>	3,932	559	291	68	22	5	12	831	97	165	67	(20)	(2)	(17)			
12 Repossessed collateral	551	-	-	-	37	-	-	37	-	-	-	(5)	-	-			
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-			

## Environmental, Social and Governance (ESG) Risks

Other Countries	30 June 2024													
	Gross carrying amount													
	of which exposures sensitive to impact from climate change physical events													
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 A - Agriculture, forestry and fishing	117	9	3	-	-	4	1	11	-	2	1	(1)	-	(1)
2 B - Mining and quarrying	69	40	-	-	-	4	40	-	-	-	23	(6)	-	(6)
3 C - Manufacturing	1,025	-	-	-	-	1	-	-	-	-	-	-	-	-
4 D - Electricity, gas, steam and air conditioning supply	366	6	26	23	-	10	55	-	-	3	-	-	-	-
5 E - Water supply; sewerage, waste management and remediation activities	31	-	-	-	-	1	-	-	-	-	-	-	-	-
6 F - Construction	304	8	4	-	-	4	12	-	-	-	1	(1)	-	(1)
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,221	-	-	-	-	-	-	-	-	-	-	-	-	-
8 H - Transportation and storage	3,429	3	-	-	-	2	-	3	-	-	-	-	-	-
9 L - Real estate activities	1,394	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Loans collateralised by residential immovable property <sup>(1)</sup>	2,389	4	13	41	1	13	-	59	-	19	5	(10)	(3)	(5)
11 Loans collateralised by commercial immovable property <sup>(2)</sup>	1,996	2	2	-	-	6	-	4	-	-	-	-	-	-
12 Repossessed collaterals	25	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Greece	31 December 2023													
	Gross carrying amount													
	of which exposures sensitive to impact from climate change physical events													
	Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which Stage 2 exposures	non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	<= 5 years	> 5 year <= 10 years	<= 20 years	> 20 years	Average weighted maturity	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1 A - Agriculture, forestry and fishing	278	114	55	9	100	4	125	2	151	32	99	(46)	(2)	(43)
2 B - Mining and quarrying	49	-	-	-	-	9	-	-	-	-	-	-	-	-
3 C - Manufacturing	3,194	1	1	2	4	15	-	8	-	2	2	(1)	-	-
4 D - Electricity, gas, steam and air conditioning supply	2,334	675	445	1,037	149	10	1,267	1,039	-	1	4	(8)	-	(2)
5 E - Water supply; sewerage, waste management and remediation activities	19	-	-	-	-	-	-	-	-	-	-	-	-	-
6 F - Construction	697	-	-	2	1	13	-	3	-	2	-	-	-	-
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,231	1	3	4	10	18	-	17	-	9	3	(2)	(1)	(1)
8 H - Transportation and storage	1,130	1	-	-	2	8	-	4	-	-	2	(1)	-	(1)
9 L - Real estate activities	850	-	-	-	-	17	-	-	-	-	-	-	-	-
10 Loans collateralised by residential immovable property	6,981	21	57	138	170	18	-	387	-	112	24	(13)	(4)	(8)
11 Loans collateralised by commercial immovable property	3,713	482	225	109	147	5	6	870	87	214	57	(14)	(3)	(10)
12 Repossessed collaterals	565	-	-	-	38	-	-	38	-	-	-	(5)	-	-
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

## Environmental, Social and Governance (ESG) Risks

a	b	c	d	e	f	g	h	i	j	k	l	m	n	o													
															31 December 2023												
															Gross carrying amount												
															of which exposures sensitive to impact from climate change physical events												
Breakdown by maturity bucket						of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact from both chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions																
>10 year	>5 year <= 10 years	<= 20 years	>20 years	Average weighted maturity									of which Stage 2 exposures	Of which non-performing exposures													
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million													
Other Countries																											
1 A - Agriculture, forestry and fishing	137	4	8	-	4	5	1	16	-	2	5	(1)	-	(1)													
2 B - Mining and quarrying	72	37	-	-	1	4	37	-	-	-	22	(5)	-	(5)													
3 C - Manufacturing	1,232	-	-	-	-	-	-	-	-	-	-	-	-	-													
4 D - Electricity, gas, steam and air conditioning supply	321	5	23	24	-	11	53	-	-	1	-	-	-	-													
5 E - Water supply; sewerage, waste management and remediation activities	46	-	-	-	-	1	-	-	-	-	-	-	-	-													
6 F - Construction	335	6	4	-	-	5	10	-	-	-	1	(1)	-	(1)													
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	879	-	-	-	-	-	-	-	-	-	-	-	-	-													
8 H - Transportation and storage	3,234	1	-	-	2	2	-	3	-	-	-	-	-	-													
9 L - Real estate activities	1,218	-	-	-	-	-	-	-	-	-	-	-	-	-													
10 Loans collateralised by residential immovable property	2,217	3	14	45	2	14	-	65	-	22	5	(10)	(3)	(4)													
11 Loans collateralised by commercial immovable property	1,968	1	3	-	-	7	1	3	-	-	-	-	-	-													
12 Repossessed colaterals	25	-	-	-	-	-	-	-	-	-	-	-	-	-													
13 Other relevant sectors (breakdown below where relevant)	-	-	-	-	-	-	-	-	-	-	-	-	-	-													

