Annual Financial Report

31 December 2023

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The information contained in this Annual Financial Report has been translated from the original Annual Financial Report that has been prepared in the Greek language. In the event that differences exist between this translation and the original Greek language Annual Financial Report, the Greek language Annual Financial Report will prevail over this document.

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STATEMENT OF ARTICLE 4 PAR. 2 OF LAW 3556/2007

To the best of our knowledge, the full year 2023 financial statements that have been prepared in accordance with the applicable accounting standards give a fair and true view of the assets, liabilities, equity and income statement of Piraeus Financial Holdings S.A. and the group of companies included in the consolidated financial statements, taken as a whole. In addition, the Board of Director's ("BoD") Annual Report for 2023 gives a fair and true view of the evolution, performance and position of Piraeus Financial Holdings S.A. and the group of companies included in the consolidated financial statements, taken as a whole, including the description of the main risks and uncertainties they have to face.

Athens, 27 February 2024

Non-Executive Chairman of BoD	Managing Director (CEO) Executive BoD Member	Non-Executive BoD Member
George P. Handjinicolaou	Christos I. Megalou	Solomon A. Berahas

BOARD OF DIRECTORS' ANNUAL REPORT

International Environment and Economic Developments in 2023

2023 was a year of multiple major challenges and heightened uncertainty from both a geopolitical and an economic standpoint. The ongoing war in Ukraine, China's increased geostrategic and technological competition mainly with the United States ("US") and secondarily with the European Union ("EU"), and the disorderly situation in the Middle East, after Hamas's strike on Israel last October, were the major sources of uncertainty. Additionally, during the third quarter of 2023, the US Federal Reserve System ("the Fed") and European Central Bank ("ECB") cycle of rate hikes ended, and the first cuts are expected this year. On the other hand, in 2023 economic activity was positively impacted by the lifting of the remaining restrictions related to the coronavirus, the milder than expected winter, the de-escalation of energy prices and overall inflation and the normalisation of international supply chains.

The global growth slowdown was moderate as some of the unfavorable headwinds did not materialize. In particular, the International Monetary Fund ("IMF") forecasts global growth rate of 3.1% for 2023 (2022: 3.5%), 2.9% for 2024 and 3.2% for 2025. At the same time, inflation is moderating further and is reverting towards the 2% inflation target.

The US economy grew 2.5% in 2023. For 2024, the IMF expects the US Gross Domestic Product (GDP) growth rate to be 2.1% and 1.7% in 2025, while inflation subsided to 4.1% in 2023 and is expected to fall to 2.8% this year. The Fed increased its key monetary policy rate four (4) times in 2023, by a total of 100 basis points ("bps"), while at the same time continued the gradual reduction of the size of its balance sheet.

In the Eurozone, real GDP in 2023 rose 0.5% year-on-year ("YoY"). As in 2022, financial support for the most vulnerable households, from the majority of states and energy sufficiency, had a positive contribution. However, challenges remain as despite the expected reduction in interest rates, they are expected to weigh on households and businesses, while at the same time the geopolitical situation could take a turn for the worse. Based on IMF estimates, in 2024 the Eurozone growth rate is estimated at 0.9% and 1.7% for 2025 and inflation at 3.3% for 2024 (2023: 5.5%).

At the same time, the ECB continued the tightening of its monetary policy in 2023 by proceeding with six (6) consecutive increases in its key interest rates, a total of 200 bps. In addition, it accelerated the rate of reduction of its balance sheet, seizing since July 2023 the reinvestment of the principal payments from maturing securities purchased under the Asset Purchase Program ("APP") program and announced a lower number of investments for the securities purchased under the Pandemic Emergency Purchase Program ("PEPP") program for the second half of 2024, while it intends to discontinue them at the end of 2024.

In China, 2023 was the first year that the economy operated free from the restrictions of the pandemic. As a result, growth in 2023 accelerated to 5.2% YoY, driven by strong pent-up demand. According to IMF estimates, Chinese GDP growth is estimated at 4.6% for 2024, positively affected by the measures taken to support the economy, but the restraint of global demand and the ongoing problems in the domestic Real Estate ("RE") market are expected to have a negative toll. Inflation, on the other hand, which slowed down to 0.2% in 2023 is expected to rise to 1.7% in 2024, while monetary policy is not expected to change substantially.

	Real GDP (% year average)			Inflation (% year average)		
	2022	2023	2024*	2022	2023	2024**
World	3.5	3.1	3.1	8.7	6.8	5.8
US	1.9	2.5	2.1	8.0	4.1	2.8
Eurozone	3.4	0.5	0.9	8.4	5.5	3.3
China	3.0	5.2	4.6	1.9	0.2	1.7

Sources: Piraeus Bank Research, *Estimate: IMF (2024): "World Economic Outlook Update", January, p. 6, **Estimate: IMF (2023): "World Economic Outlook", October, p.12, 40-2.

Developments in the Greek Economy in 2023

In 2023, the Greek economy remained on a growth trajectory despite the uncertainty that prevailed in the international environment and the macroeconomic impact of monetary policy in the Eurozone. In the first nine months of 2023, real GDP increased by 2.2%, on an annual seasonally adjusted basis, a rate that, although slower than the corresponding 2022 level, remains higher than the Eurozone average (0.6%). Domestic demand and exports positively contributed to GDP growth. In nominal terms, GDP increased by 7.5% YoY in the first nine months of 2023, following a 13.8% annual increase in 2022. In the labor market, based on seasonally adjusted data, employment increased by 1.5% in 2023 on an annual basis and the unemployment rate decreased to 10.6%, compared to 12.4% in 2022. The inflationary pressures, which were a key feature of 2022 at international and domestic levels, showed a clear trend of de-escalation. In 2023 national inflation was limited to 3.5% YoY, from 9.6% in 2022, mainly due to the lower energy prices. Average Harmonized Index of Consumer Prices ("HICP") for 2023 increased by 4.2% on an annual basis, from 9.3% in 2022.

With regard to the country's credit rating, its gradual upgrade resulted in the recovery of the investment grade for the first time since 2010. More specifically, on 1 December 2023, the rating agency Fitch Ratings upgraded Greece's credit rating to investment grade "BBB-" from "BB+" with a stable outlook. On 20 October 2023, the rating agency S&P Global upgraded Greece's credit rating to investment grade "BBB-" from "BB+" with a stable outlook. Earlier, on 8 September 2023, the rating agency DBRS Morningstar upgraded Greece to investment grade "BBB (low)" from "BB" with a stable outlook and on 4 August 2023 the rating agency Scope Ratings upgraded Greece's long-term credit ratings to investment grade "BBB-" with a stable outlook. Moody's upgraded Greece's credit rating by two (2) notches to "Ba1" from "Ba3" with a stable outlook on 15 September 2023, one notch below investment grade. According to the latest evaluations, Greece has secured the investment grade from four (4) rating agencies out of five (5), recognized by the ECB (Moody's, S&P, Fitch Ratings, DBRS Morningstar and Scope Ratings).

Date	Rating Agency	Rating Action	Outlook
1 December 2023	Fitch Ratings	BBB- from BB+	Stable
20 October 2023	S&P Global	BBB- from BB+	Stable
15 September 2023	Moody's	Ba1 from Ba3	Stable
8 September 2023	DBRS Morningstar	BBB (low) from BB	Stable
4 August 2023	Scope Ratings	BBB- from BB+	Stable

According to European Commission's ("EC") forecasts, economic activity in Greece is expected to grow by 2.4% in 2023, and 2.3% in 2024, before gradually moderating to 2.2% in 2025. The expansion of the Greek economy will continue to be supported by the execution of the Greece 2.0 National Recovery and Resilience Plan ("RRP") and a resilient labor market. The unemployment rate is anticipated to gradually decline, and inflationary pressures to be limited. Employment growth is set to continue, albeit at a slower pace. The unemployment rate is forecasted to fall to 9.9% by 2025, its lowest level in over a decade. Consumer prices based on HICP are expected to increase by 2.8% and 2.1% in 2024 and 2025, respectively. The general government deficit is set to decrease further on the back of muted expenditure growth and higher revenues. The primary balance is expected to record a surplus of 1.1% of GDP in 2023, up from 0.1% in 2022, reaching 2.5% of GDP in 2024. Along with solid nominal GDP growth, this is set to support the decline of the high public debt-to-GDP ratio.

	European Commission			
	2022	**2023***	**2024***	**2025***
Real GDP growth rate (%)	5.6	2.4	2.3	2.2
Inflation (HICP %)	9.3	4.3	2.8	2.1
Unemployment rate (% of labor force)	12.5	11.4	10.7	9.9
General Government Balance (% of GDP)	-2.4	-2.3	-0.9	-0.8
General Government Primary Balance (% of GDP)	0.1	1.1	2.5	2.6
General Government Gross Debt (% of GDP)	173	161	152	148

*Estimate

Source: European Commission: European Economic Forecast, Autumn 2023

The development prospects of the Greek economy depend on the utilization of European funds for the implementation of investment plans and the stimulation of entrepreneurship. The Recovery and Resilience Fund ("RRF"), both in terms of grants and private sector investments through the loan facility, is a key factor from a sustainable development perspective. On 8 December 2023, the Economic and Financial Affairs Council ("ECOFIN") approved the amended RRP of Greece, which includes capital for REPowerEU amounting to € 795 million, as well as an additional € 5 billion that will be added to the existing loan program. The revised plan amounts to € 36 billion (from € 30.5 billion of European funding in the original plan), with € 18 billion RRF grants and € 18 billion RRF loans. The EC, under RRF has already disbursed to Greece € 17.4 billion until January 2024.

Overall, it is estimated that by 2027 the country's funding from EU programs (RRF, NSRF, CAP[1]) will exceed € 76 billion. In the medium term, the Greek economy is expected to enhance its resilience, despite the challenging and unstable global environment, building on credible fiscal policy, reform orientation, productive investments and extroversion. Increasing investments, implementing the RRP, and maintaining the momentum of reforms can ensure continued sustainable growth in the long term.

However, there are risk factors that could negatively affect developments in the Greek economy and its prospects. Any worsening of the geopolitical crisis in Ukraine and the Middle East increases the risk of disruptions in energy supply with a possible impact on energy prices, and the overall price level. Slow growth in Europe also poses risks to the country's export performance and the continued recovery of tourism services. Additional risks for the prospects of the Greek economy are the maintenance of the tighter monetary policy, that can burden economic activity and weaken the stimulation of investments, as well as delays in the implementation of public and private projects and in meeting the RRF schedule. Finally, environmental challenges and extreme weather events are a growing risk to the economy. These risks could affect the Greek banking system and Piraeus Bank (the "Bank") in particular. Higher energy prices may cause inflation, which reduces consumer spending and corporate earnings, making it harder for some people and businesses to repay their loans, resulting in lower asset quality and more Non-Performing Exposure ("NPE") inflows. Weaker economic activity and possible hold-ups in the RRF funds distribution, could affect credit growth and Piraeus Group's[2] revenue sources, reducing profitability and capital creation. Lastly, extreme weather events such as the fires and floods that occurred in 2023 in Greece, could damage the repayment capacity of the affected borrowers and the value of collaterals in those areas.

Developments in the Greek Banking System in 2023

The Greek banking system, in 2023, continued to recover, supported by the favorable interest rate environment, due to the ECB Governing Council's decisions since July's 2022 meeting to raise interest rates cumulatively by 450 bps in total.

Deposit growth decelerated in 2023 compared to 2022 but remained in positive territory YoY. In December 2023, private sector deposits reached € 194.8 billion, up by 3.1% YoY.

Following the ECB's decision at its 27 October 2022 meeting, to recalibrate the Targeted Longer Term Refinancing Operations ("TLTRO") III terms with effect from 23 November 2022 and until the maturity date or early repayment date of each respective outstanding TLTRO III operation, Greek banks repaid a significant part of the TLTRO III funding, and as at 30 November 2023, total ECB funding to the Greek banking system had been reduced to € 16.3 billion compared to € 35.4 billion at the end of December 2022[3].

Although loans to the domestic private sector were affected by seasonality and high prepayments in the first half of 2023, the deployment of RRF programs supported the last quarter of the year. In December 2023, loans to the domestic private sector grew by 3.6% YoY to € 118.4 billion.

Going forward, credit expansion is expected to be positively affected by solid and stable economic growth, which is expected to continue exceeding the EU average, a healthy Loan to Deposit ("LDR") ratio of the Greek banking system at below 70% in November 2023, while further support will come from the funds of the Next Generation EU, the 2021-2026 EU sponsored funding package which targets to alleviate the impact of the Covid-19 pandemic. The Greek banking system is expected to

[1] NSRF: National Strategic Reference Framework ("NSRF")
CAP: Common Agricultural Policy ("CAP")

[2] Piraeus Bank and Bank subsidiaries

[3] Browse publications (bankofgreece.gr)

leverage the EU funds in order to support the Greek economy and lay the ground for sustainable growth rates in the next years. Six (6) domestic banking institutions have signed agreements with the Ministry of Finance for the utilization of loans from the RRF. Until late November 2023, more than 240 projects have been contracted, amounting to a total capital expenditure ("CapEx") of more than € 8.0 billion, of which approximately 120 projects related to small and medium enterprises ("SMEs").

During 2023, the Bank and two (2) other systemic Greek banks proceeded with the issuance of Senior Preferred Bonds of a total amount of € 2.5 billion, as part of their strategy to further increase their Minimum Requirements for own funds and Eligible Liabilities ("MREL").

As at 30 September 2023, the NPE balance of the Greek banking system stood at € 12 billion[4] with the NPE ratio standing at 7.9%, compared to 9.7% a year ago. The main driver of NPE ratio decline has been the Hellenic Asset Protection Scheme ("HAPS"), also called "Hercules" plan, which has been instrumental in assisting banks to reduce their NPEs, through securitizations, of which the senior tranches bear Government's guarantee.

Significant developments that are expected to play key role in the Greek banks' priorities during 2024 are:

- The deployment of the RRF funds for the financing of Greek businesses that is expected to mobilize a total of € 60 billion of investments in the country over the next three (3) years;
- The potential ECB rates' cut that is expected to start taking place within this year. At its two (2) last meetings, the ECB's Governing Council left interest rates unchanged, following several consecutive raises since July 2022. Consensus expects the ECB to gradually start cutting rates from mid-2024 onwards and accelerate the pace of cuts in 2025;
- The TLTRO III funding expiration, as the outstanding amounts are maturing in 2024. Currently, Greek banks have sufficient excess liquidity to repay TLTRO III balances, thus reducing total ECB funding significantly;
- The establishment of the intermediate MREL targets by the Single Resolution Board ("SRB"), which came into force on 1 January 2022 and aim to ensure that banks are provided with sufficient own funds and eligible liabilities to guarantee their capacity to absorb losses in adverse scenarios, thus ensuring the continuity of their activity. For Greek banks, MREL targets have been set according to a transition period, i.e., setting the final binding target by 31 December 2025.

Piraeus Financial Holdings Group Developments

The most important corporate events for Piraeus Financial Holdings Group (hereinafter the "Group") during 2023 and up to the authorization date for issuance of the annual financial statements by the BoD, were the following:

Completion of Mandatory Tender Offer ("MTO") addressed to MIG Holdings S.A. ("MIG") Shareholders

In accordance with the provisions of article 24 paragraph 2(a) of the Law 3461/2006, Piraeus Financial Holdings S.A. (hereinafter the "Company") announced on 21 April 2023, that the Bank acquired, on the same date, through the Athens Stock Exchange, 5,646,780 shares of MIG, at the price of € 0.2170 per share. The said price equals to the MTO price, following the publication of the MTO of the Bank to MIG shareholders, on 9 February 2023, for the acquisition of the total number of common registered voting shares. The period of acceptance took place from 24 February 2023 to 21 April 2023. The Hellenic Competition Commission ("HCC") granted approval with regard to the acquisition of the additional shareholding in MIG in the context of the MTO on 13 April 2023.

Effective from 13 April 2023 (Hellenic Competition Committee approval date), MIG (excluding Attica Holdings S.A.) is fully

4 https://www.bankofgreece.gr/en/statistics/evolution-of-loans-and-non-performing-loans

consolidated as a subsidiary of Piraeus Group. Following the completion of the MTO, the Bank holds an 87.8% shareholding in MIG.

Rating Upgrades

On 14 December 2023, S&P Global Ratings raised the Bank's long-term issuer credit rating to "BB-" from "B+" with a positive outlook. As regards the Company, its long-term issuer credit rating was upgraded to "B", with a positive outlook.

On 14 December 2023, Fitch Ratings upgraded the Bank's long-term issuer credit rating to "BB-" from "B" with a positive outlook. On 8 January 2024, Fitch Ratings rated the Company's long-term issuer rating to "BB-" with a positive outlook.

On 19 September 2023, Moody's upgraded the Bank's long-term issuer credit rating to "Ba1" from "Ba3" and Senior Preferred debt rating to "Ba2" from "B1", both with a positive outlook. As at the same date, Moody's rated the Company "Ba3" with a positive outlook.

On 6 December 2023, DBRS Morningstar upgraded the Bank's long-term issuer rating to "BB" from "B". Concurrently, DBRS Morningstar upgraded the Bank's Long-Term Deposit Rating to "BB" from "B". The trend on all ratings is stable.

Constitution of the new BoD into Body

On 28 June 2023, the new BoD, which was elected at the annual General Meeting ("GM") of shareholders held on 27 June 2023, was constituted as a Body and designated its Executive and non – Executive Members, in accordance with Law 4706/2020 as in force. Following the Company's announcement on 1 December 2023 as regards the resignation of Ms. Fransesca Tondi from the position of the Independent Non-Executive Member of the BoD, the Audit Committee, and the Committees of the BoD, as well as the subsequent announcement on 23 February 2024 regarding the replacement of the resigned member, by Ms. Maria Semedalas, the composition of the Company's BoD is as follows:

1. Handjinicolaou George son of Petros Handjinicolaou, Chairman of the BoD, Non-Executive Member
2. De Boeck Karel, son of Gerard De Boeck, Vice-Chairman of the BoD, Independent Non-Executive Member, Senior Independent Director

Executive Board Members:

3. Megalou Christos, son of Ioannis Megalou, Managing Director (Chief Executive Officer, "CEO")
4. Koutentakis Vasileios, son of Dimitrios Koutentakis

Independent Non-Executive Board Members:

5. Kontogouris Venetia, daughter of Gerasimos Kontogouris
6. Cucchiani Enrico, son of Clemente Cucchiani
7. Hexter David, son of Richard Hexter
8. Berahas Solomon, son of Alvertos Berahas
9. Panzures Andrew, son of Deones Panzures
10. Weatherston Anne, daughter of John Weatherstone
11. Semedalas Maria, daughter of Ilias Semedalas

Non-Executive Board Members:

12. Blades Alexander, son of Zisis Blades
13. Dontas Periklis, son of Nikolaos Dontas, Hellenic Financial Stability Fund ("HFSF") Representative under Law 3864/2010

The new BoD has a term of three (3) years, namely until 27 June 2026, which may be extended until the annual GM convened after such term has lapsed.

Sunrise III – HAPS NPE Securitization

After obtaining the HAPS guarantee, the Bank completed the transfer of, in aggregate, 95% of the mezzanine and junior notes of the Sunrise III securitization to the nominees of Intrum AB (publ) and Waterwheel Capital Management LP. The Bank retained 5% of the mezzanine and junior notes of the Sunrise III securitization, as per the relevant securitization regulatory requirements, as well as the Sunrise III senior notes in their entirety. The Bank has been granted with significant risk transfer ("SRT") approval and derecognized the portfolio.

Solar – HAPS NPE Securitization

In November 2023, the Bank together with the other three systemic banks (together "the Banks") announced the execution of a binding agreement between the four systemic banks and Waterwheel Capital Management L.P., acting as investment manager on behalf of an affiliated entity managed by it ("Waterwheel Capital") with respect to the sale to Waterwheel Capital of 95% of the mezzanine notes and of 95% of the junior notes to be issued in the context of the concurrent securitization by the Banks of Solar portfolio, with a total gross book value of approximately € 1.2 billion as of 30 September 2021, of which € 0.4 billion relates to Piraeus. The Solar Transaction is expected to be completed within the first half of 2024 and is subject to customary conditions for such transactions.

Senna – NPE Portfolio sale

On 29 June 2023, the Bank completed the sale of an NPE portfolio, amounting to € 0.3 billion gross book value, to Intrum Holding AB. The agreed total consideration reached approximately 21% of the gross book value. The NPE portfolio comprised mainly of small sized mortgage, as well as consumer and small business loans.

Monza – NPE Portfolio sale

In December 2023, the Bank classified as Held-for-Sale ("HFS") an NPE portfolio consisting of retail and business NPEs, namely portfolio Monza with a total gross book value of € 0.3 billion. The transaction is expected to be concluded within 2024.

Other NPE Portfolios

In June 2023, the Bank classified as HFS two (2) NPE portfolios, namely portfolio Delta (Romanian NPEs) and Wheel II, with a total gross book value of € 0.2 billion. The first transaction is expected to be concluded within 2024 and the second transaction was concluded in July 2023.

The Bank successfully priced Senior Preferred Bonds amounting to an aggregate € 1.0 billion

On 7 July 2023, the Bank successfully completed the issuance of a new € 500 million Senior Preferred Bond with a coupon of 7.25%, attracting the interest of a large number of institutional investors. The bond has a maturity of five (5) years, an embedded issuer call option after four (4) years and is listed on the Luxembourg Stock Exchange's Euro MTF market.

On 29 November 2023, the Bank successfully completed the pricing of a new € 500 million Senior Preferred Bond with a coupon of 6.75%, attracting the interest of a large number of institutional investors. The bond has a maturity of six (6) years and an embedded issuer call option after five (5) years. Settlement took place on 5 December 2023 and the notes have been listed on the Luxembourg Stock Exchange's Euro MTF market.

The issuances are part of the Bank's strategy to increase its MREL, which is a requirement for all banks that are directly supervised by the ECB.

2023 EBA Stress Test Results

On 28 July 2023, the results of the 2023 European Banking Authority ("EBA") Stress Test were announced. The 2023 EU-wide stress test was conducted by the EBA, on a much larger sample compared to previous years, covering 70 EU banks and 75% of total banking assets in the EU. The exercise assessed the performance of banks under a baseline and adverse scenario during the period 2023-2025. In terms of scenario severity, the 2023 EU-wide stress test, featured the most severe GDP decline assumed, with the 3-year cumulative reduction in Greek GDP growth at -5.5%, compared to the previous 3 EU-wide stress test exercises.

For Piraeus Group, the fully loaded Common Equity Tier 1 ratio ("CET1 ratio") resulting from the stress test for 2025, the final year considered in the exercise, is illustrated below:

	CET-1 Ratio		
	2022	**2025**	**Delta**
(a) Stress test "baseline" scenario	11.5%	14.3%	+2.7%
(b) Stress test "adverse" scenario	11.5%	9.1%	-2.4%

The adverse scenario results led to a depletion of circa 241 bps for the 3-year period. The respective depletion in the 2021 Stress Test Exercise was circa 480 bps.

The adverse scenario results to circa 318 bps depletion at the year with the highest impact (2023). The Piraeus' Group results of the 2023 stress test exercise imply a material improvement compared to the 2021 and 2018 stress test exercises, as displayed below:

	Maximum Depletion	CET1 Ratio end-period ("adverse")
Stress test 2018	-8.9%	5.9%
Stress test 2021	-6.1%	8.6%
Stress test 2023	-3.2%	9.1%

Conclusion of the Sale of a Leasing Subsidiary, including an NPE portfolio amounting to € 0.5 billion gross book value

On 5 September 2023, the Company announced that the Bank had concluded the sale of 100% of the Group's leasing subsidiary Sunshine Leases Single Member S.A., including a portfolio of leasing NPEs ("Sunshine Portfolio"), (the "Sunshine Transaction"), to Hellas Capital Leasing Single Member S.A., a Greek leasing company wholly owned by funds managed or advised by Bain Capital. The Sunshine Portfolio, already classified as HFS, amounted to € 0.5 billion gross book value as at 30 June 2023. The transaction has been part of Piraeus Group's focused and systematic actions, targeted to fulfil its NPE de-risking plan. The financial impact of the Sunshine Transaction has been reflected in the 30 June 2023 Group's financial position.

Acquisition of Own Shares and conclusion of Piraeus Financial Holdings Share Buyback program

On 29 September 2023, the Company announced, in accordance with the Regulation (EU) No. 596/2014, Commission Delegated Regulation (EU) 2016/1052 and the Athens Exchange Regulation that, following the corporate announcement for the commencement of the Share Buyback Program (the "Program") dated 22 September 2023, the Program had been concluded.

5,283,004 common shares of the Company traded on the Athens Stock Exchange were acquired in the period from 22 September 2023 up to and including 29 September 2023 at an average price of € 2.8393 per share and a total cost of € 14,999,974.

Free Distribution of Shares Plan of Piraeus Financial Holdings

On 1 December 2023, the Company announced the implementation of the decision of the annual GM of the shareholders of the Company dated 27 June 2023 and of the respective delegated resolution of the BoD dated 16 June 2023 for the approval of the Terms of a Free Distribution of Company's Shares Plan to executives and employees of the Company and its affiliated companies (the "Beneficiaries"). A total of 1,307,585 own, common registered voting shares of the Company were distributed free of charge to 137 Beneficiaries, under the applicable variable remuneration schemes ("Top Management Retention Scheme" and "Performance Incentive Scheme" for 2022), through over-the-counter transactions. The total value of the above shares amounted to € 4,218,269 based on the closing price of € 3.226 of the Company's share on 1 December2023 (distribution date).

The above shares were acquired in the context of the Company's own share buyback program. Beneficiaries who fall under the category of Material Risk Takers ("MRTs") are subject to a retention obligation of such shares for a period of one year from the date of their acquisition. After the aforementioned distribution, the Company owns a total of 3,975,419 own shares, which correspond to a percentage of 0.32% of its total shares.

Sale of Piraeus Direct Solutions S.M.S.A. ("PDS")

On 25 October 2023, the Company announced that the Bank had completed the sale of 100% of PDS to Mellon Technologies S.A. ("Mellon"), part of a multinational group providing technology solutions, contact center and outsourcing services. The transaction consideration amounted to circa € 3 million, primarily based on the PDS's net assets, and is subject to adjustment for any subsequent movements that took place up to the transaction completion date. The transaction also includes renewal of the servicing agreement relating to provision by PDS of call center activities to Piraeus Group.

Voluntary Exit Scheme

In accordance with its strategic objectives and transformation priorities, the Group initiated in 2023 a new Voluntary Exit Scheme ("VES") for certain group of employees. As a result, voluntary redundancy costs of € 62 million increased the staff costs of the Group. The number of full-time equivalents ("FTE") who exited voluntarily in 2023, making use of the 2023 and 2022 VES stood at 538.

The Company successfully priced a Subordinated Tier 2 Bond amounting to € 500 million

On 10 January 2024, the Company announced that it successfully completed the pricing of a new € 500 million Subordinated Tier 2 Bond with a coupon of 7.250%, attracting the interest of a large number of institutional investors. The bond has a maturity of 10.25 years and an embedded issuer call option between year 5 and 5.25, with settlement taking place on 17 January 2024. The bond was listed on the Luxembourg Stock Exchange's Euro MTF market and was rated "B1" and "B" by Moody's and Fitch respectively. In conjunction with the new issuance, the Bank announced a cash tender offer on its 9.750% Non-Call June 2024 Subordinated Tier 2 notes. In aggregate, the principal amount of the notes that were validly tendered pursuant to the offer stood at € 294 million. The funds raised through the new issue have been used by the Bank for financing the tender offer and for solidifying its capital position.

Organizational Structure of the Group

The CEO, supported by the members of the Group Executive Committee, is considered the Chief Operating Decision Maker for the purposes of identifying the Group's reportable segments. The Group manages its business through the following reportable segments:

Retail Banking – includes Mass, Affluent, Small Businesses, International Business Unit ("IBU") and Public core customer segments as well as channels of banking activity (i.e. branches, e-branches, ATMs etc).

Corporate Banking – includes Large Corporates, Shipping, SMEs and Agricultural core customer segments.

Piraeus Financial Markets ("PFM") – includes the Fixed Income, Foreign Exchange, Treasury activities (including the interest rate gap management arising from all banking activities) and Institutional clients.

Other – includes all management related activities not allocated to specific customer segments, the management of Real Estate Owned ("REO") assets, Wealth and Asset Management ("WAM") activities, certain equity participations of the Group, funding transactions approved by the Asset and Liability Management Committee ("ALCO") and intersegmental eliminations.

NPE Management Unit ("NPE MU") – includes the management of any NPE assessed as non-core business, irrespectively of whether the said exposures are serviced by the Group or third parties. In addition, following the derecognition of Phoenix, Vega I, II, III, Sunrise I, II and III securitized portfolios, this reportable segment includes also the senior and subordinated notes

issued by the securitization special purpose vehicles ("SPVs") and retained by the Group. The fees payable for servicing the Group's NPE portfolio are recognized within this segment. Furthermore, the respective segment includes certain equity participations classified in either Fair Value through Other Comprehensive Income ("FVTOCI") or Fair Value through Profit or Loss ("FVTPL"), and certain associates (i.e., Strix Asset Management Ltd, Strix Holdings LP and Strix Holdings II LP).

Business segments include internal allocations of income and expense based on an internally approved methodology. These allocations include, among other, the costs of certain support services and functions to the extent that they can be meaningfully attributed to the reportable business segments. Such allocations are made on a systematic and consistent basis and involve a degree of subjectivity. Costs that are not allocated to business segments are included in Corporate Centre (reported under business segment "other").

Where relevant, income and expense amounts presented, include the results of inter-segment funding along with inter-company and inter-business line transactions. All inter-company transactions between business segments are undertaken on arm's length terms and inter-segment transactions and balances are eliminated within each relevant segment.

Evolution of Volumes and Results of the Group during 2023

The Group has a systemic position in the Greek banking market in terms of total assets, which amount to € 76.5 billion as at 31 December 2023. The Group holds the most extensive footprint in Greece with 378 branches (plus another 16 branches in 2 countries abroad) and a wide customer base of 6 million active customers. The branch network in Greece was reduced by 11 units during 2023. As at 31 December 2023, the Group's headcount totalled 8,053 employees in the continuing operations, of which 7,672 were employed in Greece (reduced by 599 compared to a year ago, mainly due to the implementation of VES).

Financial Position

Regarding the financial position of the Group as at 31 December 2023, total assets amounted to € 76.5 billion compared to € 74.6 billion as at 31 December 2022, with the difference attributed to the increased liquidity position and the solid profitability achieved during 2023.

Customer deposits of the Group continued to increase, reaching € 59.6 billion as at 31 December 2023, corresponding to a rise of 2.0% compared to 31 December 2022, in line with market dynamics. The Group holds 28% domestic market share in deposits as at 31 December 2023. Savings deposits constitute 41% of the total deposits of the Group, with time deposits at 23% and current, sight and other deposits at 37%. Corporate deposits correspond to 29% of the total deposit base with retail deposits at 70%. Average time deposits' cost picked up at 1.62% in 2023 versus 0.29% in 2022.

Selected Balance Sheet Figures	31/12/2023	31/12/2022 As reclassified[1]	YoY
Gross Loans and advances to customers at amortised cost before ECL allowance (grossed up with PPA adjustments)	38,346	38,787	-1.1%
Less: Expected Credit Losses ("ECL") allowance (grossed up with PPA adjustment)	(819)	(1,421)	-42.4%
Loans and advances to customers at amortised cost	37,527	37,367	0.4%
Financial Assets	13,938	12,523	11.3%
Other Assets	24,985	24,756	0.9%
Total Assets	**76,450**	**74,645**	**2.4%**
Due to Banks	4,618	6,185	-25.3%
Due to Customers	59,567	58,372	2.0%
Other Liabilities	4,912	3,507	40.1%
Total Liabilities	**69,097**	**68,064**	**1.5%**
Total Equity	**7,353**	**6,581**	**11.7%**

[1]Comparative figures have been reclassified, due to the amendment in the current period of the presentation of derivative financial instruments in the statement of the financial position, by: a) offsetting derivative assets and liabilities entered into with a central counterparty clearing member against the margin collateral posted or received and b) presenting the carrying amount of derivatives on a gross basis, with accrued interest receivable and payable netted off at deal level. Refer to notes [4.8] and [49] for further information.

Gross loans and advances to customers at amortised cost before ECL allowance as at 31 December 2023 amounted to € 38.3 billion compared to € 38.8 billion as at 31 December 2022, while loans and advances to customers at amortised cost stood at € 37.5 billion as at 31 December 2023, compared to € 37.4 billion as at 31 December 2022, with the Group's seasonally adjusted net loans to deposits ratio at 61.5%, stable compared to 31 December 2022, on the back of balanced increase of deposits and adjusted net loans. The Group's loan book in terms of gross balance (grossed up with Purchased Price Allocation adjustment, "PPA adjustment") consists of corporate and public sector by 79%, mortgage by 17% and consumer, personal, credit cards and other loans by 4%.

The Group's financial assets portfolio has increased to € 13.9 billion as at 31 December 2023, compared to € 12.5 billion as at 31 December 2022, mainly the result of higher balances in the Group's portfolio of securities at amortised cost.

Utilisation of the Eurosystem funding stood at € 3.5 billion as at 31 December 2023, following the repayment of € 2.0 billion of the TLTRO III facility, while interbank repo funding increased to € 435 million from € 298 million a year ago.

Group NPEs reduced further to € 1.3 billion as at 31 December 2023, compared to € 2.6 billion as at 31 December 2022. The NPEs over total gross loans ratio for the Group stood at 3.5% as at 31 December 2023 from 6.8% as at 31 December 2022, due to the continuous efforts of the Group to improve its asset quality, through the organic management of the remaining NPE portfolio and selected NPE portfolio sales. As at 31 December 2023, the Group NPE (cash) coverage ratio increased to 61.6% from 54.5% as at 31 December 2022.

Income Statement

The Group's net interest income amounted to € 2,003 million in 2023, presenting an increase of 48% compared to 2022, attributed to the favorable interest rate environment. Net interest margin ("NIM") reached 2.7% in 2023, compared to 1.8% in 2022. Net fee and commission income and income from non-banking activities amounted to € 547 million (income from non-banking activities amount to € 79 million), in 2023, 12.8 % higher compared to 2022, driven by strong performance of rental

income, loan origination, funds transfers, and asset management. Net fee income over assets reached 0.7% in 2023, from 0.6% in 2022. Other income fell to € 57million in 2023 compared to € 744 million in 2022. The latter was mainly affected by enhanced trading gains in the fixed income portfolio and the carve-out and sale of the Bank's merchant acquiring business unit, that took place in 2022.

Total net income in 2023 amounted to € 2.6 billion presenting an increase of 0.9% compared to 2022. The Group's total operating expenses stood at € 863 million in 2023, compared to € 889 million in 2022. Excluding the extraordinary cost related to VES and other extraordinary depreciation costs amounting in total to € 61 million for 2022 and € 71 million related to VES and other extraordinary expenses, total operating expenses amounted to € 793 million in 2023, a reduction of 4.2% versus the comparative period. As a result, cost-to-core income ratio, excluding the extraordinary costs mentioned above, stood at 31.1% in 2023 from 45.2% in 2022.

Selected Profit & Loss Figures	31/12/2023	31/12/2022	YoY
Net Interest Income	2,003	1,353	48.0%
Net Fee & Commission Income [1]	547	485	12.8%
Other Income	58	744	-92.2%
Total Net Income	**2,607**	**2,582**	**1.0%**
Staff Costs	(442)	(446)	-0.9%
-excl. VES costs	(387)	(389)	-0.5%
Administrative expenses	(315)	(338)	-6.8%
Depreciation and amortization	(106)	(106)	0.0%
Total Operating Expenses	**(863)**	**(889)**	**-2.9%**
-excl. VES and other non-recurring costs	(793)	(828)	-4.2%
Profit Before Provisions, Impairment and other credit risk related expenses	**1,743**	**1,693**	**3.0%**
ECL impairment losses and other credit risk related expenses on loans and advances to customers at amortised cost	(559)	(615)	-9.1%
Other impairment and provisions	(92)	(70)	31.4%
Share of profit/ (loss) of associates and joint ventures	(15)	29	-
Profit / (Loss) Before Income Tax	**1,078**	**1,037**	**4.0%**
Income tax benefit / (expense)	(292)	(140)	108.6%
Profit/ (Loss) for the Period	786	948	-17.1%
Profit/ (Loss) attributable to the equity holders of the parent (from Continuing Operations)	788	899	-12.3%
Profit / (Loss) attributable to the equity holders of the parent (from Discontinued Operations)	-	51	-
Earnings / (losses) per share attributable to the equity holders of the parent (from Continuing Operations)	0.63	0.72	-12.5%

[1] Net Fee and Commission Income also includes income from non-banking activities

As a result of the above, Group's profit before provisions, impairments and other credit risk related expenses in 2023 amounted to € 1.7 billion, increased by 3.0%. The results of the year ended 31 December 2023 were burdened by ECL impairment charges on loans plus other credit risk related expenses amounting to € 559 million (31 December 2022: € 615 million). Excluding impairments related to NPE sales, impairments on loans stood at € 306 million, compared to € 294 million in 2022, with organic cost of risk on net loans reaching 0.8%, in the same level with 2022.

The Group's profit before income tax in 2023 reached € 1.1 billion compared to € 1.0 billion in 2022, an increase of 4%. Profit from continuing operations attributable to equity holders of the parent amounted to € 788 million compared to € 899 million in 2022, due to higher tax expenses that reached € 292 million compared to € 140 million in 2022. Overall, the return on

average tangible book value ("RoaTBV") normalized, adjusted for Additional Tier 1 ("AT1") coupon, rose to 16.6% in 2023, from 9.1% in 2022.

Capital

As at 31 December 2023, the Group's total equity amounted to € 7.4 billion, compared to € 6.6 billion as at 31 December 2022, as a result of the recovered profitability of the Group. Hence, the Group's Basel III Common Equity Tier 1 (CET1) as at 31 December 2023 stood at 13.2% (31 December 2022: 13.04%) and the total capital ratio ("TCR") stood at 17.7% (31 December 2022: 17.8%). Proforma for the Risk Weighted Assets ("RWAs") relief underpinned from Monza, Delta and Solar loans portfolios' derecognition, as well as the capital accretion from the new issuance of Tier 2 in January 2024, the TCR stood at 18.2% as at 31 December 2023, whilst the CET1 ratio stood at 13.3% for the Risk Weighted Assets ("RWAs") relief underpinned from Monza, Delta and Solar loans portfolios' derecognition.

The amount of deferred tax assets included in the Group's regulatory capital in accordance with the provisions of Greek Laws 4172/2013, 4302/2014, 4340/2015, stood at € 3.3 billion as at 31 December 2023, compared to € 3.5 billion as of 31 December 2022.

The ECB, through the Supervisory Review and Evaluation Process ("SREP") decision on 30 November 2023, informed the Management on the revised Overall Capital Requirements ("OCR") levels, effective since 1 January 2024. The Group has to maintain, on a consolidated basis, a Total SREP Capital Requirement ("TSCR") of 11% and an OCR of 14.57% (OCR plus Pillar 2 guidance ("P2G") at 16.32%), which includes: (a) the minimum Pillar I total capital requirements of 8.00% as per article 92(1) of Regulation 575/2013/EU; (b) the additional Pillar II capital requirement of 3.00% as per article 16(2) of Regulation 1024/2013/EU; (c) the fully loaded capital conservation buffer of 2.50% under Greek Law 4261/2014,(d) the transitional Other Systemically Important Institutions ("O-SII") capital buffer of 1.00% under Greek Law 4261/2014 and (e) the institution-specific Countercyclical Capital Buffer ("CCyB") under Greek Law 4261/2014 (as amended by Greek Law 4799/2021) of 0.07% for the year ended 31 December 2023.

Share Capital

On 31 December 2023, the share capital of the Group amounted to € 1,163 million divided into 1,250,367,223 common registered voting shares with a nominal value of € 0.93 each. Common shares of the Company are intangible, registered and listed on Athens Stock Exchange.

The number of the outstanding shares of the Company is the following:

Number of outstanding common shares owned by the HFSF / Percentage of total share capital	337,599,150	27.00%
Number of outstanding common shares owned by private investors / Percentage of total share capital	912,768,073	73.00%
Total number of outstanding common shares / Percentage of total share capital	1,250,367,223	100.00%

Pursuant to par. 1, art. 16C of Greek Law 3864/2010 the acquisition of treasury shares is not permitted, without the approval of HFSF, for as long as the HFSF is a shareholder of the Company. However and as already mentioned above, on 1 December 2023, the Company announced the implementation of the decision of the annual GM of the shareholders of the Company for the approval of the Terms of a Free Distribution of Company's Shares Plan to the Beneficiaries. A total of 1,307,585 own,

common registered voting shares of the Company were distributed free of charge to 137 Beneficiaries, under the applicable variable remuneration schemes, through OTC transactions. Prior to this and within September 2023, the Company executed the share buy-back program by acquiring 5,283,004 treasury shares at an average cost of € 2.84 per share.

After the aforementioned transactions, the Company owned a total of 3,975,419 own shares, which correspond to a percentage of 0.32% of its total shares.

Apart from the above, the remaining purchases and sales of treasury shares that occurred during the current year, relate to transactions executed by the Group's subsidiary Piraeus Securities S.A. in the context of its market making operations. As at 31 December 2023, Piraeus Securities S.A. held 1,269,606 of the Group's common shares, of total nominal value € 1,180,733. The total value of treasury shares held by the Group amounted to € 15.2 million as of 31 December 2023.

The Company's shareholder structure presents great diversity. The total number of the Company's common shareholders was approximately 18,900 as at 31 December 2023. The HFSF held 27% of the outstanding common shares and the remaining 73% was held by the private sector and in particular 67% were legal entities and 6% individuals.

Going concern conclusion

Management has made an assessment on the Group's ability to continue as a going concern. Management's assessment considered the Group's principal business risks deriving mainly from the macroeconomic environment in combination with the Group's strategy, its liquidity and capital position. The following were taken into consideration:

a) the resilient economic growth in 2023, and the prospects for a positive rate of growth of GDP in the medium term, which is expected to remain above the euro area average, mainly driven by the implementation of the RRP and the inflow of private investments, the decelerating level of inflation mainly as a result of the dropping energy prices, and the dynamic contribution of tourism in the current account balance;

b) the recovery of sovereign credit rating to investment grade status after more than a decade, by three (3) major rating agencies, namely S&P, Fitch and DBRS, which reflects on the prudent fiscal policies and the implementation of reforms including among others the restructuring of the banking sector;

c) the Group's effective liquidity risk management, leading to a robust liquidity position as evident by the Liquidity Coverage Ratio ("LCR") as at 31 December 2023, as well as Management's assessment of the impact of stress test scenarios, within the Internal Capital Adequacy Assessment Process ("ICAAP") and Internal Liquidity Adequacy Assessment Process ("ILAAP") framework, on the Group's liquidity position and on mandatory liquidity ratios;

d) the capital adequacy of the Group, which exceeded the OCR - plus P2G - and the MREL ratio of Piraeus Group, which exceeded the January 2024 Intermediate Guidance Target of 21.88%, as at 31 December 2023, as a result of the successful issuances of two (2) senior preferred bonds in July and in November 2023 and the current year profitability. It is estimated that for the next 12 months the Group's capital adequacy ratios and the MREL ratio will remain higher than the required minimum regulatory levels;

e) the geopolitical developments, which pose significant downside risks, with the Middle East and particularly the Russia / Ukraine conflicts, due to the Group's operations in Ukraine, which comprise a financial institution, namely JSC Piraeus Bank ICB, and investments in RE assets which represent approximately 0.2% of the total consolidated assets of the Company as at 31 December 2023;

f) the net profit attributable to the equity holders of the parent Company amounted to € 788 million and the NPE ratio dropping to 3.5% as at 31 December 2023 from 6.8% as at 31 December 2022. NPE (cash) coverage increased to 62% at year-end 2023 versus 55% a year ago.

Based on the analysis performed, Management has concluded that there are no material uncertainties which would cast significant doubt over the ability of the Group to continue to operate as a going concern for a period of 12 months from the date of approval of the annual financial statements. For this reason, the Group and the Company continue to adopt the going concern basis of accounting for preparing the financial statements.

The basis of preparation is presented in Note 2.2 of the annual financial statements.

Non-Financial Information for 2023 (Greek Law 4403/2016)

Group Human Resources ("HR")

In alignment with the Group's strategic goals and corporate values, it is the Group's priority to ensure a modern work environment that supports the well-being and continuous development of employees, rewards high performance, enhances collaboration and open communication and at the same time fosters the retention and attraction of talent. Through relevant actions, the Group cultivates the profile of a socially responsible employer, both for the existing and future employees, while ensuring the sustainable development of the organization.

Training & continuous learning: In 2023 a new learning management system has been implemented in the Bank. The new Piraeus ".edu" platform provides an upgraded learning experience, allowing 24/7 access from any device, flexibility in time and methods of attendance, personalized learning, enriched material from a variety of sources, easy and quick knowledge sharing. Through the new platform, 1,275 training events were held, with the participation of 7,419 employees. The training activity accounted 324,105 training hours, presenting an increase of 6% compared to 2022. The learning actions for 2023 were focused on actions related to the new model operation of the Bank's branches, the development and empowerment of talents, as well as the design of the new risk awareness training program "Analyze This Training", which aims to recognize, prevent and manage risk. The program is addressed to all employees with mandatory monitoring and consists of 10 courses, covering topics such as anti-bribery and corruption.

New Ways of Work ("NWoW")**:** In 2023, Piraeus Group launched a project to introduce NWoW in a systematic way. The project's key priorities are to improve employee satisfaction and productivity, retain and attract new talent, unlock operational savings and have a positive environmental impact. This is a culture-strengthening initiative that promotes collaboration, supports work-life balance, adjusts the work environment to employee needs and is technologically amplified. In order to design the new model, an employee survey to approximately 3,500 employees was run in July regarding current ways of working and future work preferences, 1:1 interviews with Executive Committee members were conducted and international benchmarks were taken under consideration. As a result, the NWoW framework and policy, as well as the RE construction guidelines for the new work areas were designed. The new model will be pilot tested in 2 buildings in 2024.

Performance Management: The 2022 performance cycle "Become & Achieve" was timely completed for 98% of eligible employees. In this context, 110 performance calibration meetings were held, while the Objections Committee for performance evaluations of 2022 examined 12 cases. The 2023 performance cycle was launched in March 2023, with 99% of the eligible employees setting their contribution to the team's goals, while 89% of managers received feedback from peer and team members.

Talent Management & Development: In 2023, the "Become & Grow" process was launched in order to identify, develop and retain talent across the organization in an organized and systematic way, in line with the overall strategic framework. The digital platform was also developed in order to support the implementation of the new process "Become & Grow", while 10 awareness sessions were held addressing all people managers to familiarize with the new approach. Furthermore, the mapping of all employees with potentiality and readiness was completed, resulting to the classification of 1,200 employees in customized Talent Development Programmes, based on the assessment of performance, potentiality and readiness to undertake a more complex role. Specific actions were designed for the development and retention of Talent Programmes

participants, while all employees were given the opportunity to design an Individual Development Plan. The implementation of these actions started in the 2nd semester 2023 and is expected to be completed within 24 months.

Development Centers: 58 Development Centers were designed and implemented in order to identify the skills and development potential of organization's people and to support the promotion process and succession planning. The outcomes of the evaluation form the basis for the creation and implementation of individual development plans, with multiple benefits for the organization and the executives.

Succession Planning: The deployment of the Succession Planning process continued for the whole organization with the identification of potential successors for critical roles and the development of the validation process by the pillar Heads. In this context, potential candidates for critical positions are being identified, based on the "Become & Grow" outcomes related to their potentiality and readiness to undertake more complex roles.

Meritocracy in selection and promotion of staff: In 2023, 197 internal job postings were posted, while in the same period the Bank received about 2,115 resumes from external candidates and 213 internal transfer requests in "Workable" platform. The number of positions that were filled in 2023, through them, was 248, out of a total of 296 staffing needs that were approved within the reference year, while at the same time 382 promotions of existing staff were completed.

Management trainee program & internship program: In the same period, 67 candidates were evaluated and 10 new trainees joined the 12-month management trainee program, aiming to hire the best of each year with an indefinite contract. At the same time, 63 young people have completed their internship program.

A culture of ethics, inclusion and equal opportunities: As part of ensuring that business ethics are incorporated in all its activities and that all employees are fully aligned with its values and principles, in early 2023 the Code of Conduct & Ethics' updated context was approved by the BoD of the Bank, in order to align with the current institutional and regulatory framework, Environmental, Social and Governance ("ESG") principles and Group's updated policies and regulations. The updated Code of Conduct & Ethics was assigned to all employees through the educational platform ".edu" in order for them to be aware of its content. Within the framework of the Policy and Procedure against violence and harassment, 13 reports regarding unprofessional behaviors were submitted through the whistle-blowing channel, which were handled by the new committee established in overseeing such cases.

Violence and harassment in the workplace: With the aim of ensuring a working environment that promotes respect and zero tolerance for incidents of violence and harassment, educational actions were implemented to align the new committee to deal with incidents of violence and harassment and to form a mutual understanding of the Group HR team that investigate the incidents. At the end of 2023, the Violence and Harassment Committee received a total of 28 cases, of which 23 were examined, in accordance with the institutionalized procedure.

"yello" – The new intranet of the Bank: The redesign of the new intranet ("yello") aligns with the organization's strategic directions for internal digital transformation and supports NWoW. In July 2023, the 1st Minimum Viable Product ("MVP") was implemented. The new common digital communication hub provides all employees with 24/7 access from any device to operational and business news, articles on strategic issues and the organization's culture, and an updated employee directory. Since its launch, the new intranet has been visited by approximately 8,800 unique users with over 2.6 million visits, while 3 articles and 6 operational news are posted every day, on average.

Health, safety & well-being of employees and their families: Actions focused on strengthening the culture of health and safety prevention. In April 2023, the "Holistic Health Week" was organized, where over 700 employees participated in preventive screenings and attended cybertalks on health and well-being topics. At the same time, experiential first aid training sessions were conducted covering 70 employees. At the same time, in collaboration with the Kids Save Lives Association, the 5 defibrillators of the Bank, based in central administration buildings were registered in a Nationwide AED Map so that they are accessible to the community. Personalized counselling through the 24/7 Helpline and free 1:1 sessions continued to be active for all employees and their families. To support parenthood, a total of 120 cumulative maternity leaves were granted in the

first semester. During this period, no accidents were recorded according to the European Statistics on Accidents at Work ("ESAW") methodology.

"Ef zin" program: With a holistic Mind-Body-Bonds approach, a total of 46 actions were carried out in 2023 as part of the Bank's health and well-being program, both physical and digital, with over 5,200 employees from across Greece showing interest in these actions. The actions include, among others, participation in major running events, workshops that raise awareness on environment issues, actions that raise awareness on social issues, cultural and recreational activities for employees' children of all ages.

Piraeus Group Personnel Institution for Occupational Retirement, Life & Medical Provision ("IORP"): Following the establishment of the allowance for assisted reproduction in 2022, by the Collective Labor Agreement, the reimbursement of the relevant benefit to the eligible population was completed in the first semester of 2023. Additionally, the Group expanded the coverage of the Medical-Pharmaceutical Program by increasing the maximum insurable age limit for the employees' children by three (3) years, from 25 to 28 years of age, regardless of their educational status, in order to improve their level of medical care for its employees and their families.

Directors' Remuneration Policy Update: Following a respective recommendation by the Remuneration Committee, and the proposal of the BoD of the Company, approved by the annual GM of Shareholders, conducted on 27 June 2023, the amendment of the Company's Directors' Remuneration Policy took place, in accordance with article 110 of Law 4548/2018. The revised Directors' Remuneration Policy is available in the corporate website[5].

Group Remuneration Policy: In July 2023, following a relevant recommendation by the Remuneration Committee and approval by the BoD, the Group Remuneration Policy was updated in order to be aligned with the existing regulatory framework and the market trends.

Variable Remuneration Schemes

- **Annual Variable Incentive Scheme:** During the 2nd semester of 2023, the annual variable incentive scheme was implemented to employees for the performance year 2022, rewarding employees' high performance (employees from the level of general manager or higher were excluded according to the law). The incentive scheme is structured to enhance both the individual and team effort and the amounts are determined based on predetermined, measurable, quantitative, and qualitative criteria that are related to the Group's strategy.
- **Retention Scheme:** In the context of strengthening the commitment of Senior Management team in the organization, the BoD, upon the Remuneration Committee's recommendation, approved in May 2023 a one-off scheme aiming to align this specific population with the long-term progress and profitability of the Group. The said scheme provides for the fulfillment of specific conditions and its mechanism is fully harmonized with the applicable legal and regulatory framework.

Free Distribution of Shares Plan: Following the respective recommendation by the Remuneration Committee and the proposal of the BoD, the annual GM, conducted on 27 June 2023, decided to grant free common shares of the Company aiming to compensate executives and employees for their contribution to the achievement of the Group's strategic objectives and of specific financial and operational goals, and/or to retain them and recruit new, remarkable and capable executives, that serve and ensure the long-term interests and sustainability of the Company and its affiliates. Additional disclosure on the beneficiaries, the conditions or/and performance and/or retention criteria will be provided ex-post in the Remuneration Report.

Establishment of a Stock Option Plan: The Company's BoD, pursuant to the authorization granted on 7 April 2021 by the Extraordinary GM of the Company's shareholders according to article 113 par. 4 of Law 4548/2018, proceeded on its meeting held on 16 November 2023, to the establishment of a Stock Option Plan for executives and employees of the Company and its affiliated companies within the meaning of article 32 of Law 4308/2014, in the form of stock option rights. The Plan will

[5] https://www.piraeusholdings.gr/~/media/Com/2023/Files/Investors/Corporate-Governance/board/PFH-en-Directors-Remuneration-Policy2023.pdf

serve as a means of payment of remuneration payable in instruments, to employees and executives of the Company and its affiliated entities, on the terms and conditions provided in the Directors' and the Group Remuneration Policies and the particular remuneration schemes adopted from time to time.

The basic terms of the Stock Option Plan are included in the relevant Company's announcement dated 17 November 2023.[6]

Anti-bribery and corruption

The Group is committed to high standards of ethical behavior and operates a zero-tolerance approach to bribery and corruption. In this context, the Group has adopted appropriate measures to protect its reputation in matters of ethical conduct, financial integrity and reliability of its operations. Consequently, all employees receive training for the recognition and avoidance of involvement in bribery and are encouraged for the awareness and prompt reporting of any case in which bribery is suspected within the administration of the Group.

The prevention, detection and reporting of bribery is the responsibility of all employees and the Management of the Group as detailed in the Group Whistle Blowing Policy, the Anti-Bribery Policy and the Conflict of Interest Policy. Moreover, Group employees are familiar with the Code of Conduct and Ethics, which describes the mission, the role and the main policies and procedures regarding HR. For the purposes of the foregoing, the Group has established appropriate communication channels for those reporting on cases of bribery, fraud and corruption or for any potential suspicion, with the utmost confidentiality so as to immediately inform the competent authority. By authorization of the Audit Committee, the Bank Whistleblowing Committee is responsible for the management of confidential claims made by employees or third parties regarding the Group. The Group Internal Audit ("GIA") has been charged with the management concerning the confidential reporting of staff on issues of bribery, corruption and fraud.

Participation in Global Sustainability Initiatives

Piraeus Group adheres to sustainability standards and principles, aiming to conduct its business with transparency and in an environmentally and socially responsible manner. The Bank is a member of the United Nations Global Compact and the United Nations Environment Programme – Finance Initiative ("UNEP FI"). The Group has signed the UN Declaration "United in the Business of a Better World", supporting global business partnerships with responsibility and transparency, the Women's Empowerment Principles ("WEPs") under the UN Global Compact and UN Women and the Commitment to Financial Health and Inclusion ("FH&I") under UNEP FI.

The Bank is a full member of the Hellenic Network of Corporate Social Responsibility ("CSR Hellas"), of the ESG-Sustainability-Governance & Green Banking Steering Committee of the Hellenic Banking Association ("HBA") and participates in working groups for sustainable banking. In addition, the subsidiaries Piraeus Asset Management A.E.D.A.K. and Iolcus Invetsments AIFM are signatories to the UN Principles for Responsible Investment ("PRI").

ESG Ratings and Sustainability Distinctions

Piraeus Group is included in the FTSE4Good sustainability index and the Bloomberg Gender Equality Index which assesses the organization's contribution to gender equality. The Group received a "Management B" rating (scale A to D) in the climate change assessment of the independent non-profit organization Carbon Disclosure Project ("CDP") and an "A" rating from the

[6] https://www.piraeusholdings.gr/en/press-office/press-release/2023/11/press-release-17-11-2023

MSCI ESG index (AAA to CCC scale). ISS Corporate Solutions rated the Bank with "1 – HIGHER DISCLOSURE" in the environmental pillar, and 2 in the governance and society pillars (scores as on 1 December 2023 / a score of 10 indicates higher risk).

The Bank is the only Greek Financial Institution included in the Financial Times "Europe's Climate Leaders 2023", for the significant reduction it achieved in Scope 1 and Scope 2 emissions intensity, over the period 2016-2021 and its commitment to emissions reduction plans. It is worth mentioning that the Bank is the only Greek company included in this list for three (3) consecutive years. Finally, it is the only Greek bank included in the sustainable investment register of the Forum Ethibel as a "Pioneer" in sustainability practices.

Commitment to the Principles for Responsible Banking

The UNEP FI Principles for Responsible Banking ("PRB"), launched in 2019, aim to align the activities of banks with the 17 UN Sustainable Development Goals ("SDGs") and the Paris Climate Agreement. The Bank has been elected on the UNEP FI Banking Board and holds one (1) of the two (2) co-chairs. The overall oversight for the implementation of the Principles rests with the Group CEO, who is also one of the 20 Heads of banks and insurance companies from around the world participating in the Leadership Council of UNEP FI.

The Bank has published its fourth annual progress report on the PRB[7], including its portfolio impact analysis results. The "Portfolio Impact Analysis Tool for Banks" (the "Tool") was developed by UNEP FI and the dedicated working group in which the Bank participated. The Tool estimates the positive and negative impacts that the financing activities of banks have on sustainable development and more specifically on three (3) pillars: natural environment, social, socio-economic.

Following the Portfolio Impact Analysis and the strategic priorities of the organization, the Bank prioritizes the following areas as the most significant:

- FH&I, focusing on Healthy Economies and Flourishing Micro-Small and Medium-sized Enterprises ("MSMEs"), and
- Climate Stability.

The Bank has set SMART (i.e., Specific, Measurable, Achievable, Relevant, and Time-bound) targets for FH&I and for Climate.

FH&I Targets

The Bank has signed the UNEP FI Commitment for FH&I and participates in the UNEP FI working group, that aims to establish Key Performance Indicators ("KPIs") for mapping, monitoring, and setting targets. The aim is to support the most vulnerable people to have opportunities to secure and maintain their standard of living and take steps to improve their financial health, such as long-term financial planning and access to credit and insurance. According to its first target announced, the Bank will provide at least 3,000 young farmers with effective access to loans, in order to start or continue their own farming business and live in the countryside.

ESG Strategy – Piraeus Group's climate strategy and ESG indicators

Piraeus Group business strategy and financial planning aim at promoting, through the subsidiary Piraeus Bank, responsible and sustainable banking. This is outlined in the Group's Sustainable Development Policy and its ESG strategy, which puts special emphasis on four dimensions:

[7] For the alignment of the Bank with the Principles of Responsible Banking, see: https://www.piraeusbank.gr/~/media/gr/idiwtes/files/unep-fi/2023_pb_prb_report_2022-final_pages.pdf

• Reach net zero in own operations by monitoring and managing environmental impact closely, investing in operational efficiency solutions, and sourcing 100% renewable energy for the Bank buildings;

• Steer portfolio towards net zero by 2050 by focusing on the carbon-intensive sectors and measuring alignment of lending with our climate and nature solutions;

• Support and advise clients in line with a carbon neutral and nature positive economy by accelerating the green economy, financing transition, and pioneering financing for new technologies and business models;

• Manage climate by fully integrating climate and environmental risks in the risk management framework and by helping clients protect their business from climate and environmental risks, providing advice, and financing their transition.

ESG Risk framework

Piraeus Group has established a comprehensive Risk Management Framework to identify, measure, control, and mitigate underlying risks, including climate and environmental risks. The annual Risk Identification ("RID") process is applied to identify the relevant and material risks, by taking into consideration the environment in which it operates and its business model. The risks that are expected to have a substantive financial or strategic impact on the Group's business are deemed material. The materiality assessment can be performed on a quantitative or qualitative basis or through a combination of both. During the RID exercise, "climate change" (physical & transition risks) has been recognized as a risk driver for many key risk categories (i.e. credit, market, liquidity, operational, business & strategic, and reputational risks), and ESG and climate-related risks have been identified as a standalone risk subcategory as well. Moreover, since the Group recognizes that climate change-related risks are expected to intensify in the longer term (i.e. over the next five years), it has launched several initiatives to take account of environmental considerations in the business targets, strategies, risk management, and decision-making process.

The Group has already identified the business functions across all Three Lines of Defense ("LoD") related to or affected by Climate-related and environmental ("C&E") risks and the respective policies in order to map any gaps and ensure that climate and ESG aspects are incorporated accordingly. In this context, a review of Group's policies has been initiated and separate working groups per function are formed to support responsible Business Units to review policies under their ownership through a C&E lens.

ESG Disclosure frameworks

All binding disclosure frameworks by the European and/or national legislation have already been embedded in the reporting processes of the Group respecting the corresponding deadlines, while the voluntary is an over-and-above effort of the Bank to provide even greater transparency regarding the Group's management of Climate and ESG issues and its performance (Task Force on Climate Related Financial Disclosures, "TCFD", CDP, Science-Based Targets Initiative, "SBTi", PRB, etc.). Undoubtedly for Financial Institutions, the Pillar III Disclosure in 2023 launched a new mandate regarding Climate and ESG disclosure and benchmarks, that will eventually feed into other climate related disclosure reports.

Piraeus Group acknowledges that the full incorporation of C&E Risks in its disclosures is an ongoing process and enhances its efforts, in order to gradually strengthen its capabilities with the aim to be fully compliant by 2024 also with other reporting frameworks (i.e. Corporate Sustainability Reporting Directive, "CSRD", Sustainable Finance Disclosure Regulation, "SFDR" etc.).

Piraeus Group's disclosures are subject to rigorous internal and/or external controls ensuring their completeness and compliance with the prevailing standards. With these control mechanisms in place, incomplete and misleading Climate & ESG information is avoided, and the potential negative reputational impact is mitigated.

Climate Targets - SBTI

In line with its climate strategy, Piraeus Group submitted intermediate science-based emission targets to the SBTi, which aim to reduce greenhouse gas emissions by 2030, both in operations and in lending & investment portfolios. The Bank adopted the SBTi methodology, as it provides a clearly defined pathway for financial institutions to reduce greenhouse gas ("GHG") emissions, helping prevent the worst impacts of climate change and future - proof business growth. Piraeus Group has set mid-term (2030) targets for operational emissions (Scope 1 and Scope 2). Additionally, Piraeus Group has set targets for 9 asset classes, of which 6 follow the Sectoral Decarbonization Approach ("SDA") and 3 the Temperature Rating Methodology ("TRM") methodologies.Overall, the SBTi targets aim to reduce emissions by over 50% by 2030. This target setting is in line with the national targets (National Energy and Climate Plan, "NCEP"and Climate Law) according to which Greece will reduce emissions 55% by 2030 and 80% by 2040.

Progress results for 2022 are presented in the Table below.

Operations	GHG emissions Scope 1 & Scope 2 (tCO2eq) (base year 2019)	GHG emissions Scope 1 & Scope 2 (tCO2eq) (target year 2030)	GHG emissions reduction (%)	Actual GHG emissions intensity (2022)	Actual GHG emissions reduction (2022)	Progress
• Direct and indirect GHG from branches and administrative buildings	**7,880**	**2,136**	**-73%**	**2,083**	**-74%**	✓
• Continue annually sourcing 100% renewable electricity through 2030						✓

Portfolios under the SDA	GHG emissions intensity (base year 2019) in kg CO_2/ m^2	GHG emissions intensity (target year 2030) in kg CO_2/ m^2	GHG emissions reduction (%) per m^2	Actual GHG emissions intensity (2022) in kg CO_2/ m^2	Actual vs expected GHG emissions reduction (2022)	
• Commercial RE loans in residential buildings managed by companies	34	17	-50.2%	24	-29.5% | -13.8%	✓
• Commercial RE loans in commercial buildings managed by companies	59	25	-58.1%	45	-23.5% | -15.9%	✓
• Commercial RE investments in residentials buildings	33	16	-50.2%	25	-23.1% |-13.7%	✓
• Commercial RE investments in commercial buildings	71	30	-58.2%	41	-41.8% |-15.9%	✓
• Investments in listed RE companies (“REITs”)	59	25	-58.1%	45	-23.5% |-15.9%	✓
• Investments in bonds issued by companies active in the electricity production	0.657 tn CO_2/ MWh	0.335 tn CO_2/ MWh	-49.1%	0.575 tn CO_2/ MWh	-12.5% |-13.4%	✓

•	Electricity generation sector: continue financing and investing only in renewable electricity activities through 2030					✓

Portfolios under the TRM	Portfolio temperature score[2] (base year 2019)	Portfolio temperature score (target year 2027)	Temperature reduction per annum		Actual temperature score for 2022	
• Investment in listed stocks	2.83 °C	2.42 °C	-0.051 °C		3.19 °C	⊖
• Long - term (>1 year) loans (for large corporates with 500+ employees)	2.85 °C	2.43 °C	-0.052 °C		2.56 °C	⊖
• Investment in corporate bonds of listed companies	1.83 °C	1.80 °C	-0.004 °C		2.26 °C	⊖

✓ On track to achieve 2030 target ⊖ Continue working in order to achieve targets

To support its sustainable finance and meet emission reduction targets Piraeus Group has developed:

- a dedicated **Sustainable Finance Framework ("SFF")** that aims to establish a clear and comprehensive methodology for identifying sustainable financing, thus facilitating the monitoring of the Bank's performance against sustainability-related strategic aspirations and targets;
- a **Green Bond Framework** under which the Group issues green bonds and uses the proceeds to finance the low-carbon economy transition in Greece;
- **Sustainability Linked Loans Framework** for loan instruments for which economic characteristics can vary depending on whether the borrower achieves predetermined sustainability performance objectives.

Task Force on Climate Related Financial Disclosures (TCFD) Recommendations

The Group complies with the TCFD Recommendations, that suggest disclosing detailed financial information on climate change management in four (4) pillars: Governance - Strategy – Risk Management ("RM") - Metrics and Targets. In 2023, the Bank published its fourth comprehensive report, which was externally assured.[8]

Energy Transition

Piraeus Group has launched its Energy Transition Project as a concrete commercial program/ action plan, which will allow the Bank to assume a frontrunning role in its clients' transformations to build a better and more sustainable Greek economy. It will leverage a structured approach and deep understanding of the specific needs of each sector with priority focus on Power Generation, RE / buildings, Agriculture and promote a tailor-made approach to support small businesses and individuals. The Group's ambition on energy transition: € 5 billion energy transition financing by 2026, including bonds issuance and in-house mutual funds.

Environmental and Carbon Footprint

The Bank's Environmental Management System is registered under the EU Eco-Management and Audit Scheme ("EMAS") and is certified in accordance with ISO 14001:2015, whereas from 2024 onwards it will also be certified according to the International Standard ISO 50001:2018 for energy management. The environmental data and KPIs are reported in the Group's Sustainability & Business Report and in the Environmental Statement. Electricity consumption, as well as Scope 1, Scope 2 and Scope 3 GHG emissions are externally assured according to the relevant Global Reporting Initiative ("GRI") Standards.

It is worth noting that to meet its Scope 2 targets, the Bank has secured Guarantees of Origin ("GOs"), certifying that 100% of the electricity consumed on its premises are sourced from renewable energy, thus achieving zero Scope 2 market-based emissions. According to the latest available data, 38,900 MWh were cancelled in the electronic certificate registry at a cost of € 23.300 (plus VAT 6%). This cost is expected to rise significantly in the future.

Scope 1 emissions saw a 27% annual decrease, due to the reduced heating oil consumption and the decreased use of refrigerants added to air-conditioning systems. Since 2019, direct emissions (Scope 1) have dropped by 27%.

Scope 2 emissions were reduced by approximately 30% YoY, following the energy saving interventions, the change in the country's energy mix and the shrinking branch network. Scope 2 emissions have been reduced by 51% over the period 2019-2022.

In total, the operational footprint of the Bank (Scope 1, Scope 2 location-based, Scope 3 categories 1-14) has been reduced by 7% over the period 2021-2022.

[8] Piraeus 2023 TCFD report: https://www.piraeusholdings.gr/~/media/Com/2023/Files/Sustainable-Banking/2023_PIRAEUS_GROUP_TCFD_Report_.pdf

The financed scope 1, 2, and 3 emissions attributed to the exposures of the Group have been estimated based on the Partnership for Carbon Accounting Financials ("PCAF") methodology. The methodology comprises two main steps: first the determination of the scope 1, 2, and 3 emissions of the counterparties and then their attribution to the Group's financed activities. Due to data availability constraints, different methodological approaches were applied to estimate the scope 1, 2, and 3 emissions of the Group's counterparties, namely:

- Method 1: Published emissions were used, where verified or unverified emissions were collected from the counterparty directly (e.g. through the company's sustainability report) or indirectly via verified third-party data providers (e.g. CDP), EU Emissions Trading System ("EU-ETS") Registry, Thetis database). Particularly for the sector H.50 (maritime transport) the Thetis database was utilized, through which each counterparty was linked with its owned vessels based on the respective International Maritime Organization ("IMO").
- Method 2: GHG emissions were calculated based on primary physical activity data collected from the borrower, applying appropriate emission factors issued or approved by a credible independent body. The method has been implemented only for sector D.35.11 regarding power generation companies using renewables. The emissions of all counterparties in D.35.11 that use fossil fuels were estimated under Method 1.
- Method 3: GHG emissions were calculated based on economic activity data of the counterparty in question (e.g. total revenues or total assets) and appropriate emission factors expressed per economic activity (e.g., tonnes of CO_2 equivalent per million EUR output of the corresponding sector). To this end, a multiregional input-output analysis was implemented for estimating emission factors per economic activity by utilizing the set of Input-Output tables recently published by Organization for Economic Cooperation and Development ("OECD").

Addressing Climate Change

Every year the Bank assesses, with the use of the Climabiz tool, the climate risk of its business borrowers. The climate risk calculation is done in monetary terms (€) for business borrowers across different economic sectors that are mostly sensitive to climate change. The calculation methodology is based on the utilization of three (3) climate Representative Concentration Pathways ("RCP") scenarios of the Intergovernmental Panel on Climate Change ("IPCC").

To assess climate related risks, Climabiz uses a set of RCPs of the IPCC, which are GHG concentration scenarios that are commonly used in the climate modeling community.

Each of the RCPs used by Climabiz offers a plausible and internally consistent description of the future:

- RCP2.6 is a "very stringent" pathway and is likely to keep global temperature increase below 2°C by 2100.
- The intermediate IPCC stabilization scenario, RCP4.5, is more likely to result in a global temperature rise between 2°C and 3°C by 2100 (35% higher than that of RCP2.6).
- The high emission pathway, RCP8.5, is generally taken as the basis for the worst-case scenario (with a global mean temperature increase of approximately 4-5°C).

The Climabiz measures both physical and transition risk quantifying them separately. The quantification considers several factors (e.g. counterparty's economic sector, annual turnover and location). The financial impact is then expressed on a relative basis compared to the company's annual turnover.

The table below presents the percentage of physical risk and transition risk over total climate risk per each RCP climate scenario for the Bank's corporate portfolio in 2022.

Climate Scenarios	% of Physical Risk over Total Climate Risk	% of Adjusted Transition Risk over Total Climate Risk
RCP2.6	7%	93%
RCP4.5	14%	86%
RCP8.5	42%	58%

The key differences concerning the climate risk outputs between the climate scenarios are primarily identified in the fluctuations of the transition risk components, driven mainly by the carbon emissions allowances prices.

For the cost of direct and indirect emissions, three (3) different prices were used for the carbon emission allowances €/t CO_2, for each of the periods 2021-2030/2031-2040/2041-2050, per RCP climate scenario. Indicatively for the period 2021-2030, the emissions allowance price used for the climate risk calculation were:

- € 80/t CO_2 for RCP2.6
- € 73.5/t CO_2 for RCP4.5
- € 21.44/t CO_2 for RCP8.5.

The aim is to establish processes for collecting and utilizing climate and environmental information needed to assess the business borrower's vulnerabilities to those risks, notably before concluding a loan agreement, in line with the Bank's risk policies and procedures.

Furthermore, the broader aim is the gradual and systematic integration of climate risks in all business and operational activities.

Exploring biodiversity challenges

Following the signing of the global "Finance for Biodiversity Pledge", to set targets by 2024 for supporting business activities that protect and enhance the natural environment and reverse biodiversity loss, Piraeus Group participates in international finance and biodiversity initiatives. It follows developments in the financial sector, globally and in the EU, regarding the management of biodiversity dependency and risks.

In 2022, the Bank developed a methodology (the PHYSIS tool), based on existing databases and best practices, to assess impacts of its financing on biodiversity. Following a pilot impact analysis for the energy and agriculture sectors, in 2023 PHYSIS tool was used to incorporate the whole business portfolio for the calculation of the Bank's biodiversity impact.

Materiality Analysis Methodology

Piraeus Group annually discloses and focuses on the most significant non-financial aspects of its operations, in the context of enhancing transparency and sharing information on corporate responsibility issues. For this reason, the Bank annually conducts a "Materiality Analysis", an analysis of the most material sustainability issues, applying the methodology of the GRI Standard, one of the most recognized standards for conducting sustainability reports.

At the first stage of the Materiality Analysis, the Organization identifies its most important stakeholders and engages in a continuous dialogue with them, in order to respond to their needs and expectations, while highlighting current and material

sustainability issues. These issues are characterized as material, as they reflect the Organization's significant economic, environmental and social impacts or they influence the decisions of stakeholders. They form the basis for the development and planning of actions for continuous improvement of the Bank's activities. During the second stage of the Materiality Analysis, the Bank conducts a Materiality Survey and an organized focus group discussion with targeted groups of stakeholders to prioritize material sustainability issues.

In 2022 the Bank advanced the Materiality Analysis process, introducing for the first time the concept of "Double Materiality" in the annual Materiality Survey, in accordance with the current European framework for non-financial information disclosures. Applying the Double Materiality, the Bank seeks to recognize and evaluate on the one hand the impacts that its activities have on the sustainable development of the country, that is, on the economy, society and the environment, and on the other hand how the most significant sustainability issues, such as climate change, the loss of biodiversity etc., affect the financial value of the organization. Double Materiality, therefore, identifies and assesses the sustainability issues that are important for the economy, society and the environment (Impact Materiality) and that have an impact on the Group's business value (Financial Materiality). To conduct the Double Materiality, the Bank examines and identifies the most important and current sustainability issues and includes them into a structured questionnaire, which it addresses to its stakeholders - inside and outside the Organization. In addition to the questionnaire process, focus group discussions with targeted stakeholders are also organized, through which the Bank gathers valuable feedback as well as different perceptions and opinions.

As part of the process, all participants are invited to evaluate, based on a standardised scale, the (actual and potential negative and positive) impact of sustainability issues within and outside the Group. Specifically:

- The Management and shareholders of the Group are invited to evaluate how sustainability issues affect the financial value of the Organization, that is, the degree of impact these issues have on the Bank, while highlighting those that significantly affect the financial results or position of the Bank (Financial Materiality).
- Other stakeholders are invited to assess the scope and degree of impact that the organization's activities have on sustainability issues and highlight those with the strongest impacts on the environment, society, human rights and the economy, while at the same time examining to what extent the Bank contributes to resolving a negative impact (Impact Materiality).

The questionnaire for the Materiality Analysis, conducted as part of the Sustainability and Business Report 2022, included 12 sustainability material topics which received the following score:

Relative Double Materiality Score			
	Impact Materiality* (max 100)	**Financial Materiality (max 100)**	**Double Materiality (max 100)**
Q1. Creation of economic value	95.2	98.3	95.9
Q2. New technologies	94.9	94.3	95.0
Q3. Providing equal access to banking services	92.2	90.9	92.2
Q4. Responsible Banking: Financing sustainable development with environmental and social criteria	100.0	93.7	99.2
Q5. Financing energy transition	98.5	91.7	97.6
Q6. Protection of personal data	99.8	100.0	100.0
Q7. Promotion of human rights	97.6	91.1	96.7
Q8. Combating unconscious biases and stereotypes in the workplace	96.9	87.6	95.6
Q9. Promoting and supporting gender equality	96.7	92.0	96.1
Q10. Supporting the new generation	94.4	91.4	94.1
Q11. Highlighting the development potential of the country's cultural reserve	89.9	87.6	89.7

Q12. Support and promotion of the Creative Economy in Greece	86.9	85.8	86.9
*Impact Materiality = Scope of impact + Scale of impact + Remediability			

It is worth mentioning that the same material topics may change over time, as deeper knowledge of these is acquired. Both the Materiality Analysis and the accompanying text receive third-party assurance, a testament to the Group's commitment to transparency and alignment with international best practices.

Disclosure obligation in accordance with article 8 of the EU Taxonomy Regulation

In 2020, the European Parliament adopted the EU Taxonomy Regulation (EU Regulation 2020/852), setting out an EU-wide framework -a classification system- that allows investors and undertakings to determine whether certain economic activities are environmentally sustainable. On 4 June 2021 the EC adopted the Commission Delegated Regulation (EU) 2021/2139, establishing the technical screening criteria for the climate change mitigation and climate change adaptation objectives, and on 6 July 2021 the Commission Delegated Regulation (EU) 2021/2178 ("the Disclosures Delegated Act"), which supplements Article 8 of the Taxonomy Regulation and specifies the content, methodology and presentation of information to be disclosed by financial and non-financial undertakings concerning the proportion of environmentally sustainable economic activities in their business, investments or lending activities. On 15 July 2022, a Complementary Climate Delegated Act was released in the Official Journal of the EU, including, under strict conditions, specific nuclear and gas energy activities in the list of economic activities covered by the EU Taxonomy. Sequentially, in November 2023, the Delegated Act for economic activities was published in the Official Journal of the EU contributing to the four additional environmental objectives for: sustainable use and protection of water, transition to a circular economy, pollution prevention and control, and protection and restoration of biodiversity and ecosystems. Further amendments were incorporated to add economic activities to the list of those substantially contributing to the objectives of climate change mitigation and adaptation, and to clarify the reporting obligations for the additional four environmental objectives.

The EU Taxonomy is a cornerstone of the EU's sustainable finance framework and an important market transparency tool. It helps direct investments to the economic activities most needed to meet the European Green Deal objectives. The Taxonomy is a classification system that defines criteria for economic activities that are aligned with a net zero trajectory by 2050 and broader environmental goals over and above climate change.

A key indicator of alignment is the Green Asset Ratio ("GAR") which enterprises must disclose from 2024 onwards. For credit institutions specifically, GAR is defined as the proportion of its assets invested in Taxonomy-aligned economic activities over its total covered assets. An economic activity is considered as Taxonomy-aligned when it satisfies all three conditions below:

i. makes a substantial contribution to at least one of the six environmental objectives;
ii. avoids negative effects on the other five objectives (Do No Significant Harm, "DNSH"); and
iii. respects minimum social safeguards.

On the other hand, an economic activity is considered Taxonomy-eligible, as long as it is described in the EU Taxonomy Regulation, regardless of whether it satisfies the above conditions.

The GAR is calculated based on the on-balance sheet exposures (total covered assets) according to the prudential scope of consolidation for the types of assets and accounting portfolios specified in the Disclosures Delegated Act. Credit institutions are required to disclose the aggregate GAR for on-balance sheet covered assets, a breakdown for the environmental objective pursued by environmentally sustainable assets, the type of counterparty, and the subset of transitional and enabling activities.

The disclosure requirements commenced in 2021 and initially focused on Taxonomy eligibility and respective ratios. Starting from the financial year 2023, the disclosures will include information and respective KPIs on Taxonomy alignment, over and above eligibility.

EU Taxonomy alignment (as a proportion of Group's total covered assets (%))	31/12/2023			
	Taxonomy aligned based on turnover € million	GAR % based on turnover	Taxonomy aligned based on CAPEX € million	GAR % based on CAPEX
1. GAR for credit institutions (total of climate change mitigation and climate change adaptation)	-	-	-	-
2. GAR for other financial undertakings (total of climate mitigation and climate change adaptation)	26	5.57	143	30.96
3. GAR for non-financial undertakings (total of climate change mitigation and climate change adaptation)	263	7.50	1,010	28.79
4. GAR for loans collateralized by residential immovable properties (climate change mitigation)	38	0.68	38	0.68
5. GAR for building renovation loans (climate change mitigation)	58	8.89	58	8.89
6. GAR for motor vehicle loans (climate change mitigation)	-	-	-	-
7. GAR for loans to local governments for house financing and other specialised lending	-	-	-	-
8. GAR for collateral obtained by taking possession: residential and commercial immovable properties (climate change mitigation)	-	-	-	-
9. Total	385	0.90	1,249	2.91
Total covered assets	42,965	-	42,965	-
Group's total assets	76,450	-	76,450	-

In estimating the above figures, the Group followed an adequately conservative approach, refraining from recognizing Taxonomy alignment in cases where all regulatory requirements (including technical screening criteria and DNSH) are not fully met. Due to limitations in available information, in particular around dedicated-purpose financings, a substantial amount of exposures that are aligned to the Group's internal sustainable finance framework has not been recognized as Taxonomy-aligned. Furthermore, when it comes to corporates, Taxonomy-aligned activities are limited to undertakings subject to the Non-Financial Reporting Directive ("NFRD") and, as a result, respective KPIs do not include exposures to SMEs.

Piraeus Group reports on Taxonomy KPIs and GARs, based on relevant input from non-financial counterparties, including information on turnover and CAPEX associated with eligible and aligned economic activities. As at reporting date, financial counterparties had not yet reported their Taxonomy-aligned exposures and related KPIs. Taxonomy-eligible and non-eligible activities related to the four non-climate environmental objectives are not reported for the financial year 2023 due to lack of required data.

When assessing Taxonomy-eligible and Taxonomy-aligned activities for financial and non-financial undertakings, actual information published by counterparties has been leveraged to the extent possible.

The Group's total GAR based on turnover amounted to 0.9% of total covered assets, and total GAR based on CapEx was 2.9% of total covered assets as at year-end 2023. It is noted that both ratios cover the two climate-related environmental objectives (mitigation and adaptation) of the EU Taxonomy.

The Group is committed to continuously improve its processes and enhance the availability of data and its frameworks and processes to upgrade its reporting scope according to the EU Taxonomy.

Through its financing of large undertakings subject to the NFRD and investments in securities, Piraeus Group supports a variety of economic activities that contribute substantially to the EU environmental objectives. Furthermore, the Energy Transition Business Building project of the Bank contributes to the EU environmental objective on climate change mitigation.

Furthermore, the Group is taking steps to enhance the EU taxonomy eligibility. Namely net credit expansion for Renewable Energy Sources ("RES") projects exceeded € 500 million in 2023. The total RES exposure amounted at € 2.7 billion. This particular loan portfolio grew further as the Group's inaugural Green Bond issued in November 2021 had earmarked € 500 million that are allocated to eligible Green Projects according to the Group's Green Bond Framework. This portfolio is not in absolute accordance with the Taxonomy Regulation, as a full-blown assessment of the technical screening criteria according to the Taxonomy is currently constrained by the limited data availability. However, the Group believes that it can contribute to the increase of the GAR ratio once the alignment criteria (technical screening, DNSH, and minimum social safeguards) are applied.

In Retail Banking, the ESG agenda has unfolded both in the lending and investment products portfolio. The Bank has supported households in the program "Energy Saving at Home" by supporting the effort to upgrade Greece's aging real estate stock and improving the environmental performance of homes, cutting energy costs. In 2023, new production of this portfolio amounted to € 44 million. A complete range of financing solutions to meet every "green" small business need is also provided, such as: financing the installation & upgrade of Photovoltaic Stations, net metering and the energy efficiency upgrade of businesses or the purchase of an electric or hybrid car etc.

The Group's aim is to gradually align its objectives to be consistent with the EU Taxonomy. Our sustainable finance proposition will be to support our customers' transition, incorporating in the relevant processes the definitions and criteria of the EU Taxonomy.

Appendix A presents the reporting templates in accordance with Delegated Regulation (EU) 2021/2178, Annexes VI and XII .

Group Cultural and Social Initiatives

Within the framework of the Group's corporate responsibility strategy, the Cultural and Social Activities unit designs and implements actions and initiatives for Society and Culture.

International initiatives - The Bank is the first in Greece that its CEO Mr. Ch. Megalou signed the UN Global Compact WEPs. In addition, it was included for the 2nd consecutive year in the Bloomberg 2023 Gender Equality Index ("GEI") among 484 companies worldwide.

Aligning its corporate responsibility strategy with key issues and strengthening its relations with society, the Bank has created the EQUALL program, which focuses on three (3) pillars:

GENDER EQUALITY

-Women Founders and Makers - to strengthen female entrepreneurship

In collaboration with 100 mentors, two (2) new cycles were completed in 2023 and a total of 2,196 applications were submitted for 200 vacancies. The 200_beneficiaries received a total of 76 hours of training.

-Women Back to Work - for women's integration into the labor market

In collaboration with 100 mentors, two (2) new cycles were completed in 2023 and a total of 1,272 applications were submitted for 200 vacancies. The 200 beneficiaries received a total of 64 hours of training.

-Women in Agriculture - for strengthening female rural entrepreneurship

In collaboration with 100 mentors, two (2) new cycles were completed in 2023 and a total of 491 applications were submitted for 100 vacancies. The 100 beneficiaries received a total of 40 hours of training.

-Profession has no Gender - to raise awareness for gender stereotypes to the new generation

In collaboration with The Tipping Point, a total of 108 live group sessions were completed in 64 public schools across Greece and 2,409 students benefited, from which 423 are primary school students.

-Piraeus EQUALL 360°

With social equality in mind, the Bank has created "Piraeus EQUALL 360°", a comprehensive bundle of products and services exclusively for women entrepreneurs. Since its launch in April 2022, more than 330 women's businesses have already acquired it.

- EQUALL opportunities for all - to support women survivors of gender-based violence

In collaboration with the Diotima Centre, the programme "EQUALL opportunities for all " was designed and implemented, including personalized support sessions of psycho-educational professional counselling, upskilling, reskilling and preparation for their integration in the labor market. The programme is offered to 25 survivors of gender-based violence with the aim of strengthening their effort to escape abuse and acquire an independent and autonomous life.

NEW GENERATION

-SKILLS 4 ALL - for young people's vocational training and integration into the labor market

In collaboration with Odyssea, the "SKILLS 4 ALL" program was designed and implemented, for the vocational training and interconnection with the labor market of young people aged 17-34 from vulnerable groups. The training focuses on skills acquisition for the tourism and construction industry and is offered to 100 beneficiaries for 2023.

-Experiential Learning Hubs - for students living in remote regions of Greece

In January 2023, the Bank, in collaboration with the Association "Together for Children", inaugurated the Experiential Learning Hub at the 10th Primary School of Komotini. A state-of-the-art classroom specially equipped for teaching science through experiential learning.

-TeenSkills - to enhance students' skills in remote areas of the country

In collaboration with The Tipping Point, the "TeenSkills" program was designed and implemented for high school students of remote and inaccessible areas, namely Promachoi (Pella), Tzermiado (Lasithi Prefecture), Prinos Thassos (Kavala Prefecture) and Korseon Fourni (Samos Prefecture). The programme focuses on cultivating horizontal and digital skills and connecting them with professionals of different specialties and occupations regarding their academic choices and future professional career.

VULNERABLE SOCIAL GROUPS

-Refugee Women Academy - for the vocational training and integration of women refugees into the labor market

Following the Memorandum of Understanding with the United Nations High Commissioner for Refugees in Greece ("UNHCR") and the cooperation with Odyssea, the "Refugee Women Academy" was designed and implemented. The programme provides refugee women with applied training and practical skills for the tourism industry, as well as targeted employability services, enhancing their prospects for immediate employment and social inclusion.

-Programme of actions to strengthen the child protection system

Following their commitment bound by a Memorandum of Understanding, the Bank and the United Nations Children's Fund ("UNICEF") have designed and are implementing a programme to develop a single collaboration protocol for the child protection services stakeholders and strengthen the capacity of state authorities to monitor child protection cases.

-Anagnorizo-Prostatevo ("Identify-Protect") - training of kindergarten teachers for the prevention of child neglect and abuse The Bank and ELIZA have designed and are implementing the programme "Anagnorizo-Prostatevo" ("Identify-Protect"), aiming at training kindergarten teachers to prevent child neglect and abuse. During the 1st pilot phase, 1,650 kindergarten teachers are expected to benefit and all preschool teachers in the country (approximately 16,500) are expected to benefit in the next phase.

-BRAVE IN - return to productivity programme for the vocational rehabilitation of people with acquired brain injury

In collaboration with ELEPAP, the "BRAVE IN" programme was designed and implemented, aiming at the social and labor reintegration of people with disabilities, who have acquired brain injury. It combines holistic neuropsychological intervention with counselling of professional rehabilitation.

-EQUALL HOOPS - for the empowerment and inclusion of children and young people in the Autism Spectrum

In collaboration with Eurohoops, the "EQUALL HOOPS" programme was designed and is being implemented. A programme of empowerment and inclusion of children and young people in the Autism Spectrum, as well as raising society's awareness about neurodiversity, using basketball as a vehicle. "EQUALL HOOPS" includes Special Basketball Education training sessions with free participation on a weekly basis, for 20 boys and girls aged 12 to 22.

Bank's participation in International Fora

- Delphi Economic Forum VIII

Within the framework of Delphi, the Bank organized the side event "Towards a society of equal opportunities", in which proposals were formulated to address key social issues such as gender equality and vulnerable groups (children, young people, refugees, etc.). In addition, important findings were analyzed, and best practices and examples were highlighted.

- Global Refugee Forum 2023

The Bank participated, as a member of the official Greek delegation, in the second United Nations Global Refugee Forum, which took place from 13 to 15 December in Geneva with the participation of 168 countries. The invitation for the Bank's participation in this important international event followed the Memorandum of Understanding signed on April 20, 2023, between the Bank and UNHCR in Greece and the kick-off of the first "Refugee Women Academy" in Greece.

Corporate Responsibility Actions for the dissemination and promotion of Culture

-Piraeus Culture and Creativity 360°

A comprehensive bundle of products and services, specially designed for Art and Culture SMEs. Since its launch in May 2021, at least 209 companies of the Creative Economy have acquired it.

-Programme "Days of Remembrance of Hellenism 1922-1924" for the 100 years since the Asia Minor Catastrophe

Within the framework of this programme, the Bank designed and implemented:

- **Publication "Mosaic of the Rural Rehabilitation of Refugees 1922"** in collaboration with the Aristotle University of Thessaloniki.
- **Documentary** as a tribute to the Asia Minor Catastrophe with historical data and testimonies of rural refugees for their rehabilitation in Northern Greece.
- **Exhibition "From Greater to Contemporary Greece (Part II): The Refugees"** and publication of an album in collaboration with the Historical and Ethnological Society of Greece-National Historical Museum.
- **Digital exhibition and album for the Asia Minor Refugees of Corfu** by the Corfu Reading Society.

Museum Network of the Group Cultural Foundation - Pillar of development for the regions of Greece

The Group's Cultural Foundation has created and is operating a network of nine (9) thematic museums in various regions of Greece, contributing to the economic growth and prosperity of the country. It promotes the tangible and intangible cultural heritage of the country and through it the developmental dimension of culture and the formation of relationships of trust at the local level. At the same time, it undertakes initiatives to increase jobs and create business opportunities for residents of the regions.

The Museums of the Foundation function as cultural hubs in the areas where they are located, acting as pillars of both qualitative and quantitative empowerment of local societies. A study carried out by the Foundation for Economic and Industrial Research in 2019 on the economic and social impact of the operation of Piraeus Group Cultural Foundation ("PIOP") Museums on local communities, calculated an increase in tourism expenditure in the respective regions of the country by € 11.8 million and an impact of museum activity on the country's GDP by € 23 million (conservative estimate). These figures are directly proportional to the number of visitors to the Museums.

The return to "normality" and the organization of various actions and exhibitions at the Museums of PIOP contributed to a significant increase in visitor numbers, as well as revenues, paving the way for a gradual "return" to the figures of the pre-pandemic years. In 2023, emphasis was given to the exhibitions on the centennial of the Asia Minor Catastrophe (an anniversary to which the Hellenic Ministry of Culture and Sports has given a three-year duration 2022-2024) at The Rooftile and Brickworks Museum in Volos and the Museum of Industrial Olive-Oil Production of Lesvos, as well as exhibitions and activities related to the thematics of the Museums of PIOP. The two (2) extreme weather phenomena Daniel and Elias that affected Thessaly in September, caused severe damages to The Rooftile and Brickworks Museum in Volos. PIOP and the Bank have committed to the complete restoration of the Museum and its reopening in 2024.

Related Party Disclosures

With reference to the transactions of the Group with related parties, such as members of the BoD and the management of the Group and its subsidiaries, with the Group's subsidiaries, associates, and joint ventures, these were conducted in usual market terms and within the normal course of business and were not material in 2023. Detailed information is included in the 2023 annual financial statements in Note 46, which is incorporated herein by reference.

Group Risk Management ("GRM")

RM is a core function of the Group, targeting to an effective and efficient identification, management, monitoring and reporting of risks. Through the Risk and Capital Strategy and the individual RM Policies (Risk) as well as relevant methodologies and procedures, the principles of an integrated RM framework are defined in order to support the achievement of the Group's strategic and business objectives, as defined by the BoD.

The RM function is not limited to the activities of the GRM and the Chief Risk Officer ("CRO") but refers to the processes performed by all 3 LoD, based on the assigned responsibilities, in the context of an enhanced RM.

The Group has established policies, procedures, and adequate mechanisms for RM, at the level of all 3 LoD, in order to identify, manage, monitor and report risks. The procedures in place promote the independence of risk-taking, RM and control activities.

The broader RM framework at Group level is constantly evolving, taking into account the current economic environment, strategic and business plans, the Bank's historical data, market dynamics, supervisory and regulatory requirements, the Group's Corporate Governance framework, international best practices and shareholder interests.

In this context, the key driving principles of GRM are described below:

- Strategically manage capital and liquidity;
- Enhance RM capabilities;
- Continuous enhancement of risk governance and control framework;
- Shape and maintain a strong Risk Culture.

During 2023, GRM continued strengthening the Group's RM framework which interacts with the Group planning processes in alignment with the in force regulatory framework, the supervisory expectations and the strategic guidelines.

Indicatively, for 2023 key risk strategic and functional objectives include:

- ✓ Early warning system ("EWS") development for the efficient performing loan portfolio management;
- ✓ ECB roadmap on climate-related and environmental risks, including Climate Stress testing;
- ✓ Compliance with Guidance on Loan Origination and Monitoring;
- ✓ Credit risk models calibration based on the EBA New Definition of Default;
- ✓ Value at Risk ("VaR") methodologies enhancements;
- ✓ Liquidity RM framework and Stress Testing enhancements (including ILAAP & Resolution);
- ✓ Interest Rate Risk in the Banking Book ("IRRBB") initiatives;
- ✓ Completion of risk models validation assessments aiming at the timely use of new or updated models in alignment with the regulatory requirements;
- ✓ Operational risk ("OR") framework and control enhancement.

Additionally, being in constant vigilance on market developments, the Group monitors and manages the exposure to interest rate and market risk due to the changes in interest rates on the fair value of fixed rate debt securities. In order to mitigate its interest rate risk the Group enters into Interest Rate Swaps ("IRSs"), consistent with the Group's overall interest rate RM strategy (incorporated herein by reference to Note 4.11 of the annual financial statements for the year 2023).

Moreover, the Group faces, amongst others, market and liquidity risks incorporated herein by reference to Notes 4.9 and 4.12 of the year 2023 Financial Statements.

Key Committees with GRM participation

Board Committees

- Risk Committee
- Audit Committee

Executive Committees

- Executive Committee
- ALCO
- Provisioning Committee
- Resolution Planning Committee
- Resolution Committee
- OR Committee
- Senior Credit Committee, Recovery Credit Committee and other Credit Committees
- Group Planning & Monitoring Committee
- ESG & Corporate Responsibility Committee
- Data Governance Committee
- Whistle Blowing Committee
- Risk Models Oversight Committee
- RE Committee
- Project Proteus Steering Committee

The GRM reports to the CRO, with main responsibilities per function as briefly described below:

CRO's office | Function main responsibilities:

- The function is responsible to support the CRO in various activities and manage, coordinate, advise on and monitor various risk initiatives and projects and consolidate overall view on figures, responses, alignment of stakeholders. Additionally, it undertakes and coordinates the support of the CRO in its capacity as the Executive Secretary of the BoD Risk Committee.

Credit Risk Management | Function main responsibilities:

- Credit RM engages in the early recognition, measurement, monitoring and reporting aiming at an effective management of Credit Risk through an integrated framework of policies, methodologies, procedures and systems that allow for the development of a profitable loan portfolio within the acceptable risk profile.
- It has the responsibility for the planning, specialization and implementation of credit risk strategy and policies. It uses the appropriate methods, including the use of models for the provision, acknowledgement, measurement and monitoring of the said risks aiming at the above-mentioned. Additionally, it has the responsibility for the provision of information regarding the evolution of the said risks to the responsible Committees and Group Management on a regular basis.

Several tasks and projects were deployed during 2023 to facilitate and enhance RM practices as presented in Table 1.

Capital Management, Risk Strategy & ESG Risks, Market, Liquidity & Asset Liability Management ("ALM") Risks | Function main responsibilities:

- Capital Management, Risk Strategy, Market, Liquidity & ALM Risks unit supports the development and implementation of the Group's Strategy, aiming at the effective management of risks and balance sheet optimization. To this end, the unit is responsible for the development and maintenance of the RID and the Risk and Capital Strategy, including the Risk Appetite Framework ("RAF") of the Group, in accordance with the Risk Committee and BoD's directions and guidance;
- Additionally, the establishment of the dedicated unit (ESG Risks unit) aims at the integration of ESG Risks into Group's strategy, operations, processes and RM framework;
- Moreover, it is responsible for the design and implementation of the Group's ICAAP and leads the preparation and execution of regular enterprise-wide stress tests. Further, it is responsible for the coordination and overall maintenance of the Group's Recovery Plan;
- Also, the function is responsible for the measurement, monitoring and reporting of capital requirements and capital adequacy ratios of the Group;
- The function is responsible for the development of the RM framework (policies, methodologies, models and processes) with respect to market, liquidity and ALM and other financial related risks. To that end, the unit deploys proper methods, including models, that allow the identification, measurement and monitoring of the aforementioned risks;
- Moreover, it is responsible for the design and implementation of the Group's ILAAP and leads the preparation and execution of regular enterprise-wide liquidity stress tests;
- Lastly, the function is responsible for the measurement, monitoring and reporting of liquidity supervisory requirements and liquidity regulatory ratios of the Group.

During the current reporting period, Capital Management, Risk Strategy & ESG Risks, Market, Liquidity & ALM Risks unit has undertaken a number of strategic risk initiatives, as presented in Table 1.

Group Control and Risk Data & Solutions | Function main responsibilities:

- Group Control and Risk Data & Solutions unit is responsible for the identification, assessment, monitoring, and reporting of OR arising from the Group's activities, through the development, implementation and evaluation of an adequate Internal Control System ("ICS"), in order to ensure the safe and efficient operations of the Group and the achievement of its business objectives. Also, the unit is collaborating with Segment Controllers to accomplish its mission;
- It is responsible for the development, implementation, assurance and supervision of the Operational Risk Management Framework ("ORMF") and the ICS Framework of the Group, with the aim to defend the business objectives and limit the risks undertaken to the acceptable levels defined by the Management;
- It contributes to the mitigation of risks arising from potential limitations in the development, or use of the Bank's models (model risk), by developing/ maintaining and implementing a Model Validation Framework and by contacting independent validations regarding the robustness, accuracy and effectiveness of the Bank's models, while contributing to the improvement of models' quality;
- Additionally, it has the responsibility for the planning and implementation of independent, ex post/ post approval, regular, qualitative and quantitative review of the application of the approved financing policies and approval procedures, as well as the provisions and write-offs policies, within the framework of the 2nd LoD, on the loan portfolio of the Group, including the Performing and Non-Performing loans as well as the Factoring and Leasing subsidiaries;

- Finally, the function contributes in supporting, coordinating, initiating and implementing initiatives in the domain of the risk data management, with the use of risk data analytics and business intelligence tools and methodologies, in compliance with the Group's Policies, the regulatory framework and the industry's best practices.

During 2023, Group Control and Risk Data & Solutions has led in a number of strategic and functional risk initiatives, as presented in Table 1.

TABLE 1 – KEY INITIATIVES for 2023

Function	Key initiatives
Credit RM	▪ Development of the Active Loan Portfolio Management and Rebalancing of Risk/ Return methodology; ▪ Design of asset quality indicators under the supervisory guidelines of Loan Origination framework; ▪ Enhanced automation and efficiency improvements in Credit Risk monitoring to aid decision making; ▪ Revision of the Model Management and Governance Framework ("MMGF") to reflect regulatory expectations and introduction of the Model Development Policy; ▪ Revision of the credit rating assessment models, incorporating the new Definition of Default; ▪ Development of Energy Performance Certificate ("EPC") rating models and Gross Value Added ("GVA") macro models to support the ESG program; ▪ Calibration and system implementation of rating model for the RE portfolio; ▪ Development of methodology and system implementation for the incorporation of Climate risk impact into the Corporate Rating models; ▪ Updates on International Financial Reporting Standard ("IFRS") 9 model infrastructure: revised measurements on Credit Conversion Factor ("CCF") and Loss Given Default ("LGD") components; ▪ Optimization of ECL calculation engine's functionalities; ▪ Active participation in the On-Site Inspection on the Commercial RE Portfolio supporting Bank's approaches; ▪ Led the credit risk stream of the EBA Stress Test 2023.

Capital Management, Risk Strategy & ESG Risks	▪ Further strengthening of RAF by introducing additional metrics and alternative calibration methodologies, reflecting the evolving Group's strategic aspirations and risk profile; ▪ Further integration of Climate & Environmental Risks into the RM framework and active participation in the regulatory dialogue; ▪ EBA Stress Test 2023 execution – successful submission of all cycles of the EBA 2023 Stress Test, with significantly improved results versus prior EU Wide Stress Test, leading to a reduction in the Group's P2G by 50 bps; ▪ ICAAP 2022 execution and submission – addressing all previous ICAAP SREP findings; ▪ Transition to an updated version of the Risk Authority capital requirements calculation engine, in preparation of the upcoming Basel IV regulatory framework; ▪ Initialization of a dedicated project to enhance the governance framework of securitization transactions, by recording all relevant processes and procedures, as well as by strengthening control points across processes involving capital management; ▪ Initialization of a project that aims to fully automate the replenishment process connected to synthetic securitization transactions, targeting the maximization of the capital relief stemming from outstanding and future transactions; ▪ Submission of the 2023 Annual update of the Group Recovery Plan; ▪ Initialization of an extensive programme to cover the new prudential requirements framework for credit risk, credit valuation adjustment risk, OR, market risk and the output floor (CRR III/CRD VI or "banking package"); ▪ Incorporation of C&E risks into Group's strategy, governance, RM framework, policies and processes to comply with the SSM December 2023 deadline; ▪ Preparation for the EBA One-off Fit-for-55 climate risk scenario analysis; ▪ First time submission of Short-Term Exercise ("STE") package (SREP 2023) and Pillar 3 disclosures on Climate and ESG risks.
Market Liquidity and ALM Risks	▪ Liquidity RM framework and Stress Testing Framework enhancements (including ILAAP & Resolution); ▪ Fulfilment and submission of Deliverables under SRB Resolution Framework's "Liquidity in Resolution 2023 Priorities"; ▪ Completion of Liquidity on Site Inspection on Liquidity Management; ▪ VaR enhancements to accommodate commodity swaps and Credit VaR model assessed by the model validation unit; ▪ Initiate a profit & loss attribution process based on Murex's module; ▪ Recalibration and enchantment of behavioral models for IRRBB purposes; ▪ Initiation of project with the scope to facilitate the newly introduced Common Reporting Framework ("COREP") in IRRBB; ▪ Update of the methodologies and assumptions adopted for the quantification of interest rate risk and the policies governing the overall measurement and monitoring thereof, to ensure compliance with the latest regulatory framework, as outlined in the EBA GL/2022/14 guidelines.

Function	Key initiatives
Group Control and Risk Data & Solutions	▪ Enhancement and optimization of the ICS across the 3 LoD, aiming at the same time to achieve further alignment (3 LoD alignment & efficiencies project); ▪ Enhancement of Information and Communication Technology ("ICT") risk management in second LoD; ▪ Implementation of a platform within the OR system for the management of internal control deficiencies in the ICS, across the Group; ▪ Enhancement of VaR methodology and procedures; ▪ Enhancement of the risk and control assessment methodologies and procedures; ▪ Completion of the migration of quarterly follow-up of model validation findings to Open Pages platform of OR resulting in the enhancement of findings management effectiveness; ▪ Contribution to RM enhancement through the validation of new or updated models, such as the revised Macro Probability of Default ("PD") models, the interest rate risk model for non-maturity deposits, as well as the climate risk incorporation methodology into business portfolio's PDs; ▪ Contribution to the EBA Stress Test 2023 requirements through the validation of credit risk models, including the new sectoral and inflation macroeconomic models. Enhancement on infrastructure tasks with emphasis on improving policies and procedures of Credit Control; ▪ Enhancement of Credit Control framework through the design and implementation of a new evaluation scale (1-4) for its credit reviews; ▪ Initiation of the design of Credit Process Analytics for a risk-based reporting facilitating automated controls and identification of material findings, to be utilized by first and second LoD functions; ▪ Initiation of a Senior Credit Committee's Charter implementation review (new six-monthly) in terms of presence, accuracy and management of information provided for decision-making; ▪ Coordination and guidance to the GRM units with regards to determining their risk data requirements, data definitions, modelling and data availability, as well as Data quality management.

Prospects and challenges of the Group's Operations in 2024

In 2023, the global economy moved amidst a challenging macroeconomic environment with geopolitical turbulence triggered by the onset of the Middle East conflict and the continued impact of the Ukraine invasion. However, with energy prices de-escalating, the supply chains in Europe normalizing and with the lifting of the remaining coronavirus restrictions, the economic environment showed resilience.

The Greek economy continued to grow, largely driven by increasing foreign and domestic investments, strong tourism, strong exports and the implementation of the RRP, as Greece has managed to secure an equivalent of 17% of its GDP in grants and loans from the EU, with 41% being already disbursed. Further, the Greek sovereign credit rating upgrade to investment grade status after more than a decade, the prudent fiscal policy and the decreasing government deficit, and the consistent implementation of structural reforms, have created a favorable environment to attract significant foreign investments.

Being the Bank with the largest footprint in the Greek economy, Piraeus Bank has benefited from the economic environment, continuing to create value for the economy and the society at large. Equipped with ample liquidity, a strengthened balance sheet and adequate capital buffers, the Bank stands ready to finance Greece's path to sustainable growth and create value for its shareholders.

In parallel, 2023 has been challenging, with Greece facing climate disasters such as the one with flood-stricken Thessaly. The consequences of the climate crisis will be stressing the business models of companies, as well as the resilience of households, thus sustainable, data-driven and proactive management of such risks is imperative.

Capitalizing on its 2023 performance, Piraeus Group, announced in mid-February 2024, its new financial targets for the period 2024-2026. The key elements comprise net recurring profitability of approximately € 1 billion per year for 2024-2026, further growth of CET1 ratio to approximately 15% in 2026, expansion of performing loans by at least 5% per year, and NPEs ratio of approximately 2.5% in 2026.

The geopolitical challenges, the energy market conditions, the technological developments that open a whole new area of opportunities and threats, the climate crisis and the emerging societal shifts, remain the medium to long-term challenges for the banking sector and the Group.

For the short-term, Greece's macroeconomic performance and its resulting effects, the continuation of long needed structural reforms, the tacking of inflation mainly arising from food prices and, most importantly, the monetary policy's tightening pace and interest rates trajectory with their impact to credit demand, banking products pricing and NPE inflows, are the key areas of focus.

Athens, 27 February 2024

On behalf of the Board of Directors

George P. Handjinicolaou

Non-Excecutive Chairman of BoD

Christos I. Megalou

Managing Director (CEO)
Executive BoD Member

CORPORATE GOVERNANCE STATEMENT

This Corporate Governance Statement of Piraeus Financial Holdings S.A. forms part of the Board of Directors' Report and contains the information required by articles 152 and 153 of Greek Law 4548/2018 as at the reporting date of 31 December 2023 and the subsequent period up to the publication date of the Annual Financial Report.

2023 Overview

The Company's BoD ensures that an appropriate governance framework and respective control mechanisms are in place so that the Company may deliver its ambitious strategic plans while the business is, at all times, resilient and sustainable in the face of a rapidly changing and challenging environment.

During 2023 and until the publication of the present, the Company has, *inter alia*:

- Ensured the smooth (re)election of the BoD, in light of the expiration of the BoD's term in mid June 2023, and revised the Directors' Suitability Policy;
- revised its Directors' Remuneration Policy and adopted a Free Distribution of Own Shares Plan and a Stock Options Plan;
- focused on ESG issues, working closely with the BoD Ethics and ESG Committee;
- engaged with stakeholders in order to enhance trust and transparency and to better understand their views and concerns.

The main corporate governance goals for the following period include:

- ensuring implementation of an effective succession planning process for the BoD;
- the increase of our organisational investments in data quality, integrity, and completeness, associated with enhancing further the Group's business, new regulatory reporting requirements and controls across the three lines of defence;
- deepening the focus of our compliance function on strategic issues and further upgrading its risk assessment methodology;
- For risk management, further investing in incorporating more accurately forward climate and environmental risks in the credit granting process.

APPLICATION OF INSTITUTIONAL FRAMEWORK AND CORPORATE GOVERNANCE STRUCTURE AND OPERATING REGULATIONS

The Company, in its capacity as a Société Anonyme listed on the Athens Stock Exchange, in parallel with the provisions of corporate law and its Articles of Association, applies the provisions set out in Greek Law 4706/2020 on corporate governance of sociétés anonymes.

In compliance with the provisions of art. 17 of said law, the Company has adopted by a Board resolution, the Hellenic Corporate Governance Code, issued in June 2021 by the Hellenic Corporate Governance Council and complies with its provisions.

It is noted that the Company, as a financial holding company, authorized as such and supervised by the ECB, applies on a consolidated basis the special provisions of Greek Law 4261/2014 and of the respective framework.

Furthermore, the Company has drawn up and applies its Internal Regulation. The Internal Regulation incorporates the provisions and practices arising from the mandatory institutional framework (especially Greek Law 4706/2020 on corporate governance, Greek Law 4548/2018 on Sociétés Anonymes, Greek Law 4261/2014 "Access to the activity of credit institutions and prudential supervision of credit institutions (transposition of Directive 2013/36/EU), repeal of Law 3601/2007, and other provisions").

The main objectives of the Internal Regulation are to:

i) ensure transparency, integrity, functionality and efficiency of the existing system of the Company's corporate governance and ICS;

ii) enhance confidence in the Company for domestic and foreign investors, shareholders, employees and customers;

iii) ensure the Company's continued compliance with the Greek Laws and regulations governing its organization and operation and its activities;

iv) develop a self-regulating framework within the Company by establishing rules for its administration, management and staff, which complement the provisions of the existing regulatory framework and are being established with a view to enhancing the Company's sound and responsible management and operations.

The organisational structure of the Company complies with the current principles of the institutional framework governing the operation of listed companies and it is structured in such a way that it meets the needs of the key business sectors in which it operates. Ensuring an effective organizational structure with a clear definition of the competencies and areas of accountability of each administrative unit of the Company, constitutes the basis upon which the functions and operations of the Company are founded. Particular emphasis is given to the setting up of a clear organizational structure with distinct, transparent and consistent lines of responsibility, the establishment of efficient and detailed procedures for conducting the Company's operations and of adequate control mechanisms in respect of such procedures, as well as to the identification, management, monitoring and reporting risks which the Company assumes or may undertake within the framework of its activities.

The Company has developed and aims at continuously improving the ICS, both on a stand alone as well as on a Group level. The ICS consists of well-documented, detailed control mechanisms and procedures, incorporating best practices of corporate governance and covering on a continuous basis every activity and transaction of the Company, contributing to its efficient and safe operation.

Moreover, in the context of being subject to the provisions of Greek Law 3864/2010, as same has been amended in mid-2022, the Company follows a number of temporary corporate governance practices unique to the Greek banking system, including the presence of an HFSF Representative on the BoD. Further details are outlined in the relevant sections of this Statement relating to HFSF's role with the Company and the Bank.

I. MANAGEMENT, ADMINISTRATIVE AND SUPERVISORY BODIES AND COMMITTEES

1. GM of Shareholders

Regarding the shareholders of the Company, as well as the convocation and meeting of shareholder's GM, according to the provisions of Greek Law 4548/2018 "*Reform of the law of sociétés anonymes*", the following are applicable:

1.1. Shareholder

The Shareholders exercise their rights through their participation at the GM. GM resolutions, adopted as prescribed by law, are also binding on absent or dissenting shareholders. The shareholder status is verified through the direct electronic linkup of the Company with the records of the Decentralized Securities System ("DSS").

In case of shares held in omnibus accounts, the capacity of the shareholder vis-à-vis the Company is evidenced through the registration of the shareholder in the books of the intermediary holding the omnibus account, in line with the legislative provisions (L. 4548/2018, L. 4706/2020 and Regulation (EU) 2018/1212) as well as the Rulebook of the Hellenic Central Securities Depository.

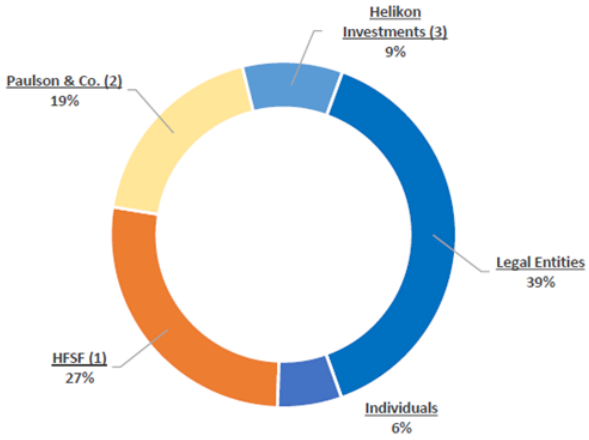
1.2. Shareholder structure

The Company's shareholder structure presents great diversity. The total number of the Company's common shareholders was approximately 18,900 in December 2023. The HFSF held 27% of the outstanding common shares (1,250,367,223 of a nominal value € 0.93 each). The remaining 73% is held by the private sector; circa 19% by Paulson & Co, circa 9% by Helikon Investments, circa 39% by legal entities and circa 6% by individuals. Strong international presence is evidenced by the fact that significant part of free float is held by foreign institutional investors.

In December 2023 the Company held directly 3,975,419 own shares, representing 0.32% of the share capital of the Company.

The shareholder structure of the Company (for descriptive, non-regulatory purposes) was as follows in December 2023:

Shareholder Structure- December 2023



(1) Based on the information received from the investor, for which the investment community was informed by the Company on 12 May 2021, through relevant corporate announcement (available here).
(2) Based on the information received from the investor, for which the investment community was informed by the Company on 12 May 2021, through relevant corporate announcement (available here).
(3) (3) Based on the information received from the investor, for which the investment community was informed by the Company on 11 August 2022, through relevant corporate announcement (available here).

1.3. Categories of GMs

The GM mandatorily convenes at the Company's seat or in another municipality within the county of the seat or another neighboring municipality or in the municipality of the Athens Stock Exchange seat, at least once every financial year and within the time limit laid down by the provisions of the Law, as in force. Extraordinary sessions may also be called by:

a) the BoD, whenever so deemed advisable or necessary;

b) requisition of minority shareholders pursuant to paragraph 1 of article 141 of law 4548/2018 (*for more information see section 1.8 below);*

c) the auditor of the Company upon request to the Chairman of the BoD.

1.4. Competences of the GM

According to article 117 of law 4548/2018, the GM has solely the authority to decide on:

- Amendments to Company's articles of association, Share capital increases and reductions are being understood as amendments thereto;

- Election of members of the BoD and auditors;
- Approval of the overall management activities according to article 108 of Law 4548/2018 and discharge of auditors;
- Approval of the annual and any consolidated financial statements;
- Distribution of the annual profits;
- Approval of remuneration paid and preliminary approval for remuneration, under article 109 of law 4548/2018;
- Approval of the remuneration policy and the remuneration report under articles 110 and 112 of law 4548/2018;
- Merger, split, conversion, revival, term extension or dissolution of the Company, according to law 4548/2018 and law 4601/2019, as in force;
- Appointment of liquidators.

It is noted that not coming under the provisions of the preceding paragraph are the following:

- Share capital increases or share capital readjustment acts explicitly vested in the BoD under the law, as well as increases imposed under the provisions of other legislation;
- The amendment or harmonization of provisions in the articles of association by the BoD when so explicitly provided by law;
- The election of directors in the place of directors who resigned, died or forfeited their office in any other manner, in accordance with the article 82 of law 4548/2018;
- The option to distribute interim dividends pursuant to paragraphs 1 and 2 of art. 162 of Law 4548/2018;
- The option to distribute (under para. 3 of art. 162 of law 4548/2018) profits or voluntary reserves within the current business year under a BoD resolution which is submitted to the publication formalities.

1.5. Invitation of GM

The invitation of the GM containing the minimum information required by law (including, *inter alia*, the date, place, time, agenda, instructions for shareholders' participation and rights) is published twenty (20) clear days minimum prior to the date appointed for its session in the Company Record in the General Commercial Register (business registry) as well as at the Company' s website. It is also communicated within the said time period in a manner ensuring fast and non-discriminatory access to it, by means of media which are reasonably reliable for the effective dissemination of the relevant information to investors.

Every shareholder has the right to receive, upon request, personal notification by e-mail about impending GM sessions ten (10) days minimum prior to the appointed day for the GM session.

1.6. Participation at the GM

Shareholders having the right to participate and vote in the GM (and the iterative) are those registered at the opening of the fifth (5) day prior to the date of the GM (Record Date). The said date of record is also applicable in the case of an adjourned or iterative session, provided such adjourned or iterative session is not more than thirty (30) days from the date of record. If this is not the case, or if in the case of an iterative GM a new notice is published, persons having shareholder status as at the start of the third (3) day prior to the day of the adjourned or reiterative GM session may participate at the GM.

The BoD may resolve, in accordance with the articles of association and under the conditions of the law, as in force, that:

- the GM will not convene at any place but will convene in full with the participation of the shareholders remotely by electronic means;
- any shareholder may participate in voting on items on the agenda of the GM at a distance by e-mail or by electronic means, the vote held before the meeting.

Shareholders may participate at the GM in person or by proxy. A shareholder may appoint a proxy for a single or multiple GM sessions and for a specified period. The proxy votes in accordance with the shareholder's instructions, if any. A shareholder may appoint up to three (3) proxies. The appointment of proxy may be freely revoked. The appointment and recall or substitution of a proxy or representative shall be made in writing or by e-mail message or other electronic means and shall be submitted to the Company forty-eight (48) hours minimum prior to the date appointed for the GM.

1.7. Quorum and majority at the GM

The GM is in quorum and validly held on the agenda when at least one fifth (1/5) of the paid-in share capital is present or represented thereat.

Qualified quorum of ½ of the paid-in share capital is required in the case of resolutions concerning a change of the nationality, a change of the business object, increase of shareholders' obligations, ordinary increase of share capital unless imposed under the law or effected by means of capitalization of reserves, share capital reduction except when it is in accordance with para. 5 of article 21 of law 4548/2018 or para. 6 of article 49 of law 4548/2018, a change in the manner of appropriation of profits, merger, split, conversion, revival, term extension or dissolution of the Company, the granting or renewal of power to the BoD for share capital increase, pursuant to para. 1 of art. 24 of law 4548/2018, as well as in all other cases in which the law specifies that the GM shall adopt resolutions under a qualified quorum and majority.

Required quorum and majority in first and iterative sessions is depicted below:

Quorum	First GM	Iterative session
Ordinary quorum	At least 20% of the paid-in share capital	One share
Qualified quorum	At least 50% of the paid-in share capital	At least 20%
Majority	**First GM**	**Iterative session**
Simple majority	At least 50% of votes represented +1 share	At least 50% +1 share
Qualified majority	At least 66.67% of votes represented	At least 66.67%

1.8. Minority Rights

According to law 4548/2018 and subject to the conditions and the deadlines prescribed by it:

Shareholders representing at least one-twentieth (1/20) of the paid-in share capital of the Company have the right to:

- call an extraordinary GM session (specifying the items of the agenda) and set a date for it not being more than forty-five (45) days from the date such requisition was submitted to the chairman of the BoD;
- include additional items in the agenda of the GM, already convened;
- submit draft resolutions on items included in the original or any revised agenda of the GM;
- request the Chairman of the GM to adjourn, but only once, the adoption of resolutions on all or some of the agenda items by the GM and fix a new session for deciding on such resolutions, on the date mentioned in the shareholders' requisition which may not, however, be later than twenty (20) days from the day of such adjournment;
- request the BoD to inform the Ordinary GM of the amounts which were paid during the last two-year period by the Company to each member of the BoD or to the managers of the Company as well as of any benefit provided by the Company to the above persons for any reason or contract existing between the Company and such persons;
- demand an open vote at the GM on any agenda item or items;
- request extraordinary judicial review, if there is suspicion of any action which is contrary to the provisions of law or the articles of association of the Company or to resolutions adopted by the GM;
- submit in writing to the BoD a requisition about the exercise of Company of claims pursuant to article 103 of law 4548/2018;
- when forming part of a minority of at least one tenth (1/10) of the share capital of the Company that opposed the adoption of the relevant resolution by the GM, apply to the competent court within two (2) months as of the GM approval, requesting a decrease of compensation or benefit paid or decided to be paid to a specific member of the BoD, with the exception of emolument to BoD members for services rendered to the Company under a special relationship, when under the existing circumstances it is considered exorbitant as per sound judgment.

Shareholders representing at least one tenth (1/10) of the paid-in share capital of the Company have the right to:

- request the BoD to provide to the GM information with regard to the progress of the corporate affairs and the status of the corporate property.

Shareholders representing at least one fifth (1/5) of the paid-in share capital of the Company have the right to:

- request judicial review if from the whole course of the Company's affairs or in light of indications in this respect it may validly be assumed that the management of these affairs is not exercised as dictated by the principles of sound and prudent administration.

Any shareholder has the right to:

- request the BoD to provide to the GM specific information regarding the affairs of the Company insofar as such information concerns the agenda items;
- receive, upon request, personal notification by e-mail about impending GM sessions ten (10) days minimum prior to the appointed day for the GM session.

Detailed information on the GM and shareholders rights are available in the Company's website (Information on Shareholders General meeting and Shareholders' Rights)

1.9. GMs of 2023

During 2023, one GM meeting was held. The Annual Ordinary GM, held on 27 June 2023, was conducted remotely in real-time via teleconference and was attended either in person or by proxy, by shareholders representing 940,335,843 shares, corresponding to 75.20% of the total 1,250,367,223 shares. All the items of the agenda were approved by the Ordinary GM of Shareholders.

The said items were the following:

1. Submission and approval of the Annual Financial Report (Company and Group) for the financial year 01.01.2022 - 31.12.2022, including the annual financial statements, along with the relevant BoD Report and Statements as well as the Independent Auditor's Report;
2. Approval of the overall management for the financial year 01.01.2022 – 31.12.2022, according to article 108 of Law 4548/2018 and release of the certified auditors from any liability for the financial year 01.01.2022 – 31.12.2022 according to article 117 par.1 case (c) of Law 4548/2018;
3. Appointment of Certified Auditors for the financial year 01.01.2023 - 31.12.2023 and approval of their fees;
4. Submission of the annual Audit Committee's Report to the GM pursuant to article 44 par. 1 case (i) of Law 4449/2017;
5. Submission of the Independent Non-Executive Directors' Report to the GM, according to article 9 par.5 of Law 4706/2020;
6. Approval of remuneration paid to members of the BoD in respect of the financial year 2022 and approval of advance

payment of remuneration in respect of the financial year 2023 in accordance with article 109 of Law 4548/2018;

7. Submission of the Remuneration Report of the year 2022 for discussion and vote by the GM, according to article 112 of Law 4548/2018;

8. Election of a new BoD and appointment of independent non-executive members in accordance with the provisions of Law 4706/2020;

9. Determination of the type of the Audit Committee, the term of office, the number and the qualifications of its members as per article 44 par. 1 case b) of Law 4449/2017;

10. Approval of amendment of the Directors' Suitability Policy;

11. Approval of amendment of the Directors' Remuneration Policy;

12. Granting of free common shares to executives and employees of the Company and affiliated entities within the meaning of article 32 of Law 4308/2014, in accordance with the provisions of articles 114 of Law 4548/2018. Relevant authorizations to the BoD;

13. Approval for the acquisition of the Company's own shares (Share buy-back Programme) and granting of relevant authorizations to the BoD;

14. Approval of the offsetting of the Company's "Share premium" account against the general ledger account 42 "Accumulated losses carried forward", for the write-off of an equivalent amount of prior years' losses according to article 35 par. 3 of Law 4548/2018, as currently in force, and granting of relevant authorizations;

15. Granting of permission, as per article 98 par. 1 of Law 4548/2018, to the Members of the BoD and Managers of the Company, to participate on the BoD or in the management of the Company's subsidiaries and affiliates;

16. Miscellaneous announcements (non-voting item).

The resolutions adopted at the Ordinary GM of Shareholders held on 27 June 2023 and the voting results have been posted on the Company's website.

2. The Board of Directors

2.1 Composition

In accordance with article 8 of its Articles of Association, as in force today, the Company is managed by a BoD consisting of nine (9) to fifteen (15) members. Pursuant to Greek Law 4706/2020, the Board consists of executive and non-executive members. The number of the non-executive members should not be less than one third (1/3) of the total number of members. Among the non-executive members, at least two (2) should be independent within the meaning of art.9 of the aforementioned Greek Law. Pursuant to Greek Law 3864/2010, a Representative of the HFSF participates as a Member to the BoD. His responsibilities are determined in Greek Law 3864/2010.

It is noted that according to the regulatory framework of the SSM of the ECB, each Member of the Board is subject to a fit-and-proper assessment by the SSM for the position held.

The BoD is elected by the GM of the Shareholders of the Company, which also appoints the independent non-executive members.

The HFSF's Representative to the Company's Board may be appointed by a respective written notice addressed to the Chairman of the Board, following which the Board proceeds to all necessary actions according to the Company's Articles of Association and corporate law for the completion of this appointment, including the required notification to the General Assembly.

The term of office for the members of the Company's BoD is three years and is extended until the annual GM which convenes following the expiry of their term. The current BoD was elected on the GM held on 27 June 2023 and consequently its term of office expires on 27 June 2026, to be extended according to the aforementioned.

According to the Company's Articles of Association, if a Board member resigns, passes away or forfeits his/her office in any way, or whose office is declared forfeited by resolution of the BoD due to unjustified absence from meetings for three (3) consecutive months, the Board may continue to manage and represent the Company without replacing the missing members if the remaining members are at least nine (9). Pursuant to Law 4706/2020, in case of unjustified absence of an independent member at least two (2) consecutive sessions of the BoD, the Board member is deemed to have resigned. Further provisions on Board attendance requirements are also included in the Board Attendance Policy.

On the date of publication of the 2023 Annual Financial Report, the BoD is composed of the following thirteen (13-) members:

BOARD OF DIRECTORS	
George Handjinicolaou	Chairman of the Board, Non-Executive BoD Member Year of birth: 1953 Nationality: Greek Member since: November 2016 Chairman since: November 2016
Karel De Boeck	Vice Chairman of the Board, Independent Non-Executive BoD Member, Senior Independent Director Year of birth: 1949 Nationality: Belgian Member since: June 2016 Vice- Chairman since: February 2017 Senior Independent Director since: June 2021
Christos Megalou	CEO, Executive BoD Member Year of birth: 1959 Nationality: Greek/ British Member since: March 2017
Vassileios Koutentakis	Executive BoD Member Year of birth: 1963 Nationality: Greek Member since: May 2020
Venetia Kontogouris	Independent Non-Executive BoD Member Year of birth: 1951 Nationality: Greek/ American Member since: June 2017
Enrico Cucchiani	Independent Non-Executive BoD Member Year of birth: 1950 Nationality: Italian Member since: November 2016
David Hexter	Independent Non-Executive BoD Member Year of birth: 1949 Nationality: British Member since: January 2016
Solomon Berahas	Independent Non-Executive BoD Member Year of birth: 1953 Nationality: Greek Member since: November 2016
	Independent Non- Executive BoD Member

Andrew Panzures	Year of birth: 1958 Nationality: British, Canadian, American Member since: June 2020	
Anne Weatherston	Independent Non-Executive BoD Member Year of birth: 1956 Nationality: British Member since: June 2020	
Alexander Blades	Non-Executive BoD Member Year of birth: 1970 Nationality: New Zealand Member since: January 2016	
Maria Semedalas	Independent Non-Executive BoD Member Year of birth: 1961 Nationality: Greek, American Member since: February 2024	
Periklis Dontas	Non-Executive BoD Member, Representative of the HFSF to the BoD pursuant to Greek Law 3864/2010 Year of birth: 1957 Nationality: Greek Member since: December 2019	
62% Independent Non-Executive (including a Senior Independent Director)	**23% Non-Independent Non-executive**	**15% Executive**

During 2023, the following amendments took place in the composition of the BoD: Ms. Francesca Tondi, Independent Non-Executive Member, resigned from the BoD on 17 November 2023.

During 2024 and until the date of publication of the Annual Financial Report the following amendments took place in the composition of the BoD: Ms. Maria Semedalas Independent Non-Executive Member joined the BoD on 22 February 2024.

Ms. Lydia Papadopoulou serves as Corporate Secretary and Secretary of the BoD as from 23 February 2023, replacing Ms. Pallikari Dimitra who has resigned. Mrs. Lydia Papadopoulou has been working with the Group since 2017 offering services in relation to the ICS, in a series of projects regarding the strengthening of the relevant structures and systems, the 3 LoD, OR, regulatory compliance etc. She has served in the past for a number of years as the Secretary of the Audit Committee and Risk Committee, and as Internal Audit Senior Manager, at another systemic Bank, as well as an external auditor at the EY audit firm in UK and in Greece. In recent years, she provided independent support services to Board Committees of Growthfund and since 2019 she is the Audit Committee Chair in two entities, independent of the Group. Ms. Papadopoulou has studied Mechanical Engineering at the National Technical University of Athens (1997), Business Administration (MBA-Finance) at Imperial College London (1998) and has received the professional certification of Chartered Auditor/ Accountant from the Institute of Chartered Accountants of England & Wales (2001).

Board Skills and Expertise

The BoD of the Company consists of members with international leadership expertise and knowhow and particularly in the areas of banking restructurings and the reduction of non-performing loans. Moreover, the members of the Board possess in depth knowledge and experience of the banking market, actively contribute to the improvement of the corporate governance framework and are driving the respective required amendments whilst participating in the creative debates and the quest for solutions to the challenges faced by the Company and the Group.

The members have the necessary collective skills and knowledge required by the existing regulatory framework for financial holding companies. In this way, the systemic stability, the good relationship of the Company with the Regulatory Authorities and the avoidance of administrative gaps in the operation of the Company and its Group are promoted.

Curriculum Vitaes for the members of the BoD are set out below and are also available on the Company's website.

George P. Handjinicolaou, Chairman of the BoD, Non-Executive Member

Mr. George Handjinicolaou is the Non-Executive Chairman of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.).

He is Chairman, Non-Executive Member of the BoD of ATHEXGroup and BoD Member of the Hellenic Energy Exchange S.A. He is also Chairman of Piraeus Bank Group Cultural Foundation and Vice President of the Executive Committee of the Council of Competitiveness of Greece. He held the position of Deputy CEO and Member of the BoD in International Swaps and Derivatives Association in London for the period 2011-2016. He also held the positions of Vice Chairman, Member of the Management Committee and the BoD of the Hellenic Capital Market Commission from 2009 to 2010. In addition, Mr. Handjinicolaou held the position of Managing Director, Global Head, Debt Emerging Markets and Member of Global Markets Management Group at Merrill Lynch, New York.

Mr. Handjinicolaou holds a BSc in Economics from University of Athens, Law School, Department of Economics (1975), an MBA in Finance (1978) from New York University, Graduate School of Business Administration and a PhD in Finance & Economics (1983) from New York University.

Karel G. De Boeck, Vice-Chairman, Independent Non-Executive Member, Senior Independent Director

Mr. Karel De Boeck is Vice Chairman, Independent Non–Executive Member and Senior Independent Director of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Chairman of the Risk Committee, Vice Chairman of the Board Ethics & ESG Committee, Member of the Audit Committee and Member of the Nomination Committee.

He is also a Board Member of LAMIFIL NV and Willemen Group NV/SA, Belgium, as well as Independent Non-Executive BoD Member at Ghelamco Invest NV in Belgium. He held the position of CEO at Dexia Group, at Dexia NV in Belgium, at Dexia Credit Local S.A. in France, as well as at Fortis Group in Belgium.

Mr. De Boeck holds a Master's Degree in Mechanical / Civil Electronic Engineering (magna cum laude) from KUL in Belgium (1972) and a Master's Degree in Economics from KUL in Belgium (1974).

Christos I. Megalou, CEO, Executive Member

Mr. Christos Megalou is an Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), CEO and Chairman of the Group Executive Committee.

Mr. Megalou is Chairman of the BoD of Snappi S.A., A' Vice Chairman of the BoD of Association of S.A. and Entrepreneurship and BoD Member of the American-Hellenic Chamber of Commerce. He is also, Non-Executive BoD Member of the HBA, in which he held the position of Deputy Chairman between 2013 to 2015. Also, he was elected, for two consecutive runs, Chairman of the HBA in the UK (2010-2013). He is a distinguished fellow in Global Federation Competitiveness Councils in Washington, D.C., USA and an Independent Non-Executive Board Member of Safe Bulkers Inc.

Mr. Megalou graduated with a BSc in Economics from the Athens University of Economics in 1981 and holds an MBA in Finance from Aston University in Birmingham, UK (1982).

Vasileios D. Koutentakis, Executive Member

Mr. Vasileios Koutentakis is an Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.). He is a Member of the Group Executive Committee, as well as an Executive General Manager, Chief Retail Banking in Piraeus Bank since 2017.

He is a Member of the BoD of Snappi S.A. and of Piraeus Agency Solutions S.A., Member of the Executive Committee of the HBA, as well as a Member and HBA Representative of Liquidity Council of Ministry of Finance and Chairman of INSEAD NAA in Greece. Also, he is a Member of the BoD at Piraeus Bank Group Cultural Foundation. He was a Board Member of VISA Hellas from 2004 until 2012.

Mr. Koutentakis holds a Diploma in Electrical Engineering from the National Technical University of Athens (1987) and an MBA from INSEAD in Fontainebleau, France (1990).

 Venetia G. Kontogouris, Independent Non-Executive Member	Mrs. Venetia Kontogouris is an Independent Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as a Member of the Nomination Committee and Member of the Board Ethics & ESG Committee. Also, she is a Member of the BoD at Kaizen Private Equity, as well as Founder and Managing Director of Venkon Group, LLC. She was Co-Managing Director at Trident from 1995 to 2011. Mrs. Kontogouris is a technology-focused venture capitalist, with over 20 years of experience. She was responsible for overseeing management and making key decisions in over 25 companies from the initial seed invest to the exit strategy. Mrs. Kontogouris holds a BA from the Northeastern University (1974) and an MBA from the University of Chicago (1977).
 Enrico Tommaso C. Cucchiani, Independent Non-Executive Member	Mr. Enrico Tommaso Cucchiani is an Independent Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Vice Chairman of the Nomination Committee, Member of the Remuneration Committee and Member the Board Ethics & ESG Committee. Mr. Cucchiani holds the position of Non-Executive Vice Chairman of the Board of IllyCaffe, as well as the position of Non-Executive Member of the Board, Chairman of the Remuneration Committee and Member of the Risk Committee of Terna SPA. He is also Vice Chairman/Lifetime Director of Javotte Bocconi Foundation and Member of the BoD at Bocconi University, ISPI - Institute for International Political Studies, and Weizmann Institute of Science. He served as Non-Executive BoD Member of TGI-Think Global Investments, as well as Member of the Board of RSA Insurance Group in London from 2014 to 2021 and held the position of Member of the Executive Board of Allianz Group being responsible for all business activities in most of Europe, Latin America and Africa. In addition, he served as Group CEO of Intesa Sanpaolo. Mr. Cucchiani was appointed Cavaliere del Lavoro, the highest honorary title by the President of Italy, as well as Bocconi Man of the Year in 2006. He holds an MBA (Fullbright Fellow) from Stanford Graduate School of Business, USA and a Dottore in Economia (PhD in Economics) from Bocconi University, Italy. He has completed his Research Activity on Multinational Corporations at Harvard Business School, UK.

 David R. Hexter, Independent Non-Executive Member	Mr. David Hexter is an Independent Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Chairman of the Nomination Committee, Member of the Audit Committee and Member of the Board Ethics & ESG Committee. He is an Independent Member of the Supervisory Board of Santander Bank Polska and Non-Executive Chairman of the Supervisory Board of PENM (Private Equity New Markets), Copenhagen. Mr. Hexter held the position of Deputy Vice President of the Banking Department, as well as Chairman of the Equity Investment Committee and Member of the Operations Committee at the European Bank of Reconstruction and Development (1996-2004). Mr. Hexter holds an MA in Philosophy, Politics and Economics from Oxford University (1970), an MBA from the Cranfield School of Management (1973), an MPhil from Birkbeck, University of London (2011) and a PhD from London University (2016).
 Solomon A. Berahas, Independent Non-Executive Member	Mr. Solomon Berahas is an Independent Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Chairman of the Board Ethics & ESG Committee, Vice Chairman of the Audit Committee and Member of the Remuneration Committee. Mr. Berahas is Chairman and Managing Director of the BoD of Tiresias S.A. Bank Information Systems in Athens. He is also Vice Chairman of the BoD at the Piraeus Bank Group Cultural Foundation, Member of the BoD at ELEPAP, Member at Association of S.A. and Entrepreneurship and Independent Non-Executive Member at Safe Growth Investments AIFLNP LTD. Between 2006 to 2012, Mr. Berahas held the position of Vice Chairman of the BoD of Eurobank Financial Planning Services. Mr. Berahas holds a BSc in Industrial Engineering and Management (1976), an MSc in Industrial Engineering and Management Information Systems (1978) and a DSc in Operations Research from the Technion Israel Institute of Technology (1981).

Andrew D. Panzures, Independent Non-Executive Member

Mr. Andrew Panzures is an Independent Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Chairman of the Remuneration Committee, Member of the Nomination Committee and Member of the Risk Committee.

Mr Panzures is a Board Member of Interaudi Bank USA/ Private Equity Investor and served as Principal-Senior Portfolio Manager at Graham Capital Management in the Global Multi Sector Macro-Graham Capital Management LLC (2011-2016). Between 2009 through 2011, Mr. Panzures was Co-CIO and a Managing Partner at Medley Macro Fund Management. From 2003 through to 2008, Mr. Panzures held the position of Managing Director and CIO of the Americas-New York at JPMorgan Chase.

Mr. Panzures graduated from Ontario Scholar in 1977 and from York University's Schulich School of Business—BBA Finance in 1981.

Anne J. Weatherston, Independent Non-Executive Member

Mrs. Anne Weatherston is an Independent Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Chair of the Audit Committee and Member of the Risk Committee.

Mrs. Weatherston is also a Board Member of ALBA Bank and a Board Member and Chair of the Operations & Technology Committee at AIB UK. She held the position of Board Member and Audit Chair of Mint Payments until April 2023. Mrs. Weatherston was also Board Member of Archa Neo – Bank from 2018 to 2022, CIO at Bank of Ireland, Group CIO of Australia and New Zealand Banking Group and Chief Transformation Officer & CIO at Energy Australia.

Mrs. Weatherston holds an MA in Archaeology from Glasgow University and an MBA from Strathclyde University Business School. She has also completed a 4-year Government scheme (UK program) in IT programming, is a graduate of the Australian Institute of Directors and Chair mentoring programme and has completed the Executive Leadership Training from Harvard & London Business School.

 Alexander Z. Blades, Non-Executive Member	Mr. Alexander Blades is a Non-Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as Member of the Risk Committee, the Nomination Committee, the Remuneration Committee and the Board Ethics & ESG Committee. Mr. Blades is Member of the BoD of Snappi S.A. He is also a Partner at Paulson & Co. Inc., New York since 2009, as well as a Member of the New York State Bar Association and a barrister and solicitor of the High Court of New Zealand. Mr. Blades holds a BA (1993) and LLB (Hons) (1994) from Victoria University of Wellington and an LLM from the University of Chicago (1997).
 Maria I. Semedalas, Independent Non-Executive Member	Mrs Maria Semedalas is an Independent Non - Executive Member of the BoD of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as a Member of the Board Ethics & ESG Committee, Remuneration Committee, Audit Committee and Risk Committee. She is also Member of the Board of Trustees and Honorary Treasurer at the Quintin Hogg Trust in London. Mrs Semedalas held the positions of International Head of Third Party Governance and Chief Administrative Officer International Finance at BNY Mellon in London from 2016 to 2021 and of Executive Director, EMEA Corporate & Investment Bank and Global Cash Management at JP Morgan Chase in London from 2011 to 2015. She served as Partner at PS Advisory Services in Athens from 2010 to 2011, Senior Country Operations & Technology Director at Citibank International Plc in Athens from 2003 to 2009, as well as Vice President, Chief of Staff/Finance, Global Corporate Bank and Global Consumer Bank at Citibank N.A. in London from 1997 to 2002. She holds a Master of Science in Management, Boston University Brussels, Belgium (1986) as well as a Bachelor of Business Administration, Public Accounting from Loyola University of Chicago (1983).

 Periklis N. Dontas, Non-Executive Member, HFSF Representative	Mr. Periklis Dontas is a Non-Executive Member of the BoD and the HFSF Representative under Law 3864/2010 of Piraeus Financial Holdings (and Piraeus Bank S.A.), as well as a Member of the Risk Committee, Audit Committee, Remuneration Committee, Nomination Committee and the Board Ethics & ESG Committee. He is also an Independent Non-Executive Board Member of FF Group. From 2008 to 2012, Mr. Dontas held the position of Deputy CEO and Executive Member of the BoD of EFG Eurobank S.A. (Poland). From 2016 to 2018, he was Director of Risk Consulting and Business Development in KPMG Advisors S.A. Mr. Dontas has Bachelor of Arts in Economics from The American College of Greece (1979) and an MA in Economics from Essex University, UK (1981).

Other professional commitments of Board members

BOARD MEMBER (of Piraeus Financial Holdings S.A. and Piraeus Bank S.A.)	RESPONSIBILITIES IN OTHER LISTED COMPANIES	RESPONSIBILITIES IN OTHER UNLISTED COMPANIES	RESPONSIBILITIES IN NON PROFIT COMPANIES
George Handjinicolaou, Chairman, Non-Executive Member	HELLENIC EXCHANGES - ATHENS STOCK EXCHANGE - Chairman, Non-Executive Member	HELLENIC CENTRAL SECURITIES DEPOSITORY - Chairman, Non-Executive Member ATHENS EXCHANGE CLEARING HOUSE (ATHEXClear) - Chairman, Non-Executive Member HELLENIC ENERGY EXCHANGE S.A. - BoD Member EnEx CLEARING HOUSE S.A. (EnExClear) - Non-Executive BoD Member	PIRAEUS BANK GROUP CULTURAL FOUNDATION – Chairman COUNCIL OF COMPETITIVENESS OF GREECE - Vice President of the Executive Committee
Christos Megalou, Managing Director (CEO)	SAFE BULKERS INC. – Independent Non-Executive BoD Member	SNAPPI S.A. - Chairman	HBA - Non-Executive BoD Member ASSOCIATION OF S.A. AND ENTREPRENEURSHIP– A' Vice Chairman AMERICAN-HELLENIC CHAMBER OF COMMERCE, BoD Member
Alexander Blades,Non-Executive Member		SNAPPI S.A. – Non-Executive BoD Member	
David Hexter, Independent Non-Executive Member	SANTANDER BANK POLSKA - Independent Member of the Supervisory Board	PRIVATE EQUITY NEW MARKETS - COPENHAGEN - Non-Executive Chairman of the Supervisory Board	
Karel De Boeck, Vice Chairman, Independent Non-Executive Member, Senior Independent Director		LAMIFIL NV – Non-Executive Board Member WILLEMEN GROEP NV/SA – Non-Executive Board Member GHELAMCO INVEST NV - Independent Non-Executive Board Member	

Solomon Berahas, Independent Non-Executive Member		TIRESIAS S.A. - Chairman & CEO SAFE GROWTH INVESTEMENTS AIFLNP LTD - Independent Non-Executive BoD Member	ELEPAP - Non-Executive BoD Member ASSOCIATION OF SA AND ENTREPRENEURSHIP – Non-Executive BoD Member PIRAEUS BANK GROUP CULTURAL FOUNDATION - Vice Chairman

Enrico Tommaso Cucchiani, Independent Non-Executive Member	*TERNA SPA – Non-Executive BoD Member*	*ILLY CAFFE – Non-Executive Vice Chairman of the Board*	*BOCCONI UNIVERSITY - BoD Member* *JAVOTTE BOCCONI FOUNDATION - Vice Chairman of the Board* *AMICI NORMALE DI PISA UNIVERSITY - Vice Chairman of the Board* *TRILATERAL COMMISSION - Chairman of the Italian delegation* *ISPI – INSTITUTE FOR INTERNATIONAL POLITICAL STUDIES – BoD Member* *WEIZMANN INSTITUTE OF SCIENCE- BoD Member*
Venetia Kontogouris, Independent Non-Executive Member	VENKON GROUP LLC - Managing Director MONTEREY CAPITAL – Non-Executive Director		
Periklis Dontas, HFSF Representative under Law 3864/2010, Non-Executive Member	FF GROUP (under suspension) - Independent Non-Executive BoD Member		
Vasileios *Koutentakis, Executive Member*	PIRAEUS AGENCY SOLUTIONS S.A. - BoD Member SNAPPI S.A. – Non-Executive BoD Member	INSEAD NAA – Chairman PIRAEUS BANK GROUP CULTURAL FOUNDATION – BoD Member	
Andrew Panzures, Independent Non-Executive Member	INTERAUDI BANK USA - Independent Non-Executive BoD Member		

Anne Weatherston, Independent Non-Executive Member	AIB UK – Independent Non-Executive BoD Member ALBA BANK – Non-Executive BoD Member
Maria Semedalas, Independent Non-Executive Member	QUINTIN HOGG TRUST – Member of the Board of Trustees & Honorary Treasurer

Below is a table with the number of shares of the Company held by members of the BoD and members of the Group Executive Committee as at 31 December 2023.

BOARD OF DIRECTORS	Number of shares	% of the share capital
George P. Handjinicolaou, Chairman of the BoD, Non-Executive Member	50,000	0.0040%
Karel G. De Boeck, Vice-Chairman, Independent Non-Executive Member, Senior Independent Director	20,000	0.0016%
Christos I. Megalou, CEO, Executive Member (and Chairman of the Group Executive Committee)	150,446	0.0120%
Vasileios D. Koutentakis, Executive Member (and member of the Group Executive Committee)	60,420	0.0048%
Venetia G. Kontogouris, Independent Non-Executive Member	-	0.0000%
Solomon A. Berahas, Independent Non-Executive Member	-	0.0000%
Alexander Z. Blades, Non- Executive Member	-	0.0000%
Enrico Tommaso C. Cucchiani, Independent Non-Executive Member	-	0.0000%
David R. Hexter, Independent Non-Executive Member	-	0.0000%
Andrew D. Panzures, Independent Non-Executive Member	-	0.0000%
Anne J. Weatherston, Independent Non-Executive Member	-	0.0000%
Periklis N. Dontas, Non-Executive Member, HFSF Representative	-	0.0000%
Maria I. Semedalas, Independent Non-Executive Member	-	0.0000%
GROUP EXECUTIVE COMMITTEE		
Gnardellis Theodoros	63,813	0.0051%
Margaritis Charalampos	44,870	0.0036%
Stamoulis Ioannis	46,595	0.0037%
Vlachopoulos Panagiotis	-	0.0000%
Total	**436,144**	**0.0349%**

2.2 Director Suitability Policy

In compliance with article 3 of Law 4706/2020, the Company has adopted, following a BoD proposal upon respective recommendation of the Board Nomination Committee (“NomCo”), the Director Suitability Policy (the "Policy") which sets the framework and specifies the suitability requirements for election to the BoD.