<sup>(1)</sup> The gross carrying amount of exposures that are collateralised by both residential and commercial immovable properties is disclosed proportionally in rows "Loans collateralised by residential immovable property" and "Loans collateralised by commercial immovable property" based on the collateral value.

### 8.4.6 Template 6: Summary of GAR KPIs

#### Group's implementation of the EU Taxonomy Regulation

The EU Taxonomy (Regulation (EU) 2020/852 of the European Parliament and of the Council) represents an important step for the EU to achieve the Paris Agreement climate neutrality goals. It sets out the criteria to establish a common classification system for sustainable economic activities. The EU Taxonomy Regulation determines whether an economic activity is environmentally sustainable and obligates financial and non-financial entities subject to the Non-Financial Reporting Directive (NFRD) to disclose the alignment of their activities. Separate reporting requirements and extensive criteria are established for financial and non-financial undertakings under Art.8 of the Delegated Act of EU Taxonomy Regulation (Commission Delegated Regulation (EU) 2021/2178). Starting from year end 2023, credit institutions have to disclose the Green Asset Ratio (GAR), on each of the first two environmental objectives (i.e. climate change mitigation "CCM" and climate change adaptation "CCA"), which determines the extent to which the Group's assets finance and are invested in taxonomy-aligned economic activities, that is the ratio of the Group's taxonomy aligned assets to covered assets (total assets excluding exposure to sovereigns, central banks and the trading portfolio). Moreover, as required by the EU Taxonomy Regulation, activities, to be taxonomy-aligned, must meet the specific taxonomy criteria and ensure that they cause no significant harm to any of the other environmental objectives (DNSH) and meet minimum social safeguards (MSS).

With the gradual adoption of the new Corporate Sustainability Reporting Directive (CSRD) by large companies, small and medium listed companies and large companies outside the EU with significant activity in the EU, the Group's KPIs are expected to evolve as the number of companies required to report on their sustainability performance against the EU Taxonomy will increase.

## Environmental, Social and Governance (ESG) Risks

### Information on EU taxonomy disclosed in Pillar 3 compared to the Non-Financial Information

The European Commission established the basis for the calculation and the first standardized templates. The EBA established similar disclosure requirements within its implementing technical standards for Pillar 3 (Commission Delegated Regulation (EU) 2021/2178). The main differences are summarized below:

- i. Only the information of the counterparties related to the aligned turnover is used for the calculation of the general purpose and does not require the alignment of the investments in fixed assets (CapEx).
- ii. Pillar 3 templates present minor differences with respect to those included in the Non-Financial Information on the basis that EBA has focused on climate risks within the banking system (i.e., no off-balance sheet information or assets under management is requested).

The table below provides an overview of the GAR KPIs calculated based on templates 7 and 8:

**Table 50:** Summary of GAR KPIs

30 June 2024				
KPI				
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
	%	%	%	%
GAR stock	2.7%	0.0%	2.7%	26.9%
GAR flow	3.3%	0.0%	3.3%	46.3%

\* % of assets covered by the KPI over banks' total assets

31 December 2023				
KPI				
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	% coverage (over total assets)*
	%	%	%	%
GAR stock	2.4%	0.0%	2.5%	26.7%
GAR flow	6.8%	0.1%	6.9%	31.5%

#### 8.4.7 Template 7: Mitigating actions: Assets for the calculation of GAR

The perimeter of this template includes loans and advances, debt securities and equity instruments on their banking book, with a breakdown of the information by type of counterparty, including financial corporations, non-financial corporations, households, local governments as well as real estate lending towards households, and the taxonomy eligibility and taxonomy alignment of the exposures with regards to the environmental objectives of climate change mitigation and climate change adaptation:



## Environmental, Social and Governance (ESG) Risks

**Table 51: Mitigating actions: Assets for the calculation of GAR**

	30 June 2024															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
	Total gross carrying amount	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
<b>GAR - Covered assets in both numerator and denominator</b>																
1 Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	21,794	12,048	1,687	1,386	7	135	24	1	-	-	-	12,072	1,688	1,386	7	136
2 <b>Financial corporations</b>	2,737	605	73	-	2	3	8	-	-	-	-	613	73	-	2	4
3 Credit institutions	2,647	590	65	-	2	2	8	-	-	-	-	598	66	-	2	2
4 Loans and advances	920	182	10	-	-	-	2	-	-	-	-	184	10	-	-	-
5 Debt securities, including UoP	1,712	405	55	-	2	2	6	-	-	-	-	411	56	-	2	2
6 Equity instruments	15	3	-	-	-	-	-	-	-	-	-	3	-	-	-	-
7 Other financial corporations	90	15	7	-	-	1	-	-	-	-	-	15	7	-	-	1
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	14	7	3	-	-	1	-	-	-	-	-	7	3	-	-	1
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	14	7	3	-	-	1	-	-	-	-	-	7	3	-	-	1
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 <b>Non-financial corporations (subject to NFRD disclosure obligations)</b>	5,501	1,964	1,596	1,386	5	132	16	1	-	-	-	1,981	1,597	1,386	5	132
21 Loans and advances	4,629	1,748	1,520	1,386	-	99	16	1	-	-	-	1,764	1,521	1,386	-	99
22 Debt securities, including UoP	856	213	75	-	5	33	-	-	-	-	-	213	75	-	5	33
23 Equity instruments	15	4	1	-	-	-	-	-	-	-	-	4	1	-	-	-
24 <b>Households</b>	13,541	9,478	18	-	-	-	-	-	-	-	-	9,478	18	-	-	-
25 of which loans collateralised by residential immovable property	9,070	9,070	14	-	-	-	-	-	-	-	-	9,070	14	-	-	-
26 of which building renovation loans	26	26	-	-	-	-	-	-	-	-	-	26	-	-	-	-
27 of which motor vehicle loans	382	382	4	-	-	-	-	-	-	-	-	382	4	-	-	-
28 <b>Local governments financing</b>	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local governments financing	15	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	575	575	-	-	-	-	-	-	-	-	-	575	-	-	-	-
32 <b>TOTAL GAR ASSETS</b>	22,369	12,623	1,687	1,386	7	135	24	1	-	-	-	12,647	1,688	1,386	7	136
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>																
33 <b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>	18,956	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34 Loans and advances	18,896	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35 Debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36 Equity instruments	60	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
37 <b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>	4,209	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38 Loans and advances	3,631	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39 Debt securities	577	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41 Derivatives	865	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42 On demand interbank loans	17	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43 Cash and cash-related assets	466	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44 Other assets (e.g. Goodwill, commodities etc.)	15,211	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45 <b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>	62,094	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
<b>Other assets excluded from both the numerator and denominator for GAR calculation</b>																
46 Sovereigns	10,606	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47 Central banks exposure	10,223	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48 Trading book	256	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
49 <b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>	21,085	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50 <b>TOTAL ASSETS</b>	83,178	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

## Environmental, Social and Governance (ESG) Risks

	31 December 2023															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
	Total gross carrying amount	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling	Of which specialised lending	Of which transitional/adaptation	Of which enabling
€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	
<b>GAR - Covered assets in both numerator and denominator</b>																
1 Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	21,065	11,393	1,474	1,291	9	62	173	10	-	-	1	12,015	1,484	1,291	9	63
2 <b>Financial corporations</b>	2,519	9	4	-	-	-	5	-	-	-	-	463	4	-	-	-
3 Credit institutions	2,447	-	-	-	-	-	-	-	-	-	-	446	-	-	-	-
4 Loans and advances	987	-	-	-	-	-	-	-	-	-	-	169	-	-	-	-
5 Debt securities, including UoP	1,451	-	-	-	-	-	-	-	-	-	-	275	-	-	-	-
6 Equity instruments	9	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-
7 Other financial corporations	71	9	4	-	-	-	5	-	-	-	-	18	4	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	14	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-
13 Loans and advances	12	-	-	-	-	-	-	-	-	-	-	1	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	12	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	12	-	-	-	-	-	-	-	-	-	-	2	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 <b>Non-financial corporations (subject to NFRD disclosure obligations)</b>	5,016	1,794	1,434	1,291	9	62	167	10	-	-	1	1,961	1,444	1,291	9	63
21 Loans and advances	4,286	1,663	1,377	1,291	2	56	95	1	-	-	-	1,758	1,378	1,291	2	56
22 Debt securities, including UoP	721	126	57	-	6	5	72	9	-	-	1	198	66	-	6	6
23 Equity instruments	9	5	-	-	-	-	-	-	-	-	-	5	-	-	-	-
24 <b>Households</b>	13,512	9,590	36	-	-	-	-	-	-	-	-	9,590	36	-	-	-
25 of which loans collateralised by residential immovable property	9,162	9,162	-	-	-	-	-	-	-	-	-	9,162	-	-	-	-
26 of which building renovation loans	36	36	36	-	-	-	-	-	-	-	-	36	36	-	-	-
27 of which motor vehicle loans	392	392	-	-	-	-	-	-	-	-	-	392	-	-	-	-
28 <b>Local governments financing</b>	18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local governments financing	18	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 Collateral obtained by taking possession: residential and commercial immovable properties	590	590	-	-	-	-	-	-	-	-	-	590	-	-	-	-
32 <b>TOTAL GAR ASSETS</b>	21,655	11,983	1,474	1,291	9	62	173	10	-	-	1	12,605	1,484	1,291	9	63