The Policy takes into consideration the applicable legislative and regulatory framework and aims to describe the general principles and the criteria for the nomination of BoD members.

For each new nomination, the Company’s business strategy and the overall risk strategy, including the Company’s risk culture, risk appetite and framework are taken into consideration. To this end, the NomCo outlines the necessary profile/ competencies for each Director having a clear view on the medium-term objectives, challenges and risks and the Company’s succession planning.

In order for a person to be considered as suitable candidate by the BoD and the NomCo, such person:

i) must meet the suitability criteria (fit and proper, “FAP”) defined in the Policy (reputation, honesty and integrity/ previous experience/ independence of mind);

ii) should not have any existing or foreseeable conflicts of interest with the Company;

iii) should be able to commit sufficient time to the BoD of the Company depending on the position for which they are recommended. Pursuant to the provisions of the applicable regulatory provisions which are incorporated in the Policy, Directors may not hold more than one (1) of the following combinations of directorships at the same time: (a) one (1) executive directorship with two (2) non-executive directorships; and b) four (4) non-executive directorships;

iv) should possess one (1) or more of the knowledge, skills and experience criteria detailed in the Policy. The desired Director Profile is outlined by a variety of factors, including indicatively skills such as leadership, strategic acumen, communication, customer and quality-orientation as well as academic qualifications and proven experience in large banking or financial firms, management of large balance-sheet companies, RM, audit etc.

Directors must also satisfy the requirements envisaged in par. 7 of article 10 of Law 3864/2010 as in force from time to time. In addition, depending on the position sought to fill, additional criteria may also apply.

The Company ensures individual and collective suitability at all times. Suitability is monitored on an on-going basis in order to identify, in the light of any relevant new incident, situations where suitability should be re-assessed (including if there is any event having material impact on the reputation of a Board member or of the Company or materially affecting the suitability of the individual Board member or the collective suitability, if there is a material change in the business model, risk appetite or risk strategy or structure of the Company, at individual and group level etc.).

The Policy is reviewed on a biannual basis, or ad-hoc in the event of changes in the legal and/ or regulatory framework, in order to be updated as required. Non-material amendments of the Policy are approved by the BoD. In preparing, amending or reviewing this Policy, the NomCo and the BoD shall take into account recommendations or findings of other Board Committees and competent departments, especially the internal control functions.

Since the adoption of the Policy in mid 2021, a number of significant changes have taken place in the applicable relevant framework. In particular, among others:

- In July 2021, the EBA and the ESMA published their revised final joint Guidelines on the assessment of the suitability of members of the management body and key function holders (EBA/GL/2021/06);

- In December 2021, the ECB published its revised ECB Guide to FAP assessments, following which the BoG Executive Committee Act 205/1/18.05.2022 "Adoption of the Questionnaire for the Fit and Proper Assessment of Members of the Board of Directors and Key Function Holders of Significant Institutions" was published, incorporating the new FAP questionnaire;

- On 16 June 2022 the HFSF Law (Law 3864/2010) was amended by Law 4941/2022 (in force as of 16 June 2022). The amendments refer, *inter alia*, to the abolition of the strict suitability criteria provided for the Company's BoD members.

All of the above include important provisions relating to BoD members' suitability/ eligibility criteria and therefore, following relevant recommendation of the BoD and the NomCos, the 2023 Annual GM approved the amended the Policy of the Company.

The Policy is available in the Company's website (Investor Relations | Piraeus Financial Holdings) (piraeusholdings.gr).

2.3 Succession Policy for the BoD

The Succession Policy for the BoD (hereinafter "the Policy") aims to provide a framework and lay out policies which ensure the stability, continuity and proper integration of the Company's BoD through the identification and selection of potential candidates, in the event of permanent, planned or unforeseen departure of any of its members, particularly for Directors serving in leadership positions (chairmen of the Board and Committees).

The Board succession planning is a continuous forward-looking process. The aim is to make the Board a strategic asset for the Company and to ensure that the Board always has the talent and experience it needs. The NomCo ensures that a roster of suitable and interested candidates with different profiles is built up over time and held current. To reduce future risks, a long-term ambition for the Company is to have a Board with an optimal mix of new Directors, those with medium tenures and those with long tenures.

The process of succession planning is summarized below.

Identification and evaluation of current and future needs: an internal evaluation of the Board and the principal Committees' future needs is carried annually by the NomCo. At least every second year, each member is interviewed by the Chairmen of the BoD and NomCo, in order to get their perspective on important issues relating to succession planning. Additional input from other stakeholders (e.g. major shareholders and management team) is collected. Additionally, an independent evaluation of the Board will be held at a minimum every three (3) years from 2020 onwards by an appointed specialist third party.

Profile matrix: the result of the above exercise will be summarized and presented to NomCo in the form of a document in which required skills, competences and diversity needs are mapped against the Board's current composition. This document, in combination with the Directors' exit plans should form the basis for a long-term recruitment plan and research for new directors.

Search, selection and appointment: In identifying possible candidates, the NomCo should base its search on the criteria described in the Policy (which, *inter alia*, incorporate the FAP criteria of HFSF and ECB). The NomCo may use a variety of internal and external sources for identifying potential candidates. In case of a new appointment, the list of potential candidates is reviewed by the NomCo with the aim to narrow the search and produce a shortlist. When the shortlisting process has been

finalized, the NomCo should meet with the candidates prior to the final recommendation to the Board. Following Board approval, meetings with the CEO and other Directors are organized prior to the candidate's formal appointment.

Diversity and inclusion: The NomCo reviews a broad spectrum of complementary skills, personalities and competencies, when searching for Non-Executive Directors, considering diversity as one of the factors when recommending for a new appointment. Board composition and succession planning is about inclusion in terms of skills, knowledge and viewpoints. Traditional dimensions of diversity, such as race, gender and tenure are important, but the members of the Board should collectively possess a diverse range of skills, expertise, industry knowledge, business and other experience (inclusion), necessary for the effective oversight of the Company.

Succession planning process for the CEO

The Succession Planning process for the CEO is governed by a separate policy, namely the CEO Succession Planning Process. Said process is based, *amongst others*, on the following principles:

- Issues related to the CEO succession should be addressed proactively and therefore the succession plan is an ongoing activity with a long-term perspective.
- Except where the CEO departs unexpectedly, the CEO is an active participant, and it is his/her responsibility to ensure that there is an internal process for developing talent for the top executive roles.
- The succession planning includes, inter alia, an annual review by NomCo during which the CEO and the Group HR lay out the forward-looking leadership factors against which the talent should be evaluated as well as an external benchmarking.

The process is partially differentiated depending on whether the departure of the current CEO is planned or unplanned.

In case of anticipated succession, the process briefly includes the following phases:

- Identification and evaluation of needs: The process begins with determining the Company's future strategy, which serves as a baseline for the type of skills, and experience that is needed from the new CEO in order to meet the Company's goals.
- Selection criteria: The NomCo, in collaboration with the CEO, distills the abovementioned considerations into a set of criteria that are the most critical for assessing and selecting suitable candidates.
- Search and selection: The NomCo should seek to sustain a pool of external and internal talent from which to identify potential candidates.
- Nomination: The NomCo reviews the list of potential candidates and produces a shortlist. Then, the Committee meets subsequently the potential candidates and assesses them, also examining incompatibilities and disqualifications of legal nature. Based on the results of the assessment, the NomCo recommends the best candidate to the Board.

In case of an unanticipated succession, the whole process is handled by the NomCo. The NomCo prepares a ready-to use list of potential candidates from which the Board could choose the individual who can run the Company as an interim CEO (in case there is no apparent successor identified and immediately available). Preferably, such an interim CEO should be selected from the pool of internal candidates. In case the Board believes there are no internal candidates there are ready for the position of

the CEO, an external search for a permanent replacement follows.

2.4 Diversity of the BoD members

Upon suggestion of the Board NomCo, the BoD has adopted the BoD Diversity Policy. The policy is applied in conjunction with the Director Suitability Policy, as mentioned above and is also considered in the implementation of the Board members and CEO succession planning.

The Company recognizes and embraces the importance and the benefits of diversity for safeguarding and improving its competitive advantage and innovation as well as for achieving maximum team performance and effectiveness. In this context, when nominating new Board members or top management executives, a combination of elements is taken into consideration, including *inter alia*: skills, abilities, qualifications, knowledge, experience, educational background, professional training, professional experience, the gender, the age and other qualities, which may vary depending on the identified weaknesses and the business or strategy needs of the Company.

All areas of knowledge and experience required for the Company's business activities are covered by the BoD. The Company has a highly diversified BoD in terms of educational and professional experience backgrounds, bringing in a variety of perspectives that can be key to an organization's success. Such education and professional backgrounds include indicatively finance, economics, business administration, mechanical/ electrical engineering, philosophy, politics, law as well as extensive banking and financial services experience and certifications, training and prior experience in accounting, audit, risk and IT.

In addition, the current BoD is consisted of members of seven (7) different nationalities (Greece, Britain, Italy, New Zealand, USA, Belgium, Canada).

Having a wide range of perspectives in the boardroom means that the status quo is constantly challenged and critically reassessed and that information is carefully evaluated. The achieved diversity of the Board members effectively contributes to the expression of different views, to the avoidance of “group thinking” and to the constructive dialogue between members, thus succeeding the final decisions to be taken on the basis that the non-executive members of the Board Members exercise appropriate oversight to the Management.

The Company is compliant with the law requirement/ threshold (25%) for the adequate representation of females in the BoD, according to the provision of the article 3 par. 1 lit. b΄ of Law 4706/2020, with the participation of three (3) women-members of the BoD (25% x 13 members = 3.25, rounded to the nearest whole number). Following the unexpected resignation of a female independent member in November 2023 the Company committed and immediately initiated the respective process to replace the resigned member with another suitable female member. The Company proceeded to the selection of such a person appointing her as an Independent Non Executive Member of the Board at the BoD meeting of 22 February 2024, thus ensuring compliance with the threshold (25%) for the adequate representation of females in the BoD. The Company will work further in enhancing gender diversity to the BoD and is committed to maintain compliance with the legislative and the regulatory requirements.

The Group also aspires to increase percentage of women in upper management positions to 35% by 2025 (currently at 32%).

2.5 Operation

The **BoD**, immediately after its election by the GM, forms into body and elects a Chairman and one or more Vice-Chairmen and Managing or Executive Directors from amongst its members. According to the current legal framework and international best

practices, the Chairman of the Company shall not at the same time serve as Managing/ Executive Director.

The **Chairman** is head of the Board and presides over its meetings. In the event of his absence or not being in a position to perform his duties, he is substituted by one of the Vice-Chairmen of the Board; they, in turn, are substituted by another director, appointed by a resolution of the Board. Secretarial duties of the BoD are performed by one of its members or any other third party appointed by the Board. The Board has assigned the support of its operations of the BoD to a capable, specialized and experienced Corporate Secretary, who is appointed by it.

The **Senior Independent Director**, appointed by the BoD from amongst its independent non- executive Board members, has the following duties and responsibilities:

1. lead the Non-Executive Directors and serve as a trusted intermediary for them, when required;

2. support the Chairman and other Directors or shareholders, in exceptional circumstances, to resolve any significant issues, including any potential conflicts of interest between the Chairman of the Board and the Company;

3. in exceptional circumstances, request for a special meeting of the BoD and define its agenda.

In the exceptional circumstances under paragraph 2 above, the Senior Independent Director may:

- organize meeting of Non-Executive Directors and reflect their concerns to the Chairman and the CEO;
- act as intermediary and facilitator between the Non-Executive Directors and the Chairman, as necessary;
- request that a Board meeting is convened as per paragraph 3 above.

The BoD is convoked by its Chairman or his deputy and convenes at least once a month at the Company's seat or by teleconference, in accordance with the provisions of its Articles of Association and of corporate law, as in force. The BoD may validly convene anywhere in Greece or abroad, where the Company pursues business activities.

Subject to the provisions of art. 5 para.3 of Law 4706/2020, stipulating that sessions of the BoD are quorate when at least two (2) independent non-executive members are present for matters regarding the preparation of the financial statements or items for the approval of which a decision by the GM by increased quorum and majority according to Law 4548/2018 is required, the Board is in a quorum and convenes validly when at least half of its members plus one (1) are present or represented. However, the number of members personally present may never be less than five (5). Fractions are omitted in determining whether a quorum is achieved. When the BoD convenes by teleconference, the members participating are considered physically present.

Resolutions of the BoD shall be taken by absolute majority of the present and represented members unless otherwise provided by Greek Law, the Articles of Association and the Regulation of the Company. Drawing up and signing of minutes by all Board members or their representatives equals a resolution of the BoD, even if no meeting has been held.

2.6 HFSF role in the Company

Pursuant to the provisions of Greek Law 3864/2010, the HFSF's Representative in the BoD has the following rights:

a) to veto any decision of the Company's BoD:

i. in respect of the distribution of dividends and the remunerations and bonuses policy for the Chairman, the Managing Director and the other members of the BoD, as well as for those persons holding the position of or exercising the duties of general managers as well as their deputies when the ratio of NPEs to total loans of the credit

institutions, as calculated according to item (ii) of case g of paragraph 2 of article 11 of Commission Implementing Regulation (EU) 2021/451 of 17 December 2020, exceeds 10%; it is noted that this provision is not currently applicable to the Company;

ii. in respect of decisions to amend the articles of association, including the increase or decrease of capital or the provision of relevant authorization to the BoD, merger, division, conversion, revival, extension of the duration or dissolution of the Company, transfer of assets, including the sale of subsidiaries, or for any another issue requiring an increased majority in accordance with the provisions of Law 4548/2018 and which decision is likely to significantly affect the HFSF's participation in the share capital of the Company;

b) to request an adjournment of a Board meeting for three (3) business days in order to receive instructions from the CEO of HFSF. This right may be exercised until the end of the relevant BoD meeting;

c) to convene the BoD of the Company.

According to the Tripartite Relationship Framework Agreement ("RFA") dated 22 February 2024 and entered into between HFSF, the Company and the Bank, an HFSF Observer assists the HFSF Representative and may attend BoD and BoD Committees' meetings on which the HFSF Representative participates, without voting or other rights.

In addition, in accordance with the RFA, until the later of (i) the end of term of the present BoD, or (ii) 31 December 2025, the HFSF's Representative may be appointed as a member of one or more of the following BoD Committees of the Company: Audit Committee, Risk Committee, the Remuneration Committee, and the Nomination Committee.

In exercising his rights, the HFSF Representative shall respect the Company's business autonomy.

The BoD held seventeen (17) meetings during the year 2023.

The following table presents the percentage of the Board and Committees members' participation in the respective meetings for the reporting period.

	BoD		Risk Committee		NomCo		Remuneration Committee		Audit Committee		Board Ethics & ESG Committee	
Average participation	100%		100%		100%		98%		98%		100%	
Total number of meetings	17		12		6		7		17		3	
Name	**Attendance**	**Meetings**	**Attendance**	**Meetings**	**Attendance**	**Meetings**	**Attendance**	**Meetings**	**Attendance**	**Meetings**	**Attendance**	**Meetings**
George Handjinicolaou	100%	17/17	-	-	-	-	-	-	-	-	-	-
Karel De Boeck	100%	17/17	100%	12/12	100%	6/6	-	-	100%	17/17	100%	3/3
Christos Megalou	100%	17/17	-	-	-	-	-	-	-	-	-	-
Vasileios Koutentakis	100%	17/17	-	-	-	-	-	-	-	-	-	-
Venetia Kontogouris	100%	17/17	-	-	100%	6/6	-	-	-	-	100%	3/3
Enrico Cucchiani	100%	17/17	-	-	100%	6/6	100%	7/7	-	-	100%	3/3
David Hexter	100%	17/17	-	-	100%	6/6	-	-	94%	16/17	100%	3/3
Solomon Berahas	100%	17/17	100%	12/12	-	-	86%	6/7	100%	17/17	100%	3/3
Anne Weatherston	100%	17/17	100%	12/12	-	-	-	-	100%	17/17	-	-
Andrew Panzures	100%	17/17	100%	12/12	100%	6/6	100%	7/7	-	-	-	-
Francesca Tondi[1]	100%	16/16	-	-	-	-	100%	6/6	94%	15/16	100%	3/3
Alexander Blades	100%	17/17	100%	12/12	100%	6/6	100%	7/7	-	-	100%	3/3

Periklis Dontas	100%	17/17	100%	12/12	100%	6/6	100%	7/7	100%	17/17	100%	3/3
*1. Ms. **Francesca Tondi** resigned from the BoD in November 2023.*												

2.7 Roles and Responsibilities

Pursuant to Article 15 of the Company's Articles of Association, the BoD represents the Company and is authorized to resolve, without restriction, on any issue relating to the Company's management, administration of its property and the pursuit of its business objectives in general. The BoD may not resolve on issues, which in accordance with the Greek Law and the Articles of Association, fall within the exclusive responsibility of the GM.

Under Article 16 of the Company's Articles of Association, the Company is represented by its BoD, which may delegate authority relating to the representation of the Company and also the exercise of all or some of its powers or responsibilities, except those requiring collective action, to one or more persons whether members of the BoD or not, setting out the extent of the powers conferred upon them. Under the above provisions of the Articles, the Board determines the system for representing the Company and the limits within which the authorized representatives can act.

The Company's Internal Regulation states that the prime obligation and duty of the Board Members is the continuous pursuit of enhancing the Company's long-term economic value and the protection of the general corporate interests. The BoD is responsible for drawing up and adopting a detailed Business Strategy extending for at least one year defining clear business objectives, both for the Company itself and for the Group. The Internal Regulation further outlines on the role and responsibilities of the BoD as a whole as well as of executive, non-executive and independent non-executive members.

Principal activities and significant issues considered during 2023

In the performance of its duties for 2023, the Company's BoD *inter alia*:

In relation to Corporate Governance issues

- Proposed to the Annual GM the re-election of the thirteen (13) members of the BoD and the type, size, term of office and qualifications of the members of the Audit Committee;
- prepared and convoked the Annual GM of Shareholders held on 27 June 2023 and approved the respective documentation;
- was updated on the results of the annual review of the independence of Board Members and confirmed that all Independent BoD members meet the independence requirements of the law;
- performed the annual CEO's evaluation for 2022 and the mid-year CEO's evaluation for 2023;
- was updated on the progress of the Board Members' Succession Plan;
- approved amendments in the Director's Remuneration Policy, the Annual Remuneration Report for the year 2022 and the BoD's remuneration for the years 2022-2023;
- approved the amendment of the Directors Suitability Policy and submitted it for approval by the Annual GM;

- approved the revision of the NomCo's Terms of Reference;
- approved the adoption of the Distribution Policy;
- approved the introduction of a Long – Term Incentive Programme;
- was updated on the final decision of the Annual SREP 2022.

In relation to Audit and Compliance issues, the BoD approved the following:

- the revision of the Audit Committee's Terms of Reference;
- the Action Plans for the year 2023 of Group's Internal Audit and Compliance Units;
- the revision of the Code of Conduct and Ethics of the Company.

The BoD was also updated on the progress of the special audits of the Internal Audit Unit ("IAU").

In relation to RM issues, the BoD approved the following:

- the Capital and Liquidity Adequacy Statements ("CAS"/ "LAS") for 2022 as well as the ICAAP and ILAAP 2022;
- the Group Risk and Capital Strategy & the RAF for 2023;
- the annual review of the Company's Recovery Plan.

In relation to corporate actions and granting authorizations the BoD approved the following:

- the VES for 2023.

In relation to business monitoring, financial information, Company's policies and relevant updates the BoD approved the following:

- the 2022 annual financial statements and the 2023 interim financial statements;
- the Group annual budget for 2024;
- the NPE Plan for the year 2023 and the Group Business Plan for the years 2023-2025.

The BoD was also updated on the assignment of non-audit services to the Company's statutory auditors.

2.8 Induction and training of Board members

Aiming to ensure that new members of the BoD are provided with all the information and training necessary to enable them to contribute appropriately to the operations of the BoD from the time of their election and to the accomplishment of its mission, the Company has adopted a Board Induction and Training Policy. In this context, it implements an induction procedure for newly elected/ appointed Board members aiming to facilitate the Board members' understanding of the Group and the Company's structure, business model, risk profile, governance arrangements and the role of the member(s) within them.

Upon the election of a new member by the GM of Shareholders or appointment by the BoD, a letter of congratulations and welcome is addressed to her/him by the Company Secretary, accompanied by a detailed induction pack (a living document which provides them with a wide range of information about the Company and the Board, comprising of material such as the articles of association, the internal regulation, information on the obligations deriving from their membership, the Board meetings schedule for the year etc.).

Prior to attending their first Board meeting, members are welcomed by the Chairman of the Board and meet with the CEO and the top executive management of the Company, with the opportunity to ask questions with reference to the Company and its operations. New members are also briefed on issues the BoD is dealing with at the moment or will be looking at in the future. In case of multiple new memberships, induction day seminars are organized and attended by the new members.

Following the FAP suitability assessment the new members are submitted to, it is expected and recognized that they possess sufficient knowledge, experience and expertise to fulfill their role. Nevertheless, they are not necessarily experts in all disciplines, business areas or governance aspects. Therefore, training is a key driver of continued board effectiveness and an ongoing commitment of Board members and the Company.

The Company makes available the financial and human resources to implement proper induction and training programs and encourages initiatives aiming to improve the collective or individual skills, knowledge or competence of Board members on an ongoing or ad-hoc basis. The Corporate Secretary, in collaboration with the Group HR, is responsible for producing the annual training schedule. The NomCo sponsors and oversees the training schedule for the members of the Board, on an ongoing basis. In addition, regular presentations by management and staff to the Board and Committees are performed in order to educate or keep them informed on changes within the Company or on legal, regulatory, market and industry requirements and standards. Personalised educational programs may be designed and implemented, where needed.

In addition, once a year, Board members attend (one-day/two days) Strategy Seminars where top executive management presents the results, goals, challenges faced by the organization.

During 2023, taking into consideration the market trends and needs as well as the previous Board self-assessment outcomes, the training initiatives for the BoD members were focused on topics related to ESG, cyber risk, anti-money laundering and artificial intelligence, and were conducted by subject matter experts from international and Greek companies.

2.9 Assessment of the BoD

According to the Company's "Self-Assessment Policy for the BoD, Board members and Board Committees", taking into consideration relevant provisions of the Suitability Policy and other related policies of the Board, the applicable regulatory provisions and best practices on corporate governance, the BoD, assisted by the NomCo, conducts a self- assessment exercise on an annual basis in order to, inter alia, identify strengths, weaknesses and training needs, to promote accountability of the Board and its members in the performance of their duties and to improve effectiveness.

The scope and the criteria of the assessment are defined by the NomCo and include, without limitation, the structure (composition, diversity, skillset, experience etc.), dynamics and operation (meeting frequency and procedures, availability and adequacy of information etc.), understanding and contribution to the Company's operations, level of candor, impartiality, transparency and other behaviors within the Board. The specific parameters and criteria may vary each year depending on the aspects on which emphasis is placed each time.

The NomCo deliberates on the format, content and methodology to be adopted for the assessment, including the engagement of external consultants at least every three years, to submit recommendation or to conduct the assessment in whole or in part,

the use of questionnaires and/ or interviews and/ or alternative methodologies.

The conclusions of the self-assessment are summarized by the NomCo in a report together with any recommendation or changes the Committee deems appropriate and are presented to the Board. A brief summary of the results is also included in the annual Corporate Governance Statement.

2023 BoD self assessment

In January 2024, the Company has conducted a self-assessment exercise to review the effectiveness of the Board for the year 2023, which involved all members of the Board and its Committees.

All Board members participated in the exercise by completing a questionnaire covering a wide range of areas, such as strategy, risk governance, internal control, strategic HR issues and remuneration, sustainability and stakeholder engagement, Board nomination and composition, Board functioning and dynamics, Board secretariat support, information flows, Board Chair performance, interaction with management, and effectiveness of the Board Committees.

The results of the aforementioned Board self-assessment exercise reflect an overall positive picture of the functioning of the Board and its Committees. Board members are committed to their role, work well together and provide a constructive challenge and oversight to Management proposals and decisions. The strengths highlighted in this year's assessment include, inter alia, the highly effective collaboration of the Board with the CEO, the appropriate empowerment of the CEO to execute the strategy and business plan agreed with the Board, the excellent performance of the Board Chairman, the productive and open communication of the Board with senior management, and the effective operation of the Board Committees that adequately and constructively support the Board's mandate, with clear roles and terms of reference.

Considering areas for attention and further improvement, the Board members focused on the Board succession plan, considering that some Independent Members reach independence limits in the upcoming years, the improvement of remuneration levels in order to be able to retain and attract talent both at senior management and at Board level, the further enrichment of the Board diversity, and the closer monitoring of the ongoing key strategic initiatives.

2.10 Board Remuneration

Board members' remuneration is approved by the Annual GM of Shareholders, upon respective recommendation of the BoD (non-executive members) following proposal by the Remuneration Committee. The proposal is formulated taking into consideration market practice, international best practice, the legal and regulatory framework applicable to the Company as well as the Directors' Remuneration Policy which sets the principles and describes the elements and governance of remuneration paid to BoD members. The Annual GM of Shareholders held on 27 June 2023: a) approved (by 99.56%) the remuneration paid to members of the BoD in respect of 2022 and gave preliminary approval for remuneration to be paid for the year 2023, b) casted a positive vote (99.49%) for the Remuneration Report of year 2022, in accordance with the provisions of article 112 of Law 4548/2018. Said report provides detailed information on the remuneration of the members of the BoD and is available in the Company's website and finally c) approved (by 91.85%) the proposed amendments to the Directors' Remuneration Policy. The revised Policy is available in the Company's website.

2.11 Committees

Aiming to constantly improve the effectiveness of the management of the Company and the Group, responsibilities for certain areas requiring expert competence have been delegated to BoD or Executive Committees.

3. BoD Committees

- **Audit Committee**

On the date of the publication of the 2023 Annual Financial Report, the composition of the Audit Committee is as follows:

AUDIT COMMITTEE	
Anne Weatherston	Chairman, Independent Non-Executive BoD Member Member since: July 2020, Chair since: July 2021
Solomon Berahas	Vice-Chairman, Independent Non-Executive BoD Member Member since: February 2017
Karel De Boeck	Member, Independent Non-Executive BoD Member Member since: August 2016
David Hexter	Member, Independent Non-Executive BoD Member Member since: August 2016
Maria Semedalas	Member, Independent Non-Executive BoD Member Member since: February 2024
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative pursuant to Law 3864/2010 Member since: December 2019
83% Independent Non-Executive	**17% Non-independent**

During 2023, the following change was made to the composition of the Committee: On 17 November 2023, Ms. Francesca Tondi ceased to be a member of the Committee, following her resignation from the BoD.

During 2024 and until the date of publication of the Annual Financial Report the following amendments took place in the composition of the Committee: Ms. Maria Semedalas Independent Non-Executive Member was appointed member of the Committee on 22 February 2024.

Governance - Operation

The Audit Committee is comprised of Non-Executive members of the Board, the majority of which are independent within the meaning of the provisions of Greek Law 4706/2020. The HFSF Representative participates as a member in the Audit Committee, with full voting rights. The operation of the Committee is governed by article 44 of Greek Law 4449/2017, as amended by Greek Law 4706/2020, the respective notices, explanations and recommendations of the Supervisory Authorities and additionally by

its Terms of Reference.

It is noted that the Chair of the Audit Committee, Ms. Anne Weatherston is an Independent Non-Executive member of the BoD and has, *inter alia*, extended experience in internal audit and finance within the meaning of Greek Law 4449/2017. The Committee as a whole possesses appropriate competence and experience for the effective performance of its duties.

The Chief Financial Officer ("CFO"), the Head of Internal Audit, Compliance and Risk Officer, the Group Controller, the Senior Advisor on Internal Control and audit matters and other Executives of Senior Management are invited to attend the Audit Committee meetings. The Group's statutory auditors are invited to attend all meetings. The Audit Committee Chair maintained regular contact with the statutory audit partner throughout the year.

The Audit Committee reviewed and submitted to the Board for its approval, the updated Terms of Reference of the Committee, on 16 November 2023.

Based on its Terms of Reference, the Audit Committee meets at least eight (8) times a year, and extraordinarily, if the circumstances so require.

In 2023, the Audit Committee convened 17 times and all its decisions were taken unanimously based on the thorough examination of supporting material and further clarifications provided during these meetings by the competent managerial officers, statutory auditors and other experts. Members' attendance rates in the Committee meetings are depicted in the Members Participation in the BoD and the respective Committees' table above. It is noted that the statutory auditors attended all Audit Committee's meetings following respective request.

Roles and responsibilities

The main duties of the Audit Committee are:

- Supervising and evaluating of the drafting processes of the annual and interim financial statements of the Group and the Company prior to their publication;
- Supervising of the audit and review of the Group and the Company's annual financial statements and mid-year interim financial information conducted by the statutory auditors and cooperation with the statutory auditors on a regular basis;
- Ensuring the independence of the statutory auditors in accordance with applicable Greek Laws;
- Proposing to the Board the selection of statutory auditors and whenever deemed appropriate, proposing their replacement or rotation; conducting the tender procedure for the appointment of the auditors in accordance with article 16 of Regulation (EU) 537/2014 in conjunction with article 44 of Greek Law 4449/2017;
- Monitoring and annual evaluation of the adequacy and effectiveness of the ICS of the Group and the Company;
- Evaluating the work of the Internal Audit, focusing on issues related to the degree of its independence, the quality and scope of its audits, the priorities determined by changes in the economic environment, the systems and in the level of risks and the overall efficiency of its operation;
- Determining the scope and appointing the latest every three (3) years, an external audit firm, other than the statutory auditors to assess the adequacy of the ICS;

- Monitoring and evaluating on an annual basis the work of the Compliance function.

How the Committee discharged its responsibilities during 2023

Regarding Financial Statements and relevant notifications, the Audit Committee:

- Reviewed the Group and the Company's critical accounting estimates and judgments and their application to the Group and the Company's quarterly interim financial statements as well as annual financial statements;
- Reviewed the quarterly interim financial statements, half-year interim financial statements and annual financial statements prior to their publication, discussing and asking for clarifications on the accounting standards implemented and suggested to the Board their approval;
- Met regularly with Management and the statutory auditors to discuss any changes in accounting policies, critical accounting estimates, one-off items impacting the financial statements and any other significant issues;
- Was updated regularly and reviewed legal and tax matters which could significantly impact the judgments made by Management when preparing the financial statements;
- Was updated regularly and reviewed financial reporting issues that could significantly affect the annual and interim financial statements, prior to their publication.

Regarding **External Audit,** the Audit Committee:

- Reviewed the statutory auditor's audit plan and methodology for the interim review and the annual audit, the extended independent auditor's report and audit findings;
- Ensured appropriate rotation of the statutory auditors after five (5) consecutive years and proposed to the BoD the appointment of Deloitte as the Group's statutory auditor for the financial year 2023;
- Reviewed and proposed to the Board the fees for audit and permissible non-audit services to Deloitte for the year ended 31 December 2023, as disclosed in Note 48 of the annual financial statements;
- Considered Deloitte's independence, in accordance with professional ethical standards. Deloitte provided the Audit Committee with written confirmation of its independence for the financial year 2023;
- Was informed of the update of Deloitte's audit plan and audit approach.

Regarding the **ICS,** the Audit Committee:

- Promoted the continuous strengthening of the ICS as a strategic priority for the BoD and Management of the Group and the Company, as well as the procedure for the development and integration of the appropriate internal control mechanisms, with the objective of the further improvement of the OR that the Group face in its operations;
- Assessed the effectiveness of the ICS and the developments affecting it. In order to carry out its assessment, the Audit Committee discussed with Management the internal control deficiencies as well as the implementations of remediation actions, following recommendations of the internal and statutory auditors as well as the Supervisory Authorities;

- Reviewed and approved the report on the Assessment of the adequacy of the ICS required by the Law 4706/2020 on listed entities performed by the audit firm Grant Thornton S.A..

Regarding **IAU,** the Audit Committee:

- Monitored the implementation of the Internal Audit Annual Action Plan for year 2023 and concluded that the Internal Audit was effective;
- Was notified of the Internal Audit Annual Action Plan for year 2024, staff related issues and budget. Pre-approved its implementation and submitted it for further approval to the BoD;
- Was notified on the significant audit findings (regular and special audits) and Management's responses in relation to the timing and activities of remediation plans.

Regarding **Compliance Function,** the Audit Committee:

- Monitored the implementation of the Compliance Annual Action Plan for year 2023 and concluded that Compliance function was effective;
- Was notified of the Compliance Annual Action Plan for year 2024, pre-approved its implementation and submitted it for approval to the BoD;
- Reviewed and approved the updated Group Compliance Policy;
- Reviewed and preapproved the Annual report of Money Laundering Responsible Officer ("MLRO"), on Anti-Money Laundering and Counter-Terrorism Financing for 2022 and submitted it for approval to the BoD;
- Reviewed the updated Code of Conduct and Ethics;
- Reviewed the new Policy against violence and harassment.

Information on the current composition of the Audit Committee, its operation and responsibilities are available on the Company's website.

The Annual Audit Committee's Report pursuant to article 44 par. 1 (case i) of Law 4449/2017 will be published together with the Annual Financial Report (to which is incorporated by reference) and will be available in the Company's website.

- **Risk Committee**

On the date of publication of the 2023 Annual Financial Report the composition of the Risk Committee is as follows:

RISK COMMITTEE	
Karel De Boeck	Chairman, Independent Non-Executive BoD Member, Senior Independent Director Chairman since: August 2016
Andrew Panzures	Member, Independent Non-Executive BoD Member Member since: July 2020
Anne Weatherston	Member, Independent Non-Executive BoD Member Member since: June 2021
Alexander Blades	Member, Non-Executive BoD Member Member since: February 2017
Maria Semedalas	Member, Independent Non-Executive BoD Member Member since: February 2024
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative Member since: December 2019
67% Independent Non Executive	**33% Non-Independent**

During 2023 Mr Solomon Berahas, an Independent non executive BoD member, was also a member of the Risk Committee and its elected Vice Chairman. On 31 January 2024 the BoD decided that Mr Berahas ceases to be a member of the Risk Committee and joins, as Chairman the BoD Ethics and ESG Committee.

During 2024 and until the date of publication of this Report the following amendments took place in the composition of the Committee: On 31 January 2024 the BoD decided that Mr Berahas ceases to be a member of the Risk Committee and joins, as Chairman the BoD Ethics and ESG Committee.Ms. Maria Semedalas Independent Non-Executive Member was appointed member of the Committee on 22 February 2024.

Governance - Operation

The Risk Committee consists of non-executive BoD members appointed by the BoD. The number of Committee Members cannot be lower than three (3) and cannot exceed 40% (rounded to the nearest integer number) of the total number of the BoD members. The majority of the Members (rounded to the nearest integer number and excluding the HFSF Representative) should meet the criteria for the independence of Board Members, in accordance with greek legislation. The Representative of the HFSF participates as a Member in the Risk Committee with full voting rights.

The Chairman of the Committee is appointed by the BoD. The capacity of the BoD's Chairman is incompatible with the capacity of the Risk Committee's Chairman, while the Chairman of the Risk Committee cannot be the Chairman of Piraeus Financial Holdings' Audit Committee at the same time.

The Chairman of the Risk Committee, Mr. Karel De Boeck has, *inter alia*, extended experience in RM. The Members of the Risk Committee should possess adequate knowledge and previous experience in the financial services and banking industry, with at least one (1) member having solid risk and capital management experience, as well as familiarity with the local and international regulatory framework.

The Compliance and Risk Officer has been designated as the Executive Secretary by the BoD. The Executive Secretary is independent, reports directly to the Risk Committee and is subject to audit by the Internal Audit.

The Committee convenes, upon its Chairman's invitation, on a monthly basis and exceptionally when this is deemed necessary. In order to fulfill its duties, the Risk Committee held 12 meetings during 2023.

The mission of the Risk Committee is, *inter alia,* to ensure that:

- The Company and its Group has a well-defined Risk and Capital Strategy and RAF, in line with its business goals as well as with the available human and technical resources. The risk appetite of the Company and the Group is articulated and clearly communicated in a set of quantitative and qualitative statements, including specific limits for the material risks;
- All risks connected to the activity of the Company and the Group are effectively identified, assessed, measured, controlled, mitigated and monitored;
- The RM and control framework in place, including policies, methods and tools, complies with Risk and Capital Strategy and and RAF as well as with regulatory and supervisory requirements.

Roles and Responsibilities

For the achievement of its goal, the Committee undertakes, *inter alia,* the following duties and responsibilities:

- Monitors, assesses and provides update to the BoD with respect to the compliance with supervisory requirements, the risk profile and the adherence to the approved risk appetite limits and early warning levels of the Company and the Group;
- Evaluates the adequacy and effectiveness of the RM & control framework to ensure that it remains comprehensive, adequate and proportionate to the nature, extent and complexity of the Company and its Group current activities;
- Oversees (jointly with the Audit Committee) and provides update to the BoD with respect to the implementation progress of the major initiatives related to OR as well as internal control enhancements.

How the Risk Committee discharged its responsibilities during 2023

- Evaluated and made recommendations to the BoD in respect to major risks related to strategic/ priority actions that required the approval of the latter, including, indicatively and not exhaustively, the:
  - 2023 Risk and Capital Strategy and RAF;
  - revisions of selected indicators and limits of 2023 RAF;
  - NPE Plan 2023-2025;

- Assessed the adequacy and effectiveness of the OR and control framework and relevant policies;
- Obtained an overview and provided update to the BoD on the 2023 Company's Risk Annual Plan, and informed on the 2024 Annual Plan;
- Obtained an overview and provided update to the BoD on Company's Risk reports regarding the operational losses, the evolution and profile of the key risks undertaken, the 2023 Risk Identification Annual Report, the Operational Risk and Control Assessment and Effectiveness and the respective results at a Company level;
- Obtained an overview, jointly with the Board Ethics and ESG Committee, on the environmental and climate risks of the Group;
- Evaluated and provided recommendation to the BoD when required, in respect to the development, documentation, re-assessment and monitoring of the:
  - Implementation process of the 2022 ICAAP and CAS and of the 2022 ILAAP and LAS;
  - 2023 Recovery Plan;
  - 2022 Risk Capital and Risk Management Regulatory Disclosures on a Consolidated Basis ;
  - 2024 Risk Identification Annual Report;
- Evaluated, and provided recommendation to the BoD in respect to the regular revision of risk related policies and documents, including indicatively, the RAF, the ICAAP Framework, the ILAAP Framework, the Stress Testing Framework, Risk Capital and Risk Management Regulatory Disclosures Policy, SRT Policy, Simple Transparent and Standardized ("STS") Synthetic Securitizations Policy, Climate Risk Classification Document, Group Anti-Fraud Policy, and Group Operational Risk and Internal Control Policy.

More information on the current composition of the Committee, its operation and responsibilities is available on the Company's website.

- **Remuneration Committee**

On the date of publication of the 2023 Annual Financial Report, the composition of the Remuneration Committee is as follows:

REMUNERATION COMMITTEE	
Andrew Panzures	Chairman, Independent Non-Executive BoD Member Vice Chairman since: June 2021 & Chairman since: June 2022
Enrico Cucchiani	Member, Independent Non-Executive BoD Member Member since: March 2017
Solomon Berahas	Member, Independent Non-Executive BoD Member Member from: February 2017 to September 2017 and reappointed as a Member since: July 2020
Alexander Blades	Member, Non-Executive BoD Member Member since: August 2016
Maria Semedalas	Member, Independent Non-Executive BoD Member Member since: February 2024
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative Member since: December 2019
67% Independent Non-Executive	**33% Non- Independent**

During 2023, the following change was made to the composition of the Committee: On 17 November 2023, Ms. Francesca Tondi ceased to be a member of the Committee following her resignation from the BoD.

During 2024 and until the date of publication of the Annual Financial Report the following amendments took place in the composition of the Committee: Ms. Maria Semedalas Independent Non-Executive Member was appointed member of the Committee on 22 February 2024.

Governance - Operation

According to its Terms of Reference, the Remuneration Committee is appointed by the BoD of the Company and consists of at least three (3) members of the BoD, while the total number of its members should not exceed 40% of the BoD Members including the HFSF Representative who participates with full voting rights. The majority of the members must be independent. The Committee, as a body, should have knowledge, expertise and professional experience in remuneration related issues, RM and control activities. At least one (1) member of the Committee should also be a member of the Risk Committee to oversee alignment of the Remuneration Policy with the Company's Risk and Capital Strategy.

The Remuneration Committee shall meet at the invitation of the Chairman whenever he/she deems it necessary for the execution of its remit, but no less than four (4) times in each calendar year. Resolutions may only be adopted when a quorum of at least half of its members are present. Resolutions of the Committee are adopted by majority vote of the members present.

The Remuneration Committee held seven (7) meetings during 2023. Members' attendance rates in the Committee meetings

are depicted in the Board Members Participation in the BoD and the respective Committees table above.

Roles and Responsibilities

The mission of the Remuneration Committee is to design, monitor the implementation and periodically review the Group's remuneration policy, in accordance with the applicable legislative and regulatory framework and the alignment with the Company's strategic goals. In the execution of its duties, the Remuneration Committee takes into account the RAF of the Company, the long-term interests of shareholders, investors and other stakeholders. Within the scope of responsibilities of the Remuneration Committee the following activities are included: a) the monitoring of the implementation of a framework that objectively evaluates performance and is directly linked to the determination of the remuneration of employees, b) the overview of the Group´s talent management and succession planning policies as well as c) the implementation of strategies aiming at building a corporate culture that will support the Company´s objectives and vision.

The Remuneration Committee*, inter alia*:

- Reviews annually the Group's Remuneration Policy;
- Evaluates on a regular basis the remuneration of Executive and Non-Executive BoD Members, as well as the senior executive management;
- Makes a recommendation to the BoD, on an annual basis, regarding the remuneration of Executive and Non-Executive BoD members for the coming period;
- Assesses the compliance of proposed variable remuneration schemes to current legislation, as well as their consistency with the Company´s RAF and strategies;
- Assesses whether the proposed remuneration packages for senior executives of the Company´s independent control functions are compliant with the Group´s remuneration policy;
- Regularly monitors pay equality and presence of discrimination based on gender, age or Bank of origin;
- Reviews and proposes to the BoD the goals and objectives relevant to the CEO compensation and evaluate the CEO's performance in light of these goals and objectives.

How the Remuneration Committee discharged its responsibilities during 2023

- Reviewed and recommended to the BoD for approval: a) the Annual Variable Incentive Schemes for Performance Year 2022, b) the introduction of: i) the Retention Scheme for Senior Management, and ii) a Long-term Incentive Plan ("LTIP") to further enhance the Group's ability to retain and attract talent in senior management levels; The Boston Consulting Group, an external remuneration consultant with no relationship with the Company or with members of the Board, has advised the Company on remuneration issues related to the LTIP, ensuring that parameters selected are in accordance with international best practices, adhere to EBA guidelines and are compatible with the organization's other variable remuneration schemes.
- Reviewed and recommended to the BoD for approval the 2023 VES of the Group;
- Recommended to the BoD for approval the updated Identification Process of Material Risk Takers ("MRTs");

- Reviewed and recommended to the BoD for approval the Annual Remuneration Report for 2022;
- Recommended to the BoD for approval the update of the Group and the Directors' Remuneration Policies;
- Recommended to the BoD to request from the 2023 Annual GM to approve:
  - the BoD's remuneration paid for 2022 and the advance payment of 2023;
  - the free distribution of common shares of the Company to executives and employees of the Company and its affiliated companies within the meaning of Article 32 of Law 4308/2014, in accordance with the provisions of article 114 of Law 4548/2018 and the Directors' and the Group Remuneration Policies;
- Recommended to the BoD for approval the terms and conditions of a five (5) year stock option plan ("Plan") for executives and employees of the Company and its affiliated companies within the meaning of article 32 of Law 4308/2014.

More information on the current composition of the Committee, its operation and responsibilities is available on the Company's website.

- **Nomination Committee**

On 31 December 2023 and on the date of the authorization for issuance of the 2023 Annual Financial Report, the composition of the BoD Members NomCo is as follows:

NOMINATION COMMITTEE	
David Hexter	Chairman, Independent Non-Executive BoD Member Member from February 2016 to July 2020|Chairman since: June 2021
Enrico Cucchiani	Vice-Chairman, Independent Non-Executive BoD Member Member since: February 2017
Venetia Kontogouris	Member, Independent Non-Executive BoD Member Member since: July 2020
Andrew Panzures	Member, Independent Non-Executive BoD Member Member from July 2020 to July 2021 and reappointed since: June 2022
Karel De Boeck	Member, Independent Non-Executive BoD Member, Senior Independent Director Ex officio Member since: December 2021
Alexander Blades	Member, Non-Executive BoD Member Member since: February 2016
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative Member since: December 2019
71% Independent Non-Executive	**29% Non- Independent**

Governance - Operation

The NomCo is comprised of at least three (3) Members of the BoD. All members are non-executive with the majority being independent non-executive. The HFSF Representative is a member of the Committee with full voting rights. The Senior Independent Director serves as an ex officio member of the NomCo.

The NomCo ensures that the BoD possesses, as a body, adequate knowledge and experience in at least the main activities of the Company in order to be able to exercise oversight over all its functions, either directly or indirectly through the various BoD Committees set up mandatorily or at the discretion of the Company.

The Committee convenes as required on a need-to-meet basis but at least twice every calendar year. The quorum necessary for holding a meeting is at least 2/3 of the total number of Committee members. Decisions of the Committee are taken with the majority of the members present or represented at the meeting.

The NomCo held six (6) meetings during 2023. Members' attendance rates in the Committee meetings are depicted in the Board Members Participation in the BoD and the respective Committees table in section 2.6.

Roles and Responsibilities

The NomCo is responsible for performing the duties set out in Greek Law and its Terms of Reference.

NomCo is, *inter alia,* responsible to:

- Identify and nominate suitable candidates to be proposed by the Board to the GM for election or re-election or as replacements for Board positions which become vacant;
- Re-evaluate the independence of the incumbent independent non-executive Board members annually, by running an appropriate independence review, to confirm compliance with applicable Greek corporate law and relevant EBA guidelines;
- Review at least annually the structure, size and composition (including the aggregate skillset, knowledge, independence, experience and diversity) of the Board and of its Committees, and make recommendations to the Board with regard to any adjustments that are deemed necessary;
- Design the succession planning for the Board and top executive management in order to ensure Board and Management continuity, and monitor its implementation;
- Adopt and periodically review a Director Suitability Policy for Board members;
- Adopt a Diversity Policy for Board members and review it on a biannual basis;
- Conduct an annual assessment of the effectiveness of the Board, the Board Chair and the Board Committees, which shall be facilitated by an external consultant at least every three (3) years;
- Under the lead of the Board Chair, the Committee shall ensure that an annual performance evaluation is conducted for the CEO and the other Board executives which will be reported to the Board;
- Adopt, periodically review and monitor the implementation of an Induction and Training Policy for Board members;
- Oversee the induction and training programs for members of the Board.

How the NomCo discharged its responsibilities during 2023

- Performed the self-evaluation process of the BoD and its Committees for 2022, with the support from an external consultant (Nestor Advisors) and reviewed its results;
- Assigned the performance of a Board skills matrix and benchmarking exercise to an external consultant and reviewed the results of the respective report;
- Reviewed and ensured that no conflicts of interest exist between the Company and the BoD;
- Assessed the independence criteria for Board Members;
- Assigned to a specialized consulting firm the search for new candidates to fill vacancies in the BoD taking into consideration the strengthening of Boards skills and the enhancement of its diversity (2023-2025 Board Directors

Nomination Program);

- Reviewed the Succession Planning process of the Board Committees' composition and discussed in detail the succession planning of the Board Committees and the optimal Board size;
- Conducted and completed the CEO's Evaluation for 2022 and the CEO's Mid-Year Assessment for 2023;
- Reviewed and approved the updated CEO targets for 2023;
- Discussed and concluded on the Board Training initiatives for 2023 (4 training sessions were completed in 2023);
- Reviewed the attendance of the BoD Members for the previous year (2022) and the respective Attendance Policy;
- Submitted to the BoD its recommendations regarding the election of a new BoD (size, term of office, composition) as well as the election of the Audit Committee members;
- Reviewed and approved the updated Directors Suitability Policy.

More information on the current composition of the Committee, its operation and responsibilities is available on the Company's website.

- **Board Ethics and ESG Committee**

On the date of publication of the 2023 Annual Financial Report, the Committee's composition was the following:

BOARD ETHICS AND ESG COMMITTEE	
Solomon Berahas	Chairman, Independent Non-Executive BoD Member Chairman since: January 2024 and Member since: October 2021
Karel De Boeck	Member, Independent Non-Executive BoD Member Member since: October 2021
David Hexter	Member, Independent Non-Executive BoD Member Member since: October 2021
Venetia Kontogouris	Member, Independent Non-Executive BoD Member Member since: October 2021
Enrico Cucchiani	Member, Independent Non-Executive BoD Member Member since: October 2021
Alexander Blades	Member, Non-Executive BoD Member Member since: October 2021
Maria Semedalas	Member, Independent Non-Executive BoD Member Member since: February 2024
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative Member since: October 2021
75% Independent Non-Executive	**25% Non- Independent**

During 2023, the following changes were made to the composition of the Committee: Ms. Franscesca Tondi ceased to be Chair of the Committee following her resignation from the BoD on 17 November 2023.

During 2024 and until the date of publication of this Report the following amendments took place in the composition of the Committee: Mr Solomon Berahas was elected by the BoD as Chairman to the Committee on 31 January 2024 .Ms. Maria Semedalas Independent Non-Executive Member was appointed member of the Committee on 22 February 2024.

Governance – Operation

The Committee consists of Non-Executive Board Members and Independent Non-Executive Board Members. The HFSF Representative is a member of the Committee with full voting rights. Depending on the items of the agenda and, if deemed necessary, other Group Executives may be present.

The Committee convenes following the Chairman's invitation, as many times as required necessary for the fulfillment of its

mission and at least quarterly.

The Committee meets with a quorum of at least half of its members (any decimal number is rounded to the next integer) and decides by a majority of 2/3 of the present members.

Roles and Responsibilities

The main objective of the Committee is to support the Board and Board Committees by proactively setting, monitoring, supporting and overseeing policies and strategies applied by Management, aiming at generating right values and culture, so that the Company operates with moral integrity.

The Board Ethics and ESG Committee has, *inter alia,* the following responsibilities:

With regard **to Ethics related policies**:

- Submits recommendations to the Board with respect to any revisions to the Company's Code of Conduct;
- is informed by Compliance, in relation to significant revisions to the Conflict of Interest Policy and on matters of policies regarding:
  - the fair treatment of customers (products and services design and suitability, sales processes, transparency of fees);
  - compliance with laws and regulations;
  - politically exposed persons;
  - related party transactions.

With regard to **Sound Governance** related topics:

- Reviews cases of alleged misconduct, relating to Board and Executive Committee members;
- Provides advice and makes recommendations to the BoD and Management on ethical matters;
- Provides advices to the NomCo regarding cases of conflicts of interest involving BoD members;
- Is informed by Group Internal Audit ("GIA") on matters regarding the Whistleblowing framework;
- Is updated periodically on the Complaints and Grievances procedures, so as to encourage the fair treatment of customers and the proper conduct of business.

With regard to **Corporate Social Responsibility**, community, environmental related topics:

- Makes recommendations to the Board and/ or relevant Board Committees with respect to the Strategy and policies for the above matters;
- Is updated on the action plans and their progress by the pertinent Management Committee;
- Supports the NomCo, if requested, in the evaluation of the knowledge, competence and experience of the Board Members in the area of ESG risks, in its assessment of the collective suitability of such members and to further arrange

the education of the Board Members in relation to all the above;

- Oversees the process for the preparation of the Annual Sustainability and Business Report and makes recommendations to the Board regarding the approval of the final report;
- Promotes best practices and ethical behavior considering interests of customers, personnel and society.

How the Board Ethics and ESG Committee discharged its responsibilities during 2023

- Was informed on the strategy on society and culture issues;
- Was informed on the energy transition project;
- Was informed about the Science Based Targets Initiative validation;
- Was updated on the Group's MSCI ESG score;
- Was updated on environmental and climate risks of the Group;
- Was informed about the Greek energy transition landscape (opportunities and challenges);
- Was informed about the Group's actions addressing critical social issues;
- Was updated on the communication strategy around social and cultural initiatives;
- Was informed on the development of a standardized KPIs framework for assessing social and cultural initiatives.

More information on the current composition of the Committee, its operation and responsibilities is available on the Company's website.

- **Group Executive Committee**

On the date of the authorization for issuance of the 2023 Annual Financial Report, the composition of the Group Executive Committee is as follows:

GROUP EXECUTIVE COMMITTEE	
Christos Megalou	Chairman, Managing Director, CEO
Vasileios Koutentakis	Member, Executive Board Member, Executive General Manager, Chief Retail Banking – Piraeus Bank
Theodoros Gnardellis	Member, Executive General Manager, Group CFO – Piraeus Bank
Charalampos Margaritis	Member, Executive General Manager, Group Chief Operating Officer ("COO") – Piraeus Bank
Ioannis Stamoulis	Member, Executive General Manager, Group CRO – Piraeus Bank
Panagiotis Vlachopoulos	Member, Chief Investment Officer – Piraeus Bank
Following BoD resolutions, Ioannis Stamoulis, Group CRO – Piraeus Bank and Panagiotis Vlachopoulos, Chief Investment Officer – Piraeus Bank were appointed members of the Group Executive Committee on 4 May 2023 and 31 January 2024, respectively.	

Governance- Operation

The Group Executive Committee consists of senior executives of the Group and is chaired by the CEO, Executive Member of the BoD.

In order for the Group Executive Committee to reach a decision, a quorum of at least 50% of its members present in person either at the meeting location or at another location via teleconferencing is required. Decisions are taken with a 2/3 majority of the members present and represented.

Roles and Responsibilities

Authorised by the BoD, the Group Executive Committee has, *inter alia*, the following responsibilities, which it may delegate or assign to administrative Committees, Committee Members or Company executives:

- Monitors the implementation of both the Business Plan of the Company and the Group and makes the necessary decisions for achieving the Plans' goals;
- Establishes the directions of the budget and proposes the Annual Budget to the BoD;
- Approves the introduction of new and significant changes to existing products and services of the Company, as well as restructuring products, and defines their pricing policy before they are made available to clients;
- Approves the marketing strategy and monitors its implementation and effectiveness;
- Approves the Group's technological infrastructure strategy;

- Approves HR programs (voluntary departure, fees, insurance and other contributions);
- Sets, within the range of its own approval limits, the approval limits of the Company's Management Committees and executives.

More Information on the current composition of the Group Executive Committee and short Curriculum Vitaes of its members (excluding those of Mr. Megalou and Mr. Koutentakis which are mentioned in a previous section of this Statement) are set out below and are also available on the Company's website.

 Theodoros Gnardellis, Executive General Manager	Mr. Theodore Gnardellis (born 1975) joined Piraeus Bank in 2018. He is Executive General Manager - Group CFO. He has also served as Deputy General Manager, PLU Strategy (2018-2019). In the past, he served as Chief Strategy and Transformation Officer at NN Group, Greece (2017-2018), Head of Strategy & Transformation at Emirates Islamic Bank, Un. Arab Emirates (2013-2017), Chief of Staff, First Deputy Group Chief Executive Officer at Bank of Cyprus, Greece (2010-2013), Associate Partner (2009-2010), Engagement Manager (2007-2009) and Associate (2005-2007) at McKinsey & Company, Greece, Aquatics Results Manager, Olympic Games, Athens 2004 at ATOS Origin, Greece, (2002-2004), Senior Associate Consultant, Mars & Co Consulting at MARS & Co, Gr. Britain (2001-2002) and IT Engineer at the Ministry of Development (1999-2000). He holds a MEng in Computer Engineering & Informatics from the University of Patras, Greece (1998) and an MBA from the Imperial College, UK (2001).
 Charalambos Margaritis, Executive General Manager	Mr Charalampos Margaritis (born 1972) joined Piraeus Bank in 2020. He is Executive General Manager – Group COO. He also served as Group CIO (2020 – 2022). In the past he served as Solutions Delivery Manager at Datamedia (1997 - 2003), Head of Enterprise Applications Delivery at Unisystems (2003 - 2008), Head of Group IT Architecture at Eurobank EFG, (2008 - 2013), Head of Enterprise Architecture and Analytics at Commercial Bank of Qatar (CBQ) (2013 - 2016), Chief Technology Officer at Commercial Bank of Dubai (CBD) (2016 - 2018) and Chief Information Officer at Commercial Bank of Dubai (CBD) (2018 - 2020). Mr Margaritis was also a Member of the UAE Banking Federation IT Committee (2018-2020). He holds a B.Sc. in Physics, University of Athens, Greece and a B.Sc. in Physics, Thesis titled "Superconductivity computer modeling", University of Portsmouth, UK. He also holds an M.Sc. in Communication Systems & Networks, University of Athens, Greece and he has done a Research towards a Ph.D. titled "Security

	framework for extended enterprises", University of Athens.
 Ioannis Stamoulis, Executive General Manager	Mr Ioannis Stamoulis (born 1975) joined Piraeus Bank in 2007. He is Executive General Manager – Group CRO and he also served as Senior Manager, Retail Credit Risk Division (2007–2011), Senior Director, Group Credit Risk Division (2011-2017) και Deputy CRO (2017-2020). In the past he provided Consulting Services at Quantos Ltd. (2002 – 2003), he was Head of the Greek Office at Statistical Decisions Ltd (2003–2006) and held the position of Senior Officer of Collections Division at National Bank of Greece (2006–2007). He holds a B.Sc. in Mathematics, Aristotle University of Thessaloniki (1996), a M.Sc. in Statistics, Athens University of Economics & Business and Catholic University of Leuven (1999) and he also fulfilled the Transition to General Management Program at INSEAD, France (2017).
 Panagiotis Vlachopoulos, Chief Investment Officer	Mr Panagiotis Vlachopoulos (born 1968) joined Piraeus Bank in 2023. He is Chief Investment Officer. In the past he held the position of Head of Strategic Positioning in the Global Macro investment team at Canada Pension Plan Investment Board (2018 - 2022) and Senior global macro portfolio manager at Moore Capital (2015 - 2018). He also served at JPMorgan, Chief Investment Office in London (2007 - 2015), at Old Lane in the sector Macro Trading & Commodities (2006 - 2007) and at Trident Group in the sector Macro Trading (2005 - 2006). Mr Vlachopoulos was Treasurer at EFG Group (2003 - 2005), Managing Director at Merrill Lynch (1997 - 2003) and he served at Salomon Brothers (1994 – 1997). He holds a Diploma/MSc in Mechanical Engineering, National Technical University, Athens (1991) and a MSc in Environmental Engineering, Stanford, USA.

4. Internal Control System (ICS) and Risk Management

Piraeus Group has developed and continuously improves its ORMF and its ICS. The development and continuous improvement of the ORMF / ICS is a key objective of the BoD and the Senior Management.

ICS is a set of recorded and documented control mechanisms and processes that integrates best practices of corporate governance and covers on an ongoing basis every activity and transaction, contributing to the organization's pursuit of objectives. It provides reasonable assurance that the Group will maintain efficient and effective operations, contain risks to acceptable low levels, safeguard its assets, produce reliable financial reporting and comply with applicable laws and regulations. The Management has decided to adopt COSO (Committee of Sponsoring Organizations) framework in implementing the ICS. Other standards, such as PCAOB (Public Company Accounting Oversight Board) and COBIT (Control Objectives for Information and Related Technologies) can be used as guidance in implementing specific controls. The Operational Risk Management ("ORM") and internal control framework are reviewed on a regular basis.

A sound ICS incorporates five components that are integral to the risk and control environment:

- Control environment;
- Risk assessment;
- Control activities;
- Information and communication, and
- Monitoring.

The ORM and Internal Control framework includes the following main components:

- **The Risk and Capital Strategy** : The Risk and Capital Strategy constitutes the cornerstone of the RM Framework aiming to define the principles, according to the BoD's guidelines, of a comprehensive RM Framework, which ensures effective risk and capital management processes and promotes risk and control culture and awareness across the Group;
- **The Organizational Structure**: The ORM and internal control organizational structure depicts the roles and responsibilities of all parties involved as well as the reporting lines and the resources required;
- **Policies, Methodologies and Processes regarding the:**
  - Identification, assessment, measurement, mitigation, monitoring and reporting of OR;
  - Establishment, allocation and monitoring of suitable OR appetite limits;
  - Establishment of the main principles on Information Communication Technology ("ICT") RM (via the overarching ICT risk policy and the core ICT risk policies);
  - Identification, assessment, monitoring and reporting of internal controls and ICS effectiveness;
  - Assessment of OR exposure level;
  - OR incidents and losses data collection and management;
  - Calculation of OR VaR and capital requirements (Pillar I, II, III);
- The required **Infrastructure** regarding:
  - IT systems and infrastructure required to support risk and control assessment and management, internal loss data collection, centralized data repository, regulatory and internal reporting etc.

Operational Risk Management and Internal Control Objectives

Piraeus Group, through the development and implementation of the ORM and internal control framework, aims at:

- Establishing a strong ORM and internal control corporate culture that supports and provides appropriate standards and incentives for professional and responsible behavior, throughout the Group;
- The timely and thorough identification, assessment, measurement, mitigation, monitoring and reporting of OR and potential impacts in all Group's business activities, products, processes and IT systems;
- Establishing an OR measurement framework to support risk assessment, monitoring, reporting, limit setting and allocation;
- Adjusting to an evolving risk landscape to timely address and manage emerging risks that the Group is exposed to, i.e., ICT risks, cyber security risks, by introducing and incorporating into the existing framework additional controls to monitor these risks effectively (e.g., governance structures, key risk indicators ("KRIs"), risk-specific policies and procedures);
- Maintaining and enhancing processes to monitor OR profile and material exposures. The associated risk-reporting framework conveys timely, complete and accurate information on actual and potential risks to support proactive management of OR;
- An adequate, documented ORM and internal control framework that mitigates impacts or reduces occurrence frequency of OR, providing at the same time, reasonable assurance for the ICS effectiveness and the achievement of the organization's strategic, business, operating, compliance and reporting objectives;
- Allowing Management to enable the full potential of the organization by containing OR and making decisions based on reliable and comprehensive risk information.

Operational Risk Management and Internal Control Governance

The Group aims to establish ORM/internal control as an integral part of every process and activity. All employees should perform their duties taking into consideration the risks generating, the risk mitigation responses as well as timely communication of risks to the competent bodies.

ORM and internal control governance is organized in two main dimensions that generate a governance matrix in which all management bodies, Committees and Units are allocated according to:

- The LoD where their activities belong to;
- Their hierarchical level upon which these activities take place.

More specifically, **the first governance dimension** comprises three LoD, as follows:

The 3LoD model has been adopted. Units are allocated to distinct LoD based on their role and responsibility in the ORM and internal control framework. Independence among different LoD is ensured, in order for OR and control processes to operate as intended.

- Units belonging to the 1st LoD are the risk and control owners. They are responsible for the RM and internal controls in their respective areas. The CEO as well as the committees with responsibilities falling under the 1st LoD perform

such activities at the tactical level, while the BoD and its Committees perform respective activities at the strategic level;

- Units belonging to the 2nd LoD have a guidance, review and challenge role on the work of the Units of the 1st LoD. The units/functions belonging to the 2nd LoD are the RM and Compliance. The Group Risk and Compliance Officers with responsibilities falling under the 2nd LoD perform such activities at the tactical level, while the BoD and its Committees perform respective activities at the strategic level;
- Internal Audit forms the 3rd LoD and is responsible for providing reasonable independent and objective assurance to the BoD on the effectiveness of governance, RM and internal controls. Internal Audit performs independent audit/ assessment (ex-post) of the overall RM and internal control framework of the Group and reports any audit findings and recommendations as well as pending and closed issues to the Management and Audit Committee of each entity at the Group. The Chief Audit Executive with responsibilities falling under the 3rd LoD performs such activities at the tactical level, while the BoD and its committees perform respective activities at the strategic level.

It is noted that the committees may engage in ORM and internal control activities, which belong to more than one LoD.

The **second governance dimension** is comprised of three levels:

- **Strategic level (BoD / BoD Committees):** RM functions performed by the BoD. They are assigned with the responsibility to provide guidelines, monitor and supervise the establishment and implementation of the ORM and internal control framework;
- **Tactical level (CEO / Executive, Administrative and other Committees and Councils / CRO / CCO):** RM functions performed by the Senior Management. They are assigned with the approval of policies and processes for identifying and managing OR and establishing adequate systems and internal controls to ensure that the overall risk profile remains within the RAF or other strategic limits appropriately approved by the BoD, as well as any regulatory restrictions;
- **Operational level: RM functions performed by all units,** i.e. business units including units with primary role in decision-making process, support units as well as the units of RM, Compliance and Internal Audit. RM, at this level, is implemented by means of appropriate internal controls incorporated into the relevant operational procedures and guidelines approved by the BoD or the Senior Management.

Under the current institutional framework, the ICS is supported by an integrated communications and Management Information System, also by inter-complementary mechanisms, forming an integrated system for controlling and auditing the Company and its Group organizational structure and operations.

The Audit Committee of the Company monitors and evaluates on a yearly basis the adequacy and effectiveness of the ICS at a Company and at Group level, based on the relevant data and information of the GIA Unit, Compliance and the findings and observations of the statutory auditors and supervisory authorities.

Periodically and at least every three years, upon recommendation of the Audit Committee, an independent chartered public auditor, other than the Group and the Bank's external statutory auditor, is appointed to assess the adequacy of the ICS.

In March 2023, Grant Thornton presented to the Audit Committee members the scope, findings and methodology followed for their assessment of the adequacy of the ICS of the Company for the period from 17 July 2021 to 31 December 2022 in accordance with the BoG Governor's Act 2577/9.3.2006 ("the BoG Act") and respective provisions of Law 4706/2020. Based on the work performed, there were no indications that the ICS, at the given time of the assessment, was not in compliance with all material aspects of the requirements of the BoG Act. Furthermore, nothing has come to Grant Thornton's attention, which would lead to the conclusion that material weaknesses exist with respect to the ICS adequacy of the Company, as of 31 December 2022.

RM and ICS with respect to financial reporting

The ICS sets out mechanisms and procedures relating to the activities of the Company on a stand alone and on a consolidated level in order to ensure complete and reliable data required for the preparation of reliable Financial Statements.

The accounting policies are in conformance with the IFRS and are followed with consistency throughout the preparation of the Interim and the annual financial statements.

The Audit Committee:

i. supervises, evaluates and reviews the financial statements reporting process of the interim and annual separate and consolidated financial statements of the Company and the Group, in order to ascertain the presentation, accuracy and completeness of the information contained in them and expresses its opinion;
ii. reviews the adequacy and effectiveness of internal controls over financial reporting and disclosures, taking into consideration any significant deficiencies identified by either the statutory auditor, the internal audit function or any regulatory or other competent authority, while monitors the remediation actions undertaken by the Management;
iii. reviews and discusses the representation letter requested from Management by the statutory auditors.

Based on the assessment of the results of the above review, the Audit Committee recommends to the BoD the approval of the Interim and annual financial statements.

The Group Finance Division regularly updates the Audit Committee on significant or unusual transactions occurring within the reporting period having significant impact on the financial statements and relevant disclosures, significant adjustments, Management's estimates for the recognition of provisions, consistency of, and any changes to, significant accounting policies and critical accounting estimates and legal matters which might have a significant impact in the financial statements.

Group Internal Audit

The Internal Audit function within the Group is carried out exclusively by the GIA unit of the Company with the support of Group Internal Audit of Piraeus Bank ("GIA-PB"). The IAUs Officers which operate in the Group's subsidiaries in Greece and abroad as well as the GIA-PB have their own Charters, which are in alignment with the Group's Charter and adapted to the respective legal and regulatory requirements.

The main mission of GIA unit is to provide reasonable, objective and independent assurance regarding the adequacy and the effectiveness of the Group's ICS. Moreover, it contributes to the protection and enhancement of the economic value of the organization as well as the accomplishment of its objectives by bringing a systematic and professional approach to evaluate and improve the effectiveness of governance, RM , and control processes.

GIA unit exercises high supervision of GIA-PB's activity, while is overall responsible for the entire Internal Audit function of the Company and the rest of its subsidiaries. In this respect, GIA unit and GIA-PB are responsible for supervising and coordinating the activity of the IAUs of their Group's subsidiaries respectively.

The Head of GIA unit (Chief Audit Officer – "CAO") reports periodically to the Senior Management and the Audit Committee the conformance of the Unit with the Code of Ethics and the Standards. CAO reports functionally to the BoD through the Audit Committee and administratively to the CEO.

GIA unit:

- Is administratively independent from other Group units and abstains from any executive and operational responsibilities;
- Occupies full-time and exclusive staff, which does not subordinate to any other Group unit.

GIA unit assesses, *inter alia*:

- Whether the risks related to the achievement of the strategic objectives are identified and managed in an appropriate manner;
- Whether the established policies and procedures are consistent with the Group's risk strategy as well as the Management's decisions;
- Whether the staff actions comply with the established policies, procedures and the general corporate governance framework, as well as regulatory and legislative framework in force;
- Whether operations are carried out effectively and (if auditable) efficiently;
- The adequacy, quality and effectiveness of the control mechanisms as well as the reports produced by Business Units, Control Units, RM and Compliance;
- Whether financial or non-financial information and the data used to identify, measure, analyze, classify, and report it are reliable, accurate and complete;
- Whether resources and assets are managed safely.

GIA unit also provides recommendations on the prevention and detection of fraud.

The CAO issues reports to the auditable units, incorporating the audit results and findings resulting from the audits performed, integrating the corrective actions for strengthening the control environment and the corporate governance framework, as well as improving the effectiveness of RM processes. The audit reports are appropriately communicated to the Senior Management.

In addition, the CAO submits reports at least every three (3) months to the Audit Committee, including the significant findings and the remedial actions within its duties, which the Audit Committee presents and submits to the BoD along with its comments.

The **Audit Committee**, the BoD and the Senior Management ought to safeguard:

- The independence of the Internal Audit and the resolution of any issue related to its independence;
- The provision of adequate and prompt updated information to the Internal Audit through relevant procedures and mechanisms, especially in case of significant problems and emergencies;
- The adequacy of the internal control tools and risk assessment methods of GIA unit, considering the size, nature, scope and complexity of Group as well as the risks associated with Group's business model, activities and culture.

The **Internal Auditors:**

- Have unimpeded access to all activities, units and sites, as well as to any data and information (documents, records, business emails, accounts, portfolios, systems, applications, minutes of meetings of all type of Committees and Bodies, etc.) of the Group;
- May communicate unimpededly with any executive, body and staff of the Group using all available means (e.g. meeting, email, conference call, video conference);
- May request and receive the written position/opinion/statement from any Group's audited executive, senior officer, or employee within the scope of their audit;
- May request and receive from any source (e.g. staff, systems, physical archives etc.) all information, data and explanations required for carrying out their audit mission using all available means. In the case of highly confidential or sensitive information, only the CAO is notified.

The BoD, the Audit Committees and the Senior Management of the Group's subsidiaries ensure that the required information is provided immediately to the internal auditors by the individual units.

The auditors may participate through their advisory role, upon request of the Management, in various stages of the development of processes, policies, procedures and information systems and significant internal projects, generally providing their opinion on the on-going improvement and development of an adequate ICS. This participation as well as the respective results, are not considered an audit engagement.

Such consulting activity is conducted given that the objectivity and the independence of GIA unit are not impaired.

The planning of audit engagements is the outcome of a risk assessment process. Additionally, the Audit Cycle, within which the audit areas are covered depending on the significance of the respective risk, is determined, giving priority to high-risk areas. Also, the Audit Cycle is approved and amended only upon decision of the BoD of the Company, following the recommendation of the Audit Committee.

The Annual Audit Plan incorporates the subsidiaries that are going to be covered within the reference year, the annual audit targets, the scheduled audit engagements on Group's activities and on critical outsourced activities, the needs in terms of audit staff, the transportation costs, the training plan and the related costs, the assessment on the coverage of the Group's activities according to the significance of the respective risks as well as the budget. The Annual Audit Plan should also take into account the execution of unforeseen engagements following respective requests by the regulatory authorities, the Audit Committee and the Senior Management as well as any other reason that may be deemed valid by the CAO.

The Company expects from GIA unit staff to demonstrate good faith, sound judgment and due diligence while exercising their duties. Internal auditors ought to comply with the Company's Code of Conduct, Internal Audit Charter and the International Standards for internal auditors. The strict adherence to the operational framework contributes to the achievement of internal audit function's consistency, cohesion, stability and reliability.

Internal auditors are expected to apply and uphold the following principles:

- Integrity

- Objectivity
- Confidentiality
- Competency

Risk and Compliance at the Company

Risk Management

The Company places particular emphasis on the effective monitoring and management of risk, at Company and Group level with a view to maintain stability and continuity in its operations. In this context, the competent bodies of the Group regularly monitor and assess the Group Business Strategy by defining, monitoring and managing risk and distinguish transactions and customers by level of risk. The Group competent bodies determine the appropriate maximum acceptable limits of risk-taking overall by each type of risk, refining each of these limits; set limits for discontinuing loss-making activities and take other corrective actions.

The Company also assures the establishment and implementation of reliable, effective and comprehensive policies and procedures in order to assess and maintain on an ongoing basis the amount, composition and distribution of its equity, that the Group management each time deems adequate to cover the level and nature of risk it undertakes or might undertake. The Company's RM internally reviews these policies and procedures on a regular basis to ensure that they remain comprehensive, adequate and proportionate to the nature, extent and complexity of the Group's current activities.