## Environmental, Social and Governance (ESG) Risks

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p														
																	31 December 2023													
																	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)			
																	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
																	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
Of which specialised lending					Of which specialised lending					Of which specialised lending																				
Of which transitional					Of which transitional					Of which transitional																				
Of which enabling					Of which enabling					Of which enabling																				
Total gross carrying amount	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million														
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>																														
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)	20,983																													
34 Loans and advances	20,524																													
35 Debt securities	393																													
36 Equity instruments	65																													
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	3,701																													
38 Loans and advances	3,432																													
39 Debt securities	269																													
40 Equity instruments	-																													
41 Derivatives	897																													
42 On demand interbank loans	19																													
43 Cash and cash-related assets	502																													
44 Other assets (e.g. Goodwill, commodities etc.)	12,693																													
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)	60,449																													
<b>Other assets excluded from both the numerator and denominator for GAR calculation</b>																														
46 Sovereigns	9,914																													
47 Central banks exposure	10,422																													
48 Trading book	379																													
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	20,715																													
50 TOTAL ASSETS	81,165																													

### 8.4.8 Template 8: GAR (%)

Template 8 presents the proportion of exposures related to Taxonomy eligible and aligned activities compared to the covered assets based on data disclosed in Template 7 as well as the GAR KPIs on flow of new Taxonomy eligible and aligned exposures:

**Table 52: GAR (%)**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p															
																	30 June 2024: KPIs on stock														
																	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)				
																	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors				Proportion of total assets covered
																	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable				
Of which specialised lending					Of which specialised lending					Of which specialised lending																					
Of which transitional					Of which transitional					Of which transitional																					
Of which enabling					Of which enabling					Of which enabling																					
1 GAR	20.3	2.7	2.2	-	0.2	-	-	-	-	-	20.4	2.7	2.2	-	0.2	26.9															
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	19.4	2.7	2.2	-	0.2	-	-	-	-	-	19.4	2.7	2.2	-	0.2	26.2															
3 Financial corporations	1.0	0.1	-	-	-	-	-	-	-	-	1.0	0.1	-	-	-	3.3															
4 Credit institutions	1.0	0.1	-	-	-	-	-	-	-	-	1.0	0.1	-	-	-	3.2															
5 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1															
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
8 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-															
9 Non-financial corporations subject to NFRD disclosure obligations	3.2	2.6	2.2	-	0.2	-	-	-	-	-	3.2	2.6	2.2	-	0.2	6.6															
10 Households	15.3	-	-	-	-						15.3	-	-	-	-	16.3															
11 of which loans collateralised by residential immovable property	14.6	-	-	-	-						14.6	-	-	-	-	10.9															
12 of which building renovation loans	-	-	-	-	-						-	-	-	-	-	-															
13 of which motor vehicle loans	0.6	-	-	-	-						0.6	-	-	-	-	0.5															
14 Local government financing	-	-	-	-	-						-	-	-	-	-	-															
15 Housing financing	-	-	-	-	-						-	-	-	-	-	-															
16 Other local governments financing	-	-	-	-	-						-	-	-	-	-	-															
17 Collateral obtained by taking possession: residential and commercial immovable properties	0.9	-	-	-	-						0.9	-	-	-	-	0.7															

## Environmental, Social and Governance (ESG) Risks

	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	30 June 2024: KPIs on flows															
% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total new assets covered
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/a daptation	Of which enabling			
<b>1 GAR</b>	11.5	3.3	1.0	-	0.2	-	-	-	-	-	11.2	3.3	1.0	-	0.2	46.3
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	11.1	3.3	1.0	-	0.2	-	-	-	-	-	11.2	3.3	1.0	-	0.2	45.9
3 Financial corporations	1.9	0.5	-	-	-	-	-	-	-	-	2.0	0.5	-	-	-	7.0
4 Credit institutions	1.9	0.5	-	-	-	-	-	-	-	-	2.0	0.5	-	-	-	7.0
5 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Non-financial corporations subject to NFRD disclosure obligations	4.5	2.6	1.0	-	0.2	-	-	-	-	-	4.6	2.6	1.0	-	0.2	20.5
10 Households	4.7	0.1	-	-	-	-	-	-	-	-	4.7	0.1	-	-	-	18.4
11 of which loans collateralised by residential immovable property	3.0	0.1	-	-	-	-	-	-	-	-	3.0	0.1	-	-	-	3.0
12 of which building renovation loans	0.1	-	-	-	-	-	-	-	-	-	0.1	-	-	-	-	0.1
13 of which motor vehicle loans	1.5	-	-	-	-	-	-	-	-	-	1.5	-	-	-	-	1.5
14 Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	0.4	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.4

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p
	31 December 2023: KPIs on stock															
% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					Proportion of total assets covered
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors					
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/a daptation	Of which enabling			
<b>1 GAR</b>	19.8	2.4	2.1	-	0.1	0.3	-	-	-	-	20.9	2.5	2.1	-	0.1	26.7
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	18.8	2.4	2.1	-	0.1	0.3	-	-	-	-	19.9	2.5	2.1	-	0.1	26.0
3 Financial corporations	-	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	3.1
4 Credit institutions	-	-	-	-	-	-	-	-	-	-	0.7	-	-	-	-	3.0
5 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Non-financial corporations subject to NFRD disclosure obligations	3.0	2.4	2.1	-	0.1	0.3	-	-	-	-	3.2	2.4	2.1	-	0.1	6.2
10 Households	15.9	0.1	-	-	-	-	-	-	-	-	15.9	0.1	-	-	-	16.6
11 of which loans collateralised by residential immovable property	15.2	-	-	-	-	-	-	-	-	-	15.2	-	-	-	-	11.3
12 of which building renovation loans	0.1	0.1	-	-	-	-	-	-	-	-	0.1	0.1	-	-	-	-
13 of which motor vehicle loans	0.6	-	-	-	-	-	-	-	-	-	0.6	-	-	-	-	0.5
14 Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	1.0	-	-	-	-	-	-	-	-	-	1.0	-	-	-	-	0.7

## Environmental, Social and Governance (ESG) Risks

	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	af
	31 December 2023: KPIs on flows															
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					TOTAL (CCM + CCA)					
% (compared to total covered assets in the denominator)	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of total new assets covered
	Of which environmentally sustainable					Of which environmentally sustainable					Of which environmentally sustainable					
	Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling			Of which specialised lending	Of which transitional/adaptation	Of which enabling			
1 <b>GAR</b>	13.7	6.8	6.2	-	0.1	0.6	0.1	-	-	-	15.2	6.9	6.2	-	0.1	31.5
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	13.4	6.8	6.2	-	0.1	0.6	0.1	-	-	-	14.8	6.9	6.2	-	0.1	31.1
3 Financial corporations	-	-	-	-	-	-	-	-	-	-	0.9	-	-	-	-	4.4
4 Credit institutions	-	-	-	-	-	-	-	-	-	-	0.8	-	-	-	-	4.3
5 Other financial corporations	-	-	-	-	-	-	-	-	-	-	0.1	-	-	-	-	0.2
6 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.1
9 Non-financial corporations subject to NFRD disclosure obligations	7.5	6.8	6.2	-	0.1	0.6	0.1	-	-	-	8.0	6.8	6.2	-	0.1	20.8
10 Households	5.9	-	-	-	-	-	-	-	-	-	5.9	-	-	-	-	5.9
11 of which loans collateralised by residential immovable property	5.7	-	-	-	-	-	-	-	-	-	5.7	-	-	-	-	5.7
12 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 of which motor vehicle loans	0.2	-	-	-	-	-	-	-	-	-	0.2	-	-	-	-	0.2
14 Local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Collateral obtained by taking possession:																
17 residential and commercial immovable properties	0.4	-	-	-	-	-	-	-	-	-	0.4	-	-	-	-	0.4

### 8.4.9 Template 10: Other climate change mitigating actions that are not covered in the EU Taxonomy

Through its Sustainable Finance Framework (SFF), the Group classifies sustainable lending solutions offered to its clients, specifying the applied classification approach and the activities defined as eligible to access sustainable financing. The purpose of establishing the SFF is to provide a clear and comprehensive methodology for classifying, monitoring, and reporting sustainable financing in line with the financed impact strategy. The SFF has been drawn from international best practices and is based on two key guiding frameworks: The ICMA principles on sustainable financing (Green Bond Principles, Green Loan Principles and Sustainability linked Bond Principles) and the EU Taxonomy. Eurobank will closely monitor the developments of the EU Taxonomy, to update its SFF and embed the relevant requirements to the extent possible. The SFF defines two levels of transaction alignment:

- SFF alignment - Fulfilment of criteria dictated by best market practice
- EU Taxonomy alignment - Fulfilment of criteria associated with each of the EU Taxonomy assessment steps (substantial contribution, DNSH, minimum social safeguards)

Through the dedicated purpose financing approach (i.e. known use of proceeds) the Group assesses and classifies financings / transactions as “Not SFF aligned”, “SFF aligned” or “SFF & EU Taxonomy aligned”.