The Company's **Risk Officer** is independent with direct reporting to the Risk Committee of the Company to which he/she provides unbiased risk oversight and update on the level and the management of risks, the compliance with the adopted risk policies, the risk assessment results, the functioning of the RM and response processes to the identified risks and the results of the risk monitoring process. The Company's Risk Officer is designated by the BoD as the Executive Secretary of the Risk Committee.

Compliance

The Company's Compliance follows the international best practices to ensure that the Group complies with the applicable legal and regulatory framework. The Company's Compliance Officer is independent with direct reporting to the BoD and Audit Committee of the Company to which he/she provides unbiased compliance oversight, update on the latest changes of the regulatory framework, on the level and the management of the compliance risk, the adopted internal policies implementation status, the level of the Compliance Annual Plan and Policy implementation. He/she is selected by the Senior Management, possesses sufficient knowledge and experience and has unrestricted access to all data and information necessary to carry out his/her duties.

The **Company's Compliance** is, *inter alia*, responsible for:

- The establishment and the implementation of the appropriate procedures and policies, the preparation of the Annual Compliance Plan and the regular monitoring of the level of its implementation, in order to achieve the timely and continued compliance of the Company with the current regulatory framework provisions and the provisions of the Compliance Policy;

- The assurance that the Company and its subsidiaries comply with the applicable legal and regulatory framework that governs the preventing of the use of the financial system for money laundering and terrorist financing;
- The provision of information and update to the Audit Committee and BoD on compliance issues through its quarterly and ad hoc reports;
- The assurance that the Company's staff is continuously informed on developments related to the regulatory framework and the policies related to their duties, by establishing appropriate procedures, updates and training programs in collaboration with the Group HR;
- The monitoring, identification and effective management of compliance risks and the assessment of non-compliance risks.

5. Other governance issues

5.1 IT security risks

The Group and the Company face significant IT security risks (including cyber security) from the growing dependence on information and integrated information systems. The growing systems' interfaces with clients and third parties, the ongoing organizational and technological changes imposed by business needs, the daily appearance of new technological and other internal and external factors, create a critical threat environment.

Information and telecommunication Systems are critical components for the achievement of the Group's and the Company's business objectives and strategies and decisively contribute to the implementation and management of its business functions. The use of networks and systems creates several risks, especially in regards to security of the data being routed. In order to protect confidentiality and ensure availability and integrity of data and systems, the Group has designed and implemented a strict and comprehensive Information Security Framework aiming to govern its IT assets. The Information Security Framework, which is applied to the whole Group wherever applicable, also ensures that the appropriate compliance and regulatory requirements are implemented, and their efficiency and effectiveness is closely monitored.

In order to minimize the aforementioned risks and protect its IT assets, management has designed and implemented strong IT security controls in order to create peripheral protection in a multi-layer architecture. These controls include but are not limited to the following areas:

- Design, development, implementation and monitoring of an Information Security Framework;
- IT Security Strategy and Policy;
- Regular awareness and training campaigns (including e-learning programs) on cyber security issues to all personnel;
- Developing and testing of a Security Incident Response Mechanism;
- Performance of periodic Risk Assessment and Data Classification on Information Assets;
- Performance of a large number of penetration tests and vulnerability assessments;
- Continuous review and monitoring of the effectiveness of security controls;

- Strict User Access Management policies and procedures over applications, operating systems and databases;
- Implementation of a Centralized User Access Management Provisioning System (IAM);
- Implementation of special security mechanisms in order to manage, log and monitor, privileged access rights;
- Change Management processes governing changes to applications and systems;
- Use of a sophisticated Security Operations Centre ("SOC") which is monitoring system logs on a 24/7 basis;
- Anti DDoS protection system;
- Internal and external Firewalls;
- IDS and IPS systems;
- Network Segmentation;
- Web Applications Firewalls;
- AntiVirus and AntiSpam systems;
- Web filtering and internet access control systems;
- Maintenance of international security standards and certifications (such as PCI DSS, ISO 27001 and Swift Security Controls Framework).

In addition to the above, the Group has an effective Disaster Recovery Plan activated in case of catastrophic events as well as an Alternative Data Center that can support, if required, the full operation of the Group. The Disaster Recovery Plan is tested on a regular basis.

5.2 ESG governance

The Group has established a concrete governance structure, factoring sustainability and the guidelines of the Principles of Responsible Banking into its everyday operational and business model. The following ESG governance structure provides leadership on ESG matters, increasing effectiveness, efficiency and accountability The Group strives to be a banking leader in building a sustainable future for the Company, employees, customers, shareholders, society, and the environment.

BoD: Responsible for ensuring a business model, governance arrangements, including a risk management framework that takes into account all risks, including climate-related and environmental risks and the implications of the transition to a more sustainable economy as well as exercising effective oversight of same. In discharging the aforementioned responsibilities, it is supported by the BoD Committees which report regularly to the BoD on issues related to their responsibilities.

Audit Committee: Responsible for overseeing the integrity of the Group's financial and non-financial/ESG disclosures within the Annual Report. It monitors the effectiveness of the ICS and RM systems and of the Internal Audit function, also with respect to ESG-related issues (e.g. fraud, whistleblowing, violence and harassment, etc.).

Risk Committee: Responsible for advising and supporting the BoD regarding the monitoring of the Group's overall actual and

future risk strategy and risk appetite, taking into account all types of risks (including climate and ESG risks), in order to ensure that they are in line with the business strategy, objectives, corporate culture and values of the Group. The Committee has responsibility to oversee the implementation of the Group's risk strategy and the corresponding limits set and to review a number of possible scenarios, including stressed scenarios, to assess how the Group's risk profile would react to external and internal events. In 2023, the Risk Committee reviewed the 2023 Risk Identification Annual Report, including the Group's strategic approach on the front of climate-related and environmental risks and opportunities. It subsequently approved the 2023 Risk and Capital Strategy and RAF.

Remuneration Committee: Responsible for ensuring that the Group remuneration policy is consistent with the objectives of the Group's business and risk strategy, including ESG risk-related objectives, corporate culture and values and long-term interests of the Group. The Committee has responsibility for aligning executive directors' and senior management's remuneration with strategic priorities, including in relation to climate and sustainability matters. In 2023, following respective proposal of the Remuneration Committee to the BoD, an amended version of the Directors' Remuneration Policy was approved by the 2023 Annual GM of Shareholders.

Board Ethics and ESG Committee: Responsible for considering the material ethical and ESG issues relevant to the Group's business activities and for supporting the Group in maintaining its position as a reference leader in ethical and ESG (environment, society, governance) issues. The Committee works closely, also by holding joint sessions, with the other Board Committees for ESG issues which are also related to their mandate. It is furthermore supported in its work by respective management committees of the Group, namely the ESG and Corporate Responsibility Committee of the Bank.

For the discharge of responsibilities of the Committee in 2023, refer to the respective section of this Statement.

The Bank follows a similar ESG governance structure at BoD and BoD Committees level with the exception of the BoD Ethics and ESG Committee which is only established at the parent company.

ESG special governance arrangements and related actions for the reporting year at the Bank include:

- On a monthly basis, a risk appetite monitoring report (CRO Statement Appendix | RAF Monitoring) is submitted to the Bank's Risk Committee, including ESG and climate-related indicators established in the 2023 RAF;
- A special sub-section "ESG Risks" has been created in the structure of the Bank's Risk Committee agendas, reflecting the importance and the frequency these issues are expected to have in the BoD Risk Committee's work;
- ECB Climate Stress Test.

ESG and Corporate Responsibility Committee (Piraeus Bank): In the context of the enforcement and coordination of management commitment to ESG purpose, the ESG and Corporate Responsibility Committee is established at the Bank. The Committee is chaired by the Group's CEO and is composed by all members of the Bank's Executive Committee and two additional members, the Group General Counsel and the Bank Head of Group Cultural and Social Initiatives. The composition of the Committee, reflects the prominent role the management of the Group is expected to play in shaping the Group's approach to managing sustainability issues and integrating the Climate & ESG criteria into the Bank's strategy, recognizing that this is a key factor in ensuring long-term success and reflecting the fact that these issues are becoming materially relevant to the Group as well as to key stakeholders, such as clients, shareholders and regulators.

The new Committee is the management level "mirror" of the BoD Committee for ESG & Ethics matters, aiming to ensure the

existence of a holistic Group ESG and Corporate Responsibility strategy plan with tangible and defined medium and long-term goals.

The purpose of this Committee is to promote and monitor Responsible and Sustainable Banking by adopting ESG criteria that combine growth and economic performance with culture, social well-being and environmental sustainability. The Committee ensures the existence of a holistic ESG strategy plan for the Group, with axes:

- the energy transition;
- the zero balance of CO2 emissions (net zero);
- the strengthening and promotion of culture;
- the support of women, children and young people, as well as vulnerable social groups in matters of education, employment and social stereotypes;
- the promotion of governance principles with an emphasis on diversity and inclusion.

Specifically, the Committee assesses, approves, recommends and monitors:

- ESG policies and strategies that harmonise the Group's governance and business decisions with the UN SDGs;
- actions that contribute to the management and adaptation to the regulatory requirements on climate and environmental risks and to the reduction of the environmental footprint of both the Group and its clients / partners;
- the implementation of the Group's values and the creation of a culture that strengthens the role of employees in achieving the Principles of Responsible Banking;
- programmes, collaborations, initiatives that promote culture and boost social cohesion;
- actions that reinforce transparency, meritocracy and corporate responsibility and strengthen the Group's extroversion.

In this context, it monitors Corporate Responsibility & ESG issues and informs and/or makes recommendations to the BoD and ESG and Ethics Committee of the Company.

The Committee meets regularly at least on a quarterly basis and on an extraordinary basis whenever required at the invitation of its Chairman.

More information on ESG related issues are/will be included in the Company's Sustainability Report and other ESG disclosures.

6. Information provided pursuant to Directive 2004/25/EU of the European Parliament and Council

The information of Directive 2004/25/EU of the European Parliament and Council, required pursuant to para.1 d) of art. 152 of Greek Law 4548/2018 are included in the Explanatory Report to the Annual GM of the Shareholders, which is a special section of the BoD's Report.

7. Information according to article 10 of Law 4961/2022 on "Emerging information and communication technologies, strengthening digital governance and other provisions"

Data ethics is about the responsible and sustainable use of data. Ethical data management involves transparency and accountability in decisions and processes involving the use of data, as well as promoting the values of respect, integrity, and justice.

The principles that define the use of data within the Group from an ethical point of view and aim to promote a healthy and ethical data culture within the Group and outside it, in business relationships, are summarized below:

- The Group takes all necessary steps to comply with the provisions of the current legislation on the protection of banking secrecy and the personal data it collects and processes (e.g., data resulting from the drawing up of a contract, financial behavior data, CCTV images, telephone conversations, etc.);
- All customer and employee information is used to carry out the purposes for which it was collected and processed or for other reasons permitted by law;
- The Group is legally processing personal data, provided that this process:
  - is necessary for servicing, supporting and monitoring business transactions and proper execution of any agreements between the data subject and the Company/ Group;
  - is necessary in order for the Group to comply with any legal obligations or for the purposes of the legitimate interests pursued by it;
  - is necessary for the performance of a task carried out in the public interest, in the context of the current legislative and regulatory framework;
  - is based on prior explicit consent of the data subject, if processing is not based on any of the aforementioned legal processing bases;
- During systems and processes designing, ensures that data is used in a responsible manner and is aware of the effects that the use of data may have on employees, customers, shareholders, and society;
- The Company / Group, in compliance with the current legislative framework, has taken all the necessary actions, applying the appropriate technical and organizational measures for the legal observance, processing and safe keeping of the personal data file, committing to ensure and protect in every way the processing of personal data from loss or leakage, alteration, transmission or their unlawful processing in any other way, while maintaining a register of artificial intelligence processing systems;
- All employees of the Group are obliged to protect the personal data of the customers from other people's use and to protect their interests;
- In case of outsourcing of activities to third parties by the Group, all necessary measures are taken, in accordance with the current legislative framework, to protect the data subjects during the processing of their personal data;

- With the exception of the cases in which the legal conditions for the possibility of providing information concerning them to third parties are met, employees demonstrate due diligence and the required confidentiality when using information that comes to their knowledge at any stage of the provision of their services, before, during or after the termination of the contractual relationship and take every reasonable and feasible measure to legally and securely maintain the information, in accordance with the applicable legislation.

Athens, 27 February 2024

Non-Executive	Managing Director (CEO)
Chairman of BoD	Executive BoD Member
George P. Handjinicolaou	Christos I. Megalou

EXPLANATORY REPORT

This explanatory report of the BoD of the Company is addressed to the Ordinary GM of its Shareholders and contains detailed information on the matters of paragraph 7 of article 4 of Greek Law 3556/2007 with reference date the 31 December 2023.

1. Structure of the share capital of the Company

On 31 December 2023 the Company's share capital amounted to one billion one hundred sixty-two million eight hundred forty-one thousand five hundred seventeen Euros and thirty-nine cents, (€ 1,162,841,517.39) divided into one billion two hundred fifty million three hundred sixty-seven thousand two hundred twenty-three (1,250,367,223) ordinary registered voting shares with a nominal value of ninety-three cents of Euro (€ 0.93) each. The ordinary shares of the Company are dematerialized and listed on the Athens Stock Exchange.

Subject to the provisions of Greek Law 3864/2010 setting forth special rights and restrictions for the ordinary shares held by the HFSF (see details below under 4 and 5), each ordinary share of the Company incorporates all the rights and obligations stipulated by Greek Law and its Articles of Association, and especially:

- The right to participate and vote in the GM of shareholders;
- The right to receive dividend from the Company's annual profits;
- The right to receive a pro rata share of the Company's net liquidation proceeds or all or part of the nominal value of any shares in the event of a total or partial redemption of the Company's share capital pursuant to a relevant resolution of the GM of the Company's shareholders. The GM of the shareholders retains all of its rights during the liquidation procedure;
- A pre-emptive right in each increase of the Company's share capital in cash and issuance of new shares unless the GM resolves otherwise;
- The right to receive prior to the Ordinary GM copies of the Annual Financial Report.

2. Restrictions on the transfer of shares of the Company

Transfer of the Company's ordinary shares is carried out as prescribed by Greek Law. The Company's Articles of Association do not impose any restrictions in respect thereof.

The disposal of the shares held by the HFSF is subject to the provisions of art. 8 of Greek Law 3864/2010, as in force (codified text of the law is available in HFSF's website, https://hfsf.gr/en/how-we-decide/hfsf-law-as-in-force/) and is based on a divestment strategy with a specific time horizon of definite and full implementation which is determined in accordance with art. 8 and in principle does not extend beyond the HFSF's termination, i.e. 31 December 2025.

3. Significant direct and indirect shareholdings within the meaning of Greek Law 3556/2007

On 31 December 2023 the HFSF directly held a total of 337,599,150 ordinary shares of the Company representing 27% of the total voting rights of the Company.

Furthermore, on 31 December 2023, pursuant to the notifications received by the Company according to Law 3556/2007:

- Mr. John A. Paulson held indirectly through Paulson & Co. Inc., a company controlled by him, 232,758,919 common registered shares with equal voting rights, corresponding to 18.62% of the Company's total common shares. Paulson & Co. Inc. is the investment manager of the funds that hold directly the shares in the Company and as manager it exercises the

voting rights on behalf of the funds.

- Helikon Investments Limited held indirectly through Helikon Long Short Equity Fund Master ICAV:
  - 54,373,407 voting rights attached to an equal number of common, registered, voting, dematerialized shares (i.e. 4.348% of the total voting rights of the Company) and
  - 29,607,188 (i.e. 2.368% of the total voting rights of the Company) and 33,271,381 (i.e. 2.661% of the total voting rights of the Company) voting rights deriving from financial instruments (cash settled equity swap), according to ar. 11 para. 1b) of law 3556/2007, as in force, with expiration dates 4 February 2025 and 4 November 2024 respectively.

As a result, the voting rights held indirectly by Helikon Investments Limited, deriving from common shares and financial instruments (cash settled equity swap), amount in total to 117,251,976 or 9.377% of the total voting rights of the Company.

Pursuant to the records kept by the Company, as at 31 December 2023 no other shareholder (individual or legal person) holds on an individual basis (directly or indirectly) more than 5% of the total number of ordinary shares of the Company.

4. Shares granting special control rights

With the exception of the ordinary shares held by the HFSF, which carry the rights arising from the provisions of Greek Law 3864/2010 and the RFA between the Company, Piraeus Bank S.A. and the HFSF, there are no shares of the Company granting special control rights to their holders.

The ordinary shares held by the HFSF in the share capital of the Company carry the special rights of Article 10 of Greek Law 3864/2010, as amended and in force, including:

- the right of the HFSF to be represented with one member on the BoD. The Representative of the HFSF has the right:

  a) to veto any decision of the Company's BoD:

     i) in respect of the distribution of dividends and the remunerations and bonuses policy for the Chairman, the Managing Director and the other members of the BoD, as well as for those persons holding the position of or exercising the duties of general managers as well as their deputies when the ratio of NPEs to total loans of the credit institution, as calculated according to item (ii) of case g of paragraph 2 of article 11 of Commission Implementing Regulation (EU) 2021/451 of 17 December 2020, exceeds 10%. It is noted that this provision is not currently applicable to the Company;

     ii) in respect of decisions to amend the articles of association, including the increase or decrease of capital or the provision of relevant authorization to the BoD, merger, division, conversion, revival, extension of the duration or dissolution of the Company, transfer of assets, including the sale of subsidiaries, or for any another issue requiring an increased majority in accordance with the provisions of Law 4548/2018 and which decision is likely to significantly affect the HFSF's participation in the share capital of the Company;

  b) to request an adjournment of a Board meeting for three (3) business days in order to receive instructions from the CEO of HFSF. This right may be exercised until the end of the relevant BoD meeting;

  c) to request that the BoD of the Company is convened;

- the right to access the books and records of the Company through executives and consultants of its choice for the purposes of the effective disposal of the shares or other financial instruments it holds in the Company.

The HFSF ensures that, in exercising their rights, the HFSF and the HFSF Representative shall respect the Company's business autonomy and independence in the decision making of the Company.

5. Restrictions on Voting Rights

The Company's Articles of Association do not impose restrictions on the voting rights or the exercise periods of voting rights attached to its ordinary shares.

6. Shareholders' Agreements

The Company is not aware of any agreements between its shareholders regarding restrictions in the transfer of the Company's ordinary shares or the exercise of the voting rights attaching to such shares.

7. Rules regarding the appointment and replacement of Board members and amendments to the Articles of Association

The rules set out in the Company's Articles of Association regarding members' appointment and replacement, as well as amendments of the provisions of the Articles of Association, do not deviate from the corresponding provisions of Greek Law 4548/2018 and Greek Law 4706/2020. BoD members are elected from the GM of Shareholders. Pursuant to art. 10 para. 2 of Greek Law 3864/2010, the HFSF is represented with one member on the BoD of the Company with the aforementioned rights.

The appointment or replacement of the members of the BoD or the renewal of their term of office is subject to their suitability assessment by the SSM pursuant to Law 4261/2014 and respective legislation.

Provisions related to the appointment and replacement of members of the BoD are also included in the Internal Corporate Governance and Operating Regulation of the Company as well as the related Policies of the BoD (see relevant sections of the Corporate Governance Statement).

8. Authority of the BoD to issue new or to acquire own shares

Pursuant to the provisions of Greek Law 4548/2018 and its Articles of Association, the Company may increase its share capital by virtue of a resolution of the GM of Shareholders or of the BoD.

On 7 April 2021, the Extraordinary GM of the Shareholders of the Company authorized, according to article 24 para. 1 of Law 4548/2018, the BoD to resolve, with the quorum and majority required by law, the increase of the share capital of the Company by an amount that cannot exceed three times the paid up capital on the date of delegation of these powers to the BoD, namely up to € 14,959,064,952 with the issuance of new common registered voting shares, and to determine the specific terms and time plan of the increase in accordance with the applicable provisions of Law 4548/2018. The BoD may exercise the above power once or partially in several transactions. The above authorisations are valid for three (3) years, i.e. until 07 April 2024.

In addition, the abovementioned Extraordinary GM granted authorization to the BoD of the Company, valid for five years, to establish a five (5) year stock option plan in accordance with the provisions of article 113 para.4 of Law 4548/2018 to executives and employees of the Company and its affiliated companies, within the meaning of article 32 of law 4308/2014, in the form of stock option rights (stock options), by increasing the share capital with the issuance of new shares and to determine, without prejudice to the provisions of the Law 3864/2010, the terms of the stock options, at its discretion, in accordance with the provisions of article 113 of Law 4548/2018. The maximum nominal value of all shares that may be awarded through the plan will correspond to 1.5% of the paid-up share capital of the Company on the date of the establishment of the plan by the BoD of the Company. Pursuant to the aforementioned authorization, the BoD proceeded on its meeting held on 16 November 2023,

to the establishment of a stock option plan (“Plan”) for executives and employees of the Company and its affiliated companies, in the form of stock option rights (“Options”). The Plan will serve as a means of payment of remuneration payable in instruments, to employees and executives of the Company and its affiliated entities, on the terms and conditions provided in the Directors’ and the Group Remuneration Policies and the particular remuneration schemes adopted from time to time. However, no stock options have yet been granted.

Furthermore, the Company following (a) the decision of the Annual GM of its Shareholders dated 27 June 2023, pursuant to which, the establishment of a share buyback program in accordance with article 49 of Law 4548/2018 (the "Program" and the "Own Shares" respectively) was approved, (b) the relevant ECB authorization for the Program and (c) the relevant decision of its BoD dated 21 September 2023, implemented the Program in the context of which it acquired 5,283,004 own shares traded on the Athens Stock Exchange in the period from 22 September 2023 up to and including 29 September 2023, representing 0.42% of the share capital of the Company.

Subsequently, in implementation of the decision of the Annual GM of the shareholders of the Company dated 27 June 2023 and of the respective delegated resolution of the BoD dated 19 October 2023 for the approval of the Terms of a Free Distribution of Company’s Shares Plan to executives and employees of the Company and its affiliated companies (the "Beneficiaries"), 1,307,585 in total own, common registered voting shares of the Company were distributed free of charge to 137 Beneficiaries, under the applicable variable remuneration schemes, through over-the-counter transactions. After the aforementioned distribution, the Company owns a total of 3,975,419 own shares, which correspond to a percentage of 0.32% of its total shares.

According to paragraph 1 of article 16C of Greek Law 3864/2010, during the period of participation of the HFSF in the share capital of the Company, the Company is not permitted to acquire own shares without the approval of the HFSF.

9. Significant agreements which enter in force, are amended or terminated in the event of change of control following a public takeover bid

There are no significant agreements of the Company, which come into force, are amended or terminated upon a change of control of the Company following a public takeover bid.

10. Agreements between the Company and members of its BoD or its staff providing for compensation in the event of resignation or dismissal without good reason or termination of their term of office or employment due to a public offer

Contracts with BoD members, reviewed on a case-by-case basis, may enclose explicit clauses for the provision of specific severance payments approved by the GM of Shareholders. Moreover, contracts with BoD members may be terminated for good reason, without any severance payment due and with no minimum prior notice. In all cases, severance payments are in compliance with regulatory restrictions.

It is noted that the 2020 Annual GM of Shareholders approved the Company’s Severance Policy, which applies to the senior management of the Company, and to the executive members of the BoD and provides for severance payments related to the early termination of an employment contract in good terms, based on their tenure in the Group.

There are no agreements between the Company and the members of its BoD or its staff which provide for their compensation in the event of their departure as a result of a public takeover bid.

Athens, 27 February 2024

Non-Executive	Managing Director (CEO)
Chairman of BoD	Executive BoD Member
George P. Handjinicolaou	Christos I. Megalou

ALTERNATIVE PERFORMANCE MEASURES ("APMs") AT GROUP LEVEL

In addition to the financial information reported under IFRS, the Group presents certain financial metrics as APMs, aligning with the guidelines issued by the ESMA on 5 October 2015, which have been in force since July 3, 2016. According to the ESMA's definition, an APM is a measure of historical or future financial performance, financial position, or cash flows, other than a financial measure defined or specified in the applicable financial framework. These measures are not required by, nor are they recognised under or presented in accordance with, IFRS or accounting principles generally accepted in Greece.

The below APMs provide a basis for monitoring the Group's periodic financial performance and results of operations through metrics which, although they are commonly used to convey the management's view to the end user, they are not explicitly defined under IFRS. These APMs are intended to provide investors and the Group's management with additional information to assist them in evaluating the Group's financial position and performance.

The Group uses APMs in the context of making decisions regarding its financial, operational and strategic planning, as well as for the evaluation and publication of its performance. These APMs should be considered as supplemental in nature and not as a substitute to the IFRS measures. They are not always comparable with measures used by other companies.

Below the Group presents the tables including APM indicators calculated pursuant to its audited consolidated financial statements as at and for the years ended 31 December 2022 and 2023.

A. APMs

No	APM	APM Definition – Calculation –Relevance of use	FY 2022[1]	FY2023
1	Cost of Risk, organic	Impairment charges (as defined herein) excluding (-) ECL impairment on loans and advances related to NPE securitizations and sales (/) Net loans seasonally adjusted (as defined herein). Relevance of use: Asset quality metric	0.8%	0.8%
2	Cost-to-core income ratio	Recurring Operating expenses (as defined herein) over (/) core income. Core income equals Net interest income plus (+) net fee and commission income plus (+) income from non-banking activities including rental income from investment property, minus (-) extraordinary net fee and commission income. Extraordinary expenses are defined herein. Relevance of use: Efficiency metric	45.2%	31.1%

No	APM	APM Definition – Calculation –Relevance of use	FY 2022[1]	FY2023
4	Financial Assets	The sum of financial assets at FVTPL, financial assets mandatorily measured at FVTPL, loans and advances to customers measured mandatorily at FVTPL, and investment securities. Relevance of use: Standard banking terminology	€ 12,523 million	€ 13,938 million
5	Loans to Deposits Ratio (LDR)	Seasonally adjusted net loans (as defined herein) by (/) Deposits (as defined herein). Relevance of use: Liquidity metric	61.5%	61.5%
6	Net Fee Income over Assets	Net fee income (NFI) recurring over (/) average total assets adjusted as defined herein (average being balance of Q4.22 and balance of Q4.23 divided by 2 for FY.2023 and balance of Q4.21 and balance of Q4.22 divided by 2 for FY.22). NFI recurring equals Net fee and commission income plus (+) income from non-banking activities (includes also rental income from investment property) Relevance of use: Profitability income	0.6%	0.7%
7	Net Interest Margin (NIM)	Net interest margin equals net interest income over (/) average total assets adjusted as defined, herein (average being balance of Q4.22 and balance of Q4.23 divided by 2 for FY.2023 and balance of Q4.21 plus balance of Q4.22 divided by 2 for FY.22). Relevance of use: Profitability metric	1.8%	2.7%
8	Net Profit, normalized	Net profit normalized is the profit / (loss) attributable to the equity holders of the parent minus (-) extraordinary items defined herein, i.e., extraordinary other income, extraordinary expenses, and impairment charges on loans and advances related to NPE securitizations and sales, defined at any given period and adjusted for the projected effective corporate tax rate of 2023 at 26%. Adjustment for the effective corporate tax rate as of the second quarter of 2023 has been used for quarters with tax normalization, based on Piraeus Bank's Business Plan assumptions for 2023. Relevance of use: Profitability metric	€ 531 million	€ 1,047 million
9	Non-Performing Exposures (NPEs)	On balance sheet credit exposures before ECL allowance for impairment on loans and advances to customers at amortised cost that include: a) loans measured at amortised cost classified in stage 3; plus (+) b) purchased or originated credit impaired ("POCI") loans measured at amortised cost that continue to be credit impaired as of the end of the reporting	€ 2,624 million	€ 1,329 million

No	APM	APM Definition – Calculation –Relevance of use	FY 2022[1]	FY2023
		period; plus (+) c) loans to customers mandatorily measured at FVTPL that are credit impaired as of the end of the reporting period. Relevance of use: Asset quality – credit risk metric		
10	NPE Ratio	NPEs over (/) gross loans (as defined herein) Relevance of use: Asset quality – credit risk metric	6.8%	3.5%
11	NPE (cash) coverage ratio	ECL allowance for impairment losses on loans and advances to customers at amortised cost over (/) NPEs Relevance of use: Asset quality – credit risk metric	54.5%	61.6%
12	Other Assets	Total Assets minus (-) Net Loans (as defined herein) minus (-) Financial Assets Relevance of use: Standard banking terminology	€ 24,756 million	€ 24,985 million
13	Other Income	Total net Income minus (-) Net Interest Income minus (-) Net Fee and Commission Income and minus (-) income from non-banking activities including rental income from investment property Relevance of use: Profitability metric	€ 744 million	€ 58 million
14	Other Liabilities	Total Liabilities minus (-) Due to Banks minus (-) Customer Deposits Relevance of use: Standard banking terminology	€ 3,507 million	€ 4,912 million
15	Performing Exposures	Gross loans (as defined herein) excluding (-) NPEs (as defined herein) excluding (-) senior tranches of NPE securitizations bearing Greek state Guarantee under the Hercules Scheme excluding (-) OPEKEPE seasonal agri loan Relevance of use: Asset quality – credit risk metric	€ 28,634 million	€ 30,134 million
16	Recurring Operating Expenses	Total operating expenses minus (-) Extraordinary expenses (as defined herein) Relevance of use: Efficiency metric	€ (828) million	€ (793) million
17	Return on average tangible book value (RoaTBV), normalized	Normalized net profit (as defined herein) minus (-) AT1 coupon payment over (/) average Tangible Book Value (TBV) (average of Q4.23 and Q4.22 for FY.2023 and average of Q4.21 and Q4.22 for FY.2022)	9.1%	16.6%

No	APM	APM Definition – Calculation –Relevance of use	FY 2022[1]	FY2023
		TBV equals capital and reserves attributable to equity holders of the parent excluding other equity instruments, i.e., Additional Tier 1 (AT1) capital and intangible assets Relevance of use: Efficiency metric		
18	Total Regulatory Capital (fully loaded) on a pro forma basis	Total capital, as defined by Regulation (EU) No 575/2013, for FY.2023 subtracting (-) from the denominator the RWA of Monza, Delta and Solar NPE portfolios, classified as HFS and the capital accretion from the new issuance of Tier 2 in Jan.24 for FY.23 and for FY.2022, subtracting (-) from the denominator the RWA of Sunrise III and Solar NPE portfolios Relevance of use: Capital position regulatory metric	16.5%	18.2%
19	CET1 Capital Ratio (fully loaded) on a pro forma basis	CET1 capital, as defined by Regulation (EU) No 575/2013, subtracting (-) from the denominator the RWA of Monza, Delta and Solar NPE portfolios, classified as HFS for FY.23 and for FY.2022, subtracting (-) from the denominator the RWA of Sunrise III and Solar NPE portfolios Relevance of use: Capital position regulatory metric	11.6%	13.3%

[1]As restated for the projected tax rate of 2023

B. APMs Components

Balance Sheet

No	APM Component	APM Definition – Calculation[2]	31/12/2022[3]	31/12/2023
1	Deposits or Customer Deposits	Due to customers	€ 58,372 million	€ 59,567 million
2	ECL Allowance grossed up with PPA adjustment and FV adjustment	ECL allowance grossed up with PPA adjustment) and fair value adjustment on loans and advances to customers mandatorily measured at FVTPL corresponding to € 11 million for 31/12/2022 and € 0 million for 31/12/2023	€ (1,431) million	€ (819) million

No	APM Component	APM Definition – Calculation[2]	31/12/2022[3]	31/12/2023
3	Gross Loans or Customer loans	Net loans (as defined herein) plus (+) ECL allowance (grossed up with PPA adjustment)	€ 38,850 million	€ 38,398 million
4	Net Loans	Loans and advances to customers at amortised cost, plus (+) loans and advances to customers mandatorily measured at FVTPL	€ 37,418 million	€ 37,579 million
5	Seasonally Adjusted Net Loans	Net loans (as defined herein) minus (-) OPEKEPE seasonal funding facility of € 1,517 million as at 31 December 2022 and € 951 million as at 31 December 2023. The OPEKEPE seasonal agri loan refers to the loan facility provided to the beneficiaries related to subsidies by OPEKEPE.	€ 35,901 million	€ 36,629 million
6	Total Assets adjusted	Total assets excluding (-) the seasonal agri loan (OPEKEPE) in December each year. The seasonal agri loan refers to the loan facility provided to the beneficiaries related to subsidies by OPEKEPE, a public sector organization aiming to the prompt distribution of EU subsidies to Greek farmers	€ 73,128 million	€ 75,500 million

[2]Relevance of use: Standard Banking terminology

[3]Certain comparative APMs and APMs' components have been restated to reflect the reclassifications performed in the Statement of Financial Position during the current period. Further information on the reclassications of comparatives is presented in Note 49.

Income Statement

No	APM Component	APM Definition – Calculation – Relevance of use	FY 2022	FY 2023
1	Impairment charges	Impairment (losses) on loans and advances to customers at amortised cost plus (+) Other credit-risk related expenses on loans and advances to customers at amortised cost. For 2023, plus (+) loss on option agreement included in other provision charges/(releases). Relevance of use: Standard banking terminology	€ (615) million	€ (559) million
2	Net Result/ net Profit	Profit / (loss) attributable to the equity holders of the parent. Relevance of use: Profitability metric	€ 899 million	€ 788 million
3	Extraordinary expenses	Extraordinary items for 2022 include € 57 million voluntary redundancy costs booked in staff costs and € 4 million extraordinary depreciation charges related to the carve-out and sale of cards merchant acquiring business unit transaction in the first quarter of 2022 booked in administrative expenses.Extraordinary expenses for 2023 include € 62 million voluntary redundancy costs, € 4 million for talent retention and € 15 million reversal of talent retention accruals due to share buyback and € 4 million subsidies to low compensated employees all booked in staff costs, and € 15.5 million donation for extreme weather phenomena booked in G&A costs. Relevance of use: Efficiency metric	€ (61) million	€ (71) million
4	Extraordinary other income	In 2022 extraordinary other income related with (i) the gain from the disposal of the merchant acquiring business in the first quarter of 2022, amounting to € 282 million booked in trading income (ii) non-recurring gain derivatives of € 282 million that were booked in net gains/(losses) from financial instruments measured at FVTPL and (iii) recycling of the FVTOCI reserve to income statement amounting to € 109 million, which was recognised in net gains/(losses) from financial instruments measured at FVTOCI. No extraordinary other income was booked in 2023 Relevance of use: Profitability metric	€ 672 million	€ 0 million

No	APM Component	APM Definition – Calculation – Relevance of use	FY 2022	FY 2023
5	Extraordinary net fee income	In 2022 extraordinary net fee income included acquiring fees of € 6 million related with the cards merchant acquiring business unit that has been carved-out (Thalis transaction) booked in net fee and commission income. No extraordinary net fee income was booked in 2023 Relevance of use: Profitability metric	€ 6 million	€ 0 million
6	Extraordinary share of profit/ (loss) of associates and joint ventures	In 2022, € 26 million related with the sale of RES infrastructure booked in net gains from disposal of associates. No extraordinary share of profit/(loss) of associates and joint ventures was booked in 2023 Relevance of use: Profitability metric	€ 26 million	€ 0 million
7	Extraordinary impairments	€ 320 million in 2022 and € 253 million in 2023 impairment losses on loans and advances to customers which relate to NPEs sold in the year or classified in held for sale, in the context of the NPE reduction plan. Relevance of use: Standard banking terminology	€ (320) million	€ (253) million
8	Operating Expenses (OpEx)	Total operating expenses Relevance of use: Efficiency metric	€ (889) million	€ (863) million

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The BoD Report contains financial information and measures as derived from the Group and the Company's annual financial statements for the years ended 31 December 2022 and 31 December 2023, which have been prepared in accordance with IFRSs, as endorsed by the EU. Additionally, it contains financial data which is compiled as a normal part of our Financial Statement Closing Process and management information systems. Management believes that the non-IFRS financial measures used, presents a more meaningful analysis of the Group's financial condition and results of operations.

Appendix A - reporting templates in accordance with Delegated Regulation (EU) 2021/2178, Annexes VI and XII

0.Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets****	Total environmentally sustainable assets*****	KPI****	KPI*****	% coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Main KPI	**Green asset ratio (GAR) stock**	**385**	**1,249**	**0.90%**	**2.91%**	**56.20%**	34.97%	43.80%

		Total environmentally sustainable activities****	Total environmentally sustainable activities*****	KPI	KPI	% coverage (over total assets)	% of assets excluded from the numerator of the GAR (Article 7(2) and (3) and Section 1.1.2. of Annex V)	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)
Additional KPIs	*GAR (flow)*	166	482	6.32%	18.32%			
	*Trading book**	N/A	N/A	N/A	N/A			
	Financial guarantees	5	17	8%	31%			
	Assets under management	-	-	-	-			
	*Fees and commissions income***	N/A	N/A	N/A	N/A			

(*) For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR.
(**) Fees and commissions income from services other than lending and Assets under Management ("AuM").

Instutitons shall dislcose forward-looking information for these KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

(***) % of assets covered by the KPI over banks´ total assets.

(****) based on the Turnover KPI of the counterparty.

(*****) based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.

Fees and Commissions and Trading Book KPIs shall only apply starting 2026. SMEs´inclusion in these KPI will only apply subject to a positive result of an impact assessment.

1.Assets for the calculation of GAR based on Turnover

Million EUR		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 Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator														
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,228	9,198	376	105	66	48	58	8	-	-	9,256	385	105	66	48
2	**Financial undertakings**	1,557	239	23	-	3	-	18	3	-	-	257	26	-	3	-
3	Credit institutions	1,096	145	-	-	-	-	-	-	-	-	145	-	-	-	-
4	Loans and advances	23	3	-	-	-	-	-	-	-	-	3	-	-	-	-
5	Debt securities, including UoP	1,065	141	-	-	-	-	-	-	-	-	141	-	-	-	-
6	Equity instruments	8	1	-		-	-	-	-		-	1	-		-	-
7	Other financial corporations	461	94	23	-	3	-	18	3	-	-	112	26	-	3	-
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*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	--	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-		-	-	-	-		-	-	-		-	-
20	**Non-financial undertakings**	3,508	1,299	257	9	5	48	40	6	-	-	1,339	263	9	5	48
21	Loans and advances	3,359	1,227	257	9	5	48	40	6	-	-	1,267	262	9	5	48
22	Debt securities, including UoP	124	61	1	-	-	-	-	-	-	-	61	1	-	-	-
23	Equity instruments	25	11	-		-	-	-	-		-	11	-		-	-

Million EUR		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
24	**Households**	9,299	6,026	96	96	58	-	-	-	-	-	6,026	96	96	58	-
25	*of which loans collateralised by residential immovable property*	5,555	5,224	38	38	-	-	-	-	-	-	5,224	38	38	-	-
26	*of which building renovation loans*	653	653	58	58	58	-	-	-	-	-	653	58	58	58	-
27	*of which motor vehicle loans*	233	150	-	-	-	-					150	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	1,863	1,634	-	-	-	-	-	-	-	-	1,634	-	-	-	-
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	26,738														
33	**Financial and Non-financial undertakings**	20,439														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	17,627														
35	Loans and advances	16,261														
36	*of which loans collateralised by commercial immovable property*	6,158														
37	*of which building renovation loans*	-														
38	Debt securities	-														
39	Equity instruments	1,366														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,812														
41	Loans and advances	2,791														
42	Debt securities	21														
43	Equity instruments	-														
44	**Derivatives**	-														
45	**On demand interbank loans**	507														
46	**Cash and cash-related assets**	729														

Million EUR		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	5,063														
48	**Total GAR assets**	42,965	9,198	376	105	66	48	58	8	-	-	9,256	385	105	66	48
49	**Assets not covered for GAR calculation**	33,485														
50	**Central governments and Supranational issuers**	22,846														
51	**Central banks exposure**	9,839														
52	**Trading book**	800														
53	**Total assets**	76,450	9,198	376	105	66	48	58	8	-	-	9,256	385	105	66	48
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	54	6	5	-	-	2	-	-	-	-	6	5	-	-	2
55	Assets under management	4,379	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

1. This template includes information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates ("NFC"), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets are considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange of cancellation of debts.
3. For motor vehicle loans, exposures generated after the date of application of the disclosure are included.

1.Assets for the calculation of GAR based on CAPEX

Million EUR		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,228	10,354	1,247	105	126	50	4	1	-	1	10,358	1,249	105	126	51
2	**Financial undertakings**	**1,557**	**334**	**142**	-	**22**	-	**2**	**1**	-	**1**	**336**	**143**	-	**22**	**1**
3	Credit institutions	1,096	145	-	-	-	-	-	-	-	-	145	-	-	-	-
4	Loans and advances	23	3	-	-	-	-	-	-	-	-	3	-	-	-	-
5	Debt securities, including UoP	1,065	141	-	-	-	-	-	-	-	-	141	-	-	-	-
6	Equity instruments	8	1	-		-	-	-	-		-	1	-		-	-
7	Other financial corporations	461	189	142	-	22	-	2	1	-	1	191	143	-	22	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	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-		-	-	-	-		-	-	-		-	-
20	**Non-financial undertakings**	**3,508**	**2,360**	**1,010**	**9**	**46**	**50**	**2**	-	-	-	**2,362**	**1,010**	**9**	**46**	**50**
21	Loans and advances	3,359	2,250	989	9	44	49	2	-	-	-	2,252	989	9	44	49
22	Debt securities, including UoP	124	99	20	-	1	1	-	-	-	-	99	20	-	1	1
23	Equity instruments	25	11	1		1	-	-	-		-	11	1		1	-

Million EUR			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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
24	**Households**	**9,299**	**6,026**	**96**	**96**	**58**	-	-	-	-	-	**6,026**	**96**	**96**	**58**	-
25	of which loans collateralised by residential immovable property	5,555	5,224	38	38	-	-	-	-	-	-	5,224	38	38	-	-
26	of which building renovation loans	653	653	58	58	58	-	-	-	-	-	653	58	58	58	-
27	of which motor vehicle loans	233	150	-	-	-	-					150	-	-	-	-
28	**Local governments financing**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	**1,863**	**1,634**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**1,634**	**-**	**-**	**-**	**-**
32	**Assets excluded from the numerator for GAR calculation (covered in the denominator)**	**26,738**														
33	**Financial and Non-financial undertakings**	20,439														
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	17,627														
35	Loans and advances	16,261														
36	of which loans collateralised by commercial immovable property	6,158														
37	of which building renovation loans	-														
38	Debt securities	-														
39	Equity instruments	1,366														
40	Non-EU country counterparties not subject to NFRD disclosure obligations	2,812														
41	Loans and advances	2,791														
42	Debt securities	21														
43	Equity instruments	-														
44	**Derivatives**	-														
45	**On demand interbank loans**	**507**														
46	**Cash and cash-related assets**	**729**														

Million EUR		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 Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
47	**Other categories of assets (e.g. Goodwill, commodities etc.)**	**5,063**														
48	**Total GAR assets**	**42,965**	**10,354**	**1,247**	**105**	**126**	**50**	**4**	**1**	**-**	**1**	**10,358**	**1,249**	**105**	**126**	**51**
49	**Assets not covered for GAR calculation**	**33,485**														
50	**Central governments and Supranational issuers**	**22,846**														
51	**Central banks exposures**	**9,839**														
52	**Trading book**	**800**														
53	**Total assets**	**76,450**	**10,354**	**1,247**	**105**	**126**	**50**	**4**	**1**	**-**	**1**	**10,358**	**1,249**	**105**	**126**	**51**
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations																
54	Financial guarantees	54	18	17	-	-	4	-	-	-	-	18	17	-	-	4
55	Assets under management	4,379	-	-	-	-	-	-	-	-	-	-	-	-	-	-
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
57	Of which equity instruments		-	-	-	-	-	-	-	-	-	-	-	-	-	-

1. This template includes information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments / municipalities (house financing).

2. The following accounting categories of financial assets are considered: Financial assets at amortised cost, financial assets at fair value through other comprehensive income, investments in subsidiaries, joint ventures and associates, financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss, and real estate collaterals obtained by credit institutions by taking possession in exchange of cancellation of debts.

3. For motor vehicle loans, exposures generated after the date of application of the disclosure are included.

2. GAR sector information based on Turnover

		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Breakdown by sector - NACE 4 digits level (code and label)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
1	C.12.00	-	-			-	-			-	-		
2	C.19.20	3	3			-	-			3	3		
3	C.20.20	-	-			-	-			-	-		
4	C.22.19	-	-			-	-			-	-		
5	C.22.21	-	-			-	-			-	-		
6	C.23.51	-	-			38	6			38	6		
7	C.24.10	4	2			-	-			4	2		
8	C.24.20	21	19			-	-			21	19		
9	C.24.42	59	3			-	-			59	3		
10	C.24.44	5	-			-	-			5	-		
11	C.25.92	-	-			-	-			-	-		
12	C.27.20	15	15			-	-			15	15		
13	C.27.32	20	18			-	-			20	18		
14	C.32.99	9	8			-	-			9	8		
15	D.35.11	246	25			-	-			246	25		
16	D.35.12	-	-			-	-			-	-		
17	D.35.13	2	-			-	-			2	-		
18	D.35.14	1	1			-	-			1	1		
19	D.35.23	-	-			-	-			-	-		
20	F.42.11	162	9			-	-			162	9		
21	F.42.22	137	137			-	-			137	137		
22	F.43.99	-	-			-	-			-	-		
23	G.45.20	-	-			-	-			-	-		
24	G.46.47	1	-			-	-			1	-		
25	G.46.51	-	-			-	-			-	-		
26	G.46.71	1	1			-	-			1	1		
27	G.47.19	53	-			-	-			53	-		
28	G.47.52	-	-			-	-			-	-		
29	G.47.59	1	-			-	-			1	-		
30	G.47.71	-	-			-	-			-	-		
31	G.47.91	-	-			-	-			-	-		
32	H.50.10	113	-			-	-			113	-		
33	H.50.20	141	9			-	-			141	9		
34	H.52.21	16	3			-	-			16	3		
35	J.62.01	-	-			-	-			-	-		

		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Breakdown by sector - NACE 4 digits level (code and label)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
36	J.62.02	-	-			-	-			-	-		
37	J.62.09	2	-			-	-			2	-		
38	L.68	2	-			-	-			2	-		
39	L.68.20	146	-			-	-			146	-		
40	L.68.32	27	-			-	-			27	-		
41	M.70.22	-	-			-	-			-	-		
42	N.77.11	109	5			2	-			111	5		
43	R.92.00	-	-			-	-			-	-		

1. Credit institutions disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.
2. The counterparty NACE sector allocation is based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor is done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes is driven by the characteristics of the more relevant or determinant obligor. Institutions disclose information by NACE codes with the level of disaggregation required in the template.

2. GAR sector information based on CAPEX

		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Breakdown by sector - NACE 4 digits level (code and label)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
1	C.12.00	-	-			-	-			-	-		
2	C.19.20	344	271			-	-			344	271		
3	C.20.20	1	1			-	-			1	1		
4	C.22.19	-	-			-	-			-	-		
5	C.22.21	-	-			-	-			-	-		
6	C.23.51	36	10			-	-			36	10		
7	C.24.10	8	3			-	-			8	3		
8	C.24.20	20	17			-	-			20	17		
9	C.24.42	75	19			-	-			75	19		
10	C.24.44	9	-			-	-			9	-		
11	C.25.92	-	-			-	-			-	-		
12	C.27.20	18	18			-	-			18	18		
13	C.27.32	19	17			-	-			19	17		
14	C.32.99	9	8			-	-			9	8		
15	D.35.11	769	238			-	-			769	238		
16	D.35.12	-	-			-	-			-	-		
17	D.35.13	37	-			-	-			37	-		
18	D.35.14	75	69			-	-			75	69		
19	D.35.23	1	1			-	-			1	1		
20	F.42.11	139	56			-	-			139	56		
21	F.42.22	161	161			-	-			161	161		
22	F.43.99	1	1			-	-			1	1		
23	G.45.20	-	-			-	-			-	-		
24	G.46.47	5	-			-	-			5	-		
25	G.46.51	-	-			-	-			-	-		
26	G.46.71	60	55			-	-			60	55		
27	G.47.19	41	-			-	-			41	-		
28	G.47.52	-	-			-	-			-	-		
29	G.47.59	20	-			-	-			20	-		
30	G.47.71	-	-			-	-			-	-		
31	G.47.91	-	-			-	-			-	-		
32	H.50.10	112	10			-	-			112	10		
33	H.50.20	140	20			-	-			140	20		
34	H.52.21	23	21			-	-			23	21		

		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)			
		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD		Non-Financial corporates (Subject to NFRD)		SMEs and other NFC not subject to NFRD	
		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount		[Gross] carrying amount	
	Breakdown by sector - NACE 4 digits level (code and label)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR	Of which environmentally sustainable (CCM + CCA)
35	J.62.01	-	-			-	-			-	-		
36	J.62.02	-	-			-	-			-	-		
37	J.62.09	-	-			-	-			-	-		
38	L.68	2	-			-	-			2	-		
39	L.68.20	113	-			-	-			113	-		
40	L.68.32	21	-			-	-			21	-		
41	M.70.22	-	-			-	-			-	-		
42	N.77.11	102	14			2	-			104	15		
43	R.92.00	-	-			-	-			-	-		

1. Credit institutions disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.
2. The counterparty NACE sector allocation is based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor is done on the basis of the characteristics of the obligor that was the more relevant, or determinant, for the institution to grant the exposure. The distribution of jointly incurred exposures by NACE codes is driven by the characteristics of the more relevant or determinant obligor. Institutions disclose information by NACE codes with the level of disaggregation required in the template.

3. GAR KPI stock based on Turnover

2023

% (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 total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	56.68%	2.32%	0.65%	0.41%	0.30%	0.36%	0.05%	-	-	57.04%	2.37%	0.65%	0.41%	0.30%	21.23%
2	**Financial undertakings**	15.36%	1.48%	-	0.18%	-	1.16%	0.17%	-	-	16.52%	1.65%	-	0.18%	-	2.04%
3	Credit institutions	13.23%	-	-	-	-	-	-	-	-	13.23%	-	-	-	-	1.43%
4	Loans and advances	13.84%	-	-	-	-	-	-	-	-	13.84%	-	-	-	-	0.03%
5	Debt securities, including UoP	13.21%	-	-	-	-	-	-	-	-	13.21%	-	-	-	-	1.39%
6	Equity instruments	13.81%	-		-	-	-	-		-	13.81%	-		-	-	0.01%
7	Other financial corporations	20.42%	5.00%	-	0.62%	0.01%	3.93%	0.57%	-	-	24.35%	5.57%	-	0.62%	0.01%	0.60%
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*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
20	**Non-financial undertakings**	37.02%	7.34%	0.25%	0.15%	1.36%	1.15%	0.16%	-	-	38.17%	7.50%	0.25%	0.15%	1.36%	4.59%
21	Loans and advances	36.52%	7.64%	0.27%	0.15%	1.42%	1.20%	0.17%	-	-	37.72%	7.80%	0.27%	0.15%	1.42%	4.39%

2023

% (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 total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
22	Debt securities, including UoP	49.26%	0.62%	-	0.07%	0.07%	-	-	-	-	49.26%	0.62%	-	0.07%	0.07%	0.16%
23	Equity instruments	42.90%	-		-	-	-	-		-	42.90%	-		-	-	0.03%
24	**Households**	64.80%	1.03%	1.03%	0.62%	-	-	-	-	-	64.80%	1.03%	1.03%	0.62%	-	12.16%
25	*of which loans collateralised by residential immovable property*	94.04%	0.68%	0.68%	-	-	-	-	-	-	94.04%	0.68%	0.68%	-	-	7.27%
26	*of which building renovation loans*	100.00%	8.89%	8.89%	8.89%	-	-	-	-	-	100.00%	8.89%	8.89%	8.89%	-	0.85%
27	*of which motor vehicle loans*	64.15%	-	-	-	-					64.15%	-	-	-	-	0.31%
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	87.70%	-	-	-	-	-	-	-	-	87.70%	-	-	-	-	2.44%
32	**Total GAR assets**	**21.41%**	**0.88%**	**0.24%**	**0.15%**	**0.11%**	**0.14%**	**0.02%**	**-**	**-**	**21.54%**	**0.90%**	**0.24%**	**0.15%**	**0.11%**	**56.20%**

3.GAR KPI stock based on CAPEX

2023

% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total assets covered
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	63.81%	7.69%	0.65%	0.78%	0.31%	0.03%	0.01%	-	0.01%	63.83%	7.69%	0.65%	0.78%	0.32%	21.23%
2	**Financial undertakings**	21.46%	9.10%	-	1.42%	-	0.13%	0.07%	-	0.07%	21.59%	9.17%	-	1.42%	0.07%	2.04%
3	Credit institutions	13.27%	-	-	-	-	-	-	-	-	13.27%	-	-	-	-	1.43%
4	Loans and advances	13.75%	-	-	-	-	-	-	-	-	13.75%	-	-	-	-	0.03%
5	Debt securities, including UoP	13.26%	-	-	-	-	-	-	-	-	13.26%	-	-	-	-	1.39%
6	Equity instruments	13.81%	-		-	-	-	-		-	13.81%	-		-	-	0.01%
7	Other financial corporations	40.93%	30.72%	-	4.79%	-	0.45%	0.24%	-	0.24%	41.37%	30.96%	-	4.79%	0.24%	0.60%
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*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
20	**Non-financial undertakings**	67.27%	28.78%	0.25%	1.30%	1.43%	0.06%	0.01%	-	-	67.33%	28.79%	0.25%	1.30%	1.43%	4.59%
21	Loans and advances	66.98%	29.44%	0.27%	1.32%	1.47%	0.06%	0.01%	-	-	67.04%	29.45%	0.27%	1.32%	1.47%	4.39%
22	Debt securities, including UoP	80.07%	16.14%	-	0.41%	0.43%	-	-	-	-	80.07%	16.14%	-	0.41%	0.43%	0.16%
23	Equity instruments	42.54%	2.87%		2.87%	-	-	-		-	42.54%	2.87%		2.87%	-	0.03%

2023

% (compared to total covered assets in the denominator)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total assets covered
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
24	**Households**	64.80%	1.03%	1.03%	0.62%	-	-	-	-	-	64.80%	1.03%	1.03%	0.62%	-	12.16%
25	*of which loans collateralised by residential immovable property*	94.04%	0.68%	0.68%	-	-	-	-	-	-	94.04%	0.68%	0.68%	-	-	7.27%
26	*of which building renovation loans*	100.00%	8.89%	8.89%	8.89%	-	-	-	-	-	100.00%	8.89%	8.89%	8.89%	-	0.85%
27	*of which motor vehicle loans*	64.15%	-	-	-	-					64.15%	-	-	-	-	0.31%
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	87.70%	-	-	-	-	-	-	-	-	87.70%	-	-	-	-	2.44%
32	**Total GAR assets**	**24.10%**	**2.90%**	**0.24%**	**0.29%**	**0.12%**	**0.01%**	**-**	**-**	**-**	**24.11%**	**2.91%**	**0.24%**	**0.29%**	**0.12%**	**56.20%**

4.GAR KPI Flow based on Turnover

2023

% (compared to flow of total eligible assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling		
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	26.32%	6.19%	2.02%	1.30%	0.48%	0.91%	0.12%	-	-	27.22%	6.32%	2.02%	1.30%	0.48%	100.00%
2	**Financial undertakings**	6.22%	1.08%	-	-	-	0.74%	0.11%	-	-	6.96%	1.19%	-	-	-	23.16%
3	Credit institutions	5.05%	-	-	-	-	-	-	-	-	5.05%	-	-	-	-	21.70%
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	5.05%	-	-	-	-	-	-	-	-	5.05%	-	-	-	-	21.70%
6	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
7	Other financial corporations	23.53%	17.18%	-	-	-	11.66%	1.69%	-	-	35.19%	18.88%	-	-	-	1.46%
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*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
20	**Non-financial undertakings**	26.12%	9.64%	0.78%	0.54%	1.09%	1.66%	0.23%	-	-	27.78%	9.87%	0.78%	0.54%	1.09%	44.21%
21	Loans and advances	26.20%	9.65%	0.78%	0.53%	1.09%	1.67%	0.23%	-	-	27.87%	9.88%	0.78%	0.53%	1.09%	43.96%
22	Debt securities, including UoP	12.96%	8.02%	-	1.23%	1.23%	-	-	-	-	12.96%	8.02%	-	1.23%	1.23%	0.25%
23	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
24	**Households**	42.79%	5.39%	5.39%	3.42%	-	-	-	-	-	42.79%	5.39%	5.39%	3.42%	-	31.41%
25	*of which loans collateralised by residential immovable property*	100.00%	5.41%	5.41%	-	-	-	-	-		100.00%	5.41%	5.41%	-	-	11.33%

2023

% (compared to flow of total eligible assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total new assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
26	*of which building renovation loans*	100.00%	73.71%	73.71%	73.71%	-	-	-	-	-	100.00%	73.71%	73.71%	73.71%	-	1.45%
27	*of which motor vehicle loans*	10.00%	-	-	-	-										
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.48%
32	**Total GAR assets**	**26.32%**	**6.19%**	**2.02%**	**1.30%**	**0.48%**	**0.91%**	**0.12%**	**-**	**-**	**27.22%**	**6.32%**	**2.02%**	**1.30%**	**0.48%**	**100.00%**

Institution dislcoses in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

4.GAR KPI Flow based on CAPEX

2023

% (compared to flow of total eligible assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	GAR - Covered assets in both numerator and denominator															
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	48.43%	18.32%	2.02%	2.07%	1.03%	0.06%	0.01%	-	-	48.49%	18.32%	2.02%	2.07%	1.03%	100.00%
2	**Financial undertakings**	9.99%	4.35%	-	0.20%	-	-	-	-	-	9.99%	4.35%	-	0.20%	-	23.16%
3	Credit institutions	5.14%	-	-	-	-	-	-	-	-	5.14%	-	-	-	-	21.70%
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	5.14%	-	-	-	-	-	-	-	-	5.14%	-	-	-	-	21.70%
6	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
7	Other financial corporations	81.88%	68.92%	-	3.15%	-	-	-	-	-	81.88%	68.92%	-	3.15%	-	1.46%
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*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
20	**Non-financial undertakings**	74.17%	35.35%	0.78%	2.16%	2.34%	0.14%	0.02%	-	-	74.31%	35.37%	0.78%	2.16%	2.34%	44.21%
21	Loans and advances	74.30%	35.27%	0.78%	2.17%	2.30%	0.14%	0.02%	-	-	74.44%	35.29%	0.78%	2.17%	2.30%	43.96%
22	Debt securities, including UoP	51.22%	48.13%	-	1.23%	8.02%	-	-	-	-	51.22%	48.13%	-	1.23%	8.02%	0.25%

2023

% (compared to flow of total eligible assets)		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total new assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
23	Equity instruments	-	-		-	-	-	-		-	-	-		-	-	-
24	**Households**	42.79%	5.39%	5.39%	3.42%	-	-	-	-	-	42.79%	5.39%	5.39%	3.42%	-	31.14%
25	*of which loans collateralised by residential immovable property*	100.00%	5.41%	5.41%	-	-	-	-	-	-	100.00%	5.41%	5.41%	-	-	11.33%
26	*of which building renovation loans*	100.00%	73.71%	73.71%	73.71%	-	-	-	-	-	100.0%	73.71%	73.71%	73.71%	-	1.45%
27	*of which motor vehicle loans*	10.00%	-	-	-	-					10.00%	-	-	-	-	5.52%
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.48%
32	**Total GAR assets**	**48.43%**	**18.32%**	**2.02%**	**2.07%**	**1.03%**	**0.06%**	**0.01%**	**-**	**-**	**48.49%**	**18.32%**	**2.02%**	**2.07%**	**1.03%**	**100.00%**

Institution dislcoses in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

5.KPI off-balance sheet exposures based on Turnover

		2023													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	11.78%	8.42%	-	0.69%	4.62%	-	-	-	-	11.78%	8.42%	-	0.69%	4.62%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Institution dislcoses in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets and applying the formulas proposed in this template.

5.KPI off-balance sheet exposures based on CAPEX

		2023													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
% (compared to total eligible off-balance sheet assets)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	32.86%	30.67%	-	0.69%	8.20%	-	-	-	-	32.86%	30.67%	-	0.69%	8.20%
2	Assets under management (AuM KPI)	-	-	-	-	-	-	-	-	-	-	-	-	-	-

Institution dislcoses in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets and applying the formulas proposed in this template.

Disclosures according to ANNEX XII Nuclear energy and Fossil gas related activities

Template 1 Nuclear energy and Fossil gas related activities		
Row	**Nuclear energy related activities**	
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
	Fossil gas related activities	
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

Template 2 Taxonomy-aligned economic activities (denominator) based on Turnover

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	385	0.90%	376	0.88%	8	0.02%
8	**Total applicable KPI**	385	0.90%	376	0.88%	8	0.02%

Template 2 Taxonomy-aligned economic activities (denominator) based on CAPEX

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	1,249	2.91%	1,247	2.90%	1	-
8	**Total applicable KPI**	1,249	2.91%	1,247	2.90%	1	-

Template 3 Taxonomy-aligned economic activities (numerator) based on Turnover

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator numerator of the applicable KPI**	385	100.00%	376	97.85%	8	2.15%
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	385	100.00%	376	97.85%	8	2.15%

Template 3 Taxonomy-aligned economic activities (numerator) based on CAPEX

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of *taxonomy-aligned* economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **numerator** of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator numerator of the applicable KPI**	1,249	100.00%	1,247	99.89%	1	0.11%
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	1,249	100.00%	1,247	99.89%	1	0.11%

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities (denominator) based on Turnover

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	60	0.14%	60	0.14%	-	-
5	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	8,811	20.51%	8,761	20.39%	50	0.12%
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	8,872	20.65%	8,822	20.53%	50	0.12%

Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities (denominator) based on CAPEX

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI.	-	-	-	-	-	-
2	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI.	-	-	-	-	-	-
3	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI.	-	-	-	-	-	-
4	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI.	27	0.06%	27	0.06%	-	-
5	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI.	-	-	-	-	-	-
6	Amount and proportion of *taxonomy-eligible but not taxonomy-aligned* economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/ 2139 in the **denominator** of the applicable KPI.	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI.**	9,082	21.14%	9,080	21.13%	3	0.01%
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI.**	9,110	21.20%	9,107	21.20%	3	0.01%

Template 5 Taxonomy non-eligible economic activities based on Turnover

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	6,971	16.23%
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	6,971	16.23%

Template 5 Taxonomy non-eligible economic activities based on CAPEX

Row	Economic activities	Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is *taxonomy-non-eligible* in accordance with Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the **denominator** of the applicable KPI	-	-
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	5,869	13.66%
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	5,869	13.66%

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INDEPENDENT AUDITOR'S REPORT

To the Shareholders of Piraeus Financial Holdings S.A.

Report on the Audit of the Separate and Consolidated Financial Statements

Opinion

We have audited the separate and consolidated financial statements of Piraeus Financial Holdings S.A. (the Company), which comprise the separate and consolidated statement of financial position as at 31 December 2023, and the separate and consolidated statements of income and comprehensive income, separate and consolidated statements of changes in equity and separate and consolidated statements of cash flows for the year then ended and notes to the financial statements, including material accounting policy information.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the separate and consolidated financial position of Piraeus Financial Holdings S.A. and its subsidiaries (the Group) as at 31 December 2023 and its separate and consolidated financial performance and its separate and consolidated cash flows for the year then ended in accordance with International Financial Reporting Standards (IFRSs), as endorsed by the European Union.

Basis for Opinion

We conducted our audit in accordance with International Standards on Auditing (ISAs) as they have been incorporated into the Greek legislation. Our responsibilities under those standards are further described in the "Auditor's Responsibilities for the Audit of the Separate and Consolidated Financial Statements" section of our report. We have been independent of the Company and the consolidated subsidiaries during the whole period of our appointment, in accordance with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code), as incorporated into the Greek legislation and the ethical requirements in Greece, relevant to the audit of the separate and consolidated financial statements. We have fulfilled our ethical requirements in accordance with the applicable legislation and the abovementioned Code of Ethics. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our opinion.

Key Audit Matters

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the separate and consolidated financial statements of the current year. These matters and the assessed risks of material misstatements were addressed in the context of our audit of the separate and consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

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Key audit matters	How our audit addressed the Key audit matters
Allowance for expected credit losses (ECL) for loans and advances to customers at amortised cost	
Loans and advances to customers at amortised cost of the Group amounted to 37,527 million as at 31 December 2023, (€ 37,367 million as at 31 December 2022) and allowance for expected credit losses amounted to € 796 million as at 31 December 2023 (€ 1,385 as at 31 December 2022). Measurement of ECL on loans at amortised cost is considered a key audit matter as the determination of assumptions used involves critical Management judgments and accounting estimates with inherent risk, high level of subjectivity, and complexity. The most significant Management judgements and accounting estimates, relate to: • The timely identification of exposures with significant increase in credit risk and credit impaired exposures • The determination of the assumptions used expected credit risk models to assess the credit risk related to the exposure and the expected future cash flows of the debtors. • Assumptions of expected future cash flows of individually assessed credit impaired exposures, including assessment approach, valuation of collaterals, and the time to liquidate the collaterals. • The Identification and valuation of post model adjustments made by Management to include any impact not captured by the models. Management has provided further information about principles and accounting policies for determining the ECL on loans and advances to customers at amortised cost and management of credit risk in Notes 2.4.19, 3.1, 3.2, 4.1, 4.2, 4.3, 4.4 and 23 to the consolidated financial statements.	Based on our risk assessment and following a risk-based approach, we have evaluated the impairment methodologies applied and assumptions made by Management in relation to this key audit matter, and we performed, inter alia, the following audit procedures: • With the support of our financial risk modelling specialists where appropriate, we assessed the design and implementation of relevant internal controls over the ECL estimate including the controls around: - the incorporation of the model's outcome within the relevant systems and the calculation of the ECL estimate - the significant assumptions used in the ECL models - model monitoring and model validation - governance and review of post model adjustments - the determination of staging criteria and staging allocation - the selection of macro-economic scenarios and probability weightings - accuracy and completeness of data used in the credit risk models. • We assessed the design and implementation of relevant controls over the ECL measurement of credit impaired loans assessed on an individual basis which included the controls around the determination of the appropriate approach and the controls around the estimation of the expected future cash flows. • With the support of our financial risk modelling specialists we: - assessed the appropriateness of the Group's IFRS9 impairment methodologies, - assessed the appropriateness of the criteria used to allocate loans to stages in accordance with IFRS9. On a sample basis tested the timely identification of exposures with significant increase in credit risk and credit impaired exposures, - assessed the methodology, the reasonableness and appropriateness of the macroeconomic variables, scenarios and weightings used in the models and compared them to macroeconomic variables included in a variety of external market sources. • We further performed substantive procedures to test the accuracy and completeness of critical data used in the models by agreeing a sample of ECL calculation data points to relevant systems or documentation. • On a sample basis we assessed whether, the approach used in the measurement of impairment for the individually assessed credit impaired exposures is appropriate, and we tested the reasonableness of

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Key audit matters	How our audit addressed the Key audit matters
Allowance for expected credit losses (ECL) for loans and advances to customers at amortised cost - *Continued*	
	significant assumptions used, including valuation of collaterals (where we also made use of our real estate specialists), time to liquidate collaterals and the estimation of the discounted future cash flows. • We evaluated the post model adjustments, made by Management at year end in response to current economic conditions. Given the complexity and granularity of the related disclosures, we further assessed their completeness and accuracy in accordance with the provisions of the relevant accounting standards.

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Key audit matters	How our audit addressed the Key audit matters
Recoverability of Deferred Tax Asset (DTA)	
The Group has recognized deferred tax assets of €5,703 million as at 31 December 2023, (€ 5,974 million as at 31 December 2022). The recognition and measurement of the deferred tax asset is considered a key audit matter as it involves a high degree of judgment in making estimates relating to the existence of future taxable profits, which are complex and subjective due to their forward-looking nature. The most significant estimates and areas with increased level of management judgement include: - The Revenue, ECL and Cost forecasts included in the annual budget and the three-year business plan. - Forward looking information and Management projections used to extend the period covered under the 3-year business plan to the time when the deferred tax asset can be utilized for tax purposes. - Adjustments required for the conversion of accounting profits to taxable profits. Management has provided further information about the deferred tax asset in Notes 2.4.34, 3.2, 4.17, 16 and 38 to the consolidated financial statements.	Based on our risk assessment, we evaluated the method used to determine the amount of deferred tax asset recognized and examined the budgets prepared and significant assumptions made by Management relating to the future taxable profits. Our examination included, inter alia the following audit procedures: • We assessed the design and implementation and tested the operating effectiveness of the relevant internal controls over the preparation and approval of budgets and forecasts, including the internal controls over the significant assumptions, inputs, calculation and methodologies used for this purpose. • We compared previous budgets to actual results, to evaluate the forecasting ability of Management. • We compared the significant assumptions used by Management in the deferred tax asset recoverability exercise with the approved budget and the 3-year business plan for consistency and performed a sensitivity analysis. • We assessed whether significant assumptions used beyond the business plan period were reasonable in the context of the long-term economic outlook. • We assessed the appropriateness of the adjustments made by Management to convert anticipated accounting profits into taxable profits, considering the tax legislation currently in force. We evaluated the completeness and accuracy of the disclosures in the financial statements including the appropriateness of the assumptions disclosed.
Carrying value of Investment in Piraeus Bank (Company only)	
The Company' Investment in Subsidiaries amount to €5,573 million as at 31 December 2023, (€ 5,558 million as at 31 December 2022). Investment in Subsidiaries is presented at cost in the Company's financial statements unless there are indicators of impairment, in which case it is presented at cost less impairment. Management estimated the recoverable amount in its investment in Piraeus Bank S.A. using the Value in Use ("VIU") which is higher than the fair value less cost to sell. Management's assessment resulted in a carrying value of €5,508 million as at 31 December 2023 (€ 5,504 million as at 31 December 2022). The calculation of VIU is dependent on certain key assumptions around the future cash flows which have been forecasted using the Group's 3-year business plan, the discount rates and the terminal growth rates. These assumptions are judgmental and require management to make estimates which are subjective due to their forward-looking nature. The most significant estimates and areas with greater level of management judgement include: - The Revenue, ECL and Cost forecasts - Long term growth rates and	Based on our risk assessment, we evaluated the methodology applied and assumptions made by Management in relation to this key audit matter, and we performed, inter alia, the following audit procedures: • We assessed the design and the implementation and tested the operating effectiveness of the relevant internal controls over the preparation and review of the forecasts, and the significant assumptions, the inputs, the methodology and the calculations, used in the VIU model. • We compared previous budgets to actual results, to evaluate the forecasting ability of Management. • We evaluated the reasonableness of certain key assumptions and considerations made when developing the estimated future cash flows. • With the assistance of our fair valuation specialists we: - Evaluated the appropriateness of the discount rate and of the terminal growth rate used.

Key audit matters	How our audit addressed the Key audit matters
Carrying value of Investment in Piraeus Bank (Company only) - *Continued*	
- Discount rates Management has provided further information in Notes 3.2 and 25 to the financial statements.	- Assessed whether the methodology over management's calculation of the VIU is compliant with the requirements of the IFRS. We evaluated the completeness and accuracy of the disclosures in the financial statements including the appropriateness of the assumptions disclosed.
Information Technology General Controls and controls over financial reporting	
The Group's financial reporting processes are highly dependent on Information Technology ("IT") systems supporting automated accounting and reconciliation procedures, thus leading to a complex IT environment, pervasive in nature and in which a significant number of transactions are processed daily, across numerous locations. This is a key audit matter since it is important that controls over access security, cyber risks, system change control and datacenter and network operations, are designed and operate effectively to ensure complete and accurate financial records and information. Management has provided further information about General Information Technology Controls under the header "Internal Control System and Risk Management" and "Other Governance Issues" in Section 4 of the Corporate Governance Statement for the year 2023.	Based on our risk assessment, we have assessed the design and operating effectiveness of General Information Technology Controls (GITCs) relevant for financial reporting. Our assessment included the evaluation of user access over applications, operating systems and databases, the process followed over changes made to information systems, as well as the evaluation of datacenter and network IT operations. In summary, our key audit activities included, among others, testing of: • User access provisioning and de provisioning process. • Privileged access to applications, operating systems and databases. • Periodic review of user access rights. • Change management process over applications, operating systems and databases (i.e. user request, user acceptance testing and final approval for promotion to production). • Datacenter and network operations.

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Other Information

Management is responsible for the other information. The other information, included in the Annual Financial Report prepared in accordance with Law 3556/2007, comprises the Board of Directors' Annual Report, referred to in the section "Report on Other Legal and Regulatory Requirements", the Statement by the Members of the Board of Directors, the Explanatory Report and the Corporate Governance Statement but does not include the separate and consolidated financial statements and our auditor's report thereon.

Our opinion on the separate and consolidated financial statements does not cover the other information and we will not express any form of assurance conclusion thereon.

In connection with our audit of the separate and consolidated financial statements, our responsibility is to read the other information and, in doing so, consider whether the other information is materially inconsistent with the separate and consolidated financial statements or our knowledge obtained in the audit, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement in this other information, we are required to report that fact. We have nothing to report in this regard.

Responsibilities of Management and Those Charged with Governance for the separate and consolidated financial statements

Management is responsible for the preparation and fair presentation of the separate and consolidated financial statements in accordance with IFRSs, as endorsed by the European Union, and for such internal control as Management determines is necessary to enable the preparation of separate and consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the separate and consolidated financial statements, Management is responsible for assessing the Company's and the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless Management either intends to liquidate the Company and the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee (article 44 of Law 4449/2017) of the Company is responsible for overseeing the Company's and Group's financial reporting process.

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Auditor's Responsibilities for the audit of the separate and consolidated financial statements

Our objectives are to obtain reasonable assurance about whether the separate and consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with ISAs, as these have been incorporated into Greek legislation, will always detect a material misstatement when it exists. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these separate and consolidated financial statements.

As part of an audit in accordance with ISAs, as these have been incorporated into Greek legislation, we exercise professional judgment and maintain professional scepticism throughout the audit.
We also:

- Identify and assess the risks of material misstatement of the separate and consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Company's and Group's internal control.

- Evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by Management.

- Conclude on the appropriateness of Management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Company's and Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the separate and consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Company and the Group to cease to continue as a going concern.

- Evaluate the overall presentation, structure and content of the separate and consolidated financial statements, including the disclosures, and whether the separate and consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.

- Obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the separate and consolidated financial statements. We are responsible for the direction, supervision and performance of the Company and the Group audit. We remain solely responsible for our audit opinion.

We communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide those charged with governance with a statement that we have complied with relevant ethical requirements regarding independence, and communicate with them all relationships and other matters that may reasonably be thought to impair our independence, and where applicable, related safeguards applied.

From the matters communicated with those charged with governance, we determine those matters that were of most significance in the audit of the separate and consolidated financial statements of the current year and are therefore the key audit matters.

Report on Other Legal and Regulatory Requirements

1) Board of Directors' Annual Report

Taking into consideration that Management is responsible for the preparation of the Board of Directors' Annual report which also includes the Corporate Governance Statement, according to the provisions of paragraph 5 of article 2 of Law 4336/2015 (part B) we note the following:

a) The Board of Directors' report includes the Corporate Governance Statement which provides the information required by article 152 of Law 4548/2018.

b) In our opinion, the Board of Directors' report has been prepared in accordance with the applicable legal requirements of articles 150 - 151 and 153 - 154 and paragraph 1 (cases c and d) of article 152 of Law 4548/2018 and its content is consistent with the accompanying separate and consolidated financial statements for the year ended 31 December 2023.

c) Based on the knowledge we obtained during our audit of the Company and the Group and its environment, we have not identified any material inconsistencies in the Board of Directors' Annual Report.

2) Additional Report to the Audit Committee

Our audit opinion on the separate and consolidated financial statements is consistent with the additional report to the Audit Committee of the Company referred to in Article 11 of the European Union (EU) Regulation 537/2014.

3) Non-audit Services

We have not provided to the Company and the Group any prohibited non-audit services referred to in Article 5 of EU Regulation 537/2014.
The allowed non-audit services provided to the Company and the Group during the year ended 31 December 2023 have been disclosed in Note 48 to the separate and consolidated financial statements.

4) Appointment

We were appointed as statutory auditors for the first time by the Annual General Assembly of shareholders of the Company (former Piraeus Bank S.A.) on 28 June 2017. Our appointment has been, since then, uninterrupted renewed by the Annual General Assembly of shareholders of the Company for 7 consecutive years.

5) Internal Regulation

The Company retains an Internal Regulation according to the provisions of article 14 of Law 4706/2020.

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6) Assurance Report on European Single Electronic Format reporting

We have examined the digital file of Piraeus Financial Holdings S.A. (hereinafter the Company or/and the Group), prepared in accordance with the European Single Electronic Format (ESEF), defined by the Commission Delegated EU Regulation 2019/815 as amended by EU Regulation 2020/1989 ("ESEF Regulation"), which include the separate and consolidated financial statements of the Company and the Group for the year ended 31 December 2023 in XHTML format as well as the XBRL file (M6AD1Y1KW32H8THQ6F76-2023-12-31-el.zip) with the appropriate tagging on these consolidated financial statements, including the notes to the financial statements.

Regulatory Framework

The ESEF digital files are prepared in accordance with the ESEF Regulation, and the Interpretation Announcement 2020/C 379/01 of the European Commission dated 10 November 2020, as provided by L.3556/2007 and the relevant announcements of the Hellenic Capital Market Commission and the Athens Stock Exchange (the "ESEF Regulatory Framework"). In summary this Regulatory Framework includes, inter alia, the following requirements:

- Annual financial statements shall be prepared in XHTML format
- In regards to the consolidated financial statements prepared in accordance with International Financial Reporting Standards, financial information included in the consolidated Statement of Financial Position, consolidated statement of income and comprehensive income, consolidated statement of changes in equity and consolidated statement of cash flows as well as financial information included in the notes to these financial statements shall be tagged with XBRL mark-up ("XBRL tags" and "block tag") in accordance with ESEF Taxonomy, as currently in force. The technical specifications of ESEF, including the related taxonomy, are included in ESEF Regulatory Technical Standards.

Regulatory requirements included in ESEF Regulatory Framework consist of an appropriate basis for the purpose of expressing a conclusion that provides reasonable assurance.

Responsibilities of Management and Those Charged with Governance

Management is responsible for the preparation and submission of these separate and consolidated financial statements of the Company and the Group for the year ended 31 December 2023, in accordance with the requirements set by the ESEF Regulatory Framework and for such internal controls that Management determines are necessary to enable the preparation of the digital files that are free from material misstatement, whether due to fraud or error.

Auditor's responsibilities

Our responsibility is to design and perform this assurance procedure in accordance with the decision 214/4/11-02-2022 of the board of Hellenic Accounting and Auditing Oversight Board (HAASOB) and the "Guidelines in connection with the procedures and the assurance report of the certified auditors on the ESEF reported of Issuers with listed shares in the Hellenic capital market" dated 14/02/2022 as issued by the Institute of Certified Public Accountants (the "ESEF Guidelines") in order to obtain reasonable assurance about whether the separate and consolidated financial statements of the Company and the Group, prepared by Management in accordance with ESEF, comply in all material respects with the ESEF Regulatory Framework, as currently in force.

In conducting this work, we have complied with the International Ethics Standards Board for Accountants' Code of Ethics for Professional Accountants (IESBA Code), as incorporated into the Greek legislation and additionally we have complied with ethical requirements regarding independence, in accordance with Law 4449/2017 and EU Regulation No 537/2014.

The assurance work performed, is limited to the items included in the ESEF Guidelines and has been performed in accordance with the International Standard on Assurance Engagements 3000 "Assurance engagements other than audits or review of historical financial information". Reasonable assurance is a high level of assurance but is not a guarantee that this work will always detect a material misstatement when it exists relating to the compliance with the requirements of ESEF Regulatory Framework.

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Conclusion

Based on the procedures performed and the evidence obtained, we conclude that the separate and the consolidated financial statements of the Company and the Group for the year ended 31 December 2023 prepared in XHTML format as well as the XBRL file (M6AD1Y1KW32H8THQ6F76-2023-12-31-el.zip) with the appropriate tagging on these consolidated financial statements, including the notes, are prepared in all material respects in accordance with the requirements of ESEF Regulatory Framework.

Athens, 27 February 2024

The Certified Public Accountant

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Certified true translation of the original in the Greek language
Alexandra V. Kostara

This document has been prepared by Deloitte Certified Public Accountants Societe Anonyme.
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Income Statement

€ Million	Note	Group		Company	
		Year ended		Year ended	
		31/12/2023	31/12/2022	31/12/2023	31/12/2022
CONTINUING OPERATIONS					
Interest and similar income	6	2,799	1,691	103	106
Interest expense and similar charges	6	(797)	(339)	(69)	(69)
NET INTEREST INCOME		**2,003**	**1,353**	**34**	**37**
Fee and commission income	7	554	508	47	44
Fee and commission expense	7	(86)	(87)	(35)	(30)
NET FEE AND COMMISSION INCOME		**468**	**421**	**12**	**14**
Income from non-banking activities	8	79	64	-	-
Dividend income	46.2	1	2	53	53
Net gains / (losses) from financial instruments measured at fair value through profit or loss ("FVTPL")	9	23	359	-	(8)
Net gains/ (losses) from financial instruments measured at fair value through other comprehensive income ("FVTOCI")	10	2	111	-	-
Net gains / (losses) from derecognition of financial instruments measured at amortised cost		(1)	(34)	-	-
Net gains / (losses) from loss of control over subsidiaries / disposal of associates and joint ventures	25	32	278	-	-
Net other income / (expenses)	11	-	29	(1)	(1)
TOTAL NET INCOME		**2,607**	**2,582**	**98**	**94**
Staff costs	12	(442)	(446)	(3)	(3)
Administrative expenses	13	(315)	(337)	(7)	(5)
Depreciation and amortization	26, 27	(106)	(106)	-	-
Net gain / (losses) from sale of property and equipment and intangible assets		-	(1)	-	-
TOTAL OPERATING EXPENSES		**(863)**	**(889)**	**(10)**	**(8)**
PROFIT BEFORE PROVISIONS, IMPAIRMENT AND OTHER CREDIT-RISK RELATED EXPENSES		**1,744**	**1,693**	**88**	**86**
Impairment (losses) / releases on loans and advances to customers at amortised cost	4	(404)	(472)	(1)	11
Other credit-risk related expenses on loans and advances to customers at amortised cost	14	(136)	(142)	-	-
Impairment (losses) / releases on other assets	30	(52)	(47)	(1)	-
Impairment on subsidiaries and associates	25	(1)	(2)	-	-
Impairment on property and equipment and intangible assets	26, 27	(29)	(4)	-	-
Impairment (losses) / releases on debt securities at amortised cost		9	(4)	16	6
Other provision (charges) / releases	15	(38)	(13)	-	-
Share of profit / (loss) of associates and joint ventures	25	(15)	29	-	-
PROFIT BEFORE INCOME TAX		**1,078**	**1,037**	**101**	**103**
Income tax expense	16	(292)	(140)	-	-
PROFIT FOR THE PERIOD FROM CONTINUING OPERATIONS		**786**	**897**	**102**	**103**
DISCONTINUED OPERATIONS					
Profit after income tax from discontinued operations		-	51	-	-
PROFIT FOR THE PERIOD		**786**	**948**	**102**	**103**
From continuing operations					
Profit attributable to the equity holders of the parent		788	899	-	-
Non controlling interest		(2)	(2)	-	-
From discontinued operations					
Profit attributable to the equity holders of the parent		-	51	-	-
Non controlling interest		-	-	-	-
Earnings per share attributable to the equity holders of the parent (in €):					
From continuing operations					
- Basic & Diluted	17	0.63	0.72	-	-
From discontinued operations					
- Basic & Diluted	17	-	0.04	-	-
Total basic and diluted	17	0.63	0.76	-	-

Statement of Comprehensive Income

€ Million	Note	Group		Company	
		Year ended		Year ended	
		31/12/2023	31/12/2022	31/12/2023	31/12/2022
CONTINUING OPERATIONS					
Profit for the year (A)		**786**	**897**	**102**	**103**
Other comprehensive income / (expense), net of tax:					
Items that may be reclassified subsequently to profit or loss					
Change in reserve from debt securities measured at FVTOCI	18	22	(129)	-	-
Change in currency translation reserve	18	(1)	(9)	-	-
Change in cash flow hedge reserve	18	2	-	-	-
Items that will not be reclassified subsequently to profit or loss					
Change in reserve from equity instruments measured at FVTOCI	18	(21)	23	-	-
Change in property revaluation reserve	18	2	7	-	-
Change in reserve of actuarial gains / (losses)	18	(2)	7	-	-
Other comprehensive income / (expense), net of tax (B)	18	**2**	**(101)**	**-**	**-**
Total comprehensive income, net of tax (A)+(B)		**788**	**796**	**102**	**103**
- Attributable to the equity holders of the parent		790	798	-	-
- Non controlling interest		(2)	(2)	-	-
DISCONTINUED OPERATIONS					
Profit for the year		**-**	**51**	**-**	**-**
Total comprehensive income, net of tax		**-**	**51**	**-**	**-**
- Attributable to the equity holders of the parent		-	51	-	-
- Non controlling interest		-	-	-	-

Statement of Financial Position

€ Million	Note	Group		Company	
		31/12/2023	31/12/2022 As reclassified	31/12/2023	31/12/2022 As reclassified
ASSETS					
Cash and balances with Central Banks	19	10,567	9,653	-	-
Due from banks	20	1,034	1,415	34	45
Financial assets at FVTPL	22	609	548	-	-
Financial assets mandatorily measured at FVTPL	22	234	182	-	-
Derivative financial instruments	21	191	220	-	-
Loans and advances to customers at amortised cost	23	37,527	37,367	-	-
Loans and advances to customers mandatorily measured at FVTPL		53	52	-	-
Investment securities	24	13,042	11,741	850	798
Investment property	28	1,757	1,522	-	-
Investments in subsidiaries	25	-	-	5,573	5,558
Investments in associated undertakings and joint ventures	25	1,255	1,023	-	-
Property and equipment	27	732	728	1	1
Intangible assets	26	347	312	-	-
Tax receivables	37	161	145	7	12
Deferred tax assets	38	5,703	5,974	-	-
Other assets	30	2,996	3,357	37	44
Assets held for sale	29	241	406	-	-
TOTAL ASSETS		**76,450**	**74,645**	**6,503**	**6,457**
LIABILITIES					
Due to banks	31	4,618	6,185	-	-
Due to customers	32	59,567	58,372	-	-
Derivative financial instruments	21	295	410	-	-
Debt securities in issue	33	1,886	849	-	-
Other borrowed funds	34	939	937	939	936
Current income tax liabilities		13	7	-	-
Deferred tax liabilities	38	9	10	-	-
Retirement and termination benefit obligations	39	52	55	-	-
Provisions	36	164	123	-	-
Other liabilities	35	1,459	1,113	60	55
Liabilities held for sale		-	2	-	-
Fair Value changes of hedged items in portfolio hedges of interest rate risk	21	94	-	-	-
TOTAL LIABILITIES		**69,097**	**68,064**	**999**	**992**
EQUITY					
Share capital	42	1,163	1,163	1,163	1,163
Share premium	42	3,255	3,555	3,255	3,555
Other equity instruments		600	600	600	600
Less: Treasury shares	42	(15)	-	(11)	-
Other reserves and retained earnings	43	2,296	1,235	497	147
Capital and reserves attributable to the equity holders of the parent		**7,298**	**6,553**	**5,503**	**5,465**
Non controlling interest		56	28	-	-
TOTAL EQUITY		**7,353**	**6,581**	**5,503**	**5,465**
TOTAL LIABILITIES AND EQUITY		**76,450**	**74,645**	**6,503**	**6,457**

The notes on pages 183 to 396 form an integral part of the Financial Statements

As at 31 December 2023, the Group and the Company have changed the presentation of financial assets measured at FVTOCI and Debt securities at amortised cost, by classifying them now into a single line item “Investment securities”. Comparative information has been reclassified accordingly (refer to Note 49).

Statement of Changes in Equity

Group		Attributable to equity shareholders of the parent entity													
€ Million	Note	Share Capital	Share Premium	Other equity instruments	Treasury shares	Currency Translation Reserve	Cash flow hedge reserve	Reserve from financial assets at FVTOCI	Property revaluation reserve	Other reserves	Non-taxed reserves	Retained earnings	Total	Non controlling interest	Total
Opening balance as at 1/1/2022		**1,188**	**18,112**	**600**	**(2)**	**(54)**	**-**	**144**	**-**	**118**	**351**	**(14,669)**	**5,787**	**15**	**5,803**
Reclassification due to change in the presentation of non-taxed reserves [1]		-	-	-	-	-	-	-	-	-	37	(37)	-	-	-
Opening balance as at 1/1/2022 (as reclassified) [1]		**1,188**	**18,112**	**600**	**(2)**	**(54)**	**-**	**144**	**-**	**118**	**388**	**(14,706)**	**5,787**	**15**	**5,803**
Other comprehensive income / (expense), net of tax	18	-	-	-	-	(9)	-	(106)	7	-	-	7	(101)	-	(101)
Profit / (loss), net of tax for the year		-	-	-	-	-	-	-	-	-	-	949	949	(2)	948
Total comprehensive income/ (expense) for the year		**-**	**-**	**-**	**-**	**(9)**	**-**	**(106)**	**7**	**-**	**-**	**956**	**849**	**(2)**	**847**
Share capital decrease in kind		(25)	-	-	-	-	-	-	-	-	-	-	(25)	-	(25)
Offset of share premium by writing-off accumulated losses		-	(14,557)	-	-	-	-	-	-	-	-	14,557	-	-	-
Payment to the holders of AT1 capital instrument		-	-	-	-	-	-	-	-	-	-	(53)	(53)	-	(53)
(Purchases) / sales of treasury shares		-	-	-	1	-	-	-	-	-	-	-	1	-	1
Transfer between reserves and retained earnings		-	-	-	-	-	-	-	-	1	-	(1)	-	-	-
Transfer of the accumulated reserve from equity securities measured at FVTOCI to retained earnings upon disposal		-	-	-	-	-	-	-	-	-	-	(1)	(1)	-	(1)
Disposals and movements in participating interests		-	-	-	-	-	-	-	-	(1)	-	(6)	(7)	14	8
Balance as at 31/12/2022		**1,163**	**3,555**	**600**	**-**	**(63)**	**-**	**38**	**7**	**118**	**388**	**747**	**6,553**	**28**	**6,581**
Opening balance as at 1/1/2023		**1,163**	**3,555**	**600**	**-**	**(63)**	**-**	**38**	**7**	**118**	**388**	**747**	**6,553**	**28**	**6,581**
Other comprehensive income / (expense), net of tax	18	-	-	-	-	(1)	2	1	2	-	-	(2)	2	-	2
Profit / (loss), net of tax for the year		-	-	-	-	-	-	-	-	-	-	788	788	(2)	786
Total comprehensive income/ (expense) for the year		**-**	**-**	**-**	**-**	**(1)**	**2**	**1**	**2**	**-**	**-**	**786**	**790**	**(2)**	**788**
Offset of share premium by writing-off accumulated losses	42	-	(301)	-	-	-	-	-	-	-	-	301	-	-	-
Payment to the holders of AT1 capital instrument		-	-	-	-	-	-	-	-	-	-	(53)	(53)	-	(53)
(Purchases) / sales of treasury shares	42	-	-	-	(15)	-	-	-	-	-	-	1	(14)	-	(14)
Non-taxed reserves		-	-	-	-	-	-	-	-	-	23	(23)	-	-	-
Share based payment		-	-	-	-	-	-	-	-	-	-	1	1	-	1
Transfer between reserves and retained earnings		-	-	-	-	-	-	-	-	3	-	(3)	-	-	-
Transfer of the accumulated reserve from equity securities measured at FVTOCI to retained earnings, upon disposal		-	-	-	-	-	-	-	-	-	-	34	34	-	34
Disposals and movements in participating interests		-	-	-	-	-	-	-	-	7	-	(19)	(12)	29	17
Balance as at 31/12/2023		**1,163**	**3,255**	**600**	**(15)**	**(64)**	**2**	**40**	**9**	**127**	**411**	**1,771**	**7,298**	**56**	**7,353**

Company € Million	Note	Share Capital	Share Premium	Other equity instruments	Treasury shares	Other reserves	Non-taxed reserves	Retained earnings	Total
Opening balance as at 1/1/2022		**1,188**	**18,112**	**600**	**-**	**96**	**351**	**(14,908)**	**5,439**
Profit, net of tax for the year		-	-	-	-	-	-	103	103
Total comprehensive income for the year		**-**	**-**	**-**	**-**	**-**	**-**	**103**	**103**
Share capital decrease in kind		(25)	-	-	-	-	-	-	(25)
Offset of Share premium by writing-off accumulated losses		-	(14,557)	-	-	-	-	14,557	-
Payment to the holders of AT1 capital instrument		-	-	-	-	-	-	(53)	(53)
Balance as at 31/12/2022		**1,163**	**3,555**	**600**	**-**	**96**	**351**	**(301)**	**5,465**
Opening balance as at 1/1/2023		**1,163**	**3,555**	**600**	**-**	**96**	**351**	**(301)**	**5,465**
Profit, net of tax for the year		-	-	-	-	-	-	102	102
Total comprehensive income for the year		**-**	**-**	**-**	**-**	**-**	**-**	**102**	**102**
Offset of Share premium by writing-off accumulated losses	42	-	(301)	-	-	-	-	301	-
Payment to the holders of AT1 capital instrument		-	-	-	-	-	-	(53)	(53)
(Purchases) / sales of treasury shares	42	-	-	-	(11)	-	-	-	(11)
Share based payments		-	-	-	-	-	-	1	1
Balance as at 31/12/2023		**1,163**	**3,255**	**600**	**(11)**	**96**	**351**	**50**	**5,503**

(1) As of 31 December 2023, the Group has changed the presentation of certain types of reserves, after taking into account their nature and purpose in accordance with the applicable legal and tax framework in Greece. In particular, reserves of € 37 million, which were formed prior to 2022, and relate mainly to dividends and gains from the sale of participations, formerly classified under retained earnings, are now presented as “Non-taxed reserves”. Comparative information has been reclassified to ensure consistency with the aforementioned changes in presentation of non-taxed reserves and retained earnings (refer to Note 49).

Cash Flow Statement

€ Million	Note	Group		Company	
		Year ended		Year ended	
		31/12/2023	31/12/2022	31/12/2023	31/12/2022
Cash flows from operating activities					
Profit before income tax		1,078	1,087	101	103
Adjustments to profit before income tax:					
Add: provisions and impairment		514	544	(14)	(17)
Add: depreciation and amortisation charge		106	108	-	-
Add: retirement benefits, cost of voluntary exit scheme and shared based payment	12	72	62	-	-
Net (gain)/ losses from valuation of financial instruments measured at FVTPL		207	381	-	1
Net (gain)/ losses from financial instruments measured at FVTOCI		(2)	(111)	-	-
(Gains)/ losses from investing activities		(29)	(401)	(53)	(53)
Accrued interest from investing and financing activities		102	71	69	69
Cash flows from operating activities before changes in operating assets and liabilities		2,048	1,742	104	104
Changes in operating assets and liabilities:					
Net (increase)/ decrease in cash and balances with Central Banks		(27)	(568)	-	-
Net (increase)/ decrease in financial instruments measured at FVTPL		(453)	403	-	-
Net (increase)/ decrease in financial assets mandatorily measured at FVTPL		24	12	-	7
Net (increase)/ decrease in debt securities at amortised cost		(650)	(2,328)	(37)	(32)
Net (increase)/ decrease in amounts due from banks		(28)	655	-	-
Net (increase)/ decrease in loans and advances to customers		(651)	(1,773)	-	-
Net (increase)/ decrease in other assets		208	133	9	2
Net increase/ (decrease) in amounts due to banks		(1,188)	(8,016)	-	-
Net increase/ (decrease) in amounts due to customers		1,193	2,938	-	-
Net increase/ (decrease) in other liabilities		318	(92)	5	-
Net cash flow from operating activities before income tax payment		795	(6,893)	81	81
Income tax paid		(17)	(10)	-	-
Net cash inflow / (outflow) from operating activities		**779**	**(6,903)**	**81**	**81**
Cash flows from investing activities					
Purchases of property and equipment		(76)	(98)	-	-
Proceeds from disposal of property and equipment and intangible assets		48	20	-	-
Purchases of intangible assets	26	(92)	(71)	-	-
Proceeds from disposal of assets held for sale other than loans and advances to customers		3	300	-	-
Purchases of financial assets at FVTOCI		(2,238)	(2,001)	-	-
Proceeds from disposal of financial assets at FVTOCI		1,774	2,656	-	-
Interest received on financial assets at FVTOCI		13	36	-	-
Acquisition of subsidiaries, net of cash and cash equivalents		(116)	(102)	(11)	(19)
Proceeds from disposal of subsidiaries, net of cash and cash equivalents disposed		34	7	-	-
Acquisition, establishment and participation in share capital increases of associates and joint ventures		(121)	-	-	-
Proceeds from disposal of associates and share capital decreases		54	8	-	-
Dividends received		19	8	53	53
Net cash inflow/ (outflow) from investing activities		**(698)**	**763**	**42**	**33**
Cash flows from financing activities					
Repayment of AT 1 capital instrument		(53)	(53)	(53)	(53)
Proceeds from issue of debt securities in issue and other borrowed funds		992	346	-	-
Repayment of debt securities in issue and other borrowed funds		-	(470)	-	-
Interest paid on debt securities in issue and other borrowed funds		(91)	(91)	(66)	(66)
Proceeds from sales of treasury shares		65	26	-	-
Purchases of treasury shares		(83)	(25)	(15)	-
Repayments of lease liabilities		(44)	(26)	-	-
Net cash inflow / (outflow) from financing activities		**786**	**(292)**	**(134)**	**(119)**
Effect of exchange rate changes on cash and cash equivalents		(26)	(35)	-	-
Net increase / (decrease) in cash and cash equivalents (A)		**841**	**(6,467)**	**(11)**	**(5)**
Cash and cash equivalents at the beginning of the year (B)		**9,401**	**15,868**	**45**	**50**
Cash and cash equivalents at the end of the year (A) + (B)	45	**10,242**	**9,401**	**34**	**45**

1 General information

Piraeus Financial Holdings S.A. (hereinafter the "Company"), registered under General Commercial Registry ("GEMI") number 225501000, was established in 1916 and its shares are registered and have been listed on the Main Market of the Athens Stock Exchange since 1918.

The Company operates in the form of a Société Anonyme, in accordance with the provisions of Greek Law 4548/2018, as currently in force, as well as the applicable regulatory framework on the operation of listed companies. In addition, as a financial holding company, it is subject to the relevant provisions of Law 4261/2014 as amended and in force and it is directly supervised by the European Central Bank ("ECB").

According to its codified articles of association, the Company's business scope includes, inter alia, activities related to directly and indirectly participating in domestic and/ or foreign legal entities and other entities, undertakings and companies established or to be established, of any form and purpose, undertaking or carrying on insurance intermediation and insurance distribution activities on a retainer, pursuant to the provisions of Greek Law 4583/2018, as in force from time to time, for and on behalf of one or several insurance undertakings (insurance agent), providing insurance advisory services to third parties and to the subsidiaries of the Company, as well as researching, studying and analysing insurance related issues. The Company also provides financial advisory services including planning, development, research, reorganization or resolution, assessment, business strategy, acquisitions, sales, mergers and restructuring of companies, as well as advisory services on private insurance issues.

The Company is incorporated and domiciled in Greece. The address of its registered office is 4 Amerikis str., 105 64, Athens. The duration of the Company lapses on 6 July 2099. The Company and its subsidiaries (hereinafter the "Group") provide services in Southeastern and Western Europe. The key subsidiary of the Group is the credit institution under the name "Piraeus Bank Société Anonyme" (hereinafter the "Bank") which is headquartered in Athens and generates circa 90% of the Group's revenues offering a full range of financial products and services in Greece. As of 31 December 2023, the headcount of the Group is 8,087 full time equivalents ("FTEs"), of which 34 FTEs refer to operations that are planned to be disposed.

Apart from the ATHEX General Index, the Company is a constituent of other major indices as well, such as FTSE/ATHEX (Large Cap, Banks, ESG Index), FTSE (Emerging Markets, Med 100), MSCI (Emerging Markets, Greece), Stoxx (All Europe TMI, Emerging Markets 1500), S&P (Global, Greece BMI), Vanguard Total International Stock Index Fund, FTSE4Good, Bloomberg Gender Equality, Solactive (ISS ESG EM Net Zero Pathway Index, ISS EM Carbon Reduction & Climate Improvers index), Carbon Disclosure Project ("CDP") and Science Based Targets initiative ("SBTi").

The Board of Directors ("BoD") of the Company which approved, on 27 February 2024, these separate and consolidated financial statements of Piraeus Financial Holdings S.A. (the Company and the Group) for the year ended 31 December 2023 (the ''Annual Financial Statements") and authorized for issue, consists of the following members:

George P. Handjinicolaou	Chairman of the BoD, Non-Executive Member
Karel G. De Boeck	Vice-Chairman of the BoD, Independent Non-Executive Member
Christos I. Megalou	Managing Director & Chief Executive Officer ("CEO"), Executive BoD Member
Vasileios D. Koutentakis	Executive BoD Member
Venetia G. Kontogouris	Independent Non-Executive BoD Member
Enrico Tommaso C. Cucchiani	Independent Non-Executive BoD Member
David R. Hexter	Independent Non-Executive BoD Member
Solomon A. Berahas	Independent Non-Executive BoD Member
Andrew D. Panzures	Independent Non-Executive BoD Member
Anne J. Weatherston	Independent Non-Executive BoD Member
Maria I. Semedalas	Independent Non-Executive BoD Member
Alexander Z. Blades	Non-Executive BoD Member
Periklis N. Dontas	Non-Executive BoD Member, Hellenic Financial Stability Fund ("HFSF") Representative under Law 3864/2010.

According to the Company's articles of association and the current regulatory framework, the members of the Company's BoD are elected by the General Meeting ("GM") of its shareholders and may be re-elected. The term of the members of the BoD may not exceed three (3) years and may be extended until the first ordinary GM convened after such term has elapsed. Pursuant to Greek Law 3864/2010, a representative of the HFSF participates in the BoD. If a member of the BoD is replaced, then according to the Law, the respective replacement applies solely to the remaining term of the member being replaced. Pursuant to the Annual General Shareholders' Meeting Resolution on 27 June 2023, the term of the current BoD expires on 27 June 2026.

The Annual Financial Report, in compliance with the European Single Electronic Format ("ESEF"), is available on the web site of Piraeus Financial Holdings S.A. at Financial Statements & Other Information | Piraeus Financial Holdings (piraeusholdings.gr)

2 Basis of preparation and significant accounting policies

2.1 Basis of preparation

The Annual Financial Statements have been prepared in accordance with International Financial Reporting Standards

("IFRSs"), as endorsed by the European Union (the "EU") at the time of preparing these financial statements. The amounts are stated in Euro, rounded to the nearest million (unless otherwise stated) for ease of presentation. Any differences between the amounts presented in the primary financial statements and the relevant amounts presented in the accompanying notes, are due to rounding. Where necessary, the comparative figures have been reclassified (refer to Note 49) to conform to changes in current period's presentation.

The Annual Financial Statements have been prepared under the historical cost convention, except for financial assets and financial liabilities measured at FVTPL or at FVTOCI, as presented in the statement of financial position and the relevant notes, derivative financial instruments and investment property, which have been measured at fair value.

The preparation of financial statements in conformity with IFRSs, requires the use of critical accounting estimates and judgements that affect the reported amounts of assets and liabilities, the disclosure of contingent assets and liabilities as at the date of the financial statements and the reported amounts of revenues and expenses during the reporting period. The areas where critical judgements and estimates are significant to the Annual Financial Statements, are disclosed in Note 3.

2.2 Going concern

Conclusion

Management has made an assessment on the Group's ability to continue as a going concern. Management's assessment considered the Group's principal business risks deriving mainly from the macroeconomic environment in combination with the Group's strategy, its liquidity and capital position. The following were taken into consideration:

a) the resilient economic growth in 2023, and the prospects for a positive rate of growth of Gross Domestic Product ("GDP") in the medium term, which is expected to remain above the euro area average, mainly driven by the implementation of the National Recovery and Resilience Plan ("RRP") and the inflow of private investments, the decelerating level of inflation mainly as a result of the dropping energy prices, and the dynamic contribution of tourism in the current account balance;

b) the recovery of sovereign credit rating to investment grade status after more than a decade by three (3) major rating agencies, namely S&P, Fitch and DBRS, which reflects on the prudent fiscal policies and the implementation of reforms including among others the restructuring of the banking sector;

c) the Group's effective liquidity risk management, leading to a robust liquidity position as evident by the Liquidity Coverage Ratio ("LCR") as at 31 December 2023, as well as Management's assessment of the impact of stress test scenarios, within the Internal Capital Adequacy Assessment Process ("ICAAP") and Internal Liquidity Adequacy Assessment Process ("ILAAP") framework, on the Group's liquidity position and on mandatory liquidity ratios;

d) the capital adequacy of the Group, which exceeded the Overall Capital Requirements ("OCR")- plus Pillar II Guidance ("P2G") - and the Minimum Requirements for own funds and Eligible Liabilities ("MREL") ratio of Piraeus Group, which exceeded the January 2024 Intermediate Guidance Target of 21.88%, as at 31 December 2023, as a result of the successful issuances of two (2) senior preferred bonds in July and in November 2023 and the current year profitability. It is estimated that for the next 12 months the Group's capital adequacy ratios and the MREL ratio will remain higher than the required minimum regulatory levels;

e) the geopolitical developments, which pose significant downside risks, with the Middle East and particularly the Russia / Ukraine conflicts, due to the Group's operations in Ukraine, which comprise a financial institution, namely JSC Piraeus Bank ICB, and investments in real estate assets which represent approximately 0.2% of the total consolidated assets of the Company as at 31 December 2023;

f) the net profit attributable to the equity holders of the parent Company amounted to € 788 million and the Non-Performing Exposures ("NPE") ratio dropping to 3.5% as at 31 December 2023 from 6.8% as at 31 December 2022. NPE (cash) coverage increased to 62% at year-end 2023 versus 55% a year ago.

Based on the analysis performed, Management has concluded that there are no material uncertainties which would cast significant doubt over the ability of the Group to continue to operate as a going concern for a period of 12 months from the date of approval of the Annual Financial Statements. For this reason, the Group and the Company continue to adopt the going concern basis of accounting for preparing the financial statements.

Macroeconomic environment

In 2023, the Greek economy remained on a growth trajectory, despite the uncertainty that prevailed in the international environment and the macroeconomic impact of monetary policy in the Eurozone. In the first nine months of 2023, real GDP increased by 2.2% on an annual seasonally adjusted basis, a rate that although slower than the corresponding 2022 level, remains higher than the Eurozone average (0.6%). Domestic demand and exports contributed positively to GDP growth. In nominal terms GDP increased by 7.5% year-on-year ("YoY") in the first nine months of 2023, following a 13.8% annual increase in 2022. In the labor market, based on seasonally adjusted data, employment increased by 1.5% in 2023 on an annual basis and the unemployment rate decreased to 10.6%, compared to 12.4% in 2022. The inflationary pressures, which were a key feature of 2022 at international and domestic levels, showed a clear trend of de-escalation. In 2023 national inflation was limited to 3.5% YoY, from 9.6% in 2022, mainly due to the lower energy prices. Average Harmonized Index of Consumer Prices ("HICP") for 2023, increased by 4.2% on an annual basis, from 9.3% in 2022.

With regard to the country's credit rating, its gradual upgrade resulted in the recovery of the investment grade for the first time since 2010. More specifically, on 1 December 2023, the rating agency Fitch Ratings upgraded Greece's credit rating to investment grade "BBB-" from "BB+" with a stable outlook. On 20 October 2023, the rating agency S&P Global upgraded Greece's credit rating to investment grade "BBB-" from "BB+" with a stable outlook. Earlier on 8 September 2023, the rating agency DBRS Morningstar upgraded Greece to investment grade, "BBB (low)" from "BB" with a stable outlook and on 4 August 2023, the rating agency Scope Ratings upgraded Greece's long-term credit ratings to investment grade "BBB-" with a stable outlook. Moody's upgraded Greece's credit rating by two (2) notches to "Ba1" from "Ba3" with a stable outlook, on 15 September 2023, one notch below investment grade. According to the latest evaluations, Greece has secured the investment grade from four (4) rating agencies out of five (5), recognized by the ECB (Moody's, S&P, Fitch Ratings, DBRS Morningstar and Scope Ratings).

According to European Commission's ("EC") forecasts, economic activity in Greece is expected to grow by 2.4% in 2023, and 2.3% in 2024, before gradually moderating to 2.2% in 2025. The expansion of the Greek economy will continue to be supported by the execution of the Greece 2.0 RRP and a resilient labor market. The unemployment rate is anticipated to gradually decline, and inflationary pressures to be limited. Employment growth is set to continue, albeit at a slower pace. The unemployment rate is forecasted to fall to 9.9% by 2025, its lowest level in over a decade. Consumer prices based on HICP, are expected to increase by 2.8% and 2.1% in 2024 and 2025 respectively. The general government deficit is set to decrease further on the back of muted expenditure growth and higher revenues. The primary balance is expected to record

a surplus of 1.1% of GDP in 2023, up from 0.1% in 2022, reaching 2.5% of GDP in 2024. Along with solid nominal GDP growth, this is set to support the decline of the high public debt-to-GDP ratio.

The development prospects of the Greek economy depend to a significant extent on the utilization of European funds for the implementation of investment plans and the stimulation of entrepreneurship. The Recovery and Resilience Fund ("RRF"), both in terms of grants and private sector investments through the loan facility, is a key factor from a sustainable development perspective. On 8 December 2023, the Economic and Financial Affairs Council ("ECOFIN") approved the amended RRP of Greece, which includes capital for REPowerEU amounting to € 795 million, as well as an additional € 5 billion that will be added to the existing loan program. The revised plan amounts to € 36 billion (from € 30.5 billion of European funding in the original plan), with € 18 billion RRF grants and € 18 billion RRF loans. The EC, under RRF has already disbursed to Greece € 17.4 billion until January 2024. Overall, it is estimated that by 2027 the country's funding from EU programs (RRF, National Strategic Reference Framework, "NSRF", Common Agricultural Policy, "CAP") will exceed € 76 billion.

In the medium term, the Greek economy is expected to enhance its resilience, despite the challenging and unstable global environment, building on credible fiscal policy, reform orientation, productive investments and extroversion. Increasing investments, implementing the RRP and maintaining the momentum of reforms, can ensure continued sustainable growth in the long term.

However, there are risk factors that could negatively affect developments in the Greek economy and its prospects. Any worsening of the geopolitical crisis in Ukraine and the Middle East increases the risk of disruptions in energy supply with a possible impact on both energy prices and overall price levels as a whole. Slow growth in Europe also poses risks to the country's export performance and the continued recovery of tourism services. Additional risks for the prospects of the Greek economy are the maintenance of the tighter monetary policy that can burden economic activity and weaken the stimulation of investments as well as delays in the implementation of public and private projects and in meeting the RRF schedule. Finally, environmental challenges and extreme weather events are a growing risk to the economy. These risks could affect the Greek banking system and the Bank in particular. Higher energy prices may cause inflation, which reduces consumer spending and corporate earnings, making it harder for some people and businesses to repay their loans, resulting in lower asset quality and more NPE inflows. Weaker economic activity and possible hold-ups in the RRF funds distribution, could affect credit growth and Piraeus Group's revenue sources, reducing profitability and capital creation. Lastly, extreme weather events such as the fires and floods that occurred in 2023 in Greece, could damage the repayment capacity of the affected borrowers from those extreme weather events and the value of collaterals in those areas.

Addressing Climate Change

The Group recognizes that climate change has an impact on the economy, the society, and the environment. Therefore, the Group has developed a climate strategy based on four pillars:

a. Reach net zero in own operations: the Bank's climate action starts by managing its own environmental footprint through its operations. The Bank monitors and manages its environmental impact closely, investing in operational efficiency solutions and sourcing 100% renewable energy for the buildings it has management control over.

b. Steer portfolio towards net zero by 2050 or sooner: As a Bank, Piraeus makes the most positive impact on climate action through its financing to companies and individuals. The Bank focuses on climate sensitive sectors, and measures whether the Bank's lending in each sector is aligning with the Group's climate ambition and targets.

c. Support and advise clients in line with a carbon neutral economy: to support Bank's clients in their climate transition the Bank focuses on accelerating the green economy, financing the energy transition, and pioneering financing for new technologies and business models. Traditionally such financing has focused more on corporate clients, but the Bank is increasingly offering such solutions to Small – Medium Entities ("SMEs"), and retail customers in Greece.
d. Manage Climate and Environmental ("C&E") risks: the Bank is progressively integrating the risks associated with climate change in the Group's Risk Management Framework ("RMF"). The Bank approach continues to develop as methodologies advance and regulatory guidance evolves.

The Group actively participates in the ECB supervisory dialogue and with a dedicated program aims to fully incorporate C&E risks in its strategies, policies, processes, and RMF by end of 2024.

Refer to Note 4.19 for further details on the Group's Financial Risk Management.

Liquidity

As at 31 December 2023, Group's deposits stood at € 59.6 billion, corresponding to a rise of 2.0% compared to 31 December 2022.

In response to inflationary pressures, the ECB's Governing Council continued to raise the key ECB interest rates in 2023 reaching 4.50% for the main refinancing rate and 4.00% for the Deposit Facility Rate ("DFR"), a development which increased the cost of funding. In addition, during the third quarter of 2023, the Fed and ECB cycle of rate hikes ended, and the first cuts are expected this year.

As at 31 December 2023, the Group's funding under Targeted Longer Term Refinancing Operations ("TLTRO") auctions amounted to € 3.5 billion, reduced by € 2.0 billion compared to 31 December 2022. In addition, funding from the interbank market increased at € 0.4 billion as at 31 December 2023, compared to € 0.3 billion as at 31 December 2022.

As regards the maturity profile of the aforementioned TLTRO funding, € 2.5 billion mature in June 2024 and the remaining € 1.0 billion matures in December 2024. The Group has the liquidity to repay the upcoming TLTRO maturities due to the ample position of € 10.6 billion in cash and balances with central banks.

The Group's balance sheet deleveraging, coupled with the moderately growing customer deposit base, alongside the active markets access through Tier 2 issuances, Additional Tier 1 ("AT1") Capital instrument, and Senior Preferred Bond issuances improved the Group's funding mix, and increased its high-quality liquid assets ("HQLA") buffer. As at 31 December 2023, the Group's LCR stood at 241% (thus, more than double than the regulatory requirement of 100%).

Based on the Group's most recent ILAAP assessment, both the LCR and Net Stable Funding Ratio ("NSFR") ratios are expected to remain above minimum regulatory thresholds throughout the next 12 months.

Capital adequacy

As at 31 December 2023, the Group's total equity amounted to € 7.3 billion, compared to € 6.6 billion as at 31 December 2022, as a result of the recovered profitability of the Group. Hence, the Group's Basel III Common Equity Tier 1 ("CET1") as

at 31 December 2023 stood at 13.2% (31 December 2022: 13.04%) and the total capital ratio ("TCR") stood at 17.7% (31 December 2022: 17.8%).

The amount of deferred tax assets ("DTA") included in the Group's regulatory capital in accordance with the provisions of Greek Laws 4172/2013, 4302/2014, 4340/2015, stood at € 3.3 billion as at 31 December 2023, compared to € 3.5 billion as of 31 December 2022.

The ECB, through the Supervisory Review and Evaluation Process ("SREP") decision on 30 November 2023, informed the Management on the revised OCR levels, effective since 1 January 2024. The Group has to maintain, on a consolidated basis, a Total SREP Capital Requirement ("TSCR") of 11% and an OCR of 14.57% (OCR plus P2G at 16.32%), which includes: (a) the minimum Pillar I total capital requirements of 8.00% as per article 92(1) of Regulation 575/2013/EU; (b) the additional Pillar II capital requirement of 3.00% as per article 16(2) of Regulation 1024/2013/EU; (c) the fully loaded capital conservation buffer of 2.50% under Greek Law 4261/2014, (d) the transitional Other Systemically Important Institutions ("O-SII") capital buffer of 1.00% under Greek Law 4261/2014 and (e) the institution-specific Countercyclical Capital Buffer ("CCyB") under Greek Law 4261/2014 (as amended by Greek Law 4799/2021) of 0.07% for the year ended 31 December 2023.

Refer to Note 4.16 for further details on the Group's capital adequacy.

2.3 Adoption of International Financial Reporting Standards

The following amendments to existing IFRSs, effective from 1 January 2023, have been issued by the International Accounting Standards Board ("IASB") and endorsed by the EU as of the date the Annual Financial Statements were issued.

Amendments to Accounting Standards

IAS 1 (Amendment) "Presentation of Financial Statements" and IFRS Practice Statement 2: Disclosure of Accounting Policies. The Group has adopted the amendments to International Accounting Standard ("IAS") 1 for the first time in the current year. The amendments change the requirements in IAS 1 with regard to disclosure of accounting policies. The amendments replace all instances of the term "significant accounting policies" with "material accounting policy information" and add guidance on how entities apply the concept of materiality in making decisions about accounting policy disclosures.

The amendments have had an impact on the Group's disclosures of accounting policies, but not on the measurement, recognition or presentation of any items in the Group's and the Company's financial statements.

IAS 8 (Amendment) "Accounting Policies, Changes in Accounting Estimates and Errors: Definition of Accounting Estimates". The amendment introduces the definition of accounting estimates and includes other amendments to IAS 8 to help entities distinguish changes in accounting estimates from changes in accounting policies.

The amendment had no impact on the Group's and the Company's financial statements.

IAS 12 (Amendment) "Deferred Tax Related to Assets and Liabilities Arising from a Single Transaction". The amendment is applied to transactions that occur on or after the beginning of the earliest comparative period presented. It also, at the beginning of the earliest comparative period presented, recognizes deferred tax for all temporary differences related to leases and decommissioning obligations and recognizes the cumulative effect of initially applying the amendment as an adjustment to the opening balance of retained earnings (or other component of equity, as appropriate) at that date.

The amendment had no impact on the Group's and the Company's financial statements.

IAS 12 (Amendment) "International Tax Reform – Pillar Two Model Rules" The objective of the amendments is to introduce a mandatory temporary exception to the requirements in IAS 12 to recognise and disclose information about deferred tax assets and liabilities, arising from the Organisation for Economic Cooperation and Development's ("OECD") Pillar Two Model Rules. The amendments also introduce targeted disclosure requirements. The temporary exception is applicable immediately and retrospectively in accordance with IAS 8, whereas the targeted disclosure requirements are applicable for annual reporting periods beginning on or after 1 January 2023. Refer to Note 16 for further information.

The adoption of the amendment did not have any impact on the Group and the Company's annual financial statements, as Greece is expected to incorporate the related legislation in 2024. According to the initial assessment made by Management, no significant impact is expected by the Group.

Amendments to standards that have been issued by the IASB and have been endorsed by the EU, but they are not effective in 2023 nor have they been early adopted by the Group and the Company:

IAS 1 (Amendment) "Classification of Liabilities as Current or Non-current". The amendment aims to promote consistency in applying the requirements by helping companies determine whether, in the statement of financial position, debt and other liabilities with an uncertain settlement date should be classified as current (due or potentially due to be settled within one year) or non-current. Moreover, the amendment addresses issues regarding the presentation and disclosures of liabilities for which an entity's right to defer settlement for at least 12 months is subject to the entity complying with specified conditions (covenants) after the reporting period.

The Group and the Company have not early adopted the above amendments, however it is not expected any material impact on the Group and the Company's financial statements.

Amendments to standards that have been issued by the IASB but they have not yet been endorsed by the EU, and therefore they have not been adopted by the Group and the Company:

IAS 21 (Amendment) "Lack of exchangeability". The amendments specify when a currency is exchangeable into another currency and, consequently, when it is not and how an entity determines the exchange rate to apply when a currency is not exchangeable. Additionally, the amendment requires disclosure of information that enables users of financial statements to understand the impact of a currency not being exchangeable.

IAS 7, IFRS 7 (Amendment) "Supplier Finance Arrangements". The amendment aims to add disclosure information about supplier finance arrangements, such as terms and conditions, carrying amount of financial liabilities that are part of such arrangements, ranges of payment due dates and liquidity risk information.

2.4 Material accounting policies

2.4.1 Consolidation

The consolidated financial statements incorporate the financial statements of the Company and its subsidiaries (including structured entities), which are entities controlled by the Company. Control is achieved, if and only if, the Company has: a) power over the subsidiaries, b) exposure, or rights to variable returns from its involvement with the subsidiaries and c) the ability to use its power over the subsidiaries to affect its returns.

Income and expenses and other comprehensive income of subsidiaries acquired or disposed of during the year are included in the consolidated income statement and in the consolidated statement of comprehensive income, respectively, from the effective date of acquisition and up to the effective date of disposal, as appropriate. Profit/ (loss) for the period and total comprehensive income/ (expense) of subsidiaries are attributed to the owners of the Company and to the non-controlling interests, even if these result in the non-controlling interests are of a deficit balance.

When necessary, adjustments are made to the financial statements of subsidiaries to bring their accounting policies in line with those adopted by the Group. All intra-group transactions, balances, income and expenses are eliminated in full on consolidation.

2.4.2 Intragroup distributions in kind by the distributing entity

Distribution of non-cash financial assets to entities within the Group, which are scoped out from International Financial Reporting Interpretations Committee ("IFRIC") 17, is recognised directly in equity, at the book value of the assets being distributed. Specifically, in cases where the distribution refers to a previously unrecognised asset (e.g. because the derecognition requirements of IFRS 9 were not met prior to the distribution), the amount to be accounted for directly in equity is determined based on the carrying amount of the on balance sheet assets derecognised and the value of the rights and obligations created as a result of the distribution, in accordance with the recognition and measurement requirements of the applicable standards.

2.4.3 Non-controlling interests

Non-controlling interests are measured on the date of acquisition either at their proportionate interest of the recognised amounts of the acquirer's net assets or at fair value. The choice of measurement is made on a transaction-by-transaction basis. Subsequent to acquisition, the carrying amount of non-controlling interests is the amount of those interests at initial recognition plus the non-controlling interests' share of subsequent changes in equity. Total comprehensive income/ (expense) is attributed to non- controlling interests even if this results in the non-controlling interests having a deficit balance.

2.4.4 Loss of control over a subsidiary or a business

When the Group loses its control over a subsidiary or a business, the profit or loss on disposal is calculated as the difference between (i) the aggregate of the fair value of the consideration received and the fair value of any retained interest and (ii) the previous carrying amount of the assets (including goodwill) and liabilities of the subsidiary or business disposed of, and non-controlling interests, if any. For assets of the subsidiary or business carried at fair value with the related cumulative gain or loss recognised in other comprehensive income, the amounts previously recognised in other comprehensive income are accounted for as if the Company had directly disposed of the relevant assets (i.e. reclassified to the income statement or transferred directly to retained earnings as specified by applicable IFRSs). The fair value of any investment retained in the former subsidiary at the date when control is lost is regarded as the fair value on initial recognition for subsequent accounting under IFRS 9 "Financial Instruments" or, when applicable, the cost on initial recognition of an investment in an associate or a jointly controlled entity.

The Group applies IFRS 10 on contributions of subsidiaries that meet the business definition, into associates. On this basis such contributions are measured at fair value and any resulting gain or loss arising from loss of control over the former subsidiary is recognised in the income statement.

2.4.5 Associates

Associates are all entities over which the Group has significant influence, but not a controlling interest. Significant influence is generally presumed when the Group holds, directly or indirectly, more than 20% of the voting rights, unless it can be clearly demonstrated that this is not the case. The existence and effect of potential voting rights that are currently exercisable or convertible are considered in assessing whether the Group has significant influence.

Investments in associates are accounted for by applying the equity method of accounting. Under the equity method of accounting, the investment is initially recognised at cost. Goodwill arising on the acquisition of an associate is included in the carrying amount of the investment (net of any accumulated impairment loss). The carrying amount of the investment is increased or decreased by the proportionate share of the associate's post-acquisition profits or losses (recognised in the Group's consolidated income statement) and movements in reserves (recognised in reserves), based on their most recent available financial information at each reporting period. Dividends received from the associate during the year reduce the carrying value of the investment. Unrealised gains and losses on transactions between the Group and its associates are eliminated to the extent of the Group's interest in the associate. Where necessary, the associate's financial statements used in applying the equity method are adjusted to ensure consistency with the accounting policies adopted by the Group.

2.4.6 Joint ventures

A joint venture is a joint arrangement whereby the parties that have joint control of the arrangement have rights to the net assets of the arrangement. The Group recognises its interest in a joint venture as an investment and accounts for that investment using the equity method (refer to Note 2.4.5).

2.4.7 Investments in subsidiaries, associates and joint ventures in the separate financial statements

In the separate financial statements, investments in subsidiaries, associates and joint ventures are initially and subsequently measured at cost less impairment.

2.4.8 Impairment of investments in subsidiaries, associates and joint ventures

The Group and the Company assess at each reporting date whether there is any indication that an investment in a subsidiary, associate or joint venture may be impaired. If any such indication exists, the recoverable amount of the investment is estimated. When the carrying amount of an investment is higher than its estimated recoverable amount, it is written down to its recoverable amount.

The Group and the Company, in the context of the impairment assessment of the carrying amount of its investments in subsidiaries, associates or joint ventures, have defined both quantitative and qualitative triggers. The qualitative triggers are related to companies' financial changes, forward-looking developments in the countries and/ or economy sectors in which they operate, changes in management etc.

An impairment loss recognised in prior years can be reversed only if there has been a change in the assumptions used to determine the recoverable amount of the investment since the last time an impairment loss was recognised. In this case, the carrying amount of the investment is increased to its recoverable amount and this increase is the reversal of the impairment loss.

2.4.9 Foreign Currency translations

Functional and presentation currency

Items included in the financial statements of each of the Group's entities are measured using the currency that best reflects the economic substance of the underlying events and circumstances relevant to that entity ("the functional currency"). The Financial Statements are presented in millions of Euro (€), which is the functional currency of the Company.

Transactions and balances

Foreign currency transactions are translated into the functional currency using the exchange rates prevailing at the dates of the transactions. Foreign exchange gains and losses resulting from the settlement of such transactions and from the translation of monetary assets and liabilities denominated in foreign currencies are recognised in the income statement. Translation differences on non-monetary financial assets that are measured at fair value, are a component of the change in their fair value and are recognised in the income statement for equity securities held for trading, or in other comprehensive income for equity securities measured at FVTOCI. Non-monetary items that are measured in terms of historical cost in a foreign currency are translated using the exchange rate at the date of the transaction.

Group companies

When preparing the consolidated financial statements, assets and liabilities of foreign operations are translated at the exchange rates prevailing at the reporting date, while income and expense items are translated at average rates for the reporting period. Differences resulting from the use of closing and average exchange rates and from revaluing a foreign operation's opening net asset balance at closing rate, are recognised directly in foreign currency translation reserve within other comprehensive income. When a monetary item forms part of a reporting entity's net investment in a foreign operation and is denominated

in a currency other than the functional currency of either the reporting entity or the foreign operation, the exchange differences that arise in the separate financial statements of both companies are reclassified to other comprehensive income upon consolidation.

2.4.10 Interest income and expense

Interest income and expense for all interest-bearing financial instruments are recognised in "interest and similar income" and "interest expense and similar charges" in the income statement using the effective interest rate ("EIR") method. The EIR is the rate that discounts any estimated future payment or proceeds throughout the life of a financial instrument or until the next date of interest reset, in order for the present value of all future cash flows to be equal to the carrying amount of the financial instrument, including any fees or transaction costs incurred. Fees and direct costs relating to financial instruments measured at amortised cost are deferred and amortised to interest income or expense over the life of the instrument using the EIR method. Interest income and expense also includes interest on derivatives in economic hedge relationship, using the contractual interest rate.

In particular, the following apply for financial assets that are carried at amortised cost or FVTOCI:

- For those financial assets classified within Stage 1 or Stage 2, interest income is calculated by applying the EIR to the gross carrying amount of the financial asset.
- For those financial assets classified within Stage 3, interest income is calculated by applying the EIR to the amortised cost of the financial asset.

- For purchased or originated credit impaired ("POCI") financial assets, interest income is calculated similar to the Stage 3 financial assets and by applying the credit adjusted EIR of the financial asset. The credit adjusted EIR is the rate that, at initial recognition, discounts the estimated future cash flows (including credit losses) to the amortised cost of the POCI financial asset.

2.4.11 Fee and commission income and expense

The Group applies the following five (5) step model to all contracts with customers, except for lease arrangements and financial instruments:

- Identification of the contract(s) with the customer;
- Identification of the performance obligations in the contract;
- Determination of the transaction price;
- Allocation of the transaction price to the performance obligations; and
- Recognition of revenue when the performance obligation is satisfied.

As such, the Group recognises revenue when a performance obligation is satisfied, that is when control of the services or goods is transferred to the customer.

Fee and commission income/ expense is recognised over time when the relevant services are provided. For instance, fee income on asset management services and on real estate management services is recognised as the service is being rendered to the customer.

Loan syndication fees are recognised as income when the syndication has been completed and the Group retains no part on the loan package for itself or retains part at the same EIR with the other participants. Fees and commissions arising from negotiating or participating in the negotiation of a transaction for a third party, such as the arrangement of the acquisition of shares or other securities or the purchase/ sale of businesses, are recognised at a point in time when the transaction is completed. Fees on the execution of transactions (e.g. sales and brokerage commissions) are recognised upon completion of the transaction.

2.4.12 Share-based payments

The Group engages in equity settled share-based payment transactions with its employees on a discretionary basis, in accordance with the legal and regulatory framework.

The Group receives services from its employees in exchange for its own equity instruments (either shares or share options). The fair value of the Company's shares or share options granted is determined at the grant date and is recognized as a staff cost expense, with an equal increase in equity (i.e. no impact on the Group's net assets). For share-based payments contingent to service vesting conditions, the total expense is proportionally recognized over the vesting period. For non-market vesting conditions, the Group revises, when necessary, its estimate over the number of equity instruments that are expected to vest and the impact from the revision is recognized in profit or loss such that the cumulative expense reflects the revised estimate.

2.4.13 Dividend income

Dividend income is recognised when the right to receive payment is established.

2.4.14 Financial assets measured at FVTPL or mandatorily measured at FVTPL and loans and advances to customers mandatorily measured at FVTPL

Financial assets at FVTPL

Financial assets measured at FVTPL are all financial assets that do not meet the criteria of being measured at either amortised cost or FVTOCI. The changes in fair value of such financial assets are recognised in the income statement, in line "net gains/ (losses) from financial instruments measured at FVTPL".

Financial assets mandatorily at FVTPL

Equity instruments are measured mandatorily at FVTPL unless the Group and the Company irrevocably elect to measure at FVTOCI.

Debt securities measured mandatorily at FVTPL are exposures for which the contractual terms do not give rise on specified dates to cash flows that are solely payments of principal and interest ("SPPI") on the principal amount outstanding (SPPI Fail).

Loans and advances to customers mandatorily at FVTPL

Loans and advances to customers mandatorily at FVTPL are credit exposures for which the contractual terms do not give rise on specified dates to cash flows that are SPPI on the principal amount outstanding (SPPI Fail).

2.4.15 Sale and repurchase agreements and securities lending

Securities sold subject to repurchase agreements (repos) are reclassified in the statement of financial position as a pledged asset when the transferee has the right by contract to sell or repledge the collateral; the liability part of the agreement is included in amounts "due to banks" or "due to customers", as appropriate.

Securities purchased under agreements to resell (reverse repos) are recorded as "reverse repos with customers". "Reverse repos with customers" are carried at amortised cost using the EIR method.

The difference between sale and purchase price of the aforementioned securities is treated as interest and accrued over the life of the agreements using the EIR method.

Securities transferred to counterparties by the Group are presented in the statement of financial position as assets, in the case that the Group retains substantially all the risks and rewards of ownership of these securities.

Securities transferred to the Group by counterparties are not recognised in the statement of financial position, except in the case of counterparty's bankruptcy. If the securities are sold to a third party, the Group recognises the consideration received as well as the corresponding obligation to return the securities, at fair value in the statement of financial position.

2.4.16 Investment Securities measured at FVTOCI

Debt securities

A financial asset is measured at FVTOCI if both of the following conditions are met:

- The financial asset is held within a business model in which assets are managed to achieve a particular objective by both collecting contractual cash flows and selling financial assets ("Hold to Collect and Sell"); and
- The contractual terms of the asset give rise on specified dates to cash flows that are SPPI on the principal amount outstanding.

A Hold to Collect and Sell business model applies when the Group has made a decision that both collecting contractual cash flows and selling financial assets are integral to achieving the objective of the business model. In order to determine whether this is so, Management considers:

- If the business model will typically involve greater frequency and value of sales than a Hold to Collect ("HTC") model;
- If there are various objectives that may be consistent with this type of business model, such as to:
  - manage everyday liquidity needs;
  - maintain a particular interest yield profile; or
  - match the duration of the financial assets to the duration of the financial liabilities that those assets are funding.

The financial assets, after initial recognition, are measured at FVTOCI with any unrealised gains/ losses recorded directly in statement of comprehensive income, until these financial assets are derecognised. On the date of derecognition (upon the sale or collection of the asset), the cumulative fair value gains/ losses are reclassified from equity to profit or loss. The Group recognises in the income statement, interest income using the EIR method, Expected Credit Losses ("ECL"), foreign exchange gains and losses and any modification gains or losses.

Effectively from September 2022, debt securities issued by corporations and financial institutions are acquired by the Group solely for HTC purposes and therefore, measured at amortised cost unless they fail the SPPI test.

Equity instruments

At initial recognition, the Group and the Company may make an irrevocable election to present in other comprehensive income subsequent changes in the fair value of an investment in an equity instrument within the scope of IFRS 9 that is not held for trading. This election is made on a "one to one" basis.

Furthermore, equity instruments that are measured at FVTOCI are not subject to any impairment and any accumulated gains and losses recognised in other comprehensive income, which are not subsequently reclassified to the income statement, but may be reclassified within equity (to the retained earnings).

Only dividend income on such equity instruments is recognised in the income statement, unless the dividend clearly represents a recovery of part of the cost of the investment. Dividends are recognised in profit or loss only when:

a) the Group's and the Company's right to receive payment of the dividend is established;

b) it is probable that the economic benefits associated with the dividend will flow to the Group and the Company; and

c) the amount of the dividend can be measured reliably.

All other gains and losses (including those relating to foreign exchange) are recognised in other comprehensive income.

2.4.17 Derivative financial instruments

Derivative financial instruments mainly include currency and Interest Rate Swaps ("IRSs"), forward rate agreements, futures and options (both written and purchased). Derivatives are initially recognised in the statement of financial position at fair value on the date when the Group engages into the contract (i.e. trade date) and subsequently remeasured at FVTPL. Derivatives are classified as assets when their fair value is positive or as liabilities when their fair value is negative. Where the Group enters into derivative instruments used for trading purposes, realised and unrealised gains and losses are recognised in the income statement. Changes in the fair values of derivative financial instruments are included in line item "net gains/ (losses) from financial instruments measured at FVTPL". A derivative may be embedded in another financial instrument, known as "host contract". If the host is any contract other than a financial asset, the embedded derivative is bifurcated from its host and treated as a separate derivative, provided that its risks and economic characteristics are not closely related to those of the host contract, the embedded derivative actually meets the accounting definition of a derivative and the host contract is not carried at fair value with unrealised gains and losses reported in the income statement. If the host contract is a financial asset, the entire hybrid instrument is measured either at amortised cost or fair value.

2.4.18 Hedge accounting

The Group has elected to continue applying hedge accounting under IAS 39, as permitted by IFRS 9. A hedge accounting relationship is established by the Group, only if all of the following criteria are met:

- at inception of the hedge, there is formal designation and documentation of the hedging instrument, hedged item, hedging objective, strategy and relationship;
- the hedge is expected to be highly effective in offsetting the risk in the hedged item throughout the hedging period. A hedge is considered to be highly effective when the Group achieves offsetting changes in fair value between 80 percent and 125 percent for the risk being hedged; and
- the hedge is highly effective on an ongoing basis.

Fair value hedge

The Group applies fair value hedge ("FVH") accounting to mitigate the risk of interest rate changes. The Group designates FVH accounting relationships either on micro basis or portfolio basis by applying the carve-out version of IAS 39, as adopted by EU. In micro hedges the Group designates individual fixed rate assets or liabilities as hedged items, while in portfolio hedges the Group designates a portion of homogenous fixed rate assets or liabilities. Changes in the fair value of derivatives that are designated and qualify as hedging instruments in FVH are recorded in the income statement under "Net gains/(losses) from financial instruments measured at FVTPL", together with any changes in the fair value of the hedged asset or liability that are attributable to the hedged risk. In micro hedges, the carrying amount of the hedged item is adjusted with

the corresponding fair value changes attributable to the hedged risk, while in portfolio hedges, the said adjustment is presented separately in the statement of financial position.

If the hedge no longer meets the criteria for hedge accounting, the adjustment to the carrying amount of a hedged item, is amortised to profit or loss over the period to maturity. The unamortised adjustment to the carrying amount of a non-interest bearing hedged item is recognised immediately in the income statement.

2.4.19 Loans and advances to customers at amortised cost

Loans and advances to customers include financial assets measured at amortised cost for which both of the following conditions are met:

i. the financial asset is held within a business model whose objective is to hold financial assets in order to collect contractual cash flows; and

ii. the contractual terms of the financial asset give rise on specified dates to cash flows that are SPPI on the principal amount outstanding (SPPI pass).

Loans and advances to customers at amortised cost drawn down by the Group and the Company are initially recognised at fair value (plus any transaction costs) and measured subsequently at amortised cost using the EIR method. Interest on loans and advances to customers is included in the income statement and is reported within line item “interest and similar income”.

Debt instruments that are contractually linked instruments in the form of collateralized loan obligations (“CLOs”) are carried at amortised cost provided that: a) the instrument itself meets both conditions for amortised cost measurement, b) the underlying assets qualify for amortised cost accounting, and c) the exposure to credit risk inherent in the CLOs is equal or less than then exposure to credit risk of the underlying pool of financial instruments. Contractually linked instruments are presented within loans and advances to customers at amortised cost, if no active market exists for that asset at the time of purchase.

Senior notes held by the Group, which are issued under securitization of loans, are presented within loans and advances to customers, provided that both conditions for amortised cost measurement are met.

The Group and the Company recognise an ECL impairment on loans and advances to customers at amortised cost when it is estimated that they will not be in a position to receive all payments due, as defined by the contract of the loan. The amount of the ECL impairment on loans and advances to customers at amortised cost is the difference between all contractual cash flows that are due in accordance with the contract and all the cash flows that the entity expects to receive, discounted at the original EIR of the loan (or credit-adjusted EIR for POCI financial assets).

At each reporting date, an impairment loss equal to 12-month ECL (allocated to Stage 1) is recognised for all financial assets for which there is no significant increase in credit risk (“SICR”) since initial recognition. For financial assets:

a. that there is a SICR since their initial recognition (allocated to Stage 2);

b. that are credit impaired (allocated to Stage 3); and

c. that are POCI,

an impairment loss equal to lifetime ECL is recognised.

Protection fees payable by the Group to protection sellers in the context of synthetic securitizations are presented within line item "other credit-risk related expenses on loans and advances to customers at amortised cost".

Default Definition

The Group and the Company apply the European Banking Authority ("EBA") NPE definition. In accordance with the Group's and the Company's Impairment Policy, a financial asset is considered as credit impaired and is classified into Stage 3, when it is classified as NPE.

The Definition of Default ("DoD") is assessed:

- On a contract level for retail portfolio.
- On an obligor level for non-retail portfolios.

The determination of a SICR takes into account many different factors and varies per portfolio type. The main criteria considered in making this determination are the following:

- Primary criteria
  - significant increase in the probability of default ("PD") of the financial instrument at the reporting date, compared to the one calculated at the initial recognition date, based on certain absolute [300-650 basis points ("bps"), depending on the portfolio segment] or relative (200%) thresholds. The aforementioned thresholds are the same as last year.
- Secondary criteria
  - existence of forbearance;
  - behavioral flags (i.e. monitoring the maximum delinquency bucket for the last 12 months);
  - existence of default event over the last 12 months;
  - watch list.
- Backstop
  - the Group and the Company apply the IFRS 9 presumption that a SICR has occurred when the financial asset is more than 30 days-past-due and all such exposures are classified in Stage 2.
- Additional criteria due to high energy prices and inflation

As of 31 December 2023, additional criteria on SICR have been considered in order to capture retail exposures' vulnerability to high energy prices and inflation (refer to Note 3.2).

Key Impairment Modeling Concepts

ECL is a function of the PD, Exposure at Default ("EAD") and Loss Given Default ("LGD") and is estimated by incorporating forward-looking economic information and through the use of experienced credit judgement to reflect factors not captured in models.

The Group considers as individually significant, facilities to Corporate and Individual customers that satisfy all of the following criteria:

- The aggregate exposure at debtor level at the period end reporting date exceeds the amount of € 1 million or the equivalent in foreign currency.
- The exposures are classified as NPE.

The result of the individual assessment is further adjusted by incorporating the effect of macroeconomic scenarios, determined on the basis of the estimates of the collective projection models.

The collective impairment assessment is carried out on all loans classified in Stages 1 and 2, as well as Stage 3, provided that they have not been individually assessed. Loans and advances to customers at amortised cost are grouped on the basis of similar credit risk characteristics (i.e. arrears bucket, industry sector, business/ product segment, and other relevant factors). These characteristics are indicative of the debtors' ability to pay all amounts due according to the contractual terms of the assets being evaluated.

If, in a subsequent period, the amount of the impairment loss decreases and the decrease can be related objectively to an event occurring after the impairment was recognised (such as an improvement of the debtor's credit rating), the previously recognised impairment loss is reduced and the gain is recognised in the income statement.

Forborne loans are defined as exposures arising from loan agreements that have been subject to forbearance measures. The measures are considered as a concession of the Group and the Company to a borrower who is facing or is about to face financial difficulties in fulfilling its financial obligations. Forbearance may involve modification of contractual terms and conditions and/ or refinancing of debts.

Forborne loans are tested for impairment in accordance with the IFRS 9 Impairment Policy for loans and advances to customers at amortised cost, as described above.

2.4.20 Modification of financial assets

When the contractual cash flows of a financial asset are renegotiated or otherwise modified and the renegotiation or modification does not result in the derecognition of that financial asset in accordance with IFRS 9, the Group and the Company recalculate the gross carrying amount of the financial asset and recognise a "modification gain or loss" in the income statement. The gross carrying amount of the financial asset shall be recalculated as the present value of the renegotiated or modified contractual cash flows that are discounted at the financial asset's original EIR (or credit-adjusted EIR for POCI financial assets). Any costs or fees incurred adjust the carrying amount of the modified financial asset and are amortised over the remaining term of the modified financial asset.

2.4.21 Derecognition of financial assets

A financial asset is derecognised when:

- the contractual rights to the cash flows from the asset expire; or
- the Group and the Company transfer the financial asset and the transfer qualifies for derecognition.

The term “financial asset” is used to refer to either the whole, or a part, of a financial asset (or the whole or a part of a group of similar financial assets).

The contractual rights to the cash flows from that financial asset have expired when for example:

- a loan receivable is repaid;
- a purchased option expires unexercised.

The Group and the Company transfer a financial asset if, and only if, either:

- transfer the contractual rights to receive the cash flows of the financial asset; or
- retain the contractual rights to receive the cash flows of the financial asset, but assume a contractual obligation to pay the cash flows on to one or more recipients.

If substantially all the risks and rewards of ownership of the financial asset are transferred, the financial asset must be derecognised and any rights and obligations created or retained in the transfer must be recognised separately as assets or liabilities.

It is a business practice, to proceed with restructuring of debt instruments particularly but not always when debtors are in financial difficulties. When the restructuring results in a substantial modification to the terms of a loan due to financial distress of the debtor or the restructuring takes place solely on the basis of a commercial renegotiation, the loan is derecognised. For financial distress restructurings, the Group has defined derecognition criteria such as: change of debtor, change of currency denomination, introduction of a conversion to equity option to the modified contract and consolidation of contracts.

On derecognition of a financial asset in its entirety, the difference between:

- the carrying amount of the asset as at the date of the derecognition; and
- the consideration received (i.e. any new asset originated/received less any new liability assumed),

is recognised in the income statement as a “derecognition gain or loss”.

2.4.22 Derecognition of financial liabilities

A financial liability is derecognised when the obligation under the liability is discharged, cancelled or expired.

If an existing financial liability is replaced by another from the same lender on substantially different terms, or the terms of the existing liability are substantially modified, such an exchange or substantial modification is treated as a derecognition of the original liability and the recognition of a new liability, and the difference in the respective carrying amounts is recognised in the income statement.

2.4.23 Intangible assets

Software

Costs associated with the acquisition of software programs, which will probably generate economic benefits to the Group for more than one year, are recognised as intangible assets. Expenditure that enhances or extends the performance of computer software programmes beyond their original specifications or software upgrade expenses are added to the original cost of the software, as long as they can be measured reliably.

Subsequent to initial recognition, software is measured at cost less accumulated amortisation and accumulated impairment loss. Software is amortised on a straight-line basis and based on its useful life, which is from 2 to 11 years.

At the end of each reporting period, the Group reviews the carrying amounts of computer software to determine whether there is any indication of impairment, i.e. whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. Whenever the recoverable amount is less than the carrying amount, software is impaired to its recoverable amount.

Costs associated with maintaining the performance of the computer software programmes are recognised as an expense in the profit or loss as incurred.

Software is derecognised when:

(a) it is disposed; or

(b) when no future economic benefits are expected from use or disposal of the software.

The gain or loss on the disposal of software is defined as the difference between the net proceeds of the sale, if any, and the net book value of the software.

Other intangible assets

Other intangible assets are initially recognised at cost when it is expected that future economic benefits will be realised from their use. The cost of the intangible asset also includes every directly attributable cost which is required for the full implementation, production and asset's proper operation. Some examples of directly attributable costs are:

- The staff cost which is directly identified and attributed to the development of a particular intangible asset;
- Payments to outside vendors and collaborators, which are attributed to the intangible asset.

Subsequent to initial recognition, other intangible assets are measured at cost less accumulated amortisation and accumulated impairment loss. These assets are amortised in a period of 5-10 years, depending on the useful life of each asset, on a straight-line basis. The useful life of other intangible assets is reviewed by the Group annually.

At the end of each reporting period, the Group reviews the carrying amounts of other intangible assets to determine whether there is any indication of impairment i.e. whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. Whenever the recoverable amount is less than their carrying amount, other intangible assets are impaired to their recoverable amount.

Other intangible assets are derecognised when:

(a) they are disposed; or

(b) when no future economic benefits are expected from their use or disposal.

The gain or loss on disposal of the intangible asset is defined as the difference between the net proceeds of the sale, if any, and the net book value of the intangible asset.

2.4.24 Property and equipment

The Group holds property and equipment for the purpose of using them for its business activity or for administrative purposes. Property and equipment includes: land, own-use buildings, leasehold improvements, furniture and other equipment, right of use assets and vehicles.

Property and equipment are initially measured at cost, which includes all costs necessary to bring an asset into operating condition.

Property and equipment are subsequently measured at historical cost less accumulated depreciation and accumulated impairment loss. Historical cost includes expenditure that is directly attributable to the acquisition of the items. At the end of each reporting period, the Group reviews the carrying amounts of property and equipment to determine whether there is any indication of impairment, i.e. whenever events or changes in circumstances indicate that the carrying amount may not be recoverable. An asset's carrying amount is written down immediately to its recoverable amount if the asset's carrying amount is greater than its estimated recoverable amount. The recoverable amount is the higher of the asset's fair value less costs to sell and the value in use.

Subsequent costs are included in the asset's carrying amount or are recognised as a separate asset, as appropriate, only when it is probable that future economic benefits associated with the item will flow to the Group and the cost of the item can be measured reliably. All other repairs and maintenance are charged to the income statement during the financial period in which they incur.

Depreciation on property and equipment is calculated using the straight-line method based on the estimated useful lives and taking into account their residual values. The Group conducts an assessment of the estimate for the useful lives and the residual values of the property and equipment on an annual basis.

Depreciation of property and equipment begins when it is available for use and ceases when it is derecognised. In the case where the asset is idle or retired from active use, it continues to be depreciated until it has been fully depreciated. The useful lives per fixed asset category is as follows:

Computer hardware	3-5 years
Leasehold improvements	the shorter of useful life and lease term
Furniture and other equipment	5-10 years
Vehicles	6-9 years
Own-use buildings	25-40 years
Land	is not depreciated

Right of use assets are depreciated according to the asset category in which they belong.

An own-occupied property is derecognised and its carrying amount is written-off, according to the provisions of IAS 16, upon disposal or when no future economic benefits are expected to flow to the Group. Property may be disposed through sale or lease agreement (as lessor) or donation. The gain or loss on disposal of own-occupied property is defined as the difference between the sale price (less cost to sell) and the carrying value of the property as at the date of the disposal. Such gain or loss is recognised in the income statement.

2.4.25 Investment property

Property that is held for long-term rental yields or for capital appreciation is recognised as investment property in the Group's statement of financial position. Investment property includes freehold land, freehold buildings or parts of buildings, land and buildings held under leases.

A property interest that is held by the Group as a lessee is classified and accounted for as investment property if and only if the definition of investment property is met according to IFRS 16 "Leases".

Investment property is initially recognised at cost including related transaction costs.

After initial recognition, investment property is carried at fair value, as this is assessed by independent valuers. Fair value is based on active market prices or is adjusted, if necessary, for any difference in the nature, location and condition of the specific asset. Additionally, fair value measurement takes into account the Group's ability to generate economic benefits by using the asset in its highest and best use or by selling it to another market participant that would use the asset in its highest and best use.

The following valuation methods are used:

i. Comparative Method. According to this method, the valuation is based on the conclusions drawn from research and collection of information about other comparable properties.

ii. Income Approach. This method calculates the fair value of each property based on the capitalized value of the present lease.

iii. Cost Approach. This method calculates the fair value of each property based on the cost of replacement of each property or its exploitation.

iv. Residual Method. This method is based on the highest price a willing buyer would pay for a plot of land, in order to use it and then operate it.

The above mentioned valuation methods are used by independent valuers in the context of the fair valuation of investment property. The fair value of investment property that is not estimated by valuers, is determined using a methodology based on valuations that have been carried out.

Investment property that is being redeveloped for continuing use as investment property, or for which the market has become less active, continues to be measured at fair value. Fair values of investment properties reflect current lease income, as well as assumptions for future leases, taking into account current market conditions.

Pursuant to the provisions of IAS 40 "Investment Property", subsequent expenses are recognised in the carrying amount of the property only when it is probable that future economic benefits associated with the property will flow to the Group and its cost can be measured reliably. Improvement and maintenance costs are recognised in the income statement during the year in which they incur.

Changes in fair value are recognised in the income statement, during the year in which they incur.

If an investment property becomes own-occupied, it is reclassified as property and equipment and its fair value at the date of reclassification becomes its new deemed cost.

Property that is being constructed or developed for future use as investment property is classified as property and equipment and stated at cost until construction or development is complete, at which time it is reclassified and subsequently accounted for as investment property.

An investment property is derecognised from the statement of financial position upon disposal. An investment property may be disposed of through a sale or lease agreement. Gains or losses arising from investment property withdrawal or disposal is calculated as the difference between the net disposal proceeds and the carrying amount of the investment property on the date of the disposal. Such difference is recognised in the income statement.

2.4.26 Non-current assets held for sale ("HFS") and Discontinued operations

The Group classifies a non-current asset as HFS if its carrying amount will be recovered principally through a sale transaction rather than through continuing use. For this to be the case, the following conditions must be met:

a) the non-current asset must be available for immediate sale at its present condition;

b) its sale is highly probable;

c) the appropriate level of management is committed to a plan to sell;

d) an active programme to locate a buyer and complete the plan has been initiated;

e) the non-current asset must be actively marketed for sale at a price that is reasonable in relation to its current fair value; and

f) the sale of the non-current asset must qualify as a completed sale within 12 months from the date of classification in the HFS category.

Assets HFS are measured at the lower of their carrying amount and fair value less costs to sell. Assets HFS are not depreciated. Gains/ losses from sale of these assets are recognised in the income statement.

A discontinued operation of the Group, refers to a clearly distinguished business operation of the Group that either has been disposed of or is classified as HFS and:

- represents a separate major line of business or geographical area of operations;

- is part of a single coordinated plan to dispose of a separate major line of business or geographical area of operations; or
- is a subsidiary acquired exclusively with a view to resale.

Assets and liabilities from discontinued operations are presented in a separate line in the statement of financial position and are not offset. Similarly, profit or loss after tax from discontinued operations is also presented in separate line in the income statement.

2.4.27 Inventory property

Inventory property includes land and buildings acquired by the Group through auctions for the full or partial recovery of their receivables. These properties are included in “other assets” in the statement of financial position.

Inventory property includes land and buildings acquired that do not meet the requirements of IAS 40, as well as property owned by the Group’s subsidiaries that are sold in the context of their normal course of business. Inventory property is accounted for according to IAS 2 “Inventories” and are measured at the lower of cost and net realisable value. The cost of the inventory property is determined using the weighted average cost method. The net realisable value is the estimated selling price, less any expenses necessary to conclude the sale.

Inventory property is derecognised from the statement of financial position at its disposal. The gain/ loss resulting from the disposal of the inventory property is determined as the difference between the net realisable value and the carrying amount of the property. This difference is recognised in the income statement.

2.4.28 Emission rights

The Group acts as a broker – dealer with respect to emission rights and as such these rights are accounted for as inventories under IAS 2.

Emission rights are classified within line item "other assets" in the statement of financial position. The Group initially recognises such rights at fair value and subsequently measures them at fair value less cost to sell. Any changes in fair value less cost to sell are charged in the income statement during the financial period that the changes occur.

Emission rights are derecognised from the statement of financial position upon disposal.

2.4.29 Leases

A. The Group is the Lessee

The Group and the Company following the provisions of IFRS 16 at the inception of a contract, assess whether the contract is or contains a lease based on whether the Group and the Company have the right to control the use of an identified asset for a period of time in exchange for a consideration and obtain substantially all the economic benefits from the use of the asset.

At the commencement of the lease, the Group and the Company recognise a right-of-use asset (“RoU”) representing their right to use the underlying asset and a lease liability representing their obligation to make lease payments.

Under IFRS 16, the Group and the Company recognise RoU assets and lease liabilities for all their lease contracts that fulfil the definition of a lease.

The Group and the Company applying IFRS 16 for all leases:

a) recognise lease liabilities in the statement of financial position;

b) recognise RoU assets in the statement of financial position;

c) recognise depreciation of RoU assets and impairment based on IAS 36 “Impairment of Assets” in the income statement;

d) recognise finance cost on lease liabilities; and

e) the total amount of cash paid (principal and interest) is presented within financing activities in the cash flow statement.

The initial measurement at cost of the RoU assets comprises of:

a) the amount of the initial measurement of the lease liability;

b) any lease payments made less any lease incentives received;

c) any initial direct costs; and

d) an estimate of costs to be incurred in dismantling and removing the underlying asset, restoring the site on which it is located or restoring the underlying asset to the condition required by the terms and conditions of the lease.

Regarding the subsequent measurement and derecognition, the Group follows the accounting policies and accounting treatment applied for the other assets accounted for in the same asset category as the RoU.

The lease liabilities are initially measured at the present value of the future lease payments using the incremental borrowing rate. Subsequently, the lease liability is adjusted for interest and lease payments, as well as the impact of lease modifications (which does not constitute a different lease contract). The Group and the Company derecognise the lease liability from the statement of financial position when, and only when, it is extinguished—i.e. when the obligation specified in the contract is discharged or cancelled or expired.

For short-term leases (lease term of 12 months or less) and leases of low-value assets (below € 5,000), the Group and the Company recognise a lease expense on a straight-line basis over the lease term as permitted by IFRS 16.

B. The Group is the Lessor

Operating leases

In case that the Group is the lessor under an operating lease (with a third party), the leased assets are stated and carried in the statement of financial position like the other -non leased assets- of similar nature. Lease income of the Group is recognised over the term of the lease by using the straight-line method or other systemic method considered as appropriate.

Finance leases

In case that the Group is the lessor under a finance lease (with a third party), the present value of the lease payments is recognised as a receivable in the statement of financial position. The difference between the gross receivable and the present value of the receivable is recognised as unearned finance income. Rental receipts are separated and reduce the balance of the lease receivable.

2.4.30 Cash and cash equivalents

For the purpose of cash flow statement, cash and cash equivalents are defined as short-term, highly liquid investments that are readily convertible to known amounts of cash and which are subject to an insignificant risk of changes in value.

Cash and cash equivalents comprise balances with less than three (3) months maturity from the date of acquisition such as: cash, unrestricted cash and balances with Central Banks, trading securities and due from banks. Mandatory reserves with the

Central Bank are not available for everyday use by the Group and therefore, these are not included in balances with less than three (3) months maturity.

2.4.31 Provisions

A provision is recognised when:

a) the Group has a present legal or constructive obligation as a result of past events;

b) it is probable, that an outflow of resources will be required to settle the obligation; and

c) the amount of the obligation can be reliably estimated.

If any of the aforementioned conditions are not met, no provision is recognised.

Provisions are measured at the present value of the expenditures expected to be required to settle the obligation using a rate that reflects current market assessments of the time value of money and the risks specific to the obligation. The increase in the provision due to passage of time is recognised as expense in the income statement.

The amount recognised as a provision is the best estimate of the expenditure required to settle the present obligation as of the balance sheet date. The amount of the provisions raised is reassessed at each reporting date.

2.4.32 Financial guarantee contracts

Financial guarantee contracts are contracts that require the issuer to make specified payments to reimburse the holder for a loss that incurs because a specified debtor failed to make payments when due, in accordance with the terms of a debt instrument. Such financial guarantees are issued by banks, financial institutions and other bodies on behalf of customers to secure loans, overdrafts and other banking facilities.

Financial guarantees are initially recognised at fair value on the date the guarantee was given. Subsequent to initial recognition, the Group's liabilities under such guarantees are measured at the higher of: a) the initial measurement, less amortisation calculated to recognise in the income statement the accrued fee income earned on a straight-line basis over the life of the guarantee and b) the amount of the provision determined through the ECL calculation.

Any change in the liability relating to guarantees is recognised in the income statement, in the period in which it arises.

Any costs or fees paid by the Group or the Company, which are incremental and directly attributable transaction costs to obtain a freestanding financial guarantee or a debt asset with embedded financial guarantee features that is not measured at FVTPL, are capitalized and amortised over the life of the instrument with the EIR method.

2.4.33 Employee benefits

A. Funded post-employment benefit plans

The funded pension schemes operated by the Group and the Company are financed through payments to grouped insurance contracts or social security funds. The Group's and the Company's pension obligations relate both to defined contribution plans as well as defined benefit plans.

The Group and the Company pay fixed contributions to Social Security Funds (state owned administered pension funds), grouped insurance contracts, and have no legal or constructive obligation to pay additional contributions, if the Funds or the insurance companies do not hold sufficient assets to pay all employees the related benefits. Thus, these schemes are

classified as defined contribution plans. The regular employee's contributions constitute net periodic costs for the year in which they are due and as such, they are recognised in the income statement under "staff costs".

Defined benefit plans are pension plans that define the level of benefits to be provided, usually as a function of one or more factors such as years of service, age and compensation.

The liability recognised in the statement of financial position in respect of defined benefit pension plans is the present value of the obligation at the balance sheet date, less the fair value of the plan assets. The Group's and the Company's benefit policy for the indemnities aligns with the IFRIC decision of IAS 19 fact pattern concerning the method of attributing benefits to periods of service. According to the specific fact pattern, for those employees that are entitled to a lump sum benefit payment only upon retirement and that the retirement benefit depends on the length of employee service prior to retirement (capped to sixteen years of consecutive years of service), the retirement benefit is attributed to each of the last sixteen (16) years of service prior to the retirement age.

The defined benefit obligation is calculated annually by independent qualified actuaries using the projected unit credit method.

Actuarial gains and losses

Actuarial gains and losses are recognised directly to the equity of the Group and the Company, when they arise. These actuarial gains and losses are not recycled to the income statement.

Past service costs

Past service cost is the change in the present value of the defined benefit obligation resulting from a plan amendment or curtailment. This cost is recognised directly to the income statement, when the plan amendment or curtailment occurs.

B. Non-funded post-employment benefit plans

The Group and the Company provide non-funded defined benefit plans to its employees on retirement. The requirements for full vesting of benefit entitlements usually include the fulfilment of the conditions for normal retirement or the completion of a minimum service period.

The expected costs of these benefits are accounted for using a methodology similar to that for funded defined benefit pension plans. These obligations are valued annually by independent qualified actuaries.

2.4.34 Income tax

Income tax

Income tax benefit/ (expense) represents the sum of the tax currently payable and deferred tax.

Current tax

The tax currently payable is based on taxable profit for the year. Taxable profit differs from "profit / (loss) before tax" as reported in the income statement because of items of income or expense that are taxable or deductible in other years and items that are never taxable or deductible. The Company's current tax is calculated using tax rates that have been enacted or substantively enacted by the end of the reporting period.

Deferred tax

Deferred tax is recognised on temporary differences between the carrying amounts of assets and liabilities in the statement of financial position and the corresponding tax bases used in the computation of taxable profit, to the extent that is probable that taxable profits in the foreseeable future will be available against which such temporarily differences can be utilized.

Deferred tax assets and liabilities are not recognised if the temporary difference arises from the initial recognition (other than in a business combination) of assets and liabilities in a transaction that affects neither the taxable profit nor the accounting profit. In addition, deferred tax liabilities are not recognised if the temporary difference arises from the initial recognition of goodwill.

Deferred tax liabilities are recognised for taxable temporary differences associated with investments in subsidiaries and associates, and interests in joint ventures, except where the Group is able to control the reversal of the temporary difference and it is probable that the temporary difference will not reverse in the foreseeable future.

DTA arising from deductible temporary differences associated with such investments and interests, are only recognised to the extent that it is probable that there will be sufficient taxable profits against which to utilize the benefits of the temporary differences and they are expected to reverse in the foreseeable future.

The carrying amount of DTA is reviewed at the end of each reporting period and reduced to the extent that it is no longer probable that sufficient taxable profit will be available to allow all or part of the asset to be recovered.

Deferred tax liabilities and assets are measured at the tax rates that are expected to apply in the period in which the liability is settled or the asset realized, based on tax rates (and tax laws) that have been enacted or substantively enacted by the end of the reporting period.

The measurement of deferred tax liabilities and assets reflects the tax consequences that would follow from the manner in which the Group expects, at the end of the reporting period, to recover or settle the carrying amount of its assets and liabilities.

Current and deferred tax for the year

Current and deferred tax are recognised in profit or loss, except when they relate to items that are recognised in other comprehensive income or directly in equity, in which case, the current and deferred tax are also recognised in other comprehensive income or directly in equity, respectively.

2.4.35 Debt securities in issue, hybrid capital and other borrowed funds

The liabilities from the issuance of the debt securities, hybrid capital and other borrowed funds are recognised initially at fair value, net of incurred issuance costs.

After initial recognition, the debt securities and hybrid capital are subsequently accounted at amortised cost. Any difference between the proceeds (net of transaction costs) and the redemption value is recognised in the income statement over the period of the securities using the EIR method.

If the Group and the Company purchase their own debt securities issued, these are removed from the statement of financial position, and the difference between the carrying amount of the liability and the consideration paid is included in the income statement.

2.4.36 Other financial liabilities measured at amortised cost

Other financial liabilities such as deposits from banks and from customers are measured at fair value upon initial recognition and subsequently are measured at amortised cost.

2.4.37 Securitizations

The Group securitises financial assets. These assets are purchased by special purpose entities which in turn issue bonds to investors. The Group consolidates special purpose entities when it controls these entities or holds main part of their risks. In

such case, the bonds issued under the securitization of financial assets are presented in the statement of financial position at their amortised cost, unless the securities issued are owned by the Group.

2.4.38 Share capital

Incremental costs directly attributable to the issue of share capital decrease equity.

Dividends on ordinary shares are recognised as a liability during the period in which they are approved by the Annual GM of the Company's Shareholders ("AGM"). Interim dividends are recognised as a deduction in the Company's equity when approved by the BoD.

The cost of acquisition of treasury shares (including any attributable incremental transaction costs) is presented as a reduction in equity, until the treasury shares are cancelled or disposed of. The gains or losses from the sale of treasury shares are included directly in equity.

The number of treasury shares held by the Group does not reduce the number of shares issued. Treasury shares held by the Company are not eligible to receive cash dividends.

2.4.39 Related party transactions

Related parties of the Group and the Company include:

a) Members of the Company's BoD and Executive Committee, the Group Chief Internal Auditor, the Group Chief Compliance Officer and the CEOs of the significant subsidiaries, collectively "Key Management Personnel";

b) close family members of Key Management Personnel;

c) entities having transactions with the Company, that are controlled or jointly controlled by the Key Management Personnel and their close family members;

d) the Company's subsidiaries;

e) the Company's associates and their subsidiaries;

f) the Company's joint ventures and their subsidiaries; and

g) the HFSF which holds ordinary shares in the share capital of the Company and benefits from the special rights stated in article 10 of Law 3864/2010, as amended and in force.

2.4.40 Fiduciary activities

The Group provides custody services to third parties for a wide range of financial instruments. These services include safekeeping of securities, clearing and settlement of securities transactions in the Greek market and abroad, execution of corporate actions, income collection, etc., on behalf of individuals, companies and institutional investors. The Group receives fee income for providing these services. Trust assets are not assets of the Group and are not recognised in the financial statements. The aforementioned services give rise only to operational risk, as the Group does not guarantee these investments and therefore does not bear any credit risk.

2.4.41 Segment reporting

The CEO, supported by the Group Executive Committee members, is considered the Chief Operating Decision Maker for the purposes of identifying the Group's reportable segments. All inter-company transactions between business segments are

undertaken on an arm's length basis and inter-segment transactions and balances are eliminated within each relevant segment.

2.4.42 Offsetting financial instruments

Financial assets and financial liabilities are offset and the net amount is presented in the statement of financial position when, and only when, the Group has a legally enforceable right to set off the recognised amounts and intends either to settle on a net basis or to realise the asset and settle the liability simultaneously.

3 Critical accounting judgements and key sources of estimation uncertainty

In the application of the Group's accounting policies, which are described in Note 2, Management has made judgements and estimates that affect the carrying amount of assets, liabilities, income and expenses. The estimates and associated assumptions are based on historical experience and other factors that are considered relevant and are reviewed on an ongoing basis. Changes to accounting estimates are recognised in the period in which the estimate is revised, if the revision affects only that period. Actual results may differ from these estimates. Judgements and estimates that may result in an adjustment in the figures described above, are presented below. The Group believes that the judgements, estimates and assumptions used in the preparation of the Annual Financial Statements are appropriate.

3.1 Critical judgements in applying the Group's accounting policies

The following are the critical judgements, apart from those involving estimations (which are referred separately below), that Management has made in the process of applying the Group's accounting policies and that have the most significant effect on the amounts recognized in the Annual Financial Statements.

Significant increase in credit risk (SICR): The Group assesses whether a SICR has occurred since initial recognition of a financial asset subject to ECL allowance, based on qualitative and quantitative criteria that include significant Management judgement. Refer to Notes 3.2 and 4.2 for further information on the criteria applied.

Segmentation of financial assets with similar credit risk characteristics: The Group segments exposures on the basis of similar credit risk characteristics for the purposes of assessing both SICR and measuring ECL allowance on a collective basis. Exposures are grouped based on their type and credit risk rating or score. The different segments aim to capture differences in PDs, as well as recovery rates in the event of default. The grouping of exposures is reviewed on a quarterly basis in order to ensure that the groups remain homogeneous in terms of their response to the identified similar credit risk characteristics. As far as SICR is concerned, the Group considers the date of initial recognition, as well as remaining maturity for each individual exposure.

Selection and calibration of the ECL models: The Group uses various models in estimating the ECL allowance. Judgement is applied in identifying the most appropriate model for each type of asset, as well as for determining the assumptions used in these models. The complexity of the models, as well as dependency to other model-based inputs, are high therefore any changes in inputs and data (e.g. internal credit ratings, behavioral scores etc.), as well as new or revised models, may materially affect the ECL allowance.

Valuation of investment and inventory properties: The carrying amount of investment property and the net realizable value of inventory property are measured at fair value. Fair value is estimated on an annual basis, by independent professional

appraisers for the entirety of individually significant and a sample of non-individually significant properties. The Bank defines a property as individually significant, if its carrying amount exceeds € 1 million. The total carrying amount of the individually significant properties for the Group as of 31 December 2023 was € 1.8 billion. The fair value of properties not assessed by independent appraisers, is determined using extrapolation techniques. The total carrying amount of investment and inventory properties not individually valued by independent appraisers for the Group as of 31 December 2023 is € 0.3 billion and € 0.7 billion, respectively. Had a different threshold been applied for defining individually significant properties, or a different extrapolation technique on non-individually significant properties, the carrying amount of the said properties may have been significantly different.

Impairment assessment of the Company's equity shareholdings in Group companies: The Company assesses for impairment in its investments in subsidiaries, associates and joint ventures in its separate financial statements, as described in Note 2.4.8. The Company performs its assessment based on specific indicators (e.g. market capitalization, multiples etc.) and thresholds, which Management believes are reasonable and supportable in the existing market environment. However, had other criteria or thresholds been applied, the impairment assessment conclusion and measurement may have been different.

Assessment of control over investees: Management exercises judgement to assess if the Group controls another entity including structured entities. The assessment of control or loss of control is carried out according to the Group's accounting policies and the applicable accounting framework. Management's assessment of control takes into account the structure of the transaction, the contractual arrangements and whether the Group directs the substantive decisions that affect the returns.

Assessment of offsetting criteria: The Group evaluates various netting agreements held with counterparties to determine whether the offsetting criteria of IAS 32 are met. Management exercises judgement in assessing the legal enforceability and set-off rights arising from these agreements across different jurisdictions and under various circumstances. This assessment considers the requirements of applicable bankruptcy laws in each territory and the applicability of set-off rights, both in the normal course of business and upon potential default events. The evaluation is conducted in accordance with the Group's accounting policies and the relevant accounting framework.

Sunrise III portfolio: The Sunrise III portfolio consisting of securitized, NPE loans, was classified as HFS in 2022. As of 31 December 2022, its carrying amount was € 169 million. The portfolio was derecognized in December 2023, as the Group assessed that the conditions precedent for the sale of 95% of the subordinated notes issued by the securitisation Special Purpose Vehicle ("SPV") and held by the Bank were substantially fulfilled. The legal transfer of the said subordinated notes was completed in January 2024. The corresponding impairment losses charged in the Group's income statement, during 2023, amounted to € 25 million.

3.2 Key sources of estimation uncertainty

The assumptions and key sources of estimation uncertainty that have a significant risk of causing a material adjustment to the carrying amounts recognized in the Annual Financial Statements within the next financial year, are discussed below.

Significant increase in credit risk criteria: The Group did not relax any of the thresholds or assumptions of the model-based staging outcome compared to the year ended 31 December 2022. The Group's stage allocation model is based on a complete set of quantitative and qualitative criteria and incorporates lifetime expectations on macro-environment and probabilities of default. The aforementioned model structure effectively captures expected changes in credit quality. As of 31 December 2023, the Group employed additional SICR criteria on retail exposures, which received moratoria during the Covid-19

pandemic, considering their vulnerability to high energy prices and inflation, as well as on customers affected by the catastrophic floods in the area of Thessaly. The aforementioned approach increased the gross balance scoped under lifetime ECL calculation by € 457 million.

Determination of macroeconomic factors, scenarios and scenario weights: To achieve the objective of measuring ECL, the Group evaluates a range of possible outcomes in line with the requirements of IFRS 9, through the application of three (3) macroeconomic scenarios i.e. base, pessimistic and optimistic, in a way that reflects an unbiased and probability weighted outcome. Each of the aforementioned scenarios, is based on the Group's dedicated macro-forecasting model and Management's assumptions for future economic conditions in the form of macroeconomic, market and other factors.

For the year ended 31 December 2023, the three (3) aforementioned scenarios and related macroeconomic factors for the collective loan assessment process were reviewed in light of the economic conditions that prevailed at that particular year. According to the established methodology, the fan-chart method was used to represent the evolution of both forecasts and the uncertainty around future estimates. The central projection of the single most likely path -the Baseline Scenario- is determined. Then, the other two (2) scenarios - Optimistic and Pessimistic Scenarios - are determined based on a degree of uncertainty and a degree of asymmetry. The Pessimistic Scenario corresponds to the threshold partitioning the worst 20% of the outcomes from the best 80% of the outcomes. The Baseline Scenario corresponds to the middle of the distribution, covering 60% of the outcomes. The Optimistic Scenario corresponds to the threshold partitioning the top 20% of the outcomes from the remaining 80%.

As a consequence, the weight allocation between the three (3) scenarios remains unchanged compared to the year ended 31 December 2022. The Optimistic and Pessimistic Scenarios were weighted with a 20% probability each, while a 60% probability weight was assigned to the Base Scenario to best reflect Management's current sentiment regarding the boundaries of economic outcomes. Refer to Note 4.2 for more details, including an analysis of the sensitivity of the reported ECL to changes in estimated forward looking information.

The table below presents the expected annual average 4-year 2023-2026 forecasts, for each key economic variable and scenario utilized in the ECL calculation of the collectively assessed loans and advances to customers at amortised cost as at 31 December 2023.

ECL Key drivers Scenario	31/12/2023	31/12/2022
	%	%
Real GDP growth		
Optimistic	5.4	6.5
Base	3.4	4.2
Pessimistic	1.5	2.1
Unemployment rates		
Optimistic	9.1	10.2
Base	11.1	12.2
Pessimistic	12.9	14.1
Price index (Residential)		
Optimistic	10.4	8.6
Base	8.6	6.7
Pessimistic	6.7	4.9
Price index (Non residential)		
Optimistic	6.1	5.5
Base	4.1	3.4
Pessimistic	2.1	1.4

In 2023, the Greek economy, remained on a growth trajectory, despite the uncertainty that prevails in the international environment and the macroeconomic impact of monetary policy in the Eurozone. In the first nine months of 2023, real GDP increased by 2.2%, on an annual seasonally adjusted basis, a rate that although slower than the corresponding 2022 level, remains higher than the Eurozone average (0.6%). Moreover, the gradual upgrade of the country's credit rating, resulted in the recovery of the "investment grade" for the first time since 2010.

The inflationary pressures, which were a key feature of 2022 at both international and domestic level, showed a clear trend of de-escalation. In 2023 national inflation was limited to 3.5% YoY, from 9.6% in 2022.

In the labor market, based on seasonally adjusted data, employment increased by 1.5% in 2023 on an annual basis and the unemployment rate decreased to 10.6%, compared to 12.4% in 2022.

In the real estate market, the upward trend in price indices continues. In the first nine months of 2023, the residential real estate price index increased by 13.9%, on an annual basis, compared to an increase of 11.2% in the corresponding period of 2022. In the first semester of 2023 the office price index increased by 6.6%, on an annual basis, compared to a 2.2% increase in the first semester of 2022.

For the macroeconomic environment developments refer also to Note 2.2.

As at 31 December 2023, the Group's forecasts of the aforementioned economic variables across, for each scenario for 2023 and 2024, are the following:

	2023			2024		
ECL Key drivers Scenario	Optimistic	Base	Pessimistic	Optimistic	Base	Pessimistic
Real GDP growth	4.5	3.4	2.4	5.5	3.5	1.8
Unemployment rates	10.6	11.7	12.6	9.2	11.2	12.9
Price index (Non residential)	4.9	3.6	2.2	5.9	4.0	2.2
Price index (Residential)	12.4	11.4	10.5	10.5	8.8	7.1

Estimation of credit risk parameters on collective ECL assessment: The ECL calculations are based on input parameters, i.e. EAD, PDs, LGDs, and Credit Conversion Factors ("CCFs") etc., incorporating Management's view about the future. The Group also determines a) the links between macroeconomic scenarios and economic inputs, such as unemployment levels and collateral values, and b) the effect on risk parameters. Forecasting of the risk parameters incorporates a number of explanatory variables, such as GDP, unemployment rate etc., which are used as independent variables for optimum predictive accuracy. Refer to Note 4.2 for more details, including an analysis of the key sources of estimation uncertainty.

Estimation of ECL on collectively assessed defaulted exposures: Under the current economic circumstances, the Group acknowledges additional volatility on expected recoveries from defaulted exposures. Additional losses of € 30 million have been considered to account for the aforementioned volatility.

Assessment of ECL on an individual basis: For loans that are assessed for impairment on an individual basis, the Group takes into account all available evidence on a case-by-case basis and the ECL measurement is determined by using a discounted cash flow methodology. The expected cash flows are based on Management's estimates as at the reporting date, reflecting reasonable and supportable assumptions and projections of future recoveries, based on a variety of factors, such as business plans and available cash flows, liquidation of collateral in cases it is likely that the recovery of the outstanding amount will include liquidation of the collateral, the fair value of the collateral at the time of expected liquidation, the costs of obtaining and selling the collateral etc. The ECL allowance is very sensitive to the assumptions used in the estimate. There could be a wider range of possible inputs on any individually assessed lending exposure. As a result, it is not practicable to meaningfully quantify ranges of potential outcomes for this type of ECL allowance, because of the diverse nature and circumstances related to these inputs and the wide range of uncertainties involved.

Recognition of deferred tax asset (DTA): Management evaluates the recoverability of the Group's and the Company's DTA at each reporting period. The recognition of a DTA relies on Management's assessment of the probability and sufficiency of future taxable profits to absorb tax losses, future settlement of existing taxable temporary differences and ongoing tax planning strategy. In the absence of a history of taxable profits, the most significant uncertainty relates to expected future profitability and to the applicability of tax planning strategy. The aforementioned assessment is performed by applying:

a) the prevailing tax legislation related to offsetting of tax losses carried forward with taxable profits generated in future periods (e.g. five years). Following the addition of par.3A to article 27 of Greek Law 4172/2013 (Greek Income Tax Code, "ITC") under Greek Law 4831/2021, the tax amortization of crystallized tax losses from write-offs and disposals of loans that have occurred after 1 January 2016, from 1 January 2021 and onwards can be carried forward for offsetting over a period of 20 years. Refer to Note 16 for further information; or

b) article 27A of the ITC, as currently in force, which allows credit institutions, under certain conditions, and from 2017 onwards to convert DTAs arising from (a) private sector involvement ("PSI") losses, (b) accumulated provisions for credit losses recognized as at 30 June 2015, (c) losses from final write off or the disposal of loans and (d) accounting write offs, which will ultimately lead to final write offs and losses from disposals, to a receivable (Tax Credit) from

the Greek State. Refer to Note 16 for further information.

Fair valuation of real estate properties: The fair value of real estate properties is determined by reference to current market prices for similar properties, adjusted as necessary for condition and location, or by reference to recent transactions updated to reflect current economic conditions. Discounted cash flow techniques may be employed to calculate fair value where there have been no recent transactions, using current external market inputs such as market rents and interest rates. The fair value measurements are carried out by appropriately qualified independent professional appraisers who consider information from various sources, such as: (a) current prices in an active market for properties of different nature, condition or location (or subject to different lease or other contracts), adjusted to reflect those differences, (b) recent prices of similar properties in less active markets, with adjustments to reflect any changes in economic conditions since the date of the transactions that occurred at those prices, and (c) discounted cash flow projections based on reliable estimates of future cash flows, derived from the terms of any existing leases and other contracts, and (where possible) from external evidence such as current market rents for similar properties in the same location and condition and relevant market researches by type of asset, in order to determine capitalization and discount rates that reflect current market assessments of the uncertainty in the amount and timing of the cash flows. The fair valuation of real estate properties has a high degree of uncertainty involved, with a wide range of possible outcomes on all properties based on their grouping for valuation purposes, hence it is not practicable to meaningfully quantify ranges of potential outcomes to changes in the various inputs utilized in the fair value measurement.

For all valuations conducted for the measurement of investment properties as of 31 December 2023, the Group has considered sustainability and Environmental, Social and Governance ("ESG") factors in the relevant reports, according to the Red Book Global Standards VPS3. All valuation reports provide a description of the sustainability-related property characteristics and attributes that have been collected, including climate matters.

As described in Note 2.2, there are risk factors that could negatively affect developments in the Greek economy and its prospects. Any worsening of the geopolitical crisis in Ukraine and the Middle East increases the risk of disruptions in energy supply, with a possible impact on both energy prices and overall price levels as a whole. Additional risks for the prospects of the Greek economy are the maintenance of the tighter monetary policy that can burden economic activity and weaken the stimulation of investments as well as delays in the implementation of public and private projects and in meeting the RRF schedule. Finally, environmental challenges and extreme weather events are a growing risk to the economy. Extreme weather events like the fires and floods that occurred in 2023 in Greece, could damage the repayment capacity of the affected borrowers from those extreme weather events and the value of collaterals in those areas.

Provisions

The Group establishes provisions in its financial statements for which it believes it is probable that a loss will incur in the future and the amount of the loss can be reasonably estimated. These provisions are derived from the best estimate of the outflow required to settle the present obligation. This estimate is determined by Management after taking into account experience from relevant transactions and in some cases expert reports. At each reporting date, provisions are revisited in order to reflect the best estimates of the obligation.

Irrevocable Payment Commitments ("IPCs")

The Bank pays part of its ex ante contributions to the Single Resolution Fund ("SRF") in the form of IPCs, backed with cash collateral, which shall be returned when the Bank pays its IPC. As of 31 December 2023 and 2022, the Bank had posted IPC collateral of € 32 million and € 26 million, respectively, which refers to contribution periods starting from 2016. The Bank accounts for the IPC under IAS 37, thus, a provision is recognized only when it becomes probable that an outflow of resources

would be required to settle the obligation. As of 31 December 2023 and 2022, such probability was assessed as remote, therefore, the IPC was accounted for as a contingent liability. The IPC collateral posted by the Bank is recognized within line item "other assets". In 2021, a former foreign European credit institution requested the return of collateral linked to its ex ante contributions to the SRF after its authorisation was withdrawn. The Single Resolution Board ("SRB") refused the return, arguing that the contributions were non-refundable and that the return of IPC collateral required the prior payment of the amount committed. On 25 October 2023, SRB's rejection was confirmed by the Court of Justice of the EU ("CJEU") on the basis that contributions whether in cash or in the form of IPCs must be regarded as definitive. The CJEU decision is not considered final, as it was appealed, hence, there is no clear basis for changing the accounting treatment followed up to and including the date that these financial statements were authorized for issue. Had the Bank charged in the income statement the IPC collateral payments as they incurred, then the Group's equity would decrease by € 32 million as of 31 December 2023, while the impact on profit before tax for 2023 would be € 6 million. Any change in the IPC accounting treatment does not affect the Group's regulatory capital, as the total outstanding amount of IPC collateral is already deducted from regulatory capital.

Held-for sale classification

Monza portfolio: Project Monza refers to the sale of a portfolio of NPEs with gross book value amounting to € 340 million. The Monza portfolio comprises consumer, mortgage and business loans and its sale is expected to be completed within 2024. Management assessed and concluded that the IFRS 5 criteria are met. Therefore, the said portfolio has been classified as HFS and its carrying amount was written down to its recoverable amount. The ECL impairment charge recognised in the income statement for the year ended 31 December 2023, as a result of the aforementioned write-down of the portfolio, stood at € 52 million.

Impairment measurement of the Company's investment in Piraeus Bank

As of 31 December 2023, the Company estimated the recoverable amount of its investment in the Bank to € 5.5 billion, which approximated the carrying amount of the investment and therefore no impairment loss was recognized or reversed during the year ended 31 December 2023. The recoverable amount was estimated based on a value-in-use calculation by applying a pre-tax discount rate of 21.6%. While Management believes that the assumptions applied were appropriate, a combination of reasonably possible changes in such assumptions could have resulted in additional impairment charges or reversals of the existing ones. Specifically, an unfavorable change by +0.5% in the discount rate or -0.5% in the terminal growth rate would result in additional impairment charges of € 217 million and € 127 million, respectively. Similarly, a favorable change by -0.5% in the discount rate or +0.5% in the terminal growth rate would result in reversals of impairment charges of € 250 million and € 150 million, respectively.

4 Financial Risk Management

4.1 Risk Management Framework

Effective risk management is a key factor of the Group's RMF in order to deliver sustainable returns to its shareholders. Management allocates substantial resources to improving its policies, processes, methods and infrastructure to ensure compliance with best international practices and the guidelines of the Basel Committee for Banking Supervision. The identification and management of risks arising from the Group's activities is a priority in the development of its business strategy. In this regard, a framework for prudent risk management has been established.

Management has adopted practices regarding risk management governance, taking into account all relevant guidelines and regulatory requirements, as set by the Basel Committee on Banking Supervision, the EBA, the ECB, the Bank of Greece ("BoG") and the Hellenic Capital Markets Commission ("HCMC"), including any decision of the competent authorities supervising the Group's subsidiaries.

The responsibility for the development and oversight of the RMF lies with the BoD. The BoD ensures the development of an appropriate RMF, including strategy and policies, by setting acceptable risk limits, while shaping an appropriate internal environment, so that every employee of the Group, is aware of the nature of the risks associated with his/her duties. In particular, the BoD has established the Risk-Committee whose primary role is to oversee risk management across the Group.

Risk Committee

The Risk Committee is responsible for exercising the duties set forth in its charter, in order to assist the BoD in fulfilling its responsibilities with respect to :

- existence of an appropriate strategy for the risks undertaken and the definition of the risk appetite statements and limits, as well as the supervision of their implementation;
- establishment of principles and rules that will govern risk management with regards to the identification, assessment, measurement, monitoring, control and mitigation of risks;
- development of the RMF and the incorporation of appropriate risk management policies and controls during the business decision-making process;
- Group compliance through strict and reliable procedures with respect to the regulatory framework for risk management functions.

The Risk Committee was established by a BoD decision, in accordance with the requirements of BoG Governors' Act No. 2577/9.3.2006. The Risk Committee comprises of non-executive members of the BoD, who possess the appropriate knowledge, skills and specialization, in order to comprehend and monitor the risk management strategy of the Group. The Chairman of the Risk Committee is appointed by the BoD and must possess significant experience in commercial banking and preferably in risk and capital management, as well as familiarity with the local and international regulatory framework.

The representative of the HFSF participates in the Risk Committee, with full voting rights.

The Risk Committee's mission is to ensure that:

- the Group has a well-defined Group Risk & Capital Strategy and Risk Appetite Framework ("RAF") that is consistent with its business goals and the available human and technical resources required. The risk appetite of the Group is articulated and clearly communicated in a set of quantitative and qualitative statements, and specific limits, for the material risks;
- all risks connected to the activity of the Group are effectively identified, assessed, measured, controlled, mitigated and monitored; and

- the risk management and control framework in place, including policies, methods and tools, complies with Risk & Capital Strategy and Risk Appetite as well as regulatory and supervisory requirements.

The Risk Committee convenes, upon its Chairman's invitation, as many times as considered necessary in order to accomplish its mission, but not less than once a month. Each member of the Risk Committee is entitled to request the convocation of the Risk Committee in writing for the discussion of specific issues.

Group Risk Management ("GRM")

GRM is an independent unit in relation to other units of the Group, that have revenue generating activities and/or are accountable for transactions. The unit carries out Risk Management and Credit Risk Control responsibilities, in accordance with the BoG Governor's Act 2577/9.3.2006 and Greek Law 4261/2014.

GRM is responsible for the design, development and implementation of the Group's policies on risk management and capital adequacy in accordance with the directions of the BoD, which covers the full range of the Group's activities for all types of risk. GRM is subject to review by Group Internal Audit as for the adequacy and effectiveness of the RMF (policies, methodologies and procedures).

The Group's Chief Risk Officer ("CRO") is the Head of GRM and is appointed by the BoD upon recommendation and endorsement of the Risk Committee. The BoG and Single Supervisory Mechanism ("SSM") are notified of the appointment or replacement of the CRO. The CRO participates in all major Executive Committees, including the Group Executive Committee, and has a dual reporting line to the Risk Committee and the Group's CEO, with direct access to the Chairman of the Risk Committee, whenever deemed necessary.

The current structure of GRM allows for an organized approach to risk management in a consistent, balanced and integrated manner. In addition, the revised structure is better aligned with the Group's strategic targets, including the profitable and sustainable business model, optimization of capital allocation, strengthening of risk monitoring and controls and adoption of superior governance standards as well as meeting the regulatory demands and oversight.

Taking into consideration the overall mission and objectives of GRM, a three (3) pillar structure was established, with clear and discrete functional areas and responsibilities, and comprised by:

- Credit Risk Management;
- Capital Management & Risk Strategy, Market, Liquidity & Asset Liability Management ("ALM") Risks;
- Group Control & Risk Data & Solutions.

Furthermore, as part of the Bank-wide implementation of the Internal Control System Enhancement initiative, the role of Segment Controller was created with a discrete reporting line to CRO (Segment Head).

The key responsibilities of GRM are as follows:

- develop, evaluate, and recommend to the CRO, amendments with respect to the RMF for the Group's activities, according to international best practices as well as legal, regulatory and supervisory requirements. Ensure that the framework is reviewed at least annually or on an ad hoc basis in the event of (a) changes in the Group's strategy or business model, or (b) changes in the regulatory framework, business environment or/and in the macroeconomic conditions. In particular, GRM develops the strategy, policies and procedures in relation to the:

- identification, assessment, measurement, management/control, monitoring and reporting of potential and actual risk exposures;
- establishment, allocation and monitoring of appropriate risk limits (e.g., credit, market, liquidity and operational risks) in cooperation with the relevant committees and units of the Group;
- capital management objectives;

- monitor the implementation of the RMF, including the risk and capital strategy, along with the regulatory requirements and the guidelines of Management;
- monitor the adherence to the approved RAF on an ongoing basis;
- independent review of compliance with Credit Policies/Procedures and the correct implementation of credit decisions;
- oversee the alignment of the Risk and Capital Strategy with the Business Plan, Restructuring Plan, Funding Plan, Budget, ICAAP, ILAAP and Recovery Plan;
- develop, conduct, monitor and report the Group's ICAAP and ILAAP;
- produce and report the capital adequacy requirements under Pillar I (e.g. credit, market and operational risks);
- document and report the capital adequacy and risk management regulatory disclosures under Pillar III;
- supervise the development and alignment of the subsidiaries' RMFs with the Group's RMF and practices;
- raise awareness about risk exposure, promote risk management culture and provide support on risk issues to all business units across the Group;
- participate in the development of the Group and the Bank's Credit Policy, which is approved with the consent of GRM;
- lead and coordinate the design and execution of Group-wide solvency stress tests. Exercise periodic and/or temporary stress tests with base and adverse scenarios tailored to the nature and scope of the operations of the Group for all types of risk;
- ensures an objective, consistent, controlled and transparent process across the standard model lifecycle through the Model Management and Governance Framework ("MMGF") and defines the key functions involved in managing the model lifecycle and the principles of model governance;
- establish and validate loan impairment models (compliant with the IFRS 9 framework);
- develop risk-based pricing models;
- assess new products and activities or significant changes to existing ones prior to their introduction;

- monitor the new production profile and communicate the results to the Bank's Business Units.

GRM comprises the following units:

Credit Risk Management

Credit Risk Management is responsible for the development of the RMF (policies, methodologies, models and processes) with respect to credit risk. To this end, the unit makes use of appropriate methodologies, including models, to identify, measure and monitor the above risks. Furthermore, Credit Risk Management produces risk-related information (reporting) to Management, corresponding Committees as well as to the supervisory authorities.

Credit Risk Management continued to develop and lead a number of initiatives aimed at assessing credit risk and effectively managing its impact on the loan portfolio. More specifically, Credit Risk Management is committed to the identification and effective management of credit risk through an integrated framework of policies, methodologies, procedures and systems that enable the development of a profitable loan portfolio within the acceptable risk profile.

Capital Management & Risk Strategy, Market, Liquidity & ALM Risks

Capital Management & Risk Strategy, Market, Liquidity & ALM Risks supports the development and implementation of the Group's Strategy, aiming at the effective management of risks and balance sheet optimization. To this end, the unit is responsible for the development and maintenance of the Risk and Capital Strategy, as well as RAF of the Group, in accordance with the Risk Committee and BoD's directions and guidance.

Moreover, it is responsible for the design and implementation of the Group's ICAAP and leads the preparation and execution of regular enterprise-wide stress tests. Further, it is responsible for the coordination and overall maintenance of the Group's Recovery Plan.

Finally, Capital Management & Risk Strategy, Market, Liquidity & ALM Risks is responsible for the measurement, monitoring and reporting of capital requirements and capital adequacy ratios of the Group.

Group Control & Risk Data & Solutions

Group Control & Risk Data & Solutions is responsible for the identification, monitoring and assessment of all types of risks (credit, market, operational, liquidity, etc.) arising from the Group's activities, through the development, implementation and evaluation of an adequate internal control system, in order to ensure the efficiency and the soundness of the Group's operations and the achievement of its business objectives. Furthermore, the unit is collaborating with Segment Controllers to accomplish its mission.

In addition, Group Control & Risk Data & Solutions is responsible for the development and implementation of an effective operational RMF (policies, methodologies and procedures) based on the Group's Risk and Capital Strategy and regulatory requirements.

Moreover, the unit is responsible for the development and implementation of the credit risk review and assessment of the Group's loan portfolio. More specifically, it systematically reviews and assesses credit exposures, limits and undertaken risks at borrower (or Group of borrowers) level as well as adherence to the Group's Credit Policy. Moreover, it reviews and monitors the credit process through sampling. In order to accomplish a targeted and effective review focusing on high risk

borrowers, Credit Control is further broken down in two (2) sub-units, namely Performing Assets, and Troubled Assets.

Finally, Group Control & Risk Data & Solutions, via the Model Validation Unit, is responsible to conduct independent assessments of the Bank's models in order to validate their robustness, accuracy and effectiveness. The scope of validation includes credit risk, operational risk, market risk, liquidity and interest rate risk models as well as other models used by the Bank. Assessments are prioritized in the context of the Annual Model Validation Plan, which is approved by the Risk Model Oversight Committee. The Model Validation Unit submits the results of its validation activities, including respective findings and recommendations to the Risk Model Oversight Committee for approval.

Segment Controller

The Segment Controller is responsible for embedding a culture of operational risk management and ensuring the design and implementation of an effective internal control system within the segment under his / her responsibility, with the objective of achieving operational excellence and remediating control deficiencies in the segment. The Segment Controller also reviews, supplements and comments on the operational risk assessment of the Unit Controllers.

In addition, the Segment Controller provides regular and ad hoc reporting to the CRO (segment Head) concerning operational risk profile of the segment and remediation actions to address underlined risk and control issues.

CRO Office

The CRO Office manages the operational aspects of GRM. It also serves as the secretariat of the Risk Committee and facilitates the discharge of its responsibilities.

Risk Culture

A formal Risk Culture Program has been established under the supervision of the CRO, to channel the Group's commitment to improving risk awareness and fine-tuning the balance between risk taking and required returns. The Risk Culture Program is sponsored by the CEO and a cross-functional Steering Committee of senior Management members, who oversee its implementation.

The scope of the Risk Culture Program is to exemplify the desired behaviors and routines that reinforce sound risk taking judgement and promote ethical behavior towards all stakeholders. The Group has put in place a number of measures to ensure that any risk-taking activities, that exceed the Group's risk appetite are identified, assessed, escalated, and addressed in an effective and timely manner. Efforts so far focused on redefining processes, systems, and frameworks linked to an augmented governance and enhancement of risk awareness. The next phase is to anchor the desired behaviors and routines to establish a strong risk culture where sound risk taking is promoted, emerging risks are addressed, and all employees conduct business in a legal and ethical manner.

Committees

Market Scenarios Steering Committee: The Market Scenarios Steering Committee reviews and approves scenario variables and probability weights proposed by the Bank's Economics and Investments Strategy Unit. It also reviews and approves temporary adjustments on the credit risk parameters.

Provisioning Committee: The Provisioning Committee is responsible for approving the quarterly ECL allowance estimates on loans and advances to customers at amortised cost of the Bank. The ECL measurement is estimated based on the relevant policies and procedures for exposures assessed on either an individual or collective basis.

The Provisioning Committee is, also, mandated to periodically, but at least annually, review the policies and methodologies (parameters, scenarios, weighting of scenarios etc.) applied to all Group entities according to the Impairment Policy in estimating ECL.

Finally, the Provisioning Committee is responsible for:

a) Reviewing and approving material exception / override requests communicated by the heads of the Business Units (NPE Unit, Credit Risk, etc.) or resolving disagreements between the approving bodies;

b) Reviewing and approving requests for accounting write-off, provided they meet specific criteria, as defined in the Debt Forgiveness & Accounting Write-Off Policy.

Risk Models Oversight Committee ("RMOC"): The RMOC is chaired by the CRO and is mainly responsible for the appropriate implementation of the MMGF, as well as the review and approval of model related issues.

In particular, RMOC reviews and approves the Model Development Framework, the development of new models, as well as the use and potential removal/replacement of existing ones.

It also reviews and approves the Model Validation Framework, the Annual Model Validation Plan and the model validation assessments submitted by the Model Validation Unit and monitors compliance with the agreed timetable for the implementation of remediation actions.

4.2 Credit Risk

Credit risk is defined as the potential risk that a debtor or counterparty of the Group will fail to meet its obligations in accordance with agreed terms and conditions.

Credit risk is the most significant risk for the Group and therefore its effective monitoring and ongoing management is a top priority for the senior management. The unremitting development of the infrastructure, systems and methodologies, aiming to the quantification and the evaluation of the credit risk, is a prerequisite to support both Management and the business units on a timely and efficiently decision-making process, policy formulation and fulfillment of supervisory requirements. The Group's exposure to credit risk mainly arises from corporate and retail credit, various investments, over the counter ("OTC") transactions, derivatives, as well as from transactions' settlement. The volume of risk associated with such credit exposures depends on various factors, including general economic conditions, market developments, debtor's financial condition, amount / type / duration of exposure and the existence of collaterals and guarantees.

The implementation of the credit policy, which sets out the Group's credit risk management principles, ensures effective and consistent credit risk monitoring and control. Management applies a consistent policy and practice with respect to the credit assessment, approval, renewal and monitoring procedures. All credit limits are reviewed and / or renewed, at least annually, and the responsible approval authorities are determined, based on the size and the category of the total credit risk exposure undertaken by the Group for each borrower or group of connected borrowers (one obligor principle).

Management has established a credit quality review process for the early identification of potential changes in counterparty creditworthiness, including regular collateral revaluations. Counterparty limits are set using a credit risk classification system, which assigns a risk rating to each counterparty. Risk ratings are subject to regular revision. The purpose of the credit quality review is to enable Management to assess the potential loss arising from the risks to which it is exposed, and consequently, to take timely corrective actions.

Analysis of Concentration Risk

Concentration risk can arise from various types of incomplete portfolio diversification, such as the concentration risk in large borrowers, economic sectors, geographical areas and types of collateral, and is being monitored on a regular basis.

In addition to monitoring supervisory limits, the Group has established internal limits within the RAF, which are reviewed annually.

Country Risk

Country risk reflects the risk arising from macro-economic instability, social events or political uncertainty in a country, including nationalization, expropriation of assets and debt restructuring, affecting the Group and the Company's earnings and /or capital. It includes sovereign, transfer and political risks.

Counterparty Credit Risk

Counterparty credit risk ("CCR") is defined as the risk that one of those involved in a transaction might default on its contractual obligation. It refers to derivative instruments, repurchase transactions, securities or commodities lending or borrowing transactions, long settlement transactions and margin lending transactions.

For the effective management of CCR, Management has in place procedures and guidelines for defining, reviewing and monitoring credit limits as well as concentration limits set on a counterparty rating basis. Limits are set either in nominal amounts or risk units (credit equivalent), depending on the transaction and they are revised at least annually. The monitoring of counterparty credit limits' utilization is monitored on a daily basis.

With respect to credit risk mitigation techniques, Management has in place comprehensive and enforceable legal agreements with its counterparties such as International Swap Derivatives Association Agreement ("ISDA"), Credit Support Annex ("CSA") and Global Master Repurchase Agreement ("GMRA"), which also enable also the effectiveness of CCR management. A GMRA permits the netting of both rights and obligations that arise from derivative transactions that have been performed under such a master agreement upon the counterparty's default, resulting in a single net claim. Moreover, in order to mitigate settlement risk and under specific transactions and conditions covered within master agreements, payment netting is performed. In order to monitor settlement exposures, Management has set daily settlement limits per counterparty.

Derivative Financial Instruments

Credit risk arising from derivatives is, at any time, limited to those with positive fair values, as recorded in the Statement of Financial Position. In the case of credit derivatives, the Group is also exposed to, or protected from, the risk of default of the underlying counterparty referenced by the derivative. However, to reflect potential losses, the Group applies portfolio-based adjustments for credit risk.

With gross-settled derivatives, the Group is also exposed to settlement risk, being the risk that the Group fulfils its obligation, but the counterparty fails to deliver the counter value.

Definition of Credit Impaired Exposures / Default

As of 1 January 2021 the Group applies and fully complies with the new regulatory requirements for the DoD issued by EBA (EBA/GL/2016/07) which aims to converge the definitions of default for accounting and regulatory purposes (IFRS 9, EBA and Capital Requirements Regulation – "CRR" guidelines). The requirements for the new DoD are stipulated in Article 178 ("Default of an obligor") of the Regulation (EU) No 575/2013 (CRR), as well as in the Guidelines and Regulatory Technical Standards issued by the EBA on the application of the DoD. The Group has aligned the DoD for financial reporting purposes with the definition of NPE used for regulatory reporting. Thus, in accordance with the Group's and the Bank's Impairment Policy, a financial asset is considered to be credit impaired and placed in Stage 3 if it is classified as NPE. Under the new DoD, the terms NPE, Defaulted and Impaired are aligned.

The new DoD applies to all the entities of the Group, considering local regulations and specific characteristics of each jurisdiction. In line with the relevant regulatory requirements and the guidelines for the identification of default, the Group implements both an objective indicator (past due criterion), as well as a set of quantitative and qualitative unlikeliness to pay indicators to capture indications where the obligor is considered by the Group as unlikely to pay its credit obligations in full. More specifically, a default is considered to have occurred with regard to a particular obligor when either or both of the following two events have taken place:

- Past Due Criterion: The obligor is past due for more than 90 consecutive days on any material credit obligation to the Group;
- Unlikeliness to Pay: The Group considers that the obligor is unlikely to repay its obligations in full, without recourse by the Group to actions such as realizing security and based on the criteria that the Group has specified.

In principle, the DoD is applied at the contract level for the retail portfolio and at the obligor level for the non-retail portfolio.

In order for an exposure classified as defaulted to return to a non-defaulted status, the behavior of the contract for the retail portfolio or the obligor for the non-retail portfolio is monitored for a pre-defined period of time (i.e. probation period) within which the exposure continues to be classified in default status. If the Group considers that for a previously defaulted exposure no trigger of default continues to apply at the end of the probation period, then a return to a non-defaulted status takes place.

Credit Rating Models (PDs)

Reliable credit risk measurement is a top priority within the Group and the Bank's RMF. The continuous development of infrastructure, systems and methodologies aimed at quantifying and evaluating credit risk is an essential precondition in order to timely and efficiently support Management and the business units in relation to decision-making, policy formulation and the fulfillment of supervisory requirements.

The Group and the Bank run separate internal models for its corporate portfolios in which its customers are rated from 1 to 18 using internal grades (master scale). The models incorporate both qualitative and quantitative information and, in addition to information specific to the borrower, utilize supplemental external information that could affect the borrower's behavior. For the retail portfolio, the Group and the Bank run Credit Rating (Scoring) Models that incorporate demographic / behavioral

/ credit bureau information. These information sources are first used to determine the PDs, within the existing regulatory default definition framework. For ECL calculation, the PDs are adjusted to incorporate forward-looking information and classification of the exposures, by staging. This is repeated for each economic scenario as appropriate.

Lending Portfolio

For credit risk measurement and monitoring purposes related to the Group's and the Bank's loans and advances to customers at amortised cost, the following are performed at a counterparty level:

- The customer's creditworthiness and the PD on its contractual obligations is systematically assessed;
- The Group and the Bank's probability of potential recovery in the event of the debtor defaulting on its obligations is estimated, based on existing collateral, guarantees provided and curing levels.

Management assesses the creditworthiness of its borrowers and estimates the PD on their obligations by applying credit rating models appropriate to their special characteristics and features, taking into account various historical, current and forward looking information.

Corporate Lending

All Corporate lending customers are assigned to credit rating grades, which correspond to different levels of credit risk and relate to different default probabilities. Each rating grade is associated with specific customer relationship policy / guidelines.

Each category of the credit rating scale corresponds either to a specific guideline or policy of the Bank as far as the relationship with the business borrowers is concerned and is presented in the relevant chapter of the Credit Policy Manual. The rating scale for business borrowers consists of 18 rating grades (master scale) that correspond to borrowers that have not defaulted on their contractual obligations. The below table presents, the Group and the Bank's policy mapped to each rating scale:

RATING	CREDITWORTHINESS		GUIDELINE OR POLICY RULE
1-3	Very Strong	Develop relationship	GUIDELINES
4-7	Strong	Develop relationship	
8-10	Good	Develop relationship based on the company's growth	
11-12	Satisfactory	Careful development of the relationship with adequate collaterals or maintain relationship	
13-15	Weak	Careful development of the relationship or maintain relationship with unsecured risk less than 30%	POLICY RULES
16-18	Poor	Probable classification as watch list / Limit relationship or Terminate relationship	

The Group uses distinct credit rating models, according to the type of operations and the size.

More specifically:

Credit Category	Rating System	Rating Scale
Business Lending	Rating Analyst for Corporate customers that keep "C" category accounting books and have a turnover more than € 2.5 million	18-grade
	Rating Analyst for Corporate customers that keep "C" category accounting books and have a turnover up to € 2.5 million	18-grade
	Small Business Loan Rating for small business or personal companies (that keep "B" category accounting books)	18-grade
Specialised Lending	Project Finance PD Scorecard	18-grade
	Object Finance (Shipping) Scorecard	18-grade
	Real Estate Scorecard	18-grade
	Manual Rating	18-grade

Manual Rating is used for customers for which no other available rating system can be applied. These are customers with no financial data (i.e. newly established companies, SPVs) or brokerage and insurance companies. In exceptional cases where the rating does not represent the borrower's creditworthiness, in the opinion of the Relationship Officers, a manual rating is used as a rating override.

Business Rating Models incorporate the following information in order to quantify customer risk:

- Historical financial information that includes realized results, solvency ratios, liquidity ratios and any other relevant ratios to measure the client's financial performance;
- Any publicly available information on the clients from external parties. This includes credit bureau information;
- Any other objective data on the quality and management capabilities of the Bank-financed company, related to its performance.

The complexity and granularity of the rating techniques vary depending on the exposure of the Group and the Bank and the complexity and size of the customer. Behavioral Scorecards are used for small business loans, as well as the agricultural loans. The Behavioral Scorecards are based exclusively on historical data on customer behavior in relation to the Bank's products and are the result of the implementation of statistical analysis. They are specific to the Bank's clients and are customized on a product and delinquency bucket basis.

These models combine financial and statistical analysis together with the expert judgement of responsible officers. Whenever possible, these models are tested by benchmarking against externally available information.

Borrowers are rated when their credit limit is initially determined and thereafter at least annually. The ratings are also updated in cases when information becomes available that may have a significant impact on the level of credit risk.

Retail Lending Scorecards and Rating Models

With regard to the retail credit portfolio, there are scorecards for assessing the creditworthiness of customers in the Retail Banking portfolio covering different stages of the credit cycle, as follows:

1. **Application Scorecards**

The Application Scorecards are based exclusively on historical data of applications and behavior and are the result of the implementation of statistical analysis. They are specific to the Group and the Bank's clients and are customized on a product and purpose basis. Thus, there are five products - based application scorecards and three purpose - based application scorecards in mortgage/ housing loans.

2. **Behavioral Scorecards**

The Behavioral Scorecards are exclusively based on historical data of client behavior regarding the Bank's products and are the result of the implementation of statistical analysis. They are specific to the Bank's clients and are customized on a product and days past due basis. There are 8 behavioral scorecards in total.

3. **Internal Bureau Scorecard**

There is also a scorecard that assesses the market behavior of Group's and the Bank's clients at the time of the loan application. This scorecard is exclusively based on historical data and is also the result of the implementation of statistical analysis. It is specific to the Group and the Bank's clients and is not customized on a product basis.

4. **Overall Application Scorecards**

These are scorecards that are part of the origination process and essentially combine the three scorecards above. Thus, when a client submits an application, his application score, his behavior score, his bureau score and his Teiresias bureau score are taken into account. These are five scorecards which are customized on a product - category basis, are based on historical data of applications and behavior and are the result of the implementation of statistical analysis.

The aforementioned internal models comprise the basic factors which are used as inputs in PD models for the total retail Banking portfolio and for the business Banking portfolio as well.

5. **Credit Bureau Scoring**

In addition, the Group and the Bank have used the credit bureau scoring model of Teiresias S.A., which takes into account the total exposure of borrowers in the Greek market. The use of this particular model has improved the performance of the existing models.

The policy used in the approval process to determine the applicant's willingness and ability of meet their obligations is also based on a number of credit criteria (in addition to credit scoring models mentioned above), such as:

- Age/Citizenship/Profession
- Minimum Income Level
- Monthly Disposable Income ("MDI")
- Loan to Income Ratio ("LTI")
- Credit history of the customer
- Maximum Unsecured Exposure
- Maximum levels of loan-to-value ("LTV") (for collateralized loans) combined with the purpose of the loan
- Collaterals and Guarantees provided
- Maximum limits per Product

6. Small Business Customer Rating system

The Group and the Bank have developed statistical models to assess the creditworthiness of small business customers. The Rating model is a combination of 4 traditional modules and an innovative module based on current account cash flow data. The modules are integrated to arrive at a final model score/rating which is subsequently calibrated to a PD. The five (5) modules are:

- Borrower Characteristics model
- Financial statements model
- Credit bureau information model
- Behavioural model
- Cash flow model

Macro-economic models

A set of macro-economic models is used for the calculation of forward-looking lifetime PD projections for all portfolios. The models combine exposure/portfolio idiosyncratic characteristics with projections of specific macro-economic variables to produce adjustments to the spot obligor/exposure PDs that take into account forward looking conditions. Forward-looking PDs are used for the purposes of IFRS 9 provision calculation, pricing, ICAAP, stress testing, etc. Moreover, macro-economic models have been developed for the business portfolio that have as an input the Gross Value Added ("GVA") macro instead of the GDP. These models incorporate industry specific sensitivity and produce complementary information for the same purposes the traditional macro PD models are used for.

Management regularly validates and tests the predictive ability of the creditworthiness evaluation of rating models (Wholesale and Retail), thus ensuring its potential for accurately depicting credit risk and allowing for the timely implementation of measures addressing potential problems.

Recovery based on existing collateral, security and guarantees

Along with the assessment of the counterparties' creditworthiness rating evaluation and during the process of setting and reviewing credit limits, Management estimates the recovery rate related to the exposure in the event the debtors default on their contractual obligations. The estimation of the recovery rate is based on the type of credit as well as the quality of any collateral / security. According to standard practice, the lower the rating of a borrower, the higher the collateral / security required, in order to maximize the recovery rate in the event that the borrower defaults on its contractual obligations to the Group and the Bank.

Exposure at Default (EAD)

EAD is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date. Thus, it is equal to the sum of the on-balance sheet exposure of the account on the observation date and any additional amounts that are drawn until the date of default. A transformation commonly used is the CCF which is equal to the ratio of "Balance at default" minus "Balance at observation point" over the undrawn amount at observation point (Limit at observation – Balance at observation).

Loss Given Default (LGD)

LGD is defined as the ratio of economic loss during the recovery period to the EAD.

LGD is cash flow oriented and all costs are included and properly discounted with the EIR from the recovery date until the date of default for its computation.

Self-cure rate models[9] are used for the calculation of LGD.

Recoveries are also taken into account and they can be of different types:

- Cash recoveries could be considered cash flows from customer, from guarantor, from cured facilities, from security (eligible collateral/guarantee), from debt sale.
- Non-cash recoveries could be considered repossessions.

For the complete LGD estimation additional inputs are used:

- Cures via Modification: Cure Rate level of accounts that have changed to non-defaulted status via the implementation of a Modification.
- Loss given non-cure: Incurred loss from cases that the Group and the Bank have not managed to cure.
- Loss given modification: Incurred losses due to the type of modification that was offered to the client.

Lending Portfolio Quality

The Lending Portfolio is segmented by quality into the following categories for both the retail and corporate portfolios:

[9] For Non-retail portfolios the cure rate models include both self-cure rate and via modification probability estimates.

- Strong
  - Retail: Stage 1 Loans and advances to customers at amortised cost that are in Bucket 0
  - Corporate: Stage 1 Loans and advances to customers at amortised cost that have rating less or equal to 12
- Recommended
  - Retail: Stage 1 Loans and advances to customers at amortised cost that are in Bucket 1
  - Corporate: Stage 1 Loans and advances to customers at amortised cost that have rating more than 12
- Substandard
  - Retail: Stage 2 Loans and advances to customers at amortised cost
  - Corporate: Stage 2 Loans and advances to customers at amortised cost
- Default
  - Retail: Stage 3 Loans and advances to customers at amortised cost
  - Corporate: Stage 3 Loans and advances to customers at amortised cost

Unrated corporate loans that belong to Stage 1 are segmented according to their bucket.

The segmentation presented above is highly correlated with the PD levels of each portfolio (the PD levels differ among the categories).

Significant increase in Credit Risk (SICR)

The assessment of SICR is a key element in determining the point of transition between the requirement to measure an allowance based on 12-month ECL or lifetime ECL (excluding POCI financial assets for which are discussed separately below). If, following this assessment, a SICR occurs, the Group and the Bank recognise a loss allowance which is determined taking into account all possible default events over the expected life of the financial instrument.

To perform this assessment, the Group and the Bank compare the risk of a default occurring on the financial asset as at the reporting date, with the risk of a default occurring on the financial asset as at the date of initial recognition.

The Group and the Bank's objective is to capture this SICR prior to the financial asset being treated as credit impaired.

The allocation between stages is based on the criteria presented below:

- If at the reporting date, the loan is in NPE status, it is allocated to Stage 3 and lifetime ECL is calculated.
- If at the reporting date a SICR was monitored against the credit risk at the initial recognition date, the loan is allocated to Stage 2 and lifetime ECL is calculated.
- The remainder of the loans are allocated to Stage 1 and ECL is calculated for the next 12 months.

The quantitative and qualitative criteria based on which the Group and the Bank assesse whether there is a SICR for an exposure are outlined below.

Furthermore, the Group has developed a comprehensive and robust Early Warning System ("EWS") that promotes the identification of potential future non-performing obligors at an early stage and supports the adoption of predefined measures and mitigation / rebalancing actions.

The EWS' key objectives are the increased visibility around obligor's creditworthiness, the reduction of the likelihood of default through preventive measures, the minimization of EAD and the increase of collateral coverage, in order to safeguard cost of risk and return on capital. This is achieved through the continuous and effective interaction among all stakeholders and the timely rebalancing of the obligor's risk / return relationship to the current risk profile.

The newly introduced EWS consists of models and indicators (quantitative and qualitative / manual) and their respective thresholds, facilitating the identification of early signs of deterioration of the obligor's creditworthiness. Credit risk data along with data from other sources such as transactional and current accounts data, were gathered and analyzed for the development of the early warning models. The quantitative indicators are quantifiable signals based on internal and external data (e.g. delinquencies in Bank's products, detrimental events initiated by other lenders, bounced checks) and are enabled upon occurrence. The qualitative indicators are based mainly on interaction with the obligor and / or non-quantifiable information that could have a relevant influence on the repayment of a loan. These indicators require manual input in the Loan Origination System (upon occurrence) and assessment by officers of the competent Business Units and are applicable for Corporate/ SME obligors.

The process is implemented by dedicated business and credit officers responsible for each obligor.

Corporate and Retail Lending Portfolio

- Primary criteria
  - significant increase in the PD of the financial asset at the reporting date compared to the one calculated at the initial recognition date, based on certain absolute (300-650 bps depending on the portfolio segment) or relative (200%) thresholds. The aforementioned thresholds are the same as last year.
- Secondary criteria
  - existence of forbearance;
  - behavioral flags (monitoring the maximum delinquency bucket for the last 12 months);
  - existence of default event over the last 12 months based on the Defaulted exposures as the identification of the latter is based on the EBA NPE Default Definition;
  - watch list.
- Backstop
  - 30 days past due or more

- Additional criteria due to high energy prices and inflation

As of December 2023, additional criteria have been considered in order to capture retail exposures' vulnerability to high energy prices and inflation.

Criteria for assessing ECL allowance of loans and advances to customers at amortised cost on an individual or collective basis

Individually Assessed

In order to better assess the expected risk, the Group and the Bank prepare a list of accounts for which an individual assessment will be performed. Individual assessment is performed for loans and advances to customers at amortised cost that are individually significant and meet both of the following criteria:

- They are extended to borrowers whose total loan exposure at the period end reporting date exceeded the amount of € 1 million or the equivalent in foreign currency for the Group and the Bank. Lower thresholds have been established for the subsidiaries.

- The exposures are classified as NPE as per the Group's Credit Policy.

Apart from individually significant loans, other exposures may be assessed individually, at the discretion of the Bank's Provisioning Committee, irrespective of their exposure level.

Description of the ECL Calculation (Individual)

ECL is defined as the difference between all contractual cash flows that are due in accordance with the contract and all the cash flows expected to be received (i.e., all cash shortfalls), discounted at the original EIR (or credit-adjusted EIR for POCI financial assets). All contractual cash flows of the loan and cash flows resulting from the sale of collateral or other credit enhancements are considered.

According to IFRS 9, probability weighted scenarios are taken into account over the expected life of the financial instrument in the estimation of the ECL allowance.

The individual assessment consists of an evaluation of the amount and timing of the cash flows for each individual exposure.

Calculation of ECL under the individual assessment is defined as below:

$$ECL = \sum_{i} (IFRS\ Outstanding\ Balance - Present\ Value\ of\ the\ Recoverable\ Amount) \cdot P_i$$

Where:

- ***IFRS Outstanding Balance:*** The gross carrying amount of the lending exposure at the reporting date.

- ***Present Value of the Recoverable Amount:*** Quantification of the recoverable amount, based upon the present value of the expected future cash flows, related either to cash recoveries from the obligor or to cash proceeds from the liquidation of loans' collaterals, discounted to their present value at the loan's original EIR.

- P_i: the probability_weight of each scenario, under which the ECL amount is calculated.

Collectively Assessed

The Collective Assessment is applied to all other facilities i.e. those allocated in Stages 1 and 2, as well as to those in Stage 3 which have not been subject to an individual assessment. For the segmentation of the exposures refer to Note 3.1.

Description of the ECL Allowance Calculation (Collective)

For the calculation of the ECL allowance on a collective basis, statistical methods are used, based on credit risk parameters. The equation used for the measurement of Lifetime ECL, for all portfolios, is depicted below:

$$LECL = \sum_i \left(\sum_t^T PD_t^i \times LGD_t^i \times EAD_t \times DF_t \right) P_i$$

Where:

- **Time to Maturity (T)**: Remaining time until the maturity of the loan.
- **Probability of Default (PD)**: This parameter expresses the PD of a financial instrument. Loans and receivables classified as Stage 1 are calculated using the 12-month PD, while those classified in Stage 2 are calculated based on PDs over the life of the facility. For Stage 3, PD=1.
- **Loss Given Default (LGD)**: This parameter defines the "expected" credit loss that arises in the event of default of a financial instrument. It is expressed as a percentage of the exposure, which if multiplied by the exposure, gives the amount of the Group and the Bank's loss at the time of the default.
- **Exposure at Default (EAD)**: This parameter defines the exposure value in the event of a default of a financial instrument. The EAD is based on the following formula:

$$EAD_t = (On - Balance\ Sheet\ Exposure)_t + (Off - Balance\ Sheet\ Exposure)_t \cdot CCF_t$$

- **Credit Conversion Factor (CCF)**: This parameter converts off-balance sheet items, such as undrawn exposures, to equivalent On-Balance Sheet credit exposures.
- **Discount Factor in t (DFt)**: Factors used to discount an expected loss to a present value at the reporting date (EIR).
- **Probability weighted outcome (Pi)**: the probability-weight of each scenario, under which the ECL amount is calculated.

The Group and the Bank measure ECL of a financial asset, taking into account multiple possible outcomes. Under the collective assessment, the Group and the Bank apply three alternative scenarios, with their impact being incorporated in the risk parameters of the ECL model. Subsequently, the relevant probability weights are applied in the ECL allowance under each scenario, leading to the probability weighted ECL allowance.

The Economics and Investments Strategy Unit is responsible for the calculation of alternative macroeconomic scenarios, including the projections of relevant macroeconomic variables and the corresponding probability weights, used in the

impairment calculation.

Calculation of expected future cash flows for corporate lending portfolio

The following debtors' specific element are considered for the assessment of future cash flows of corporate lending portfolio:

- **Ongoing operating cash flows**: The operating cash flows of the obligor or guarantor, which are ongoing and can be used to service the debt.
- **Existing collateral and guarantees**: The current value of the obligor's existing collaterals and guarantees, and their eligibility for liquidation, are assessed under a forced liquidation scenario or under a voluntary surrender or sale scenario.
- **Binding Repayment or Settlement Agreements**: Any additional debt restructuring or settlement agreements made between the Group and the Bank and the Obligor are also taken into consideration.
- **Additional Information received by the Account Officer**: Any additional and reliable information available to the Account Officer regarding the borrower's ability to meet its contractual obligations to the Group and the Bank is considered.
- **Personal Guarantees of the obligor:** In exceptional cases, those mainly involving exposures of prominent customers, the value of personal guarantees in favor of the obligor may be taken into consideration.
- **Special Administration or Reconciliation Process via Art.106, Greek law 3588/2007:** Any proceeds anticipated through the Special Administration or Reconciliation Process via Art.106.

In addition, in line with the ECB's guidance on how institutions are expected to consider Climate & Environmental risks, the Group has planned initiatives which are presented in Note 2.2.

Going Concern Approach

Under a "going concern" scenario, the debtor/ guarantor is able to generate cash flows that can be used to repay the financial debt to all creditors. The Group and the Bank consider different approaches depending on the specific borrower in applying the going-concern assumption in determining the cash flows to be received from the operations of the borrower, as well as from the realization of non-core collaterals in cases where applicable:

- The estimated future cash flows based on the updated financial statements of the debtor / guarantor.
- In restructuring cases, the restructuring plans and the resulting changes to the structure of the entity.
- Estimations consider potential investments that are necessary to maintain future cash flows (CAPEX).
- Where cash flows are based on the realisation of the debtor's assets, the Group and the Bank estimate the expected selling price to reflect the future expected cash flows derived from the sale of assets less the estimated costs associated with the realization. Collateral may be realised to the extent that it does not affect operating cash flows. In addition, where a "two-step" approach is used (i.e. period by period analysis followed by an estimate of the terminal value), a "gone concern" approach may also be assumed for the second step, involving the liquidation of

collaterals.

Based on the previous information, the ECL allowance will be measured as the difference between the asset's carrying amount and the estimated future cash flows discounted at the financial asset's original EIR.

In addition, in line with the ECB's guidance on how institutions are expected to consider C&E risks, the Group has planned initiatives which are presented in Note 2.2.

Gone Concern Approach

ECL allowance is measured on a "gone concern" basis when Management determines that the debtor's operating cash flows cease and collateral is exercised, including any other collections that Management determines as recoverable.

This could be the case when one or a combination of the below takes place:

- Future operating cash flows of the debtor are estimated to be low or negative; or / and
- Exposure is significantly collateralized, and this asset is central to cash flow generation; or / and
- There is a very significant degree of uncertainty surrounding the estimation of the future cash flows; or / and
- Insufficient information is available to perform a going concern analysis.

The sale proceeds from collateral execution are adjusted for liquidation costs and market discounts where applicable. Consideration of market valuations, expectation on collateral liquidation strategy (consensual vs. non-consensual forced) and underlying legal framework is taken in order to determine market price discount that may need to be applied as well as time to sell assumptions.

Write-offs

The Group and the Bank write off loans and advances when there is no reasonable expectation of recovery of all or part of the amount due.

Usually this is the case when: i) all necessary legal actions, foreclosure procedures and recovery collection efforts against the borrower, co-borrowers or guarantors have been exhausted, ii) the continuation of legal proceedings, whether in or out of court is not likely to result in a positive outcome for the Group and the Bank, iii) the cost of collection is economically unfavorable in relation to the benefit.

The contractual amount outstanding on loans that were written off during the year ended 31 December 2023 and that are still subject to enforcement activity is € 73 million (2022: € 148 million).

The Provisioning Committee approves accounting write-offs while the BoD or other authorized bodies approve debt forgiveness requests.

Debt securities and other short term treasury products

The Group and the Bank recognize impairment allowances on debt securities and other short-term treasury products that are measured at amortised cost or at FVTOCI.

The amount of impairment losses depends on the extent of the credit deterioration of the issuer since initial recognition. The assessment of significant deterioration is key factor in establishing the point of transitioning between the requirement to measure an allowance based on 12-month ECL and lifetime ECL. The approach of recognizing impairment is based on the following allocation to Stages:

- Stage 1: Contains instruments that have not deteriorated significantly in credit quality since initial recognition or have low credit risk at the reporting date.

  The Group and the Bank follow the 'low risk simplification', according to which, if a financial instrument has low credit risk, it is assumed that no significant increases in credit risk have occurred. The Group and the Bank consider that all investment grade instruments are low risk instruments; hence, they are allocated to Stage 1.

  At stage 1, 12-month ECL is recognized. For instruments with a residual maturity of less than 12 months, ECL is calculated for the remaining period until maturity.

- Stage 2: Contains instruments that have deteriorated significantly in credit quality since initial recognition. At Stage 2, lifetime ECL is recognized.

- Stage 3: Contains instruments that have incurred an actual default (impaired). At Stage 3, lifetime ECL is recognized.

For the assessment of significant credit risk deterioration of non-investment grade instruments and the allocation from Stage 1 to Stage 2 (and vice versa), the Group and the Bank rely on the following two (2) independent conditions: a) external credit rating downgrade (upgrade) since the recognition date or b) increase (decrease) in the 12-month PD since the recognition date. In case where an external credit rating is not available, the Group and the Bank use the internal rating evaluation.

As a parallel staging process, the Group and the Bank also monitor the bond market credit singular evolution. Any increase in credit spreads above an indicative spread threshold since initial recognition, triggers an internal review process of the affected financial instruments' current staging, in order to assess if the observed change of the credit spread reflects an actual change in credit risk expectations.

Default Definition

A debt security or other short-term treasury product is considered as defaulted and consequently allocated to Stage 3, when it has been assigned a 'Default' rating by an external credit rating agency. Furthermore, if the issuer or counterparty has additional obligations with the Group and the Bank and is in default in one of these obligations, then based on the cross-contamination rule, the instrument will be assigned to Stage 3.

Expected Credit Loss Estimation

The Group and the Bank use the following key elements to measure ECL for debt securities:

- **PD**: Can be classified in the following two categories:

- 12-month PD, which corresponds to the estimated PD occurring within the horizon of the next 12 months and is used to compute 12-month ECL for stage 1 allocation.
- Lifetime PD, which expresses the estimated PD occurring over the remaining life of the financial asset and is used to

calculate the lifetime ECL for Stage 2 allocation. For stage 3 allocation, PD equal to 100% is used.

- **LGD:** Defined as the fraction of the total exposure that the Bank estimates not to be able to recover in the case of default. The LGD assumption depends on the type of the issuer, level of seniority and the presence of collateral.
- **EIR:** The yield to maturity of the instrument at the time of acquisition.
- **EAD:** Defined as the total loss that the Bank may incur, from a potential default of the issuer of the financial instrument. The Bank follows a forward amortizing cost approach to calculate EAD and it is estimated assuming that future cash flows will not be received and in return, the Bank will receive a recovery amount. EAD is the sum of the discounted cash flows as at the reporting date, using the EIR.

The Group and the Bank do not utilize any internal models for estimating the PDs, LGDs or any of the staging criteria used for the ECL calculation of debt securities and other short-term treasury products. As primary methodology for the staging and ECL calculation, the Bank relies on the assessment of external rating agencies and the published rating-mapped PDs. This approach assumes a single 'average' economic state scenario, which represents the average of all possible outcomes under different scenarios of macroeconomic conditions.

The assessment of SICR for debt securities is performed through an automated process. Any other assessment relating to SICR and which leads to different outcome in terms of stage allocation as defined above, will need to be approved by the Provisioning Committee at each reporting date.

Purchased or originated credit impaired

POCI financial assets are credit-impaired on initial recognition. Unlike credit-impaired financial assets, the corresponding assessment for POCIs is made at initial recognition rather than in subsequent periods.

For POCI assets, the amortised cost always reflects the lifetime ECL. POCI assets remain in the POCI category for their entire lifetime and are not assessed for stage allocation or any stage transfers, therefore, any POCI that is no longer credit impaired as of the end of the reporting period is still presented in this category for classification purposes.

Analysis of inputs to the ECL model under multiple economic scenarios

The Economics and Investments Strategy Unit of the Group produces forecasts for the possible evolution of macroeconomic variables, such as GDP, unemployment rate, inflation rate, House Price Index and Commercial real estate index that affect the level of ECL of loan portfolios under multiple economic scenarios. When estimating the ECLs, the Management considers three (3) scenarios and each of these are associated with different PDs and LGDs (Optimistic – Base – Pessimistic).

Management has assigned the following weights in each scenario: 60% base scenario, 20% optimistic and 20% pessimistic.

When relevant, the assessment of multiple economic scenarios also incorporates how defaulted loans are expected to be recovered, including the probability that the loans will cure. Further information is presented in Note 3.2.

Multiple scenarios on the allowance

Management assesses and considers the sensitivity of the Group's ECL allowance on loans and advances to customers at

amortised cost, against reasonably possible changes in Greece's real GDP growth, compared to the forward-looking scenarios utilised in the ECL measurement as of 31 December 2023. The sensitivity analysis was performed assuming a 'favorable' and an 'adverse' shift in the three (3) forward-looking scenarios for GDP by 1%, thus affecting the full GDP growth trajectory. A complete re-estimation of all modelled macroeconomic variables was performed taking under consideration the aforementioned 'favorable' and 'adverse' variations of the original forward-looking scenarios, since GDP plays a pivotal role in the modelling of all other macroeconomic variables.

The following tables include the ECL impact as of 31 December 2023 and 2022, for each of the alternative scenarios assumed. The impact should be read in the context of the sensitivity analysis as a whole, in conjunction with the narrative disclosures provided above.

Alternative scenario assumed as at 31/12/2023 (Group)	ECL impact			
	Stage 1	Stage 2	Stage 3	Total
Higher GDP (+1%)	(6)	(10)	(8)	**(24)**
Lower GDP (-1%)	6	9	7	**22**

Alternative scenario assumed as at 31/12/2022 (Group)	ECL impact			
	Stage 1	Stage 2	Stage 3	Total
Higher GDP (+1%)	(3)	(9)	(13)	**(25)**
Lower GDP (-1%)	2	8	10	**20**

The Company has no loans and advances to customers at amortised cost as at 31 December 2023 and 2022.

4.3 Credit Risk Management

Maximum exposure to credit risk before collateral held or other credit enhancements

The following table represents the maximum credit risk exposure of the Group and the Company as at 31 December 2023 and 2022, without taking account of any collateral held or other credit enhancements attached for those financial assets which are not subject to IFRS 9 impairment requirements. For on-balance sheet assets, the exposures set out below are based on net carrying amounts as reported in the Statement of Financial Position.

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Due from banks (Note 20- as reclassified)	1,034	1,414	34	45
Derivative financial instruments (Note 21)	191	220	-	-
Financial assets at FVTPL (Note 22)	576	528	-	-
Loans and advances to customers at amortised cost (Note 23)	37,527	37,367	-	-
Investment securities (Note 24)	12,994	11,640	848	796
Assets held for sale (Note 29)	241	400	-	-
Other financial assets (Note 30- as reclassified)	1,089	1,125	24	29
Credit commitments (Note 41)	7,762	6,527	-	-
Total	**61,414**	**59,221**	**906**	**870**

The below tables show the gross amounts of the Group and the Company's credit exposures, per staging, for financial instruments at amortised cost or at FVTOCI and other financial assets, as well as off-balance credit exposures.

Group	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2023			Collective	Individual	Collective	Individual	
Due from banks	1,034	-	-	-	-	-	**1,034**
Loans and advances to customers at amortised cost	33,215	3,346	478	702	492	113	**38,346**
Retail Lending	**5,657**	**1,835**	**265**	**19**	**337**	**2**	**8,115**
Mortgages	4,431	1,514	206	16	285	2	**6,454**
Consumer, Personal and Other	900	221	49	3	51	-	**1,224**
Credit Cards	326	100	11	-	1	-	**437**
Corporate and Public Sector Lending	**27,558**	**1,511**	**212**	**683**	**156**	**111**	**30,231**
Large Corporate	18,915	606	2	379	60	26	**19,988**
SMEs	7,647	904	210	303	94	85	**9,244**
Public Sector	996	-	-	-	2	-	**999**
Debt securities measured at FVTOCI	1,335	-	-	-	-	-	**1,335**
Debt securities at amortised cost	11,673	-	7	-	-	-	**11,681**
Other assets - Financial assets	1,011	54	7	212	-	-	**1,285**
Total on balance sheet credit exposures	**48,268**	**3,400**	**492**	**914**	**492**	**113**	**53,680**
Financial guarantees	5,320	187	172	-	-	-	**5,680**
Letters of credit	121	-	-	-	-	-	**121**
Irrevocable undrawn credit commitments	1,920	34	-	-	6	-	**1,961**
Total off balance sheet credit exposures	**7,362**	**222**	**172**	**-**	**6**	**-**	**7,762**

Group	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2022			Collective	Individual	Collective	Individual	
Due from banks (as reclassified)	1,415	-	-	-	-	-	**1,415**
Loans and advances to customers at amortised cost	31,932	3,797	799	1,478	595	186	**38,787**
Retail Lending	**5,763**	**2,040**	**526**	**47**	**394**	**5**	**8,774**
Mortgages	4,551	1,677	306	20	319	5	**6,879**
Consumer, Personal and Other	876	263	172	27	71	-	**1,409**
Credit Cards	336	99	48	-	3	-	**485**
Corporate and Public Sector Lending	**26,169**	**1,757**	**273**	**1,431**	**202**	**181**	**30,013**
Large Corporate	17,778	536	6	654	67	34	**19,076**
SMEs	6,776	1,221	267	772	132	147	**9,313**
Public Sector	1,615	-	-	5	2	-	**1,623**
Debt securities measured at FVTOCI	796	-	-	-	-	-	**796**
Debt securities at amortised cost	10,867	11	-	-	-	-	**10,878**
Other assets - Financial assets (as reclassified)	1,037	52	9	202	-	-	**1,300**
Total on balance sheet credit exposures	**46,047**	**3,859**	**808**	**1,680**	**595**	**187**	**53,176**
Financial guarantees	4,550	37	202	-	-	-	**4,789**
Letters of credit	114	-	-	-	-	-	**114**
Irrevocable undrawn credit commitments	1,536	78	3	-	6	-	**1,624**
Total off balance sheet credit exposures	**6,200**	**116**	**204**	**-**	**6**	**-**	**6,527**

Company	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2023			Collective	Individual	Collective	Individual	
Due from banks	34	-	-	-	-	-	**34**
Loans and advances to customers at amortised cost	-	-	-	-	-	-	**-**
Retail Lending	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Mortgages	-	-	-	-	-	-	**-**
Consumer, Personal and Other	-	-	-	-	-	-	**-**
Credit Cards	-	-	-	-	-	-	**-**
Corporate and Public Sector Lending	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Large Corporate	-	-	-	-	-	-	**-**
SMEs	-	-	-	-	-	-	**-**
Public Sector	-	-	-	-	-	-	**-**
Debt securities measured at FVTOCI	-	-	-	-	-	-	**-**
Debt securities at amortised cost	855	-	-	-	-	-	**855**
Reverse repos with customers	-	-	-	-	-	-	**-**
Other assets - Financial assets	20	-	-	4	-	-	**24**
Total on balance sheet credit exposures	**910**	**-**	**-**	**4**	**-**	**-**	**913**
Financial guarantees	-	-	-	-	-	-	**-**
Letters of credit	-	-	-	-	-	-	**-**
Irrevocable undrawn credit commitments	-	-	-	-	-	-	**-**
Total off balance sheet credit exposures	**-**	**-**	**-**	**-**	**-**	**-**	**-**

Company	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2022			Collective	Individual	Collective	Individual	
Due from banks	45	-	-	-	-	-	**45**
Loans and advances to customers at amortised cost	-	-	-	-	-	-	**-**
Retail Lending	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Mortgages	-	-	-	-	-	-	**-**
Consumer, Personal and Other	-	-	-	-	-	-	**-**
Credit Cards	-	-	-	-	-	-	**-**
Corporate and Public Sector Lending	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Large Corporate	-	-	-	-	-	-	**-**
SMEs	-	-	-	-	-	-	**-**
Public Sector	-	-	-	-	-	-	**-**
Debt securities measured at FVTOCI	-	-	-	-	-	-	**-**
Debt securities at amortised cost	819	-	-	-	-	-	**819**
Reverse repos with customers	-	-	-	-	-	-	**-**
Other assets - Financial assets	18	-	-	11	-	-	**29**
Total on balance sheet credit exposures	**882**	**-**	**-**	**11**	**-**	**-**	**892**
Financial guarantees	-	-	-	-	-	-	**-**
Letters of credit	-	-	-	-	-	-	**-**
Irrevocable undrawn credit commitments	-	-	-	-	-	-	**-**
Total off balance sheet credit exposures	**-**	**-**	**-**	**-**	**-**	**-**	**-**

4.3.1 Loans and advances to customers at amortised cost

For credit risk management purposes, the Group monitors its credit risk exposure on all acquired loans and advances to customers at amortised cost on a gross basis, i.e. the EAD is grossed up with the unamortised purchase price allocation adjustment (the "PPA adjustment") as at the reporting date.

For the purposes of this disclosure, gross carrying amount is defined as the amortised cost, before adjusting for any loss allowance, grossed up with the PPA adjustment. Similarly, the ECL allowance for impairment losses presented in the following tables includes the PPA adjustment. As such, the gross carrying amount and ECL allowance for impairment losses presented below does not reconcile to Note 23.

The Company has no loans and advances to customers at amortised cost as at 31 December 2023 and 2022.

Loans and advances to customers at amortised cost for the Group as at 31 December 2023 and 2022 are summarised as follows:

Group 31/12/2023	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Stage 3 Credit impaired Lifetime ECL	POCI Credit impaired Lifetime ECL	Total
Mortgages					
Gross carrying amount	4,431	1,514	221	287	**6,454**
Less: ECL Allowance for impairment losses	(3)	(15)	(17)	(6)	**(42)**
Total Mortgages	**4,428**	**1,499**	**204**	**281**	**6,412**
Consumer, Personal and Other loans					
Gross carrying amount	900	221	52	51	**1,224**
Less: ECL Allowance for impairment losses	(7)	(22)	(27)	(5)	**(61)**
Total Consumer, Personal and Other loans	**892**	**199**	**25**	**46**	**1,162**
Credit Cards					
Gross carrying amount	326	100	11	1	**437**
Less: ECL Allowance for impairment losses	(2)	(7)	(9)	-	**(18)**
Total Credit Cards	**324**	**93**	**2**	**-**	**419**
Retail Lending					
Gross carrying amount	5,657	1,835	284	339	**8,115**
Less: ECL Allowance for impairment losses	(12)	(44)	(53)	(12)	**(122)**
Total Retail Lending	**5,644**	**1,791**	**231**	**327**	**7,993**
Large Corporate Lending					
Gross carrying amount	18,915	606	382	86	**19,988**
Less: ECL Allowance for impairment losses	(17)	(8)	(233)	(19)	**(278)**
Total Large Corporate Lending	18,897	598	148	67	**19,710**
SMEs Lending					
Gross carrying amount	7,647	904	513	179	**9,244**
Less: ECL Allowance for impairment losses	(18)	(53)	(283)	(64)	**(419)**
Total SMEs Lending	**7,629**	**851**	**230**	**115**	**8,825**
Public Sector Lending					
Gross carrying amount	996	-	1	2	**999**
Less: ECL Allowance for impairment losses	-	-	(1)	-	**(1)**
Total Public Sector Lending	**996**	**-**	**-**	**2**	**998**
Corporate and Public Sector Lending					
Gross carrying amount	27,558	1,511	895	267	**30,231**
Less: ECL Allowance for impairment losses	(36)	(61)	(517)	(83)	**(697)**
Total Corporate and Public Sector Lending	**27,523**	**1,449**	**378**	**183**	**29,534**
Loans and advances to customers at amortised cost					
Gross carrying amount	33,215	3,346	1,180	605	**38,346**
Less: ECL Allowance for impairment losses	(48)	(106)	(571)	(95)	**(819)**
Total Loans and advances to customers at amortised cost	**33,167**	**3,240**	**609**	**510**	**37,527**

Group 31/12/2022	Stage 1 12-month ECL	Stage 2 Lifetime ECL	Stage 3 Credit impaired Lifetime ECL	POCI Credit impaired Lifetime ECL	Total
Mortgages					
Gross carrying amount	4,551	1,677	327	324	**6,879**
Less: ECL Allowance for impairment losses	(3)	(20)	(48)	(15)	**(86)**
Total Mortgages	**4,548**	**1,657**	**278**	**309**	**6,793**
Consumer, Personal and Other loans					
Gross carrying amount	876	263	199	71	**1,410**
Less: ECL Allowance for impairment losses	(6)	(28)	(116)	(13)	**(163)**
Total Consumer, Personal and Other loans	**870**	**236**	**83**	**58**	**1,247**
Credit Cards					
Gross carrying amount	336	99	48	3	**485**
Less: ECL Allowance for impairment losses	(1)	(5)	(41)	(3)	**(50)**
Total Credit Cards	**334**	**94**	**6**	**-**	**435**
Retail Lending					
Gross carrying amount	5,763	2,040	573	399	**8,774**
Less: ECL Allowance for impairment losses	(11)	(53)	(206)	(31)	**(300)**
Total Retail Lending	**5,752**	**1,987**	**367**	**368**	**8,475**
Large Corporate Lending					
Gross carrying amount	17,778	536	660	102	**19,076**
Less: ECL Allowance for impairment losses	(12)	(5)	(325)	(20)	**(363)**
Total Large Corporate Lending	**17,766**	**531**	**335**	**81**	**18,713**
SMEs Lending					
Gross carrying amount	6,776	1,221	1,039	279	**9,314**
Less: ECL Allowance for impairment losses	(14)	(62)	(581)	(97)	**(754)**
Total SMEs Lending	**6,762**	**1,159**	**458**	**182**	**8,560**
Public Sector Lending					
Gross carrying amount	1,615	-	5	2	**1,623**
Less: ECL Allowance for impairment losses	-	-	(4)	-	**(4)**
Total Public Sector Lending	**1,615**	**-**	**2**	**2**	**1,619**
Corporate and Public Sector Lending					
Gross carrying amount	26,169	1,757	1,704	383	**30,013**
Less: ECL Allowance for impairment losses	(26)	(68)	(910)	(117)	**(1,121)**
Total Corporate and Public Sector Lending	**26,143**	**1,689**	**794**	**265**	**28,892**
Loans and advances to customers at amortised cost					
Gross carrying amount	31,932	3,797	2,277	782	**38,787**
Less: ECL Allowance for impairment losses	(37)	(120)	(1,115)	(148)	**(1,421)**
Total Loans and advances to customers at amortised cost	**31,895**	**3,677**	**1,162**	**633**	**37,367**

Stage 1 exposures presented under note line “Large corporate lending” include collateralised loan obligations (“CLOs”) with a gross carrying amount of € 466 million as at 31 December 2023 (31 December 2022: € 502 million). The corresponding ECL is immaterial for both years. Refer also to Note 23.

4.3.2 Credit quality per loan portfolio and industry

The tables below present the credit quality per loan portfolio and industry, inclusive of the value of collateral for the Group's gross carrying amount of loan and advances to customers at amortised cost as at 31 December 2023 and 2022.
The Group implements guidelines on the eligibility and valuation of collateral value which are described in the Credit Policy Manual and further explained in note 4.3.3.

The fair value of collateral depicted in the tables below is capped at the gross carrying amount of the loan without application of a haircut.

	Group					
31/12/2023	Strong	Recommended	Substandard	Default	Total	Value of collateral
Retail Lending	**5,595**	**62**	**2,140**	**318**	**8,115**	**6,671**
Mortgages	4,395	36	1,772	251	6,454	6,210
Consumer, Personal and Other	880	19	268	56	1,224	460
Credit Cards	319	7	100	11	437	1
Corporate Lending	**24,623**	**1,997**	**1,652**	**959**	**29,232**	**18,355**
Large Corporate	17,892	1,045	662	390	19,988	12,717
SMEs	6,731	952	990	570	9,244	5,638
Public Sector	**996**	**0**	**2**	**1**	**999**	**953**
Greece	996	0	2	1	999	953
Total	**31,214**	**2,059**	**3,795**	**1,278**	**38,346**	**25,979**

	Group					
31/12/2022	Strong	Recommended	Substandard	Default	Total	Value of collateral
Retail Lending	**5,704**	**59**	**2,356**	**655**	**8,774**	**7,133**
Mortgages	4,517	34	1,939	389	6,879	6,551
Consumer, Personal and Other	858	18	317	216	1,410	581
Credit Cards	329	7	100	50	485	1
Corporate Lending	**22,630**	**1,952**	**1,948**	**1,860**	**28,390**	**18,959**
Large Corporate	16,941	839	611	685	19,076	12,849
SMEs	5,689	1,113	1,337	1,175	9,314	6,110
Public Sector	**1,609**	**6**	**2**	**5**	**1,623**	**1,566**
Greece	1,609	6	2	5	1,623	1,566
Total	**29,944**	**2,017**	**4,306**	**2,521**	**38,787**	**27,658**

The value of collateral for large corporate mainly includes the guarantee provided by the Hellenic Republic under the Hellenic Asset Protection Scheme for the senior notes held by the Bank related to its own securitizations. The respective figure for 2022 has been restated for comparability purposes.

The balance for the Group's gross carrying amount of loan and advances to customers at amortised cost, where collaterals is held as at 31 December 2023 is € 31,034 million (31 December 2022: € 32,446 million)

The tables below show the Group's ageing analysis of past dues and the classification of gross exposures per loan category, into stages, inclusive of the corresponding value of collateral:

Group	Gross loans and advances to customers at amortised cost												
31/12/2023	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denounced	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Retail Lending	**7,695**	**172**	**66**	**49**	**43**	**56**	**34**	**8,115**	**5,657**	**1,835**	**284**	**339**	**8,115**
Mortgages	6,168	100	47	36	37	34	31	**6,454**	4,431	1,514	221	287	**6,454**
Consumer, Personal and Other	1,117	55	16	10	4	19	3	**1,224**	900	221	52	51	**1,224**
Credit Cards	409	17	4	3	1	3	-	**437**	326	100	11	1	**437**
Corporate Lending	**26,441**	**1,981**	**200**	**57**	**30**	**166**	**357**	**29,232**	**26,562**	**1,511**	**895**	**265**	**29,232**
Large Corporate	18,309	1,495	101	30	-	38	14	**19,988**	18,915	606	382	86	**19,988**
SMEs	8,132	485	99	27	30	127	343	**9,244**	7,647	904	513	179	**9,244**
Public Sector	**998**	**-**	**-**	**-**	**-**	**-**	**-**	**999**	**996**	**-**	**1**	**2**	**999**
Greece	998	-	-	-	-	1	-	**999**	996	-	1	2	**999**
Total	**35,134**	**2,153**	**266**	**106**	**73**	**223**	**391**	**38,346**	**33,215**	**3,346**	**1,180**	**605**	**38,346**
Value of collateral	**23,986**	**1,267**	**178**	**94**	**64**	**146**	**244**	**25,979**	**22,220**	**2,578**	**705**	**477**	**25,979**

Group	Gross loans and advances to customers at amortised cost												
31/12/2022	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denounced	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Retail Lending	**8,080**	**174**	**79**	**69**	**87**	**132**	**155**	**8,774**	**5,763**	**2,040**	**573**	**399**	**8,774**
Mortgages	6,501	98	53	48	56	45	78	**6,879**	4,551	1,677	327	324	**6,879**
Consumer, Personal and Other	1,158	59	22	17	26	61	66	**1,410**	876	263	199	71	**1,410**
Credit Cards	420	16	5	3	5	25	11	**485**	336	99	48	3	**485**
Corporate Lending	**25,268**	**1,608**	**180**	**32**	**82**	**441**	**780**	**28,390**	**24,554**	**1,757**	**1,699**	**381**	**28,390**
Large Corporate	17,888	809	43	-	58	207	71	**19,076**	17,778	536	660	102	**19,076**
SMEs	7,380	798	136	32	25	234	709	**9,314**	6,776	1,221	1,039	279	**9,314**
Public Sector	**1,617**	**-**	**-**	**-**	**-**	**-**	**5**	**1,623**	**1,615**	**-**	**5**	**2**	**1,623**
Greece	1,617	-	-	-	-	-	5	**1,623**	1,615	-	5	2	**1,623**
Total	**34,965**	**1,781**	**259**	**102**	**169**	**573**	**939**	**38,787**	**31,932**	**3,797**	**2,277**	**782**	**38,787**
Value of collateral	**25,401**	**1,108**	**199**	**85**	**117**	**296**	**453**	**27,658**	**22,839**	**2,981**	**1,272**	**567**	**27,658**

The tables below show the Group's ECL allowance, per loan category, based on past dues and staging:

Group	ECL allowance for impairments on loans and advances to customers at amortised cost												
31/12/2023	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denounced	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Retail Lending	**67**	**10**	**6**	**7**	**3**	**20**	**9**	**122**	**12**	**44**	**53**	**12**	**122**
Mortgages	29	1	2	2	1	2	6	**42**	3	15	17	6	**42**
Consumer, Personal and Other	29	7	3	4	1	15	3	**61**	7	22	27	5	**61**
Credit Cards	9	2	1	2	1	3	-	**18**	2	7	9	-	**18**
Corporate Lending	**279**	**16**	**56**	**18**	**6**	**75**	**247**	**697**	**35**	**61**	**517**	**83**	**697**
Large Corporate	178	10	48	14	-	23	5	**278**	17	8	233	19	**278**
SMEs	101	6	7	4	6	52	242	**419**	18	53	283	64	**419**
Public Sector	**-**	**-**	**-**	**-**	**-**	**1**	**-**	**1**	**-**	**-**	**1**	**-**	**1**
Greece	-	-	-	-	-	1	-	**1**	-	-	1	-	**1**
Total	**346**	**26**	**62**	**25**	**9**	**96**	**256**	**819**	**48**	**106**	**571**	**95**	**819**

Group	ECL allowance for impairments on loans and advances to customers at amortised cost												
31/12/2022	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denounced	Total	Stage 1	Stage 2	Stage 3	POCI	Total
Retail Lending	**88**	**13**	**9**	**12**	**19**	**77**	**81**	**300**	**11**	**53**	**206**	**31**	**300**
Mortgages	39	2	3	4	4	10	24	**86**	3	20	48	15	**86**
Consumer, Personal and Other	41	10	5	6	11	43	47	**163**	6	28	116	13	**163**
Credit Cards	8	2	1	2	4	23	10	**50**	1	5	41	3	**50**
Corporate Lending	**253**	**16**	**7**	**8**	**50**	**248**	**536**	**1,117**	**26**	**68**	**906**	**117**	**1,117**
Large Corporate	153	1	-	-	44	118	47	**363**	12	5	325	20	**363**
SMEs	100	15	7	8	6	130	488	**754**	14	62	581	97	**754**
Public Sector	**-**	**-**	**-**	**-**	**-**	**-**	**3**	**4**	**-**	**-**	**4**	**-**	**4**
Greece	-	-	-	-	-	-	3	**4**	-	-	4	-	**4**
Total	**341**	**29**	**16**	**20**	**69**	**325**	**620**	**1,421**	**37**	**120**	**1,115**	**148**	**1,421**

The tables below present the credit quality per loan portfolio and industry:

Group	Gross loans and advances to customers at amortised cost						
31/12/2023	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,657**	**1,835**	**265**	**19**	**337**	**2**	**8,115**
Corporate and Public Sector Lending	**27,558**	**1,511**	**212**	**683**	**156**	**111**	**30,231**
Financial corporations	7,485	74	-	3	7	3	**7,572**
Manufacturing / Handicraft	3,210	331	31	143	15	11	**3,741**
Construction	731	58	11	19	10	13	**841**
Real Estate Companies	809	22	3	129	14	4	**981**
Project Finance	2,605	4	-	-	-	-	**2,609**
Wholesale and retail trade	2,972	197	71	80	17	28	**3,365**
Shipping Companies	2,122	146	-	-	-	-	**2,269**
Coastline / Ferries Companies	115	1	-	-	-	-	**116**
Hotels	2,086	381	6	41	52	17	**2,583**
Agriculture	511	43	32	19	6	-	**610**
Energy	1,148	22	1	4	14	11	**1,201**
Transports and Logistics	577	22	9	101	2	-	**710**
Other industries	2,191	209	49	144	17	24	**2,635**
Public sector	996	-	-	-	2	-	**999**
Total	**33,215**	**3,346**	**478**	**702**	**492**	**113**	**38,346**

Group	Gross loans and advances to customers at amortised cost						
31/12/2022	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,763**	**2,040**	**526**	**47**	**393**	**6**	**8,774**
Corporate and Public Sector Lending	**26,169**	**1,757**	**273**	**1,431**	**202**	**181**	**30,013**
Financial corporations	7,280	39	2	11	7	3	**7,344**
Manufacturing/ Handicraft	3,388	325	45	231	21	22	**4,032**
Construction	539	225	25	99	12	13	**914**
Real Estate Companies	770	35	3	247	15	22	**1,093**
Project Finance	2,182	5	1	9	-	-	**2,198**
Wholesale and retail trade	2,563	351	84	223	25	27	**3,272**
Shipping Companies	2,141	62	2	2	-	-	**2,206**
Coastline/ Ferries Companies	124	-	-	99	-	-	**223**
Hotels	1,772	296	10	172	67	27	**2,345**
Agriculture	493	34	23	20	7	-	**577**
Energy	854	25	2	30	15	12	**938**
Transports and Logistics	456	97	13	142	2	-	**709**
Other industries	1,991	260	63	140	29	55	**2,539**
Public sector	1,615	-	-	5	2	-	**1,623**
Total	**31,932**	**3,797**	**799**	**1,478**	**595**	**187**	**38,787**

Group	ECL allowance for impairments on loans and advances to customers at amortised cost						
31/12/2023	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**12**	**44**	**48**	**5**	**12**	**-**	**122**
Corporate and Public Sector Lending	**36**	**61**	**84**	**433**	**13**	**70**	**697**
Financial corporations	4	-	-	3	-	3	**11**
Manufacturing / Handicraft	4	14	12	75	3	8	**116**
Construction	2	5	5	11	2	9	**34**
Real Estate Companies	-	1	-	81	-	1	**84**
Project Finance	2	-	-	-	-	-	**3**
Wholesale and retail trade	6	17	31	51	3	17	**125**
Shipping Companies	1	1	-	-	-	-	**2**
Coastline / Ferries Companies	-	-	-	-	-	-	**-**
Hotels	3	3	1	30	1	4	**41**
Agriculture	4	5	10	13	-	-	**31**
Energy	4	1	-	2	1	7	**15**
Transports and Logistics	1	2	4	87	-	-	**95**
Other industries	5	12	19	82	2	21	**140**
Public sector	-	-	-	-	-	-	**1**
Total	**48**	**106**	**132**	**439**	**24**	**71**	**819**

Group	ECL allowance for impairments on loans and advances to customers at amortised cost						
	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2022			Collective	Individual	Collective	Individual	
Retail Lending	**11**	**53**	**177**	**28**	**30**	**1**	**300**
Corporate and Public Sector Lending	**26**	**68**	**120**	**790**	**24**	**94**	**1,121**
Financial corporations	2	-	2	11	-	2	**18**
Manufacturing/ Handicraft	3	13	19	102	5	11	**154**
Construction	1	7	13	61	2	8	**92**
Real Estate Companies	1	1	1	110	-	11	**125**
Project Finance	2	1	-	7	-	-	**11**
Wholesale and retail trade	4	22	39	156	6	14	**242**
Shipping Companies	1	-	1	1	-	-	**3**
Coastline/ Ferries Companies	-	-	-	67	-	-	**67**
Hotels	2	3	3	38	1	3	**48**
Agriculture	1	3	8	9	1	-	**23**
Energy	4	2	1	20	1	5	**34**
Transports and Logistics	1	2	6	108	1	-	**118**
Other industries	4	12	27	95	6	39	**183**
Public sector	-	-	-	3	-	-	**4**
Total	**37**	**120**	**298**	**818**	**54**	**95**	**1,421**

Group	Loans and advances to customers at amortised cost						
31/12/2023	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,644**	**1,791**	**217**	**14**	**325**	**2**	**7,993**
Corporate and Public Sector Lending	**27,523**	**1,449**	**129**	**250**	**143**	**41**	**29,534**
Financial corporations	7,481	74	-	-	6	-	**7,561**
Manufacturing / Handicraft	3,205	317	19	68	13	3	**3,625**
Construction	729	53	6	8	8	3	**807**
Real Estate Companies	809	21	2	48	14	3	**897**
Project Finance	2,602	4	-	-	-	-	**2,606**
Wholesale and retail trade	2,966	180	40	30	13	11	**3,240**
Shipping Companies	2,122	145	-	-	-	-	**2,267**
Coastline / Ferries Companies	115	1	-	-	-	-	**116**
Hotels	2,083	378	5	12	51	13	**2,542**
Agriculture	507	38	21	6	6	-	**578**
Energy	1,144	21	-	2	13	4	**1,185**
Transports and Logistics	576	20	5	14	1	-	**616**
Other industries	2,186	197	31	62	15	3	**2,495**
Public sector	996	-	-	-	2	-	**998**
Total	**33,167**	**3,240**	**346**	**263**	**468**	**42**	**37,527**

Group	Loans and advances to customers at amortised cost						
31/12/2022	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,752**	**1,987**	**349**	**19**	**363**	**4**	**8,475**
Corporate and Public Sector Lending	**26,143**	**1,689**	**153**	**642**	**178**	**88**	**28,892**
Financial corporations	7,278	39	1	-	7	1	**7,326**
Manufacturing / Handicraft	3,385	312	26	129	16	11	**3,878**
Construction	538	218	13	38	10	5	**822**
Real Estate Companies	769	34	2	137	14	11	**968**
Project Finance	2,180	4	1	2	-	-	**2,187**
Wholesale and retail trade	2,558	330	45	67	18	13	**3,031**
Shipping Companies	2,140	62	-	1	-	-	**2,204**
Coastline / Ferries Companies	124	-	-	32	-	-	**156**
Hotels	1,771	294	8	135	66	24	**2,297**
Agriculture	492	31	14	11	6	-	**554**
Energy	850	23	1	10	14	6	**904**
Transports and Logistics	455	95	7	33	1	-	**591**
Other industries	1,987	248	36	45	23	16	**2,355**
Public sector	1,615	-	-	1	2	-	**1,619**
Total	**31,895**	**3,677**	**501**	**660**	**541**	**92**	**37,367**

The tables that follow show the credit quality, per staging, of each loan category of the Group as at 31 December 2023 and 2022, inclusive of the value of collaterals.

Mortgages

Group	Mortgages - Internal rating grade				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	4,395	-	-	-	**4,395**
Recommended	36	-	-	-	**36**
Substandard	-	1,514	-	258	**1,772**
Default	-	-	221	29	**251**
Total Gross Balance	**4,431**	**1,514**	**221**	**287**	**6,454**
Strong	3	-	-	-	**3**
Recommended	-	-	-	-	**-**
Substandard	-	15	-	2	**18**
Default	-	-	17	4	**21**
Total ECL Allowance	**3**	**15**	**17**	**6**	**42**
Total Balance	**4,428**	**1,499**	**204**	**281**	**6,412**
Value of collateral	4,283	1,447	212	269	**6,210**

Group	Mortgages - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	4,517	-	-	-	**4,517**
Recommended	34	-	-	-	**34**
Substandard	-	1,677	-	262	**1,939**
Default	-	-	327	62	**389**
Total Gross Balance	**4,551**	**1,677**	**327**	**324**	**6,879**
Strong	3	-	-	-	**3**
Recommended	-	-	-	-	**-**
Substandard	-	20	-	3	**22**
Default	-	-	48	13	**61**
Total ECL Allowance	**3**	**20**	**48**	**15**	**86**
Total Balance	**4,548**	**1,657**	**278**	**309**	**6,793**
Value of collateral	4,378	1,586	290	298	**6,551**

Consumer, Personal and Other Lending

Group	Consumer, Personal and Other Lending - Internal rating grade				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	880	-	-	-	**880**
Recommended	19	-	-	-	**19**
Substandard	-	221	-	47	**268**
Default	-	-	52	4	**56**
Total Gross Balance	**900**	**221**	**52**	**51**	**1,224**
Strong	7	-	-	-	**7**
Recommended	-	-	-	-	**-**
Substandard	-	22	-	4	**26**
Default	-	-	27	1	**28**
Total ECL Allowance	**7**	**22**	**27**	**5**	**61**
Total Balance	**892**	**199**	**25**	**46**	**1,162**
Value of collateral	342	73	18	27	**460**

Group	Consumer, Personal and Other Lending - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	858	-	-	-	**858**
Recommended	18	-	-	-	**18**
Substandard	-	263	-	54	**317**
Default	-	-	199	18	**216**
Total Gross Balance	**876**	**263**	**199**	**71**	**1,410**
Strong	6	-	-	-	**6**
Recommended	-	-	-	-	**-**
Substandard	-	28	-	5	**33**
Default	-	-	116	8	**124**
Total ECL Allowance	**6**	**28**	**116**	**13**	**163**
Total Balance	**870**	**236**	**83**	**58**	**1,247**
Value of collateral	403	95	50	33	**581**

Credit Cards

Group	Credit Cards - Internal rating grade				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	319	-	-	-	**319**
Recommended	7	-	-	-	**7**
Substandard	-	100	-	-	**100**
Default	-	-	11	-	**11**
Total Gross Balance	**326**	**100**	**11**	**1**	**437**
Strong	1	-	-	-	**1**
Recommended	-	-	-	-	**-**
Substandard	-	7	-	-	**7**
Default	-	-	9	-	**9**
Total ECL Allowance	**2**	**7**	**9**	**-**	**18**
Total Balance	**324**	**93**	**2**	**1**	**419**
Value of collateral	1	-	-	-	**1**

Group	Credit Cards - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	329	-	-	-	**329**
Recommended	7	-	-	-	**7**
Substandard	-	99	-	-	**100**
Default	-	-	48	3	**50**
Total Gross Balance	**336**	**99**	**48**	**3**	**485**
Strong	1	-	-	-	**1**
Recommended	-	-	-	-	**-**
Substandard	-	5	-	-	**5**
Default	-	-	41	3	**44**
Total ECL Allowance	**1**	**5**	**41**	**3**	**50**
Total Balance	**334**	**94**	**6**	**-**	**435**
Value of collateral	1	-	-	-	**1**

Large Corporate

Group	Large Corporate - Internal rating grade				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	17,892	-	-	-	**17,892**
Recommended	1,023	22	-	-	**1,045**
Substandard	-	584	18	60	**662**
Default	-	-	364	26	**390**
Total Gross Balance	**18,915**	**606**	**382**	**86**	**19,988**
Strong	13	-	-	-	**13**
Recommended	4	-	-	-	**4**
Substandard	-	8	2	1	**11**
Default	-	-	232	18	**250**
Total ECL Allowance	**17**	**8**	**233**	**19**	**278**
Total Balance	**18,897**	**598**	**148**	**67**	**19,710**
Value of collateral	12,113	421	132	51	**12,717**

Group	Large Corporate - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	16,941	-	-	-	**16,941**
Recommended	837	2	-	-	**839**
Substandard	-	534	10	67	**611**
Default	-	-	650	35	**685**
Total Gross Balance	**17,778**	**536**	**660**	**102**	**19,076**
Strong	9	-	-	-	**9**
Recommended	3	-	-	-	**3**
Substandard	-	5	-	2	**7**
Default	-	-	325	19	**344**
Total ECL Allowance	**12**	**5**	**325**	**20**	**363**
Total Balance	**17,766**	**531**	**335**	**81**	**18,713**
Value of collateral	12,044	391	355	60	**12,849**

SME

Group	SME - Internal rating grade				
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	6,731	-	-	-	6,731
Recommended	916	36	-	-	952
Substandard	-	868	34	88	990
Default	-	-	479	91	570
Total Gross Balance	**7,647**	**904**	**513**	**179**	9,244
Strong	16	-	-	-	16
Recommended	3	-	-	-	3
Substandard	-	53	33	2	87
Default	-	-	250	62	313
Total ECL Allowance	**18**	**53**	**283**	**64**	419
Total Balance	**7,629**	**851**	**230**	**115**	8,825
Value of collateral	4,529	637	342	130	5,638

Group	SME - Internal rating grade				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	5,689	-	-	-	**5,689**
Recommended	1,086	27	-	-	**1,113**
Substandard	-	1,194	37	106	**1,337**
Default	-	-	1,002	173	**1,175**
Total Gross Balance	**6,776**	**1,221**	**1,039**	**279**	**9,314**
Strong	10	-	-	-	**10**
Recommended	4	-	-	-	**4**
Substandard	-	62	33	2	**98**
Default	-	-	547	95	**642**
Total ECL Allowance	**14**	**62**	**581**	**97**	**754**
Total Balance	**6,762**	**1,159**	**458**	**182**	**8,560**
Value of collateral	4,452	909	573	177	**6,110**

Public Sector

Group	Public Sector - Internal rating grade				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	996	-	-	-	**996**
Recommended	-	-	-	-	**-**
Substandard	-	-	-	2	**2**
Default	-	-	1	-	**1**
Total Gross Balance	**996**	**-**	**1**	**2**	**999**
Strong	-	-	-	-	**-**
Recommended	-	-	-	-	**-**
Substandard	-	-	-	-	**-**
Default	-	-	1	-	**1**
Total ECL Allowance	**-**	**-**	**1**	**-**	**1**
Total Balance	**996**	**-**	**-**	**2**	**998**
Value of collateral	953	-	-	-	**953**

Group	Public Sector - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	1,609	-	-	-	**1,609**
Recommended	6	-	-	-	**6**
Substandard	-	-	-	2	**2**
Default	-	-	5	-	**5**
Total Gross Balance	**1,615**	**-**	**5**	**2**	**1,623**
Strong	-	-	-	-	**-**
Recommended	-	-	-	-	**-**
Substandard	-	-	-	-	**-**
Default	-	-	4	-	**4**
Total ECL Allowance	**-**	**-**	**4**	**-**	**4**
Total Balance	**1,615**	**-**	**2**	**2**	**1,619**
Value of collateral	1,562	-	4	-	**1,566**

As at 31 December 2023 and 2022 the Group has not granted any Public Sector lending outside Greece.

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Group's Retail lending portfolio for 2023 is as follows:

Group	Retail Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2023	5,763	2,040	573	399	**8,775**
Transfer (to) / from Held for Sale	(6)	(23)	(367)	(58)	**(455)**
New assets originated or purchased	472	23	-	-	**495**
Other debits to the Gross Balance / (Repayments)	(849)	(308)	(7)	(20)	**(1,183)**
Assets sold	-	-	-	-	**-**
Assets derecognised (excluding write offs)	-	-	-	-	**-**
Transferred from Stage 1 to Stage 2	(1,022)	1,022			**-**
Transferred from Stage 1 to Stage 3	(18)		18		**-**
Transferred from Stage 2 to Stage 1	975	(975)			**-**
Transferred from Stage 2 to Stage 3		(157)	157		**-**
Transferred from Stage 3 to Stage 1	-		-		**-**
Transferred from Stage 3 to Stage 2		98	(98)		**-**
Change in the present value of the allowance	321	105	26	17	**469**
Write-off of interest recognised from change in the present value of the allowance	-	-	(8)	(1)	**(9)**
Write-offs	(1)	(1)	(10)	-	**(12)**
FX differences and other movements	21	10	2	2	**35**
Gross carrying amount as at 31/12/2023	**5,657**	**1,835**	**284**	**339**	**8,115**

Group	Retail Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2023	**11**	**53**	**205**	**31**	**299**
Transfer (to) / from Held for Sale	-	(2)	(167)	(20)	**(189)**
Transferred from Stage 1 to Stage 2	(6)	6			**-**
Transferred from Stage 1 to Stage 3	-		-		**-**
Transferred from Stage 2 to Stage 1	19	(19)			**-**
Transferred from Stage 2 to Stage 3		(12)	12		**-**
Transferred from Stage 3 to Stage 1	-		-		**-**
Transferred from Stage 3 to Stage 2		17	(17)		**-**
ECL impairment charge / (release) for the year (P&L)	(11)	(1)	28	(12)	**5**
ECL impairment charge for new financial assets originated or purchased (P&L)	-	-	-	-	**-**
Recoveries of amounts previously written-off (P&L)	-	-	-	-	**-**
Change in the present value of the allowance	-	-	9	1	**10**
Write-off of interest recognised from change in the present value of the allowance	-	-	(8)	(1)	**(9)**
Write-offs	(1)	(1)	(10)	(0)	**(12)**
Financial assets derecognised	-	-	-	-	**-**
Disposals of loans and advances	-	-	-	-	**-**
FX differences and other movements	1	3	1	12	**16**
ECL allowance as at 31/12/2023	**12**	**44**	**53**	**12**	**121**

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Group's Retail lending portfolio for 2022 is as follows:

Group	Retail Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2022	**5,806**	**2,271**	**676**	**436**	**9,189**
Transfer (to) / from Held for Sale	(1)	(2)	(120)	(23)	**(146)**
New assets originated or purchased	609	37	-	4	**649**
Other debits to the Gross Balance / (Repayments)	(902)	(258)	(42)	(22)	**(1,224)**
Assets sold	-	-	-	-	**-**
Assets derecognised (excluding write offs)	-	-	-	-	**-**
Transferred from Stage 1 to Stage 2	(1,115)	1,115			**-**
Transferred from Stage 1 to Stage 3	(14)		14		**-**
Transferred from Stage 2 to Stage 1	1,177	(1,177)			**-**
Transferred from Stage 2 to Stage 3		(240)	240		**-**
Transferred from Stage 3 to Stage 1	-		-		**-**
Transferred from Stage 3 to Stage 2		206	(206)		**-**
Change in the present value of the allowance	206	78	21	11	**316**
Write-off of interest recognised from change in the present value of the allowance	-	-	(8)	(1)	**(9)**
Write-offs	(11)	(1)	(3)	(8)	**(23)**
FX differences and other movements	9	10	2	2	**22**
Gross carrying amount as at 31/12/2022	**5,763**	**2,040**	**573**	**399**	**8,775**

Group	Retail Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2022	**21**	**60**	**177**	**36**	**295**
Transfer (to) / from Held for Sale	-	(1)	(67)	(13)	**(82)**
Transferred from Stage 1 to Stage 2	(3)	3			**-**
Transferred from Stage 1 to Stage 3	-		-		**-**
Transferred from Stage 2 to Stage 1	24	(24)			**-**
Transferred from Stage 2 to Stage 3		(20)	20		**-**
Transferred from Stage 3 to Stage 1	-		-		**-**
Transferred from Stage 3 to Stage 2		27	(27)		**-**
ECL impairment charge / (release) for the year (P&L)	(26)	-	72	(1)	**46**
ECL impairment charge for new financial assets originated or purchased (P&L)	-	-	-	-	**-**
Recoveries of amounts previously written-off (P&L)	-	-	-	-	**-**
Change in the present value of the allowance	-	-	9	1	**10**
Write-off of interest recognised from change in the present value of the allowance	-	-	(8)	(1)	**(9)**
Write-offs	(11)	(1)	(3)	(8)	**(23)**
Financial assets derecognised	-	-	-	-	**-**
Disposals of loans and advances	-	-	-	-	**-**
FX differences and other movements	6	8	34	15	**63**
ECL allowance as at 31/12/2022	**11**	**53**	**205**	**31**	**299**

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Group's Corporate and Public sector lending portfolio for 2023 is as follows:

Group	Corporate and Public Sector Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2023	**26,169**	**1,757**	**1,704**	**383**	**30,013**
Transfer (to) / from Held for Sale	(37)	(1)	(295)	(42)	**(375)**
Intercompany loans (recognized) / derecognized due to change in Group's perimeter	-	-	(89)	-	**(89)**
New assets originated or purchased	5,569	107	12	-	**5,688**
Other debits to the Gross Balance / (Repayments)	(3,287)	(456)	(156)	(65)	**(3,963)**
Assets sold	(50)	-	(42)	(11)	**(102)**
Assets derecognised (excluding write offs)	(1,656)	(8)	-	-	**(1,664)**
Transferred from Stage 1 to Stage 2	(1,363)	1,363			-
Transferred from Stage 1 to Stage 3	(209)		209		-
Transferred from Stage 2 to Stage 1	1,469	(1,469)			-
Transferred from Stage 2 to Stage 3		(62)	62		-
Transferred from Stage 3 to Stage 1	2		(2)		-
Transferred from Stage 3 to Stage 2		191	(191)		-
Debt for equity exchange	-	-	(12)	-	**(12)**
Change in the present value of the allowance	1,026	97	78	21	**1,222**
Write-off of interest recognised from change in the present value of the allowance	-	-	(44)	(8)	**(53)**
Write-offs	(1)	(1)	(333)	(13)	**(347)**
FX differences and other movements	(76)	(7)	(5)	1	**(86)**
Gross carrying amount as at 31/12/2023	**27,558**	**1,511**	**896**	**267**	**30,231**

Group	Corporate and Public Sector Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2023	**26**	**68**	**910**	**117**	**1,121**
Transfer (to) / from Held for Sale	-	-	(185)	(25)	**(210)**
Intercompany loans (recognized) / derecognized due to change in Group's perimeter	-		-		**-**
Transferred from Stage 1 to Stage 2	(4)	4			**-**
Transferred from Stage 1 to Stage 3	(2)		2		**-**
Transferred from Stage 2 to Stage 1	18	(18)			**-**
Transferred from Stage 2 to Stage 3		(6)	6		**-**
Transferred from Stage 3 to Stage 1	-		-		**-**
Transferred from Stage 3 to Stage 2		13	(13)		**-**
ECL impairment charge / (release) for the year (P&L)	(10)	1	408	7	**407**
ECL impairment charge for new financial assets originated or purchased (P&L)	-	1	-	-	**1**
Recoveries of amounts previously written-off (P&L)	-	-	(9)	-	**(9)**
Change in the present value of the allowance	-	-	44	8	**52**
Write-off of interest recognised from change in the present value of the allowance		-	(44)	(8)	**(53)**
Write-offs	(1)	(1)	(333)	(13)	**(347)**
Financial assets derecognised	(12)	-	(1)	-	**(13)**
Disposals of loans and advances	-	-	(9)	(6)	**(15)**
Changes to contractual cash flows due to modifications not resulting in derecognition	2	-	-	-	**2**
Debt for equity exchange	-	-	-	-	**-**
FX differences and other movements	18	1	(259)	2	**(238)**
ECL allowance as at 31/12/2023	**35**	**61**	**517**	**83**	**697**

Regarding the movement in gross carrying amounts the "transfer to / from assets held for sale" of € 830 million (€ 455 million in Retail and € 375 million in Corporate & Public Sector) refers to Senna, Delta, Monza and Wheel II portfolios.

Regarding the movement in ECL allowance, line item "transfer (to) / from assets held for sale" of € 399 million (€ 189 million in Retail and € 210 million in Corporate & Public Sector) refers to Senna, Delta and Monza portfolios. Amount of € 262 million in line item "ECL impairment charge/ (release) for the year (P&L)" relates mainly to the ECL recognised during the year upon classification of the aforementioned portfolios as HFS. Accordingly, the respective ECL related to the said HFS portfolios is deducted from line item "FX differences and other movements". Refer to Note 29 for further information of the aforementioned portfolios.

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Group's Corporate and Public sector lending portfolio for 2022 is as follows:

Group	Corporate and Public Sector Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2022	**22,202**	**2,855**	**3,666**	**580**	**29,303**
Transfer (to) / from Held for Sale	(2)	30	(610)	(121)	**(704)**
Intercompany loans (recognized) / derecognized due to change in Group's perimeter	(75)	-	5	-	**(70)**
Contribution to Associates	-	-	(421)	-	**(421)**
New assets originated or purchased	6,864	166	35	5	**7,069**
Other debits to the Gross Balance / (Repayments)	(3,585)	(581)	(314)	(72)	**(4,551)**
Assets sold	-	-	(62)	(2)	**(64)**
Assets derecognised (excluding write offs)	(830)	-	(4)	-	**(834)**
Transferred from Stage 1 to Stage 2	(1,708)	1,708			**-**
Transferred from Stage 1 to Stage 3	(32)		32		**-**
Transferred from Stage 2 to Stage 1	2,715	(2,715)			**-**
Transferred from Stage 2 to Stage 3		(116)	116		**-**
Transferred from Stage 3 to Stage 1	60		(60)		**-**
Transferred from Stage 3 to Stage 2		328	(328)		**-**
Debt for equity exchange	-	-	(44)	-	**(44)**
Change in the present value of the allowance	569	85	94	23	**771**
Write-off of interest recognised from change in the present value of the allowance	-	(2)	(56)	(13)	**(71)**
Write-offs	-	-	(380)	(19)	**(399)**
FX differences and other movements	(7)	(2)	35	1	**28**
Gross carrying amount as at 31/12/2022	**26,169**	**1,757**	**1,704**	**383**	**30,013**

Group	Corporate and Public Sector Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2022	**69**	**115**	**1,330**	**160**	**1,675**
Transfer (to) / from Held for Sale	(1)	15	(295)	(71)	**(351)**
Intercompany loans (recognized) / derecognized due to change in Group's perimeter			2		**2**
Contribution to Associates			(92)		**(92)**
Transferred from Stage 1 to Stage 2	(11)	11			**-**
Transferred from Stage 1 to Stage 3	-		-		**-**
Transferred from Stage 2 to Stage 1	63	(63)			**-**
Transferred from Stage 2 to Stage 3		(13)	13		**-**
Transferred from Stage 3 to Stage 1	-		-		**-**
Transferred from Stage 3 to Stage 2		30	(30)		**-**
ECL impairment charge / (release) for the year (P&L)	(135)	(32)	564	41	**437**
ECL impairment charge for new financial assets originated or purchased (P&L)	1	-	-	-	**1**
Recoveries of amounts previously written-off (P&L)	-	-	(12)	-	**(12)**
Change in the present value of the allowance	-	1	31	9	**41**
Write-off of interest recognised from change in the present value of the allowance	-	(2)	(56)	(13)	**(71)**
Write-offs	-	-	(380)	(19)	**(399)**
Financial assets derecognized	(2)	-	-	-	**(2)**
Disposals of loans and advances	-	-	-	(1)	**(1)**
Changes to contractual cash flows due to modifications not resulting in derecognition	-	-	1	-	**1**
Debt for equity exchange	-	-	(15)	-	**(15)**
FX differences and other movements	44	5	(153)	12	**(93)**
ECL allowance as at 31/12/2022	**26**	**68**	**910**	**117**	**1,121**

The table below presents the impact from the modification of contractual terms for Group loans and advances to customers measured on lifetime ECL at the end of 31 December 2023 and 2022:

	31/12/2023	31/12/2022
Gross modification impact before reversal of ECL allowance (A)	1	(3)
Reversal of ECL allowance (B)	(20)	(16)
Net modification impact in Income Statement (A+B)	**(19)**	**(19)**
Gross carrying amount of loans before modification	**708**	**1,267**

The gross carrying amount of modified loans initially ECL measured using lifetime ECL (Stage 3 and Stage 2) and currently measured using 12 month ECL (Stage 1) as at 31 December 2023 amounted to € 334 million (31 December 2022: € 208 million).

4.3.3 Collateral and other credit enhancements

Along with the evaluation of the creditworthiness of counterparties, the Group estimates the recovery rate against exposures, when limits are set or reviewed. This estimation is based on the type of debt claim and the existence of any connected collaterals and/or guarantees.

According to standard practice, when a borrower's credit rating is low, then even stronger collaterals / guarantees are requested, in order to secure a higher recovery rate to account for the borrowers' default probability.

The Group has defined categories of acceptable collateral and it has incorporated them in the credit policy. Main types of acceptable collateral are the following:

- Pledged deposits and cheques;
- Mortgages on real estate property;
- Ship mortgages;
- Greek government guarantees;
- Bank letters of guarantee;
- Guarantees by Development Bodies (i.e. the Hellenic Fund for Entrepreneurship & Development S.A);
- Pledged financial instruments such as mutual fund shares, stocks, bonds, T-bills and receivables.

The collateral / security associated with a credit facility is initially evaluated during the credit approval process, based on their current value or fair value and it is re-evaluated at regular intervals. Collaterals or guarantees are not usually received against exposures to financial institutions.

Market value assessment of properties, which may secure any type of credit facilities towards individuals or legal entities, is performed by external certified independent valuers. The valuations are categorized into individual valuations on a specific property either on-site or desktop and indexed valuations performed with statistical methodology (e.g. Propindex, BoG Indexes etc.) or any other automated processes.

The Group accepts the following key valuation methodologies provided by International Valuation Standards (IVS):

a) Market approach or comparative method
b) Income approach
c) Cost Approach

The initial valuations of mortgaged properties are always performed on-site (physical inspection).

The Group and the Company update the valuations (either with individual valuations or statistical methods) for the collateral of all exposures (irrespective of their classification as PE / NPE) at least annually.

Furthermore, the revaluation of the immovable property is updated on an individual basis, at the time the exposure is classified as NPE and at least annually (either through individual evaluations or statistical methods), while it continues to be classified as such.

The Group, according to the credit policy manual is constantly monitoring the changes in the market conditions in the real estate market, either internally, through macroeconomic reports of the Group's Chief Economist, or externally through reports produced by prestigious independent valuation firms. Changes in market conditions are considered as an important factor in determining the market value of a real estate property. More volatile real estate market conditions may lead to a higher evaluation frequency.

The Group may also obtain corporate guarantees from parent companies for loans and advances granted to its subsidiaries.

Group	Fair value of collateral and credit enhancements held under the base scenario				
	Type of collateral or credit enhancement				
31/12/2023	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received
Loans and advances to customers at amortised cost	14,132	1,707	10,140	25,979	3,881
Mortgages	6,104	66	41	6,210	-
Consumer, Personal and Other	271	82	107	460	-
Credit Cards	-	1	-	1	-
Large Corporate	4,820	1,046	6,851	12,717	1,485
SMEs	2,936	512	2,190	5,638	2,395
Public Sector	1	1	952	953	-
Total financial assets at amortised cost	**14,132**	**1,707**	**10,140**	**25,979**	**3,881**
Derivative financial instruments	-	294	-	294	-
Total financial instruments at FVTPL	**-**	**294**	**-**	**294**	**-**
Financial guarantees	129	159	98	385	1,098
Letters of credit	-	1	-	1	4
Irrevocable undrawn credit commitments	572	22	144	738	1,663
Total	**701**	**181**	**242**	**1,124**	**2,765**

Group	Fair value of collateral and credit enhancements held under the base scenario				
	Type of collateral or credit enhancement				
31/12/2022	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received
Loans and advances to customers at amortised cost	14,899	1,427	11,333	27,658	3,449
Mortgages	6,426	70	56	6,551	-
Consumer, Personal and Other	350	78	153	581	-
Credit Cards	-	1	-	1	-
Large Corporate	5,018	853	6,979	12,849	1,453
SMEs	3,105	425	2,580	6,110	1,996
Public Sector	1	1	1,565	1,566	-
Total financial assets at amortised cost	**14,899**	**1,427**	**11,333**	**27,658**	**3,449**
Derivative financial instruments	-	635	-	635	-
Total financial instruments at FVTPL	**-**	**635**	**-**	**635**	**-**
Financial guarantees	126	120	86	333	1,046
Letters of credit	-	1	-	1	2
Irrevocable undrawn credit commitments	595	31	37	663	1,464
Total	**721**	**152**	**123**	**996**	**2,512**

The tables below provide the fair value of collaterals held and credit enhancements (refer to Note 4.3.2 for further information) for Stage 3 loans and advances to customers at amortised cost. Depending on the level of collateral some Stage 3 loans and advances to customers at amortised cost may not have individual ECL when the expected value of the collateral is greater than loan's carrying amount, even if the future value of collateral is forecasted using multiple economic scenarios.

Group	Fair value of collateral and credit enhancements of Stage 3 loans and advances to customers at amortised cost held under the base scenario					
	Type of collateral or credit enhancement					
31/12/2023	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received	Associated ECL
Loans and advances to customers at amortised cost	515	11	178	705	153	571
Mortgages	209	1	2	212	-	17
Consumer, Personal and Other	15	-	2	18	-	27
Credit Cards	-	-	-	-	-	9
Large Corporate	106	8	18	132	88	233
SMEs	184	2	156	342	66	283
Public Sector	-	-	-	-	-	1
Total loans and advances to customers at amortised cost	**515**	**11**	**178**	**705**	**153**	**571**
Financial guarantees	4	2	9	15	69	69
Letters of credit	-	-	-	-	-	-
Total	**4**	**2**	**9**	**15**	**69**	**69**

Group	Fair value of collateral and credit enhancements of Stage 3 loans and advances to customers at amortised cost held under the base scenario					
	Type of collateral or credit enhancement					
31/12/2022	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received	Associated ECL
Loans and advances to customers at amortised cost	1,066	17	189	1,271	322	1,115
Mortgages	285	1	4	290	-	48
Consumer, Personal and Other	46	1	3	50	-	116
Credit Cards	-	-	-	-	-	41
Large Corporate	331	3	21	354	147	325
SMEs	404	12	157	573	175	581
Public Sector	-	-	4	4	-	4
Total loans and advances to customers at amortised cost	**1,066**	**17**	**189**	**1,271**	**322**	**1,115**
Financial guarantees	13	1	8	22	137	80
Letters of credit	-	-	-	-	-	-
Total	**13**	**1**	**8**	**22**	**137**	**80**

4.3.4 Loan-to-value ratio of mortgage and commercial real estate lending portfolios

The below table depicts the LTV ratio, which represents the correlation between mortgage and commercial portfolios gross carrying amounts and the value of the property held as collateral (plus any other eligible collateral according to credit policy manual). A clustering of residential and commercial real estate, by range of LTV, is summarized as follow:

31/12/2023	Group	
	Mortgages (gross amounts)	Commercial real estate loans (gross amounts)
Less than 50%	3,350	82
50%-70%	1,411	269
71%-80%	468	116
81%-90%	338	177
91%-100%	228	10
101%-120%	235	22
121%-150%	176	56
Greater than 150%	248	69
Total exposure	**6,454**	**799**
Weighted Average LTV	**56.5%**	**99.3%**

31/12/2022	Group	
	Mortgages (gross amounts)	Commercial real estate loans (gross amounts)
Less than 50%	3,082	50
50%-70%	1,568	53
71%-80%	555	19
81%-90%	415	35
91%-100%	311	8
101%-120%	356	37
121%-150%	254	3
Greater than 150%	338	17
Total exposure	**6,879**	**223**
Weighted Average LTV	**63.1%**	**92.5%**

4.3.5 Repossessed collaterals

The below mentioned real estate collaterals refer to property that is included in line items "Other Assets", "Property and equipment","Investment property" and "Assets held for sale" in the Statement of Financial Position.

Group 31/12/2023	Gross amount	Of which: added this year	Accumulated impairment or fair value adjustment	Of which: on newly added	Net amount	Net sale price of repossessed collaterals sold	Net gain / losses on sale of repossessed collaterals
Real estate	**2,005**	**39**	**(142)**	**(4)**	**1,863**	**66**	**(3)**
-Residential	455	22	(27)	(1)	429	18	4
-Commercial	1,549	17	(115)	(3)	1,434	47	(7)
Other collateral	**6**	**-**	**(6)**	**(1)**	**-**	**1**	**-**

Group 31/12/2022	Gross amount	Of which: added this year	Accumulated impairment or fair value adjustment	Of which: on newly added	Net amount	Net sale price of repossessed collaterals sold	Net gain / losses on sale of repossessed collaterals
Real estate	**2,029**	**60**	**(127)**	**(19)**	**1,902**	**53**	**6**
-Residential	455	33	(29)	(4)	425	24	3
-Commercial	1,574	27	(98)	(16)	1,477	29	3
Other collateral	**8**	**-**	**(7)**	**(1)**	**1**	**1**	**-**

As of 31 December 2023 and 2022 the Company has no repossessed collaterals.

The Group mainly through the Bank grants loans and advances to customers at amortised cost which are secured by real estate. In case these loans become defaulted, the Group and the Bank proceed to the repossession of the underlying real estate collaterals relevant property, if this is assessed as the best solution by the responsible, authorized for this purpose, units of the Bank and of the Group. In this context, the specific characteristics of each property (such as the type and the condition of the property, the location, possible uses, etc.) and the cost for acquiring the property are being assessed, taking into account the potential value of subsequent sale or the potential benefit resulting from own use of the asset. In this context, as at 31 December 2023 the carrying amount of the repossessed property classified as investment property, which is also rented, amounted to € 506 million.

This assessment is part of the Group's and the Bank's strategy and is in line with the real estate owned assets ("REO") Policy Framework and its objectives for profitability, liquidity and capital adequacy.

For the Group and the Bank, the selection of properties acquired from auctions and / or via voluntary surrenders is performed by the Real Estate Committee of the Group, which is responsible for deciding in which auctions the Bank will participate in order to acquire the collateral (based on recent market valuation), in cooperation with Intrum Hellas Credit Servicing S.A. Furthermore, the management of the above-mentioned properties, as well as the supervision of the relevant REO servicers, is performed by the Group Real Estate ("GRE") unit.

Regarding the properties for sale, there are procedures in place that involve several sale channels. These procedures are supervised by GRE and are executed via the Bank's branch network, real estate agencies, direct sales, or through public tender processes. Relevant sale procedures are executed through the channels of the cooperating servicers (Intrum REO Solutions and Resolute Hellas). Furthermore, rental agreements for many acquired properties, managed by GRE unit or the REO servicers, are signed when it is deemed favorable for the asset. Such rental agreements for the perimeter of assets under the exclusive management of GRE are being monitored by the REO servicers, who are responsible for the monitoring and collection of rents. Additionally, the Real Estate portfolio includes properties to be used by the Bank or to be rented to other companies of the Group. Such assets are managed by GRE, in cooperation with the Technical Division of the Bank. In addition, special properties that can be utilized through further investments are examined on an individual base.

The above-mentioned activities determine the basic policy and framework for the Group's procedures under normal real estate conditions. However, the Management assesses alternative scenarios for portfolio sales of repossessed property or their contribution to various investment vehicles, in an attempt to improve total assets' return.

4.4 Forbearance

Overview of forborne loans

The Group applies the Implementing Technical Standards ("ITS") of EBA relating to forborne loans.

The alignment of the Restructuring Policy of the Group with the relevant EBA definitions and BoG guidelines, was backed up with the development of structures and procedures, deployment of new information systems and updates on existing applications, in order to achieve more effective and reliable management of loans past dues, by performing restructurings according to the financial ability of the borrower and monitoring the effectiveness of various types of forbearance measures.

Forborne loans and advances are defined as exposures arising from loans that have been subject to forbearance measures. These measures are considered as a concession of the Group to a borrower who is facing or is about to face financial difficulties in fulfilling its debt obligations. Forbearance may involve modification of contractual terms and conditions and /or refinancing of debts.

Forbearance measures do not lead to derecognition, unless the modification changes substantially the loan terms of the original contract.

According to the ITS of EBA, for the forborne status to be removed, all relevant criteria should apply, including mainly the minimum required probation period (at least 2 years from the date of classification as non forborne exposure) . All forborne

performing exposures are classified in Stage 2, while all forborne non-performing exposures are classified in Stage 3. The Group has relevant detailed procedures in place.

In order to achieve greater efficiencies in the management of NPEs, the Group entered in October 2019 to a long-term strategic partnership with Intrum for the management of NPEs and REOs, through the establishment of an independent NPE servicing entity in Greece. Intrum provides restructuring and turnaround services of NPE portfolios, aiming at maximising recoveries and minimising credit related losses, in line with the operational and financial targets set by the Group.

The Group Planning Committee of the Bank, which inter-alia, is responsible for the management of loans' past dues, collaborates with GRM for the achievement of a common understanding and the development of appropriate methodologies to assess the risk of the portfolio managed by Intrum. GRM monitors the forbearance process, assesses the relative risks by portfolio and forbearance type and informs the CRO about the NPE evolutions on a monthly basis.

As of 31 December 2023 and 2022, the Company's forborne loans and advances to customers measured at amortised cost portfolio is nil.

Credit quality of forborne loans and advances to customers measured at amortised cost

31/12/2023	Group		
	Loans measured at amortised cost	Forborne loans measured at amortised cost	% of Forborne loans measured at amortised cost
Stage 1	33,215	-	0.0%
Stage 2	3,346	649	19.4%
Stage 3	1,180	533	45.2%
POCI	605	101	16.7%
Total Gross exposure	**38,346**	**1,283**	**3.3%**
Stage 1 ECL allowance	(48)	-	0.0%
Stage 2 ECL allowance	(106)	(19)	17.8%
Stage 3 ECL allowance	(571)	(276)	48.3%
POCI ECL allowance	(95)	(14)	14.9%
Total ECL allowance	**(819)**	**(309)**	**37.7%**
Stage 1	33,167	-	0.0%
Stage 2	3,240	630	19.4%
Stage 3	609	258	42.3%
POCI	510	87	17.0%
Loans measured at amortised cost	**37,527**	**974**	**2.6%**
Value of collateral	25,979	881	3.4%

31/12/2022	Group		
	Loans measured at amortised cost	Forborne loans measured at amortised cost	% of Forborne loans measured at amortised cost
Stage 1	31,932	-	0.0%
Stage 2	3,797	1,223	32.2%
Stage 3	2,277	936	41.1%
POCI	782	206	26.4%
Total Gross exposure	**38,787**	**2,365**	**6.1%**
Stage 1 ECL allowance	(37)	-	0.0%
Stage 2 ECL allowance	(120)	(44)	36.9%
Stage 3 ECL allowance	(1,115)	(351)	31.5%
POCI ECL allowance	(148)	(24)	16.4%
Total ECL allowance	**(1,421)**	**(420)**	**29.5%**
Stage 1	31,895	-	0.0%
Stage 2	3,677	1,178	32.0%
Stage 3	1,162	585	50.4%
POCI	633	182	28.7%
Loans measured at amortised cost	**37,367**	**1,945**	**5.2%**
Value of collateral	27,658	1,727	6.2%

Forborne loans and advances to customers measured at amortised cost by type of forbearance measure

	Group	
	31/12/2023	31/12/2022
Reduced payment schedule	264	395
Payment moratorium / Holidays	55	21
Term extension	37	177
Arrears capitalization	84	113
Hybrid (i.e. combination of forbearance measures)	484	1,037
Other	51	202
Total net amount	**974**	**1,945**

Movement of forborne loans measured at amortised cost for the year ended 31 December 2023 and 2022

	Group	
	31/12/2023	31/12/2022
Opening balance as at 1/1 (net)	**1,945**	**2,950**
Forbearance measures during the year	267	435
Repayment of loans (partial or total)	(205)	(282)
Loans that exited forbearance status during the year	(1,010)	(989)
Transfer (to) / from Held for sale	(49)	(152)
ECL impairment charge for the year	21	(33)
FX differences and other movements	6	16
Closing balance (net)	**974**	**1,945**

Forborne loans measured at amortised cost by product line

	Group	
	31/12/2023	31/12/2022
Retail lending	**347**	**869**
Mortgage	307	761
Consumer, Personal and Other	40	107
Credit cards	-	-
Corporate lending	**627**	**1,077**
Large Corporate	350	513
SME	277	564
Public sector	**-**	**-**
Greece	-	-
Other countries	-	-
Total net amount	**974**	**1,945**

Forborne loans measured at amortised cost by geographical region

	Group	
	31/12/2023	31/12/2022
Greece	963	1,921
Rest of Europe	12	24
Total net amount	**974**	**1,945**

4.5 Debt to equity transactions

In certain cases, a debt restructuring may involve the exchange of equity for debt in an effort to make the borrower's businesses viable. Such debt restructuring agreements result to obtaining a controlling interest, joint control, significant influence or a minority shareholding over the borrower. The Group did not engage into material debt to equity transactions with third party in 2023 and 2022.

4.6 Investment securities

The tables below present the credit rating and stage allocation of debt securities measured at FVTOCI, based on Standard and Poor's rating scale:

Group	External rating grade of debt securities measured at FVTOCI				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
AAA	297	-	-	-	**297**
A- to A+	-	-	-	-	**-**
BBB- to BBB+	-	-	-	-	**-**
BB- to BB+	1,038	-	-	-	**1,038**
Lower than BB-	-	-	-	-	**-**
Unrated	-	-	-	-	**-**
Total	**1,335**	**-**	**-**	**-**	**1,335**

Group	External rating grade of debt securities measured at FVTOCI				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
AAA	-	-	-	-	**-**
A- to A+	-	-	-	-	**-**
BBB- to BBB+	-	-	-	-	**-**
BB- to BB+	795	-	-	-	**795**
Lower than BB-	1	-	-	-	**1**
Unrated	-	-	-	-	**-**
Total	**796**	**-**	**-**	**-**	**796**

The Company had no debt securities measured at FVTOCI as at 31 December 2023 and 2022.

The tables below present the credit rating, stage allocation and ECL allowance of debt securities measured at amortised cost, based on Standard and Poor's rating scale:

Group	External rating grade of debt securities at amortised cost						
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Total
AAA	524	-	-	-	**524**	-	**524**
A- to A+	83	-	-	-	**83**	-	**83**
BBB- to BBB+	2,552	-	-	-	**2,552**	2	**2,549**
BB- to BB+	8,435	-	-	-	**8,435**	13	**8,422**
Lower than BB-	79	-	7	-	**87**	6	**81**
Total	**11,673**	**-**	**7**	**-**	11,681	21	**11,659**

Company	External rating grade of debt securities at amortised cost						
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Total
BBB- to BBB+	-	-	-	-	**-**	-	-
BB- to BB+	855	-	-	-	**855**	7	**848**
Lower than BB-	-	-	-	-	**-**	-	-
Total	**855**	**-**	**-**	**-**	855	7	**848**

Group	External rating grade of debt securities at amortised cost						
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Total
AAA	10	-	-	-	**10**	-	**10**
A- to A+	21	-	-	-	**21**	-	**21**
BBB- to BBB+	2,463	-	-	-	**2,463**	-	**2,462**
BB- to BB+	8,126	-	-	-	**8,126**	25	**8,101**
Lower than BB-	248	11	-	-	**258**	9	**250**
Total	**10,867**	**11**	**-**	**-**	10,878	34	**10,844**

Company	External rating grade of debt securities at amortised cost						
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Total
BBB- to BBB+	-	-	-	-	**-**	-	**-**
BB- to BB+	819	-	-	-	**819**	23	**796**
Lower than BB-	-	-	-	-	**-**	-	**-**
Total	**819**	**-**	**-**	**-**	819	23	**796**

4.7 Concentration of risks of financial assets with credit risk exposure

Geographical sector

The following tables break down the gross carrying amounts of financial assets, which are exposed to credit risk. The credit risk exposure is based on the country of domicile of each counterparty.

Group	Gross carrying amounts										
31/12/2023	Greece					Other Countries					Grand Total
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total	
Due from banks	392	-	-	-	**392**	642	-	-	-	**642**	**1,034**
Loans and advances to customers at amortised cost	23,613	3,082	1,029	594	**28,317**	9,602	264	151	11	**10,028**	**38,346**
Retail Lending	5,585	1,813	280	332	**8,011**	71	22	4	7	**104**	**8,115**
Mortgages	4,363	1,493	218	280	**6,355**	68	21	4	7	**99**	**6,454**
Consumer, Personal and Other	897	220	52	51	**1,220**	2	1	-	-	**4**	**1,224**
Credit cards	325	100	11	1	**436**	1	-	-	-	**1**	**437**
Corporate and Public Sector Lending	18,027	1,269	748	262	**20,307**	9,531	242	147	5	9,924	**30,231**
Large Corporate	9,449	390	285	86	**10,210**	9,465	216	97	-	**9,778**	**19,988**
SME	7,581	879	463	174	**9,098**	66	25	50	5	**146**	**9,244**
Public Sector	996	-	1	2	**999**	-	-	-	-	-	**999**
Financial assets at FVTOCI	1,038	-	-	-	**1,038**	297	-	-	-	**297**	**1,335**
Debt securities at amortised cost	8,415	7	-	-	**8,423**	3,251	-	7	-	**3,258**	**11,681**
Other assets - Financial Instruments	959	41	183	-	**1,184**	87	-	14	-	**101**	**1,285**
Total	**34,417**	**3,130**	**1,212**	**594**	**39,354**	**13,878**	**264**	**172**	**11**	**14,325**	**53,679**

Group	Gross carrying amounts										
31/12/2022	Greece					Other Countries					Grand Total
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total	
Due from banks	77	-	-	-	**77**	1,338	-	-	-	**1,338**	**1,415**
Loans and advances to customers at amortised cost	22,526	3,612	1,735	766	**28,638**	9,407	185	542	15	**10,149**	**38,787**
Retail Lending	5,673	1,994	509	390	**8,566**	90	46	64	9	**208**	**8,774**
Mortgages	4,478	1,649	315	316	**6,758**	73	28	11	9	**121**	**6,879**
Consumer, Personal and Other	860	246	146	71	**1,323**	16	17	53	-	**86**	**1,410**
Credit cards	335	99	47	3	**484**	1	-	-	-	**1**	**485**
Corporate and Public Sector Lending	16,852	1,617	1,226	376	**20,072**	9,317	139	478	6	**9,941**	**30,013**
Large Corporate	8,572	424	439	100	**9,535**	9,206	112	221	2	**9,541**	**19,076**
SME	6,665	1,193	782	275	**8,915**	111	28	257	4	**400**	**9,314**
Public Sector	1,615	-	5	2	**1,623**	-	-	-	-	**-**	**1,623**
Financial assets at FVTOCI	795	-	-	-	**795**	1	-	-	-	**1**	**796**
Debt securities at amortised cost	8,177	-	-	-	**8,177**	2,690	11	-	-	**2,701**	**10,878**
Other assets - Financial Instruments	967	43	166	-	**1,176**	67	-	57	-	**124**	**1,300**
Total	**32,542**	**3,654**	**1,901**	**766**	**38,863**	**13,503**	**196**	**599**	**15**	**14,313**	**53,176**

The comparative figures for the Group of line items “Due from banks” and “Other assets – Financial instruments” have been reclassified. Refer to Notes 4.8 and 49 for further information.

Company	Gross carrying amounts										
31/12/2023	Greece					Other Countries					Grand Total
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total	
Due from banks	34	-	-	-	**34**	-	-	-	-	**-**	**34**
Debt securities at amortised cost	855	-	-	-	**855**	-	-	-	-	**-**	**855**
Other assets - Financial Instruments	20	-	-	-	**20**	-	-	4	-	**4**	**24**
Total	**910**	**-**	**-**	**-**	**910**	**-**	**-**	**4**		**4**	**914**

Company	Gross carrying amounts										
31/12/2022	Greece					Other Countries					Grand Total
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total	
Due from banks	45	-	-	-	**45**	-	-	-	-	**-**	**45**
Debt securities at amortised cost	819	-	-	-	**819**	-	-	-	-	**-**	**819**
Other assets - Financial Instruments	18	-	-	-	**18**	-	-	11	-	**11**	**29**
Total	**882**	**-**	**-**	**-**	**882**	**-**	**-**	**11**	**-**	**11**	**893**

Industry Sector

The following tables break down the gross carrying amounts per industry sector of the Group's financial assets that are exposed to credit risk, inclusive of staging classification. The allocation was performed according to the business sector of each counterparty.

Group	Gross carrying amounts - Industry sectors															
31/12/2023	Financial corporations	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline / Ferries Companies	Hotels	Agricul-ture	Energy	Transport and Logistics	Other industries	Individuals	Total
Due from banks	1,034	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**1,034**
Loans and advances to customers at amortised cost	7,572	3,741	841	981	2,609	3,365	999	2,269	116	2,583	610	1,201	710	2,635	8,115	**38,346**
Retail lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,115	**8,115**
Mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,454	**6,454**
Consumer, Personal and Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,224	**1,224**
Credit cards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	437	**437**
Corporate and Public Sector Lending	7,572	3,741	841	981	2,609	3,365	999	2,269	116	2,583	610	1,201	710	2,635	-	**30,231**
Large Corporate	7,523	1,487	332	672	2,605	945	-	2,269	116	1,372	14	886	405	1,364	-	**19,988**
SME	49	2,254	510	309	4	2,420	-	-	-	1,211	596	315	306	1,271	-	**9,244**
Public Sector							999									**999**
Financial assets at FVTOCI	-	-	-	-	-	-	1,335	-	-	-	-	-	-	-	-	**1,335**
Debt securities at amortised cost	1,090	87	-	9	-	-	10,233	-	-	-	-	26	27	208	-	**11,681**
Other assets - Financial Instruments	13	27	17	16	-	2	550	-	-	-	-	12	-	503	144	**1,285**
Total	**9,709**	**3,855**	**858**	**1,006**	**2,609**	**3,368**	**13,116**	**2,269**	**116**	**2,583**	**610**	**1,239**	**738**	**3,346**	**8,259**	**53,679**
Stage 1	9,621	3,323	736	833	2,605	2,972	13,038	2,122	115	2,086	511	1,186	604	2,752	5,791	**48,296**
Stage 2	74	331	58	22	4	197	22	146	1	381	43	22	22	234	1,835	**3,394**
Stage 3	4	175	42	133	-	153	53	-	-	47	49	5	110	319	294	**1,384**
POCI	10	26	23	18	-	45	2	-	-	69	7	25	2	40	339	**604**
Total	**9,709**	**3,855**	**858**	**1,006**	**2,609**	**3,368**	**13,116**	**2,269**	**116**	**2,583**	**610**	**1,239**	**738**	**3,346**	**8,259**	**53,679**

The Group's gross carrying amount of the Public sector's loans of € 999 million as at 31 December 2023 includes the funding facility to OPEKEPE of € 951 million (31 December 2022: € 1,558 million).

Group	Gross carrying amounts - Industry sectors															
31/12/2022	Financial corporations	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline/ Ferries Companies	Hotels	Agricul-ture	Energy	Transport and Logistics	Other industries	Individuals	Total
Due from banks	1,415	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**1,415**
Loans and advances to customers at amortised cost	7,344	4,032	914	1,093	2,198	3,272	1,623	2,206	223	2,345	577	938	709	2,539	8,774	**38,787**
Retail lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,774	**8,774**
Mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,879	**6,879**
Consumer, Personal and Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,410	**1,410**
Credit cards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	485	**485**
Corporate and public sector lending	7,344	4,032	914	1,093	2,198	3,272	1,623	2,206	223	2,345	577	938	709	2,539	-	**30,013**
Large Corporate	7,272	1,775	351	755	2,183	902	-	2,206	223	1,199	19	628	361	1,203	-	**19,076**
SME	72	2,257	563	337	15	2,371	-	-	-	1,146	558	311	348	1,336	-	**9,314**
Public Sector							1,623									**1,623**
Financial assets at FVTOCI	-	-	-	-	-	-	796	-	-	-	-	-	-	-	-	**796**
Debt securities at amortised cost	521	82	-	9	-	-	10,010	-	-	-	-	27	27	201	-	**10,878**
Other assets - Financial Instruments	11	18	18	14	-	4	605	-	-	-	-	9	-	482	138	**1,300**
Total	**9,291**	**4,133**	**932**	**1,115**	**2,198**	**3,277**	**13,034**	**2,207**	**223**	**2,345**	**577**	**974**	**736**	**3,222**	**8,913**	**53,176**
Stage 1	9,227	3,488	545	791	2,182	2,563	12,968	2,141	124	1,772	493	890	483	2,523	5,855	**46,045**
Stage 2	39	325	225	36	5	354	16	62	-	296	34	26	97	295	2,040	**3,850**
Stage 3	14	277	137	251	10	309	48	3	99	183	43	32	154	320	619	**2,499**
POCI	10	43	26	37	-	52	2	-	-	94	7	27	2	84	399	**782**
Total	**9,291**	**4,133**	**932**	**1,115**	**2,198**	**3,277**	**13,034**	**2,207**	**223**	**2,345**	**577**	**974**	**736**	**3,222**	**8,913**	**53,176**

The comparative figures of line items “Due from banks” and “Other assets – Financial instruments” have been reclassified. Refer to Notes 4.8 and 49 for further information.

The following tables break down the gross carrying amounts per industry sector of the Company’s financial assets that are exposed to credit risk, inclusive of staging classification. The allocation was performed according to the business sector of each counterparty.

Company	Gross carrying amounts - Industry sectors															
31/12/2023	Financial corporations	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline / Ferries Companies	Hotels	Agricul-ture	Energy	Transport and Logistics	Other industries	Individuals	Total
Due from banks	34	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**34**
Debt secutities at amortised cost	855	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**855**
Other assets - Financial Instruments	1	-	-	-	-	-	-	-	-	-	-	-	-	23	-	**24**
Total	**890**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**23**	**-**	**914**
Stage 1	890	-	-	-	-	-	-	-	-	-	-	-	-	19	-	**910**
Stage 3	-	-	-	-	-	-	-	-	-	-	-	-	-	4	-	**4**
Total	**890**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**--**	**-**	**-**	**-**	**23**	**-**	**914**

Company	Gross carrying amounts - Industry sectors															
31/12/2022	Financial corporations	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline / Ferries Companies	Hotels	Agricul-ture	Energy	Transport and Logistics	Other industries	Individuals	Total
Due from banks	45	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**45**
Debt securities at amortised cost	819	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**819**
Other assets - Financial Instruments	1	-	-	-	-	-	-	-	-	-	-	-	-	28	-	**29**
Total	**864**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**28**	**-**	**893**
Stage 1	864	-	-	-	-	-	-	-	-	-	-	-	-	17	-	**882**
Stage 3	-	-	-	-	-	-	-	-	-	-	-	-	-	11	-	**11**
Total	**864**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**28**	**-**	**893**

The following tables break down the nominal amounts of off-balance items per industry sector of the Group's financial assets that are exposed to credit risk inclusive of staging classification. The allocation was performed according to the business sector of each counterparty.

Group	Nominal Amounts of Off Balance Sheet Items - Industry sectors															
31/12/2023	Financial corporations	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline / Ferries Companies	Hotels	Agriculture	Energy	Transport and Logistics	Other industries	Individuals	Total
Letters of Guarantee	2,512	602	1,055	28	-	513	-	-	-	41	12	534	62	322	-	5,680
Letters of Credit	-	35	50	-	-	9	-	-	-	-	6	-	-	21	-	121
Irrevocable undrawn credit commitments	305	149	62	26	450	71	-	265	-	133	36	182	55	127	100	1,961
Balance at 31/12/2023	**2,818**	**786**	**1,166**	**54**	**450**	**593**	**-**	**265**	**-**	**174**	**54**	**716**	**117**	**470**	**100**	**7,762**
Stage 1	2,816	755	947	48	450	528	-	265	-	166	48	708	115	441	76	7,362
Stage 2	2	7	99	2	-	51	-	-	-	4	4	8	2	21	23	222
Stage 3	-	24	120	4	-	15	-	-	-	4	-	-	-	4	-	172
POCI	-	-	-	-	-	-	-	-	-	-	1	-	-	3	1	6
Total	**2,818**	**786**	**1,166**	**54**	**450**	**593**	**-**	**265**	**-**	**174**	**54**	**716**	**117**	**470**	**100**	**7,762**

Group	Nominal Amounts of Off Balance Sheet Items - Industry sectors															
31/12/2022	Financial corporations	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline/ Ferries Companies	Hotels	Agricul-ture	Energy	Transport and Logistics	Other industries	Individuals	Total
Letters of Guarantee	2,180	536	987	28	-	246	-	-	-	46	13	466	57	230	-	**4,789**
Letters of Credit	-	54	6	1	-	12	-	-	-	-	4	-	-	36	-	**114**
Irrevocable undrawn credit commitments	58	164	74	103	224	71	-	164	-	176	36	216	41	188	106	**1,624**
Balance at 31/12/2022	**2,239**	**755**	**1,068**	**132**	**224**	**330**	**-**	**164**	**-**	**222**	**53**	**681**	**98**	**454**	**106**	**6,527**
Stage 1	2,238	717	920	126	224	274	-	164	-	207	49	680	95	433	71	**6,200**
Stage 2	1	8	15	-	-	38	-	-	-	4	2	1	2	12	34	**116**
Stage 3	-	30	132	6	-	17	-	-	-	11	-	-	1	6	-	**204**
POCI	-	-	-	-	-	0	-	-	-	-	2	-	-	3	1	**6**
Total	**2,239**	**755**	**1,068**	**132**	**224**	**330**	**-**	**164**	**-**	**222**	**53**	**681**	**98**	**454**	**106**	**6,527**

As at 31 December 2023 and 2022, the Company does not have any off balance sheet credit exposures.

Receivables from the Greek Public Sector

The following table presents the carrying amount of the Group's and the Company's receivables from the Greek Public Sector.

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Derivative financial instruments (as reclassified)	43	73	-	-
Debt securities at FVTPL	475	154	-	-
Loans and advances at amortised cost	998	1,619	-	-
Debt securities at amortised cost	7,713	7,517	-	-
Debt securities at FVTOCI	1,038	795	-	-
Other assets	692	731	7	12
Total	**10,960**	**10,889**	**7**	**12**

The comparative figure of line item "Derivative financial instruments" has been reclassified. Refer to Note 49 for further information. The decrease in the carrying amount of line item "Loans and advances at amortised cost" by approximately € 621 million is mainly due to the decrease of the funding facility to OPEKEPE by € 607 million.

4.8 Offsetting of financial assets and liabilities

Financial assets and liabilities are offset and the net amount is reported in the Statement of Financial Position where the Group currently has a legally enforceable right to set-off the recognised amounts and there is an intention to settle on a net basis or realize the asset and settle the liability simultaneously. The Group enters into various master netting arrangements or similar agreements that do not meet the criteria set by the applicable accounting guidance for offsetting in the Statement of Financial Position but still allow for the related amounts to be set off in the event of a default by the counterparty (such as bankruptcy or a failure to pay or perform). In the current period the Group offset derivative assets and liabilities entered into with a central counterparty clearing member against margin collateral and reclassified accordingly the prior year amounts. Refer to Note 49 for further information. The Company does not hold any master netting agreements.

The tables below present the recognised financial instruments that are either offset or subject to master netting arrangements or similar agreements but not offset, as at 31 December 2023 and 2022, and shows under "Net amount" what the net impact would be on the Group's Statement of Financial Position if all set-off rights were exercised.

- **Financial assets subject to offsetting, enforceable master netting agreements and similar arrangements**

Group 31/12/2023	Gross amounts of recognised financial assets	Gross amounts of recognised financial instruments offset in the Statement of Financial Position	Net amounts of financial assets presented in the Statement of Financial Position	Related amounts not offset in the Statement of Financial Position		
				Financial instruments and other non cash collateral received	Cash collateral received	Net amount
Financial Assets						
Derivative financial instruments	1,960	(1,769)	**191**	(87)	(27)	77
Reverse Repurchase agreements	51	-	**51**	(51)	-	-
Due from Banks	983	-	**983**	(8)	-	975
Total	**2,994**	**(1,769)**	**1,225**	**(146)**	**(27)**	**1,052**

Group 31/12/2022 (As reclassified)	Gross amounts of recognised financial assets	Gross amounts of recognised financial instruments offset in the Statement of Financial Position	Net amounts of financial assets presented in the Statement of Financial Position	Related amounts not offset in the Statement of Financial Position		
				Financial instruments and other non cash collateral received	Cash collateral received	Net amount
Financial Assets						
Derivative financial instruments	1,871	(1,651)	**220**	(93)	(62)	65
Reverse Repurchase agreements	52	-	**52**	(52)	-	-
Due from Banks	697	665[(1)]	**1,362**	(5)	-	1,358
Total	**2,620**	**(986)**	**1,635**	**(150)**	**(62)**	**1,423**

[1] Refers to initial margin receivable reclassified from "Due to banks" in the context of derivatives and margin collateral offsetting.

- **Financial liabilities subject to offsetting, enforceable master netting agreements and similar arrangements**

Group 31/12/2023	Gross amounts of recognised financial liabilities	Gross amounts of recognised financial instruments offset in the Statement of Financial Position	Net amounts of financial liabilities presented in the Statement of Financial Position	Related amounts not offset in the Statement of Financial Position		
				Financial instruments and other non cash collateral pledged	Cash collateral pledged	Net amount
Financial Liabilities						
Derivative financial instruments	603	(308)	**295**	(87)	(8)	200
Repurchase agreements	435	-	**435**	(435)	-	-
Due to Banks	5,644	(1,461)	**4,183**	(27)	-	4,156
Total	**6,682**	**(1,769)**	**4,913**	**(549)**	**(8)**	**4,356**

Group 31/12/2022 (As reclassified)	Gross amounts of recognised financial liabilities	Gross amounts of recognised financial instruments offset in the Statement of Financial Position	Net amounts of financial liabilities presented in the Statement of Financial Position	Related amounts not offset in the Statement of Financial Position		
				Financial instruments and other non cash collateral pledged	Cash collateral pledged	Net amount
Financial Liabilities						
Derivative financial instruments	659	(249)	**410**	(93)	(5)	313
Repurchase agreements	298	-	**298**	(298)	-	-
Due to Banks	6,624	(737)	**5,887**	(62)	-	5,824
Total	**7,581**	**(986)**	**6,595**	**(453)**	**(5)**	**6,137**

Line items "Due from banks" and "Due to banks" reported in the tables above, do not include reverse repurchase agreements and repurchase agreements, respectively, as they are separately disclosed.

4.9 Market risk

Market risk is the current or prospective risk of loss due to adverse movements in the level or the volatility of market prices and rates, including interest rates, equity and commodity prices and foreign exchange rates.

The Risk Committee of the BoD has approved a market risk management policy that applies to both the Group and the Company and outlines the basic definitions of market risk management and defines the roles and responsibilities of the units and executives involved. The Group and the Company engage in moderate trading activities in order to enhance profitability and service their clientele. These trading activities bear an inherent market risk, which the Group and the Company pursue to identify, estimate, monitor and manage effectively through a framework of principles, measurement processes and a valid set of limits that apply to all the transactions of the Group and the Company. The most significant types of market risk for the Group and the Company are interest rates, equity and foreign exchange risk.

The Group and the Company apply up to date, generally accepted techniques for the measurement of market risk. Specifically, sensitivity indicators such as CSPV01 (adverse impact to the net present value of the bond portfolio for a 1 basis point parallel move in the yield spread curve) as well as Value-at-Risk ("VaR" incorporates all risk factors) are calculated.

For every activity that bears an inherent market risk, the Group and the Company have assigned adequate market risk limits which are monitored systematically. Market risk management is not confined to trading book activities but covers the Statement of Financial Position as a whole.

The VaR measure is an estimate of the potential loss in the net present value of a portfolio, over a specified period and with a specified confidence level. The Group adopted the Historical VaR approach ("HVaR") which is a scenario-based method based on historical data variations. It uses past observations to infer the potential future movements of market parameters, with no assumption about the risk factors distribution. Market data shifts are measured over a look-back period of two (2) years at daily horizons. The current positions are fully revaluated using these shifted market parameters. After applying the different historical scenarios, the simulated profit & loss variations are sorted from the lowest to the highest. The VaR is determined by reading the corresponding value out of the ordered profit & loss variations at the desired confidence level.

As the VaR methodology evaluates the maximum risk at a specified confidence level (e.g. a 99% VaR measures a loss that is expected to be exceeded only 1% of the time), another metric the Expected Shortfall ("ES"), captures the tail risk that is not accounted for in the existing VaR measures. Thus, ES calculates the average loss above this level (e.g. a 99% ES measures the average of the worst 1% of losses).

As a complement to VaR, a stress test analysis is conducted to estimate the potential outcomes on portfolio values under exceptional events. A scenario analysis approach is used where a series of shifts (historical or market specific) on market parameters is defined. Stress testing results are produced by the same calculation engine that produces VaR results and are analyzed, on a scenario basis to identify how the positions perform under the predefined scenarios.

The Group and the Company evaluate the validity of the VaR estimates, by conducting a relevant back-testing on the trading book VaR, through the comparison of the VaR estimate against the actual change in the value of the portfolio, due to the changes in market prices, on a daily basis.

The VaR estimate for the Group's Trading Book as at 31 December 2023 amounted to € 4.5 million (31 December 2022: € 2.8 million) and the decomposition of this estimate, per type of risk, inclusive of the diversification effect, is illustrated in the table below. As at 31 December 2023 and 2022, the Company does not have any exposure included in trading book and hence there is not a relevant VaR metric.

Group - Amounts in € million	Total VaR	VaR Interest Rate Risk	VaR Equity Risk	VaR Foreign Exchange Risk	VaR Commodities Risk	Diversification Effect
2023	4.5	2.5	1.2	0.2	0.8	(0.2)
2022	2.8	1.0	1.6	0.2	0.0	0.0

4.10 Currency risk

The Group and the Company are exposed to the effects of fluctuations in the prevailing foreign currency exchange rates on their financial position and cash flows. Management sets limits on the level of exposure by currency, which are monitored daily. The tables below summarise the Group's and the Company's exposure to foreign currency exchange risk as at 31 December 2023 and 2022.

The following tables include an analysis per currency of the Group's and the Company's carrying amount of both assets and liabilities, as well as the notional amounts of derivatives, which reduce significantly the undertaken foreign currency exchange risk:

Group 31/12/2023	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Cash and balances with Central Banks	10,403	31	4	-	4	125	10,567
Due from banks	919	42	6	2	37	28	1,034
Financial assets at FVTPL	609	-	-	-	-	-	609
Financial assets mandatorily measured at FVTPL	219	15	-	-	-	-	234
Derivative financial instruments (notional amounts)	1,789	1,374	145	-	1	267	3,575
Loans and advances to customers at amortised cost	34,510	2,390	4	1	600	22	37,527
Loans and advances to customers mandatorily measured at FVTPL	53	-	-	-	-	-	53
Investment securities	12,999	20	23	-	-	-	13,042
Investment property	1,539	-	-	-	-	218	1,757
Investments in associated undertakings and joint ventures	1,255	-	-	-	-	-	1,255
Property and equipment	729	-	-	-	-	3	732
Intangible assets	345	-	-	-	-	2	347
Tax receivables	161	-	-	-	-	-	161
Deferred tax assets	5,701	-	-	-	-	2	5,703
Other assets	2,911	32	1	-	33	19	2,996
Assets held for sale	192	-	-	-	39	9	241
Total assets	**74,335**	**3,905**	**182**	**3**	**714**	**696**	**79,835**
Liabilities							
Due to banks	4,601	10	4	-	-	3	4,618
Due to customers	56,366	2,700	123	4	30	343	59,567
Derivative financial instruments (notional amounts)	1,388	1,195	50	1	665	285	3,584
Debt securities in issue	1,886	-	-	-	-	-	1,886
Other borrowed funds	939	-	-	-	-	-	939
Current income tax liabilities	11	-	-	-	-	2	13
Deferred tax liabilities	9	-	-	-	-	-	9
Retirement and termination benefit obligations	52	-	-	-	-	-	52
Provisions	142	-	-	-	20	1	164
Other liabilities	1,432	-	-	-	-	27	1,459
Fair Value changes of hedged items in portfolio hedges of interest rate risk	94	-	-	-	-	-	94
Total liabilities	**66,920**	**3,906**	**177**	**4**	**716**	**662**	**72,386**
Derivative financial instruments - fair value adjustment	**(96)**	**-**	**-**	**-**	**-**	**-**	**(96)**
Foreign currency exposure	**7,318**	**(1)**	**5**	**(1)**	**(2)**	**33**	**7,353**

Group 31/12/2022 As reclassified	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Cash and balances with Central Banks	9,535	26	13	-	4	76	9,653
Due from banks	1,302	38	6	2	35	32	1,415
Financial assets at FVTPL	548	-	-	-	-	-	548
Financial assets mandatorily measured at FVTPL	165	17	-	-	-	-	182
Derivative financial instruments (notional amounts)	1,499	1,093	227	20	2	226	3,067
Loans and advances to customers at amortised cost	34,292	2,335	4	1	680	54	37,367
Loans and advances to customers mandatorily measured at FVTPL	52	-	-	-	-	-	52
Investment securities	11,699	18	23	-	-	1	11,741
Investment property	1,459	-	-	-	-	63	1,522
Investments in associated undertakings and joint ventures	1,023	-	-	-	-	-	1,023
Property and equipment	724	-	-	-	-	4	728
Intangible assets	311	-	-	-	-	1	312
Tax receivables	145	-	-	-	-	-	145
Deferred tax assets	5,972	-	-	-	-	2	5,974
Other assets	3,299	15	1	-	-	42	3,357
Assets held for sale	386	-	-	-	20	-	406
Total assets	**72,411**	**3,542**	**274**	**23**	**741**	**500**	**77,492**
Liabilities							
Due to banks	6,080	63	42	-	-	1	6,185
Due to customers	55,303	2,597	127	3	25	317	58,372
Derivative financial instruments (notional amounts)	1,171	898	105	20	742	138	3,075
Debt securities in issue	849	-	-	-	-	-	849
Other borrowed funds	937	-	-	-	-	-	937
Current income tax liabilities	7	-	-	-	-	-	7
Deferred tax liabilities	9	-	-	-	-	1	10
Retirement and termination benefit obligations	55	-	-	-	-	-	55
Provisions	122	-	-	-	-	2	123
Other liabilities	1,095	-	-	-	-	17	1,113
Liabilities held for sale	2	-	-	-	-	-	2
Total liabilities	**65,630**	**3,559**	**274**	**23**	**767**	**476**	**70,729**
Derivative financial instruments - fair value adjustment	**(182)**	**-**	**-**	**-**	**-**	**-**	**(182)**
Foreign currency exposure	**6,599**	**(16)**	**-**	**-**	**(26)**	**24**	**6,581**

Company 31/12/2023	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Due from banks	34	-	-	-	-	-	34
Investment securities	849	2	-	-	-	-	850
Investments in subsidiaries	5,562	-	-	-	-	11	5,573
Property and equipment	1	-	-	-	-	-	1
Tax receivables	7	-	-	-	-	-	7
Other assets	37	-	-	-	-	-	37
Total assets	**6,489**	**2**	**-**	**-**	**-**	**11**	**6,503**
Liabilities							
Other borrowed funds	939	-	-	-	-	-	939
Other liabilities	60	-	-	-	-	-	60
Total liabilities	**999**	**-**	**-**	**-**	**-**	**-**	**999**
Derivative financial instruments - fair value adjustment	**-**		**-**	**-**	**-**	**-**	**-**
Foreign currency exposure	**5,490**	**2**	**-**	**-**	**-**	**11**	**5,503**

Company 31/12/2022	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Due from banks	45	-	-	-	-	-	45
Investment securities	796	2	-	-	-	-	798
Investments in subsidiaries	5,546	-	-	-	-	12	5,558
Property and equipment	1	-	-	-	-	-	1
Tax receivables	12	-	-	-	-	-	12
Other assets	43	1	-	-	-	-	44
Total assets	**6,442**	**3**	**-**	**-**	**-**	**12**	**6,457**
Liabilities							
Other borrowed funds	936	-	-	-	-	-	936
Other liabilities	55	-	-	-	-	-	55
Total liabilities	**992**	**-**	**-**	**-**	**-**	**-**	**992**
Derivative financial instruments - fair value adjustment	**-**	**-**	**-**	**-**	**-**	**-**	**-**
Foreign currency exposure	**5,450**	**3**	**-**	**-**	**(0)**	**12**	**5,465**

4.11 Interest rate risk

Interest rate risk is the risk of a negative impact on the Group and the Company's financial position due to its exposure to interest rates fluctuations.

Changes in interest rates affect the Group and the Company's profitability by changing its net interest income and the level of the other interest - sensitive income and expenses.

Changes in interest rates also affect the underlying value of the Group and the Company's assets and liabilities because the present value of future cash flows (and in some cases, the cash flows themselves) changes when interest rates also change. Accordingly, an effective interest rate risk management process that assesses, monitors and helps maintain interest rate risk within prudent levels (through effective hedging, where relevant), is essential for the sustainability and soundness of the Group's and the Company's financial performance.

The Group and the Company apply an Interest Rate Risk Management Policy outlining various valuation techniques that mainly rely on maturity and repricing schedules, incorporating behavioral models, where necessary. In addition, the Group and the Company have entered into hedging derivative transactions classified as FVH, to actively manage their interest rate risk.

As presented in the tables below, interest rate gap analysis is a maturity / repricing schedule that distributes interest-sensitive assets and liabilities into a certain number of predefined time bands, according to their maturity (for fixed-rate instruments) or time remaining to their next repricing (for floating-rate instruments).

Those assets and liabilities lacking actual maturities (e.g. open accounts) or definitive repricing intervals (e.g. sight deposits or savings accounts) are assigned to the appropriate time band through the application of behavioral models.

Assets and liabilities in foreign currency are translated into Euro using the corresponding FX rates as of the reporting date.

Group 31/12/2023	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Cash and balances with Central Banks	10,529	17	-	-	-	21	10,567
Due from banks	1,003	3	6	2	-	21	1,034
Financial assets at FVTPL	19	66	154	43	296	32	609
Financial assets mandatorily measured at FVTPL	-	-	-	42	27	165	234
Loans and advances to customers	13,560	9,444	5,879	3,951	4,746	-	37,579
Investment securities	121	926	728	1,388	9,824	55	13,042
Other assets	3	-	2	66	57	960	1,089
Total financial assets	**25,235**	**10,456**	**6,769**	**5,492**	**14,949**	**1,254**	**64,155**
Financial liabilities							
Due to banks	4,479	115	1	23	-	-	4,618
Due to customers	22,773	9,838	9,440	9,565	7,949	-	59,567
Debt securities in issue	-	-	-	1,886	-	-	1,886
Other borrowed funds	-	-	419	520	-	-	939
Other liabilities	2	-	2	3	-	1,452	1,459
Total financial liabilities	**27,254**	**9,954**	**9,862**	**11,997**	**7,949**	**1,453**	**68,469**
Net notional amount of derivative financial instruments	**(12)**	**(11)**	**16**	**(13)**	**3**		**(18)**
Total interest rate gap	**(2,032)**	**491**	**(3,077)**	**(6,518)**	**7,003**	**(199)**	**(4,332)**

Group 31/12/2022	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Cash and balances with Central Banks	9,643	-	-	-	-	10	9,653
Due from banks (as reclassified)	1,313	69	7	3	-	23	1,415
Financial assets at FVTPL	73	145	212	46	53	19	548
Financial assets mandatorily measured at FVTPL	-	-	32	-	12	138	182
Loans and advances to customers	14,743	7,669	6,627	5,298	3,080	-	37,418
Investment securities (as reclassified)	80	837	564	1,171	8,988	101	11,741
Other assets (as reclassified)	-	-	5	35	92	994	1,125
Total financial assets	**25,854**	**8,720**	**7,446**	**6,552**	**12,225**	**1,286**	**62,083**
Financial liabilities							
Due to banks (as reclassified)	5,978	103	5	92	7	-	6,185
Due to customers	29,216	4,304	6,505	10,621	7,726	-	58,372
Debt securities in issue	-	-	-	849	-	-	849
Other borrowed funds	-	-	-	937	-	-	937
Other liabilities (as reclassified)	2	1	3	2	-	1,105	1,113
Total financial liabilities	**35,197**	**4,408**	**6,513**	**12,501**	7,733	**1,105**	**67,456**
Net notional amount of derivative financial instruments	**842**	**(23)**	**88**	**2,618**	**(3,537)**		**(12)**
Total interest rate gap	**(8,501)**	**4,290**	**1,022**	**(3,331)**	**955**	**181**	**(5,385)**

Company 31/12/2023	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Non - interest bearing	Total
Financial assets							
Due from banks	34	-	-	-	-	-	34
Investment securities	-	-	393	455	-	2	850
Other assets	-	-	-	-	-	24	24
Total financial assets	**34**	**-**	**393**	**455**	**-**	**27**	**909**
Financial liabilities							
Other borrowed funds	-	-	419	520	-	-	939
Other liabilities	-	-	-	-	-	60	60
Total financial liabilities	-	**-**	**419**	**520**	**-**	**60**	**999**
Total interest rate gap	**34**	**-**	**(26)**	**(65)**		**(33)**	**(90)**

Company 31/12/2022	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Non-interest bearing	Total
Financial assets							
Due from banks	45	-	-	-	-	-	45
Investment securities (as reclassified)	-	-	-	796	-	2	798
Other assets	-	-	-	-	-	29	29
Total financial assets	**45**	**-**	**-**	**796**	**-**	**31**	**871**
Financial liabilities							
Other borrowed funds	-	-	-	936	-	-	936
Other liabilities	-	-	-	-	-	55	55
Total financial liabilities	**-**	**-**	**-**	**936**	-	**55**	**992**
Total interest rate gap	**45**	**-**	**-**	**(141)**	**-**	**(24)**	**(120)**

The comparative figures for the Group of line items “Due from banks”, “Investment securities”, “Other assets”,”Due to banks”, and “Other liabilities” have been reclassified. For the Company, line item “Investment securities” has been reclassified. Refer to Note 49 for further information.

The Group and the Company calculate any change in the net present value of on balance-sheet items in response to a change in interest rates by assuming a parallel yield curve shift of 1 basis point (PV01).

In addition, the changes in Net Interest Income (“ΔNII”) measure, denote the negative effect on the expected annual interest income, as a result of a parallel shift in interest rates for all currencies considered.

For ΔNII and PV01, Management has assigned adequate limits, which are monitored on a regular basis.

Management evaluates potential financial losses under stressful market conditions. Possible stress scenarios include abrupt changes in the level of interest rates, changes in the slope and the shape of the yield curves, or changes in the volatility of market rates.

Interest rate risk disclosures under Pillar III are available at the Group’s website.

4.12 Liquidity risk

Management acknowledges that effective Liquidity Risk Management is essential to the Group’s ability to meet its liabilities, while also safeguarding its financial results and its capital adequacy. Liquidity risk is defined as the risk arising from the Group’s inability to meet its cash flow obligations when they come due, without incurring unacceptable costs or losses at all times, including under stress. In order to manage this risk, current and future liquidity requirements are monitored thoroughly, along with the respective needs for funding, depending on the projected maturity of outstanding transactions. In general, liquidity management is a process of balancing cash flows within time bands, so that, under normal conditions, the Group may meet all its financial obligations as they become due.

The Board Risk Committee (“BRC”) is responsible for the approval of the Liquidity Risk Policy the effective management of liquidity risk which is applied in a uniform manner by the Group. This policy is consistent with the globally applied practices and supervisory regulations, and adapted to the individual activities and structures of the Group.The policy specifies the principal liquidity risk assessment definitions and methodologies, defines the roles and responsibilities of the Group’s Units, subsidiaries and staff involved in the liquidity management governance, and sets out the guidelines for liquidity crisis management. The contribution of each administrative level to Liquidity Risk management is organized in such a way as to ensure the establishment of clear areas of responsibility, the separation of tasks and the avoidance of conflicts of interest.

The Group’s executive and senior management has the responsibility to implement the business plan’s strategic targets and aspirations within the Liquidity Risk appetite approved by the BRC, and to develop the policies, methodologies and procedures for identifying, measuring, monitoring and controlling Liquidity Risk, consistent with the nature and complexity of the Group’s activities. An extensive set of reports on the Group’s liquidity position and other key risk metrics, including approved RAF, Contingency Funding Plan and Recovery Plan liquidity risk indicators’ usage and limits, is produced on a daily basis, and submitted to executive and senior management stakeholders, ensuring that Liquidity Risk stays within approved levels. Similar set of reports are produced on a regular basis and submitted to Management Committees, the BoD, internal shareholders, and the regulatory authorities, depending on the type of analysis. In order to manage liquidity risk effectively, Management monitors regular reporting contains, inter alia, the amount, quality and composition/diversification of its liquid assets, the cash flow analysis of its assets and liabilities (inflows, outflows) in time buckets, the

composition/diversification and cost of its funding sources, the composition/diversification and funding capacity of its unencumbered collateral and its funding needs in local and foreign currencies.

Furthermore, the policy defines a contingency funding plan to be used in the case of a liquidity crisis. Such a crisis can take place either due to an event specific to the Company or due to a market-driven event. Triggers and early warning signals prescribed within the contingency funding plan serve as indicators for its realisation.

The Group calculates its LCR and NSFR ratios on a monthly and quarterly basis, respectively, to monitor its liquidity buffer resilience to acute short-term stress and its funding profile stability in relation to the composition of its assets, as prescribed in regulation (EU) No. 575/2013. As at 31 December 2023, both the Group LCR and NSFR exceeded the minimum regulatory threshold of 100%, standing at 241% and 133% respectively. Liquidity Risk disclosures under Pillar III are available at the Group's website.Under Directive 2013/36/EU (known as CRD IV), which has been transported into Greek Law by virtue of Greek Law 4261/2014, credit institutions are required to have comprehensive strategies, procedures, policies and systems to ensure adequate monitoring of liquidity risk. In accordance with the said Directive, the Group submitted in 2023 to the SSM, its annual ILAAP report, which includes the rules governing the management of liquidity risk and the main results of current and future liquidity position assessments for the Company and the Group. In addition, within the ICAAP and ILAAP framework, Management examined stress test scenarios and assessed their impact on the Company's and the Group's liquidity position and on mandatory liquidity ratios.

Contractual undiscounted cash flows

The contractual undiscounted cash flows of non-derivative financial liabilities and irrevocable undrawn credit commitments are presented in the tables below. Liquidity risk arising from derivative liabilities is not considered significant. The cash flows arising from liabilities items are calculated and classified into time periods in accordance with the contractual maturity date or an estimated date based on a statistical analysis.

The comparative figures for the Group of line items "Due to banks", and "Other liabilities" have been reclassified. Refer to Note 49 for further information.

Group 31/12/2023	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Due to banks	542	4	3,726	412	182	4,865
Due to customers	49,419	4,181	5,992	48	-	59,640
Debt securities in issue	29	-	90	2,284	-	2,403
Other borrowed funds	-	28	439	525	-	992
Other liabilities	156	72	68	87	281	664
Total	**50,146**	**4,285**	**10,314**	**3,356**	**463**	**68,564**
Irrevocable undrawn credit commitments	31	51	52	998	829	**1,961**

Group 31/12/2022	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Due to banks (as reclassified)	524	3	2,071	3,848	43	6,489
Due to customers	52,984	2,870	2,511	25	-	58,389
Debt securities in issue	5	-	19	1,061	-	1,085
Other borrowed funds	-	28	39	994	-	1,061
Other liabilities (as reclassified)	153	80	45	86	181	547
Total	**53,667**	**2,980**	**4,685**	**6,014**	**225**	**67,571**
Irrevocable undrawn credit commitments	-	8	71	990	554	**1,624**

Company 31/12/2023	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Other borrowed funds	-	28	439	525	-	992
Other liabilities	-	2	21	-	-	23
Total	**-**	**29**	**460**	**525**	**-**	**1,015**
Irrevocable undrawn credit commitments	-	-	-	-	-	**-**

Company 31/12/2022	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Other borrowed funds	-	28	39	994	-	1,061
Other liabilities	-	44	6	-	-	51
Total	**-**	**72**	**45**	**994**	**-**	**1,111**
Irrevocable undrawn credit commitments	-	-	-	-	-	**-**

4.13 Transfers of financial assets

As of 31 December 2023 and 2022, the carrying amount of transferred financial assets, which continue to be recognized in their entirety on the Group's Statement of Financial Position, inclusive of the associated liabilities, are presented in the following tables:

31/12/2023	Transferred assets		Associated liabilities	
	Carrying amount		Carrying amount	
	Group	Company	Group	Company
Financial assets at FVTPL	9	-	9	-
Loans and advances to customers	9,839	-	5,069	-
Financial assets at FVTOCI	41	-	37	-
Debt securities at amortised cost	462	-	395	-
Total	**10,350**	**-**	**5,510**	**-**

31/12/2022	Transferred assets		Associated liabilities	
	Carrying amount		Carrying amount	
	Group	Company	Group	Company
Financial assets at FVTPL	55	-	54	-
Loans and advances to customers	10,833	-	6,489	-
Financial assets at FVTOCI	-	-	-	-
Debt securities at amortised cost	427	-	337	-
Total	**11,316**	**-**	**6,881**	**-**

Transactions whereby financial assets are transferred but continue to be recognized in their entirety on the Group's Statement of Financial Position relate to Eurosystem funding under the general terms applying to such agreements, and securities sold under agreements to repurchase, which are conducted under GMRAs. With respect to Eurosystem funding, a haircut is generally applied to the collateral, which results in the associated liabilities having a carrying value less than the carrying value of the transferred assets. The Group is unable to use, sell or pledge the aforementioned assets during the term of the transaction and remains exposed to interest rate risk and credit risk on these assets. The counterparty's recourse is not limited to the transferred assets.

The Group has not transferred financial assets that are not subject to derecognition in full but remain on the Statement of Financial Position to the extent of continuing involvement or were derecognized in full, but continuing involvement exists.

The subsidiary that contributes to the Group amounts is Piraeus Bank S.A.

4.14 Financial instruments not measured at fair value

The following tables summarise the fair values and carrying amounts of those financial instruments, which are not measured at fair value on a recurring basis and their carrying amount is not a reasonable approximation of fair value.

Group	Carrying Amount	Fair Value			
	31/12/2023	31/12/2023	Level 1	Level 2	Level 3
Financial assets					
Loans and advances to customers at amortised cost	37,527	37,061	-	-	37,061
Investment securities at amortised cost	11,659	10,785	7,827	2,958	-
Financial liabilities					
Debt securities in issue	1,886	1,946	1,946	-	-
Other borrowed funds	939	935	935	-	-

Group	Carrying Amount	Fair Value	As reclassified		
	31/12/2022	31/12/2022	Level 1	Level 2	Level 3
Financial assets					
Loans and advances to customers at amortised cost	37,367	37,007	-	-	37,007
Investment securities at amortised cost	10,844	9,139	6,821	2,318	-
Financial liabilities					
Debt securities in issue	849	774	774	-	-
Other borrowed funds	937	848	848	-	-

Company	Carrying Amount	Fair Value			
	31/12/2023	31/12/2023	Level 1	Level 2	Level 3
Financial assets					
Investment securities at amortised cost	848	878	-	878	-
Financial liabilities					
Other borrowed funds	939	935	935	-	-

Company	Carrying Amount	Fair Value			
	31/12/2022	31/12/2022	Level 1	Level 2	Level 3
Financial assets					
Investment securities at amortised cost	796	760	-	760	-
Financial liabilities					
Other borrowed funds	936	848	848	-	-

The following methods and assumptions were used to estimate the fair values of the aforementioned financial instruments at 31 December 2023 and 2022.

Loans and advances to customers at amortised cost: Fair value is estimated using discounted cash flow models, taking into account yield curves observable in the market as of the date of the valuation and adjustments for credit risk.

Investment securities at amortised cost, debt securities in issue and other borrowed funds: Fair value is estimated using market prices, or, if such is not available, using discounted cash flow models based on current market interest rates offered for instruments with similar credit quality and duration.

4.15 Financial assets and liabilities measured at fair value

Fair value is the price that would be received to sell a financial asset or paid to transfer a liability in an orderly transaction between market participants, at the measurement date, under current market conditions.

IFRS 13 establishes a fair value hierarchy that categorises financial instruments into three levels based on the type of inputs to the valuation techniques used, as follows:

Level 1 inputs comprise unadjusted quoted prices in active markets for identical assets and liabilities that the entity can access at the measurement date. Level 1 assets and liabilities include debt and equity securities, as well as derivative contracts that are traded in an active and organized market structure (i.e. exchange listed futures and options). An active market is a market in which transactions for assets or liabilities take place with sufficient frequency and volume to provide information on an ongoing basis and are characterized by low bid / ask spreads.

Level 2 inputs comprise observable inputs, other than Level 1 quoted prices, for similar assets or liabilities, quoted prices in markets that are not active, or other inputs that are observable or can be corroborated by observable market data for the full term of the instrument. An input is observable if it is developed using market data, such as publicly available information about events or transactions, and reflects the assumptions that market participants would use when pricing the asset or liability. Level 2 assets and liabilities include OTC derivatives and securities whose values are determined using

pricing models, discounted cash flow methodologies, or similar techniques with inputs that are observable in the market or can be corroborated by observable market data.

Level 3 inputs refer to unobservable inputs, including the entity's own data which are adjusted, if necessary, to reflect the assumptions market participants would use in the circumstances. An input is unobservable if, in the absence of market data availability, it is developed using the best information available about the assumptions that market participants would use when pricing the asset or liability. Level 3 assets and liabilities include financial instruments whose value is determined using pricing models, discounted cash flow methodologies, or similar techniques with inputs that require significant management judgement or estimation. OTC complex derivatives transactions or structured securities, which are valued using a non-market standard model, comprising substantial model uncertainty, are classified as level 3 instruments.

The fair value hierarchy gives the highest priority to Level 1 inputs and the lowest priority to Level 3 inputs. The level of the fair value hierarchy within which the fair value measurement is categorized, is determined on the basis of the lowest input that is significant to the fair value measurement. For this purpose, the significance of an input as well as model uncertainty are assessed against the entire fair value measurement of the instrument.

The following table presents the fair value by hierarchy, of the financial assets and liabilities which are measured at fair value, on a recurring basis, and continue to be recognized, in their entirety, on the Group's and Company's Statement of Financial Position at the end of the reporting period, by fair value hierarchy level:

Financial instruments measured at fair value and basis of valuation

Group	31/12/2023				31/12/2022 as reclassified			
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets								
Derivative financial instruments	-	191	-	**191**	-	220	-	**220**
Financial assets at FVTPL	598	11	-	**609**	434	114	-	**548**
Financial assets mandatorily measured at FVTPL	118	-	116	**234**	104	-	78	**182**
Loans and advances to customers mandatorily measured at FVTPL	-	-	53	**53**	-	-	52	**52**
Investment securities at FVTOCI	1,322	39	22	**1,383**	872	-	25	**897**
Financial liabilities								
Derivative financial instruments	-	295	-	**295**	-	410	-	**410**

Financial instruments measured at fair value and basis of valuation

Company	31/12/2023				31/12/2022			
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets								
Investment securities measured at FVTOCI	-	-	2	**2**	-	-	2	**2**

Transfers between Level 1 and Level 2

Within the year ended 31 December 2023, € 4 million of bonds issued by corporations were transferred from Level 2 to Level 1, due to change in their trading activity, while no transfers of financial assets from level 1 to level 2 occurred during the year ended 31 December 2023. There were no transfers of financial liabilities between Level 1 and Level 2 during the

years ended 31 December 2023 and 31 December 2022. Transfers between levels of fair value hierarchy are deemed to have occurred at the end of the reporting period, in which the financial instruments were transferred.

Level 3 financial instruments

Level 3 financial instruments include:

a) Credit impaired loans and advances to customers, which are mandatorily measured at FVTPL because their contractual cash flows are not SPPI, are valued using an income approach expected cash flow (expected present value) technique incorporating unobservable inputs.

b) Financial assets mandatorily measured at FVTPL, including contingent and variable consideration assets recognized following the disposal of NPE portfolios, the fair value of which was estimated at € 67 million (i.e. Senna, Sunshine), for which the models used to estimate their fair value utilize significant unobservable inputs (e.g. discount rate, volatility, expected cash flows etc.).

c) Mutual funds and closed end funds, which do not meet the definition of an equity instrument under IAS 32 and are mandatorily measured at FVTPL, for which the models used to estimate the fair value are price-based and the price is obtained from the fund manager.

d) Equity securities at FVTOCI and FVTPL, which are not traded in active markets and their fair value is estimated on the basis of the available information using an income or market approach, for which the main inputs used are earnings forecasts, comparable multiples, net asset value, adjusted equity and other parameters which are not market observable, as well as estimations that may adjust these values.

e) Contingent convertible instruments for which the trigger of conversion to equity is based on non-market observable triggers.

f) Subordinated notes of the Sunrise I, II and III, Phoenix and Vega I, II, III securitizations retained by the Group as at 31 December 2023 classified within line item“Loans and advances to customers mandatorily measured at FVTPL”, which have been valued using multiple valuation techniques incorporating significant unobservable inputs.

During the years ended 31 December 2023 and 31 December 2022, there were no transfers into or out of Level 3. The following table presents a movement of Level 3 fair value measurements for the aforementioned periods:

Group	Movement of Level 3 instruments		
	Financial assets mandatorily measured at FVTPL	Loans and advances to customers mandatorily measured at FVTPL	Investment securities measured at FVTOCI
Opening balance as at 1/1/2022	**93**	**77**	**22**
Gain/ (loss) recognised in the income statement or OCI	(26)	-	-
Additions	29	-	3
Disposals	(22)	(25)	-
FX differences	5	-	-
Closing Balance as at 31/12/2022	**78**	**52**	**25**
Gain/ (loss) recognised in the income statement or OCI	(13)	1	(2)
Additions	86	1	2
Disposals	(35)	(1)	(3)
Closing Balance as at 31/12/2023	**116**	**53**	**22**

Company	Movement of Level 3 Instruments		
	Financial assets mandatorily measured at FVTPL	Loans and advances to customers mandatorily measured at FVTPL	Investment securities measured at FVTOCI
Opening Balance as at 1/1/2022	**9**	**26**	**-**
Gain/ (loss) recognised in the income statement or OCI	-	(1)	-
Additions	-	-	2
Disposals	(9)	(25)	-
Closing Balance as at 31/12/2022	**-**	**-**	**2**
Closing Balance as at 31/12/2023	**-**	**-**	**2**

Valuation Process and Control Framework

The Group has established appropriate processes and internal controls to ensure that the fair values of its financial assets and liabilities are reasonably estimated. The fair value measurements are determined by functions of the Group that are independent of the Risk Management Unit.

The fair values of bonds are determined either by reference to prices for traded instruments in active markets, to external quotations or widely accepted financial models, which are based on market observable or unobservable information where the former is not available, as well as relevant market based parameters such as interest rates, option volatilities, currency rates, etc. The Group may, sometimes, also utilize third-party pricing information, and perform validating procedures on this information to the extent possible or base its fair value on the latest transaction prices available, given the absence of an active market or similar transactions or other market observable inputs. Such instruments are categorised within the lowest level of the fair value hierarchy (i.e. Level 3). The fair value measurement of debt securities, including significant inputs on the valuation models, is performed by Middle Office and independently validated by GRM on a systematic basis.

The Group mainly engages in plain vanilla derivative products, hence, the valuation models utilised are fairly standard across the industry. Inputs to valuation models are determined based on market observable information wherever possible. CCR adjustments are applied on all OTC derivatives. The Group calculates a separate Credit Value Adjustment ("CVA") for each counterparty to which the Group has exposure. The CVA is estimated considering expected exposures generated using simulation techniques (i.e. Monte Carlo simulation), as well as ISDA master netting agreements and collateral postings under CSA contracts. With respect to own credit risk, the Group estimates a Debt Value Adjustment ("DVA") by applying a methodology symmetric to the one applied for CVA. The bilateral CVA ("BCVA") is based on implied probabilities of default, derived from credit default swaps ("CDS") spreads observed in the market, or, if these are not available, from appropriate proxies. As of December 2023 and 2022, the BCVA was immaterial.

On a systematic basis, adequate control procedures are in place for the validation of these models, including the valuation inputs. The Group's Middle Office and GRM provide the control valuation framework necessary to ensure that the fair values are reasonably determined, reflecting current market circumstances and economic conditions. Furthermore, under European Markets and Infrastructure Regulation ("EMIR") regulation, the valuation of interbank OTC derivatives is reconciled on a daily basis with counterparties' valuations, under the daily collateral management process.

Quantitative information for the Level 3 fair value measurements of the Group as at 31 December 2023 and 2022:

Financial instruments[1]	Fair Value 2023	Fair Value 2022	Valuation Technique	Significant Unobservable Input	Range of Inputs 2023		Range of Inputs 2022	
					Low	High	Low	High
Financial assets mandatorily measured at FVTPL – Contingent & variable considerations	67	42	Monte Carlo simulation Discounted Cash Flows	Revenue volatility Discount rate Risk premium Expected cash flows	15% 14% 6% n/a[2]	15% 14% 6% n/a[2]	15% 14% n/a n/a[2]	15% 14% n/a n/a[2]
Financial assets mandatorily measured at FVTPL and FVTOCI – equity securities, mutual funds	70	59	Income, market approach	n/a[3]	n/a[3]	n/a[3]	n/a[3]	n/a[3]
Loans and advances to customers mandatorily measured at FVTPL – Other	47	46	Discounted Cash Flows	Credit risk adjusted expected cash flows	0%[4]	100%[4]	0%[4]	100%[4]

[1] Includes financial instruments with an individual fair value higher than € 5 million at the end of the reporting period.

[2]The expected Cash Flows throughout the earn-out calculation period are commercially sensitive and are not included in the table, given that disclosing them would be detrimental to the Group's interests.

[3] Mainly refers to equity participations of the Group in the share capital of private companies, thus the respective shares are not traded in active markets. In the absence of an active market, the fair value of these securities is estimated using an income or market valuation approach. Given the bespoke nature of the valuation method in respect of each equity shareholding, it is not practicable to quote a range of unobservable inputs. The changes in the value do not materially affect the Group´s results and assets.

[4] Represented as percentage of the loan's gross carrying amount.

Reasonably possible assumptions, other than the aforementioned used for determining unobservable inputs of Level 3 instruments, would not have a significant effect on the Group's financial assets and liabilities measured at fair value on a recurring basis.

4.16 Capital adequacy

The main objectives of Management with respect to capital adequacy are the following:

- To comply with the capital requirements against risks undertaken, according to the regulatory framework;
- To preserve the Group's ability to continue its operations unhindered, thus to continue providing returns and benefits to its shareholders and ensure the confidence of its customers;
- To retain a sound and stable capital base in order to support the Group's Business Plans; and
- To maintain and enhance existing infrastructures, policies, procedures and methodologies for the adequate coverage of supervisory needs, in Greece and abroad.

The Group currently complies with the CRD IV regulatory framework (Basel III implementation under EU rules), which came into force with Directive 2013/36/EU as transposed into Greek Law 4261/2014 (amended by Law 4799/2021) and Regulation (EU) No. 575/2013 as it is currently in force.

The aforementioned regulatory framework requires financial institutions to maintain for the Group a minimum level of regulatory capital related to the undertaken risks. The minimum thresholds for the capital adequacy ratios, as per article 92 of the CRR2, are as follows:

	Group
Common Equity Tier 1 (CET1) Ratio	4.5%
Tier 1 (T1) Ratio	6.0%
Total Capital Ratio (TCR)	8.0%

Following the activation of the SSM on 4 November 2014, the Group was placed under the direct supervision of the ECB.

The ECB, through the SREP decision on 14 December 2022, informed Management on the revised OCR levels, effective since 1 January 2023. The Group has to maintain, on a consolidated basis, a TSCR of 11% and an OCR of 14.57% (OCR plus P2G 16.32%), which includes:

a) the minimum Pillar I total capital requirements of 8.0% as per article 92(1) of the CRR;

b) an additional Pillar II capital requirement of 3.0% as per article 16(2) of Regulation 1024/2013/EU;

c) the CCB of 2.5% under Greek Law 4261/2014, as amended by Greek Law 4799/2021;

d) the O-SII capital buffer of 1.0% for 2023 under Greek Law 4261/2014, as amended by Greek Law 4799/2021; and

e) the institution specific CCyB under Greek Law 4261/2014 (as amended by Greek Law 4799/2021) of 0.07% for the

year ended 31 December 2023.

The capital adequacy ratios as at 31 December 2023 and 2022 for the Group, as calculated under the existing regulatory framework, taking into account the relevant transitional period provisions applicable under Regulation 575/2013 are as follows:

	Group	
	31/12/2023	31/12/2022
Ordinary shares	1,163	1,163
Share premium	3,255	3,555
Less: Treasury shares	(15)	-
Other reserves and retained earnings	2,217	1,235
Minority Interest	56	28
Less: Intangible assets	(230)	(217)
Other regulatory adjustments	(2,118)	(1,699)
Common Equity Tier 1 Capital (CET1)	**4,327**	**4,064**
Additional Tier 1 instruments	600	600
Total Additional Tier 1 Capital	**600**	600
Tier 1 Capital (A)	**4,927**	**4,664**
Subordinated debt	895	893
Total Tier II Capital (B)	**895**	**893**
Total regulatory capital (A) + (B)	**5,822**	**5,557**
Total RWAs (on and off- balance sheet items)	**32,765**	**31,178**
CET1 Capital ratio	**13.21%**	**13.04%**
T1 Capital ratio	**15.04%**	**14.96%**
Total Capital ratio	**17.77%**	**17.82%**

As at 31 December 2023, the TCR for the Group stood at 17.77% and the CET1 ratio stood at 13.21%, covering the minimum OCR levels. CET1 includes also specific prudential adjustments in accordance with article 3 of the CRR and supervisory expectations (inclusive of any NPE stock / Addendum calendar shortfall, which is also related to government guaranteed exposures). The Bank is expected to apply a prudential treatment for the Greek State-Guaranteed Exposures, to be assessed with a reference date of 31 December 2024 and compliance to be confirmed in the context of the SREP decision of 2025. In accordance with the supervisory expectations, the Bank is required to apply the minimum NPE coverage level in alignment with the SREP recommendation on the coverage of the NPE stock and the Addendum to the ECB Guidance to banks on non-performing loans, to such Greek State-Guaranteed Exposures. The net book value of these exposures amounted to € 687 million as at 31 December 2023. This prudential treatment does not affect the respective accounting treatment.

The Additional Tier 1 instruments (“AT 1 Instrument”) comprise notes issued by the Company on 16 June 2021 with total nominal value € 600 million. The AT 1 Instrument is perpetual and redeemable at the full discretion of the Company, from 16 June 2026 to 16 December 2026 (the initial call date) and on any subsequent coupon payment date. The respective note bears a fixed coupon of 8.75% payable semi-annually in arrears, until the first call date, and resets to 9.195% plus the then

prevailing 5-year mid swap rate every five years thereafter. The Company has the right to cancel all or part of any payment of interest, on any interest payment date and for any reason, at its sole discretion.

4.17 Risks related to the recognition of the main part of deferred tax assets as claims (Deferred Tax Credits) against the Greek State as regulatory capital or as an asset

The calculation of the capital adequacy ratios of the Group, takes into account the DTA which have been recognised on the basis of the relevant provisions of the IFRS. As at 31 December 2023 the DTA of the Group amounted to € 5,703 million (31 December 2022: € 5,974 million). At each reporting date, the Group and the Company review the carrying amount of the deferred taxation, which is likely to lead to a change in the amount of DTA recognised in the Statement of Financial Position, and consequently affect the calculation of the capital adequacy ratios. Under the current directive about the capital adequacy ("CRD IV"), DTA are deducted from the CET1 capital, if they exceed specific limits.

Under the provisions of Greek Law 4172/2013, Article 27A, as amended by Greek Law 4465/2017 and being currently in effect, DTA of Greek financial institutions, as well as DTA of leasing and factoring companies, that have been recognized due to losses from the PSI and accumulated provisions due to credit risk in relation to existing loans and advances to customers as of 30 June 2015, as well as the accounting write offs and final losses due to permanent write offs or restructuring of debts under certain conditions, will be converted from 2017 onwards into directly enforceable claims (Tax Credit) against the Greek State, provided that the financial result under IFRS, is a loss from the fiscal year 2016 onwards. This claim will be offset against the relevant amount of income tax of the legal person or companies of the same corporate group (associated companies) of the tax year the approved financial statements refer to. When the amount of income tax is insufficient to offset the above claim, any remaining claim will give rise to a direct refund right against the Greek State. Simultaneously, equivalent conversion rights are granted to the Greek State for the issuance and delivery of ordinary shares.

Existing shareholders have option to buy the conversion rights from the State. Furthermore, a gradual amortization over a 20-year period of the final tax losses arising from write-offs and disposals is provided, maintaining the DTC status during all this period, while it disconnects the accounting write-offs from final debt write-offs.

As at 31 December 2023, the DTA of the Group that meets the provisions of article 27 of Law 4172/2013, as currently in force i.e. is eligible for Deferred Tax Credit ("DTC"), amounted to € 3,303 million (31 December 2022: € 3,541 million), of which € 995 million relates to unamortised PSI losses (31 December 2022: € 1,050 million) and € 2,308 million relates to temporary differences between the IFRS carrying amount and tax base of loans and advances to customers (31 December 2022: € 2,491 million).

In addition, refer to Note 3.2 for the key sources of estimation uncertainty in regards with the recoverability of DTA. The recognition of DTA may be adversely affected by: a) the future reduction of income tax rates, b) the adverse change of the regulations governing the treatment of DTA for regulatory capital purposes and c) any adverse change in the interpretation of the aforementioned legislative amendments by the EC. In case where any of the aforementioned risks occur, it would probably have an adverse effect on the adequacy of the Group's regulatory capital ratios.

4.18 IBOR Reform

In 2021, the Group established an internal Benchmark Rates Reform Working Group (the "BR Working Group"), led by

senior representatives from the Bank's business units, in order to manage the transition to the new risk-free rates ("RFRs"), mitigate any related risks and comply with the regulatory requirements of the EU 2016/1011 – EU Benchmark Regulation ("EU BMR"). In this context, the IBOR reform process for CHF / GBP / JPY related contracts was completed successfully.

In addition to the above, in 2021 the Group initiated all necessary actions relating to the new USD risk-free reference rate definition ("USD SOFR") in order to replace the USD LIBOR Benchmark, expected to cease being representative and published on 30 June 2023, as per 5 March 2021 FCA Announcement.

In this context, the Bank proceeded to the automatic replacement of the USD LIBOR with the new USD RFR Secured Overnight Financing Rate ("SOFR") effective from 3 July 2023, both in its systems and procedures. The Bank also applied relevant contracts' amendments, inserting the new RFR SOFR definition and necessary fallback language provisions.

As of 30 June 2023, all financial instruments affected by the IBOR reform, had successfully completed the transition to the alternative benchmark rates.

Regarding Euro Interbank Offered Rate ("EURIBOR"), it underwent a methodological reform in 2019 to make it compliant with the regulatory requirements laid down in the EU 2016/1011 –EU BMR. In specific, EURIBOR may continue to be representative following a hybrid methodology that became applicable at the end of 2019, based on transactions and expert judgement derived from related markets, if there is no relevant unsecured money market activity. Following the application of this methodology, the EURIBOR administrator (European Money Markets Institute, "EMMI") has confirmed that EURIBOR may continue to be used as a reference rate for new and legacy contracts after 1 January 2022.

In October 2022, EMMI issued a press release to start publishing the Euro Forward Looking Term Rate ("EFTERM") on 14 November 2022. The EFTERM rate will be an alternative interest rate (fallback rate) for EURIBOR in accordance with the provisions of Regulation (EU) 2016/1011 (Benchmark Regulation). The Group, assessing the future possibility of EURIBOR reform, has initiated preparatory work for the adjustment of the respective contracts, by introducing fallbacks provisions to cover the possibility of the abolition of EURIBOR and its replacement by a new reference interest rate.

IBOR reform does not have any impact on the active FVH accounting relationships of the Group as of 31 December 2023, considering that the hedging instruments used are referenced to Euribor rates which are not subject to the contemplated reform.

4.19 Climate Related Matters

Assessing Climate and Environmental Risk

The Group has established a comprehensive Risk Management Framework to identify, measure, control, and mitigate underlying risks, including C&E risks. The annual Risk Identification ("RID") process is applied to identify the relevant and material risks, by taking into consideration the environment in which it operates and its business model. The risks that are expected to have a substantive financial or strategic impact on the Group's business are deemed material. The materiality assessment could be performed on a quantitative or qualitative basis or through a combination of both. During the RID exercise, "climate change" (physical & transition risks) has been recognized as a risk driver for many key risk categories (i.e. credit, market, liquidity, operational, business & strategic, and reputational risks), and ESG and climate-related risks have been identified as a standalone risk subcategory. Moreover, since the Group recognizes that climate change-related risks

are expected to intensify in the longer term (i.e. over the next five years), it has launched several initiatives to take account of environmental considerations in its business targets, strategies, risk management framework, and decision-making processes.

The Group, has already identified the business functions across all Three Lines of Defense related to or affected by C&E risks and the respective policies in order to map any gaps and ensure that climate and ESG aspects are incorporated accordingly. In this context, a group-wide program has been initiated and separate workstreams are formed to support responsible Business Units to review policies under their ownership through C&E lens.

The Group has assessed its exposure to climate-sensitive sectors, areas, and clients and formed the basis for materiality analysis in terms of credit, market, liquidity, operational, reputation, and business & strategic risks. The analysis is based on potential impact from climate-related risks on the Group's material portfolios representing the majority of its exposures (i.e. business portfolio and immovable property held as collateral), using quantitative and qualitative analyses. Based on its internal classification methodology, the Group has conducted an analysis in order to determine the materiality of the impact of C&E risks on its main risk categories. More specifically:

Credit Risk: for credit risk the materiality assessment focuses on the Group's business portfolio and on its immovable properties' portfolio. For the business portfolio, the Group analyzed its exposure in climate sensitive sectors, for both physical and transition risk, its distribution across asset classes and business lines, the average weighted maturity of these exposures and their credit quality, and the existence or not of counterparties' transition plans. On the immovable properties' portfolio, an analysis was performed related to transition risk, assessing the collaterals' Energy Performance Certificate ("EPC") label distribution and loan-specific factors such as the counterparty's credit quality and business segment as well as physical risk, where the analysis focused on the collateral pool's distribution in high risk geographical areas and factors such as LTV ratio and insurance coverage for extreme events (e.g. earthquakes, floods, wildfires). Based on this analysis, the increase in the risk profile is currently considered immaterial. Notwithstanding, as the effects of climate change in the future may be intensified, the risk profile may be substantially increased.

Market Risk: Group's trading book contains limited exposure to non-financial corporates (especially to corporates falling in the high-risk perimeter), hence any potential impact would be immaterial. The assessment is also based on the Group's business model and its intention to contain its exposures in the trading book. The Group will closely monitor and re-assess the potential impact when deemed necessary.

Liquidity Risk: For the materiality assessment of Liquidity Risk, the Group has assessed the following main drivers:

- the impact of climate change on the market values of trading instruments;
- the non-tradable/ECB eligible exposures (i.e. pools of credit claims) used as collateral for refinancing through the ECB, via credit deterioration due to physical and transition climate risks; and
- the corporate deposit base.

The overall impact on liquidity risk is expected to be immaterial, based on the Group's business model, book structure and nature of exposures.

Operational Risk: A historical analysis has been performed on actual operational risk events, resulting in an immaterial increase in the Group's risk profile in the short-term. With the implementation of its Geographic Information System ("GIS") the Group aims at strengthening its scenario analysis capabilities (especially for physical risk), in order to enhance its materiality assessment in the medium- and longer-term horizons and update the relevant policies and frameworks accordingly. The GIS will serve as a tool for assessing climate physical risks as it allows the Group to integrate and analyze different types of spatial data related to climate and hazards and combine it with climate scenario analysis.

The Group will continue to review and enhance the materiality assessment process based on its evolving scenario analysis capabilities and methodologies and as more granular data become available.

5 Segment analysis

The CEO, supported by the Group Executive Committee members, is considered the Chief Operating Decision Maker for the purposes of identifying the Group's reportable segments.

The Group manages its business through the following reportable segments:

Retail Banking – Includes Mass, Affluent, Small Businesses, International Business Unit ("IBU") and Public core customer segments, as well as channels of banking activity (i.e. branches, e-branches, ATMs etc.).

Corporate Banking – Includes Large Corporates, Shipping, SMEs and Agricultural Core customer segments.

Piraeus Financial Markets ("PFM") – Includes the Fixed Income, Foreign Exchange, Treasury activities (including the interest rate gap management arising from all banking activities) and Institutional Clients.

Other – Includes all management related activities not allocated to specific customer segments, management of REO assets, Wealth and Asset Management ("WAM") activities, certain equity participations of the Group, funding transactions approved by the Asset and Liability Management Committee ("ALCO") and intersegmental eliminations.

NPE Management Unit ("NPE MU") – Includes the management of any NPE assessed as non-core business, irrespectively of whether the said exposures are serviced by the Group or third parties. In addition, following the derecognition of Phoenix, Vega I, II, III, Sunrise I, II and III securitized portfolios, this reportable segment includes also the senior and subordinated notes issued by the securitization SPVs and retained by the Group. The fees payable for servicing the Group's NPE portfolio are recognized within this segment. Furthermore, the respective segment includes certain equity participations classified in either FVTOCI or FVTPL and certain associates (i.e. Strix Asset Management Ltd, Strix Holdings LP and Strix Holdings II LP).

Business segments include internal allocations of income and expense based on an internally approved methodology. These allocations include, among other, the costs of certain support services and functions to the extent that they can be meaningfully attributed to the reportable business segments. Such allocations are made on a systematic and consistent basis and involve a degree of subjectivity. Costs that are not allocated to business segments are included in Corporate Centre (reported under business segment "other").

Where relevant, income and expense amounts presented include the results of inter-segment funding along with inter-company and inter-business line transactions. All inter-company transactions between business segments are undertaken on arm's length basis and inter-segment transactions and balances are eliminated within each relevant segment.

An analysis of the results and other financial information per business segment of the Group is presented below.

1/1 - 31/12/2023	"Core" Segments					NPE MU	Group
	Retail Banking	Corporate Banking	PFM	Other	Total		
Net interest income	961	615	401	46	2,022	(20)	**2,003**
Net fee and commission income	244	188	9	21	462	6	**468**
Income