For general purpose financing / transactions (i.e. not known use of proceeds) the SFF defines two other approaches: a) Company Business mix - Financing to companies that fulfil the eligibility green/ social criteria and derive most of their revenues from eligible activities. b) Sustainability-linked loans - Financing linked to ambitious and predefined Sustainability Performance Targets (SPTs).

The purpose of this template is to report exposures that aim to support counterparties in the transition and adaptation process for the objectives of climate change mitigation and climate change adaptation and which are not taxonomy-aligned as referred to in EU Taxonomy Regulation.

## Environmental, Social and Governance (ESG) Risks

**Table 53:** Other climate change mitigating actions that are not covered in the EU Taxonomy

a	b	30 June 2024			f
		c	d	e	
Type of financial instrument	Type of counterparty	Gross carrying amount € million	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
1	Financial corporations	201	Yes	No	Includes Green/Sustainable bonds
2	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	246	Yes	Yes	Includes Green bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)
3	Of which Loans collateralised by commercial immovable property	-	-	-	-
4	Households	-	-	-	-
5	Of which Loans collateralised by residential immovable property	-	-	-	-
6	Of which building renovation loans	-	-	-	-
7	Other counterparties	233	Yes	Yes	Includes Green/Sustainable bonds
8	Financial corporations	10	Yes	No	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
9	Non-financial corporations	916	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
10	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)	496	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
11	Households	69	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
12	Of which Loans collateralised by residential immovable property	38	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
13	Of which building renovation loans	26	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned
14	Other counterparties	-	-	-	-

## Environmental, Social and Governance (ESG) Risks

		31 December 2023				
a	b	c	d	e	f	
Type of financial instrument	Type of counterparty	Gross carrying amount € million	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions	
1	Financial corporations	169	Yes	No	Includes Green Bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)	
2	Non-financial corporations	274	Yes	Yes	Includes Green Bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)	
3	Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)					
4	Of which Loans collateralised by commercial immovable property	-	-	-	-	
5	Households	-	-	-	-	
6	Of which Loans collateralised by residential immovable property	-	-	-	-	
7	Of which building renovation loans	-	-	-	-	
7	Other counterparties	187	Yes	Yes	Includes Green Bonds and Sustainability Linked Bonds with climate-related Sustainability Performance Targets (SPT)	
8	Financial corporations	2	Yes	No	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
9	Non-financial corporations	1,221	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
10	Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)					
11	Of which Loans collateralised by commercial immovable property	663	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
12	Households	29	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
13	Of which Loans collateralised by residential immovable property	21	Yes	Yes	Includes financing activities that are classified as SFF aligned but not EU-Taxonomy aligned	
14	Of which building renovation loans	-	-	-	-	
14	Other counterparties	-	-	-	-	

## Appendix 1: Capital instruments' main features disclosure

### Appendix 1: EU CC1 - Composition of regulatory own funds

	a			b	
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 December 2023 <sup>(1)</sup>		
	Current period	Current period	Current period		
	€ million	€ million	€ million	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>					
1	Capital instruments and the related share premium accounts	1,979	1,979	1,979	f & g
2	Retained earnings	3,019	2,676	1,527	
3	Accumulated other comprehensive income (and other reserves)	2,993	2,993	3,354	
5	Minority interests (amount allowed in consolidated CET1)	-	-	-	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	721	429	1,140	
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>8,712</b>	<b>8,077</b>	<b>8,000</b>	
<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>					
7	Additional value adjustments (negative amount)	(5)	(5)	(6)	
8	Intangible assets (net of related tax liability) (negative amount)	(246)	(246)	(229)	b
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	-	-	c
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	15	15	14	h
12	Negative amounts resulting from the calculation of expected loss amounts	-	-	-	
15	Defined-benefit pension fund assets (negative amount)	-	-	-	
16	Direct and indirect holdings by an institution of own CET1 instruments (negative amount)	(98)	(98)	(101)	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	-	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	(160)	(223)	-	a
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	(63)	(63)	(64)	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	-	-	-	
EU-20c	of which: securitisation positions (negative amount)	(63)	(63)	(64)	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	-	-	-	d
22	Amount exceeding the 17.65% threshold (negative amount)	(383)	(460)	(161)	a & d
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	(202)	(234)	(67)	a
25	of which: deferred tax assets arising from temporary differences	(181)	(226)	(95)	d
EU-25a	Losses for the current financial year (negative amount)	-	-	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	(27)	(27)	(25)	
27a	Other regulatory adjustments	(76)	(74)	(80)	
28	<b>Total regulatory adjustments to Common equity Tier 1 (CET1)</b>	<b>(1,043)</b>	<b>(1,181)</b>	<b>(652)</b>	
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>7,670</b>	<b>6,896</b>	<b>7,348</b>	
<b>Additional Tier 1 (AT1) capital: instruments</b>					
30	Capital instruments and the related share premium accounts	-	-	-	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	-	-	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) subject to phase out from AT1	-	-	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) subject to phase out from AT1	-	-	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	-	-	
35	of which: instruments issued by subsidiaries subject to phase out	-	-	-	
36	<b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>	<b>-</b>	<b>-</b>	<b>-</b>	
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>					
37	Direct and indirect holdings by an institution of own AT1 instruments (negative amount)	-	-	-	
38	Holding of the AT1 instruments of financial sector entities where those entities have reciprocal cross holding with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	-	
39	Direct and indirect holding of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	(27)	(27)	(25)	
41		-	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	-	-	
42a	Other regulatory adjustments to AT1 capital	-	-	-	
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	<b>(27)</b>	<b>(27)</b>	<b>(25)</b>	
44	<b>Additional Tier 1 (AT1) capital</b>	<b>-</b>	<b>-</b>	<b>-</b>	
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>7,670</b>	<b>6,896</b>	<b>7,348</b>	
<b>Tier 2 (T2) capital: instruments</b>					
46	Capital instruments and the related share premium accounts	1,288	1,288	1,074	
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2 as described in Article 486 (4) CRR	-	-	-	
50	Credit risk adjustments	-	-	-	
51	<b>Tier 2 (T2) capital before regulatory adjustments</b>	<b>1,288</b>	<b>1,288</b>	<b>1,074</b>	
<b>Tier 2 (T2) capital: regulatory adjustments</b>					
56b	Other regulatory adjustments to T2 capital	-	-	-	
57	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>	<b>-</b>	<b>-</b>	<b>-</b>	
58	<b>Tier 2 (T2) capital</b>	<b>1,288</b>	<b>1,288</b>	<b>1,074</b>	
59	<b>Total Capital (TC = T1 + T2)</b>	<b>8,958</b>	<b>8,185</b>	<b>8,422</b>	
60	<b>Total risk exposure amount</b>	<b>45,884</b>	<b>45,527</b>	<b>43,395</b>	



## Appendix 1: Capital instruments' main features disclosure

	a			b
	30 June 2024 <sup>(1)</sup>	30 June 2024	31 December 2023 <sup>(1)</sup>	Source based on reference
	Current period	Current period	Current period	numbers/letters of the
	€ million	€ million	€ million	balance sheet under the regulatory scope of consolidation
<b>Capital ratios and requirements including buffers</b>				
61	Common Equity Tier 1	16.7%	15.1%	16.9%
62	Tier 1	16.7%	15.1%	16.9%
63	Total capital	19.5%	18.0%	19.4%
64	Institution CET1 overall capital requirements	10.28%	10.28%	9.98%
65	of which: capital conservation buffer requirement	2.50%	2.50%	2.50%
66	of which: countercyclical capital buffer requirement	0.48%	0.48%	0.43%
67	of which: systemic risk buffer requirement	0.00%	0.00%	0.00%
EU-67a	of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement	1.25%	1.25%	1.00%
68	Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements	8.66%	7.09%	8.66%
<b>Amounts below the thresholds for deduction (before risk weighting)</b>				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	463	463	436
73	Direct and indirect holdings by the institution of CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% threshold and net of eligible short positions)	629	534	462
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in 38 (3) are met)	561	516	656
<b>Applicable caps on the inclusion of provisions in Tier 2</b>				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	-	-	-
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	494	490	460
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	-	-	-
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	-	-	-

<sup>(1)</sup> Including profits € 721 million for the 1H 2024 and € 1,140 million for year ended 31 December 2023.

## Appendix 2: Abbreviations

### Appendix 2: List of Abbreviations

Abbreviation	Definition
AC	Amortised Cost
AML/TF	Anti-Money Laundering/Terrorist Financing
AT1	Additional Tier 1
AuM	Assets under Management
AVA	Additional Value Adjustments
BI	Basic Indicator
BLS	Business Line Statements
BoD	Board of Directors
BoG	Bank of Greece
BRC	Board Risk Committee
BRRD	Bank Recovery and Resolution Directive
BTAR	Banking Book Taxonomy Alignment Ratio
CBR	Combined Buffer Requirement
CCA	Climate Change Adaptation
CCB	Capital Conservation Buffer
CCF	Credit Conversion Factor
CCM	Climate Change Mitigation
CCP	Central Counterparty
CCR	Counterparty Credit Risk
CCyB	Counter Cyclical Buffer
CDP	Carbon Disclosure Project
CET1	Common equity Tier 1
CIB	Corporate & Investment Banking
COREPs	Common Reports
CR&E	Climate-Related and Environmental
CRD	Capital Requirements Directive
CRM	Credit Risk Mitigation
CRR	Capital Requirements Regulation
CRST	Climate Risk Stress Test
CSA	Credit Support Annex
CSR	Corporate Social Responsibility
CSRBB	Credit Spread Risk in the Banking Book
CSRD	Corporate Sustainability Reporting Directive
CVA	Credit Value Adjustment
CVP	Collateral Valuation Policy
DNSH	Do No Significant Harm
DTC	Deferred Tax Credit
E&S	Environmental & Social
EBA	European Banking Authority
EC	European Commission
ECAIs	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Loss
EEFIG	Energy Efficiency Financial Institutions Group
ELSTAT	Hellenic Statistical Authority
EMAS	Eco-Management and Audit Scheme
EP	European Parliament
EPC	Energy Performance Certificate
ESG	Environmental, Social and Governance
ESMS	Environmental and Social Management System
EVE	Economic Value of Equity
FinGuar	Financial Undertakings
FRTB	Fundamental Review of the Trading Book
FVOCI	Fair Value through Other Comprehensive Income
GAR	Green Asset Ratio
GCR	Group Climate Risk
GCRO	Group Chief Risk Officer
GDP	Gross Domestic Product
GHG	Greenhouse Gas
GMRA	Global Master Repurchase Agreement
GONFR	Group Operational and Non-Financial Risks
GRM	Group Risk Management
GRMSPO	Group Risk Management Strategy Planning and Operations
G-SIIs	Global Systemic Institution Buffer
GVA	Gross Value Added
HAPS	Hellenic Asset Protection Scheme
HBA	Hellenic Bank Association
HFS	Held For Sale
HQLA	High Quality Liquid Assets

## Appendix 2: Abbreviations

Abbreviation	Definition
IAG	Internal Audit Group
ICAAP	Internal Capital Adequacy Assessment Process
ICMA	International Capital Markets Association
IFRS	International Financial Reporting Standards
ILAAP	Internal Liquidity Adequacy Assessment Process
IMA	Internal Model Approach
IP	Immovable Property
IRB	Internal Ratings Based
IRC	Incremental Risk Charge
IRRBB	Interest Rate risk in the Banking Book
ISDA	International Swaps and Derivatives Association
KPIs	Key Performance Indicators
KRIs	Key Risks Indicators
KYC	Know-Your-Customer
LCR	Liquidity Coverage Ratio
LMA	Loan Market
LoD	Lines of Defense
MRA	Moody's Risk Analyst
MRC	Management Risk Committee
MREL	Minimum Requirement for own funds and Eligible Liabilities
MSS	Minimum Social Safeguards
NFRD	Non-Financial Reporting Directive
NFRs	Non-Financial Risks
NGFS	Network for Greening the Financial System
NII	Net Interest Income
NPE	Non-Performing exposures
NSFR	Net Stable Funding Ratio
OCR	Overall Capital Requirement
OECD	Organization for Economic Cooperation and Development
OpRisk	Operational Risk
OSI	Operational Impact Strategy
O-SIIs	Other Systemically Important Institution
P&L	Profit & Loss
P2G	Pillar 2 Guidance
P2R	Pillar 2 Requirement
PCAF	Partnership for Carbon Accounting Financials
PMO	Project Management Office
PRB	Principles for Responsible Banking
PRI	Principles for Responsible Investment
RAF	Risk Appetite Framework
RAROC	Risk Adjusted Return on Capital
RAS	Risk Appetite Statements
RCSA	Risk & Control Self-Assessment
RES	Renewable Energy Sources
RIMA	Risk Identification & Materiality Assessment
RRF	Recovery and Resilience Facility
RTS	Regulatory Technical Standards
RWEAs	Risk Weighted Exposure Amounts
SDGs	Sustainable Development Goals
SFF	Sustainable Finance Framework
SFTs	Securities Financing Transactions
SIF	Sustainable Investment Framework
SLL	Sustainability Linked Loans
SPE	Single Point of Entry
SPTs	Sustainability Performance Targets
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SRM	Single Resolution Mechanism
SRT	Significant Risk Transfer
SSM	Single Supervisory Mechanism
STD	Standardised Approach
STS	Simple Transparent and Standardised
SVAR	Stressed VaR
SyRB	Systemic Risk Buffer
TCFD	Task Force on Climate-Related Financial Disclosures
TLTRO	Targeted Long Term Refinancing Operations
TSCR	Total SREP Capital Requirement
UNEP FI	UN Environment Programme Finance Initiative
VAR	Value at Risk

## Appendix 3: Guidelines and Regulations mapping on Disclosures Requirements

### Appendix 3: Guidelines and Regulations mapping on Disclosures Requirements

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### Appendix 3: Guidelines and Regulations mapping on Disclosures Requirements

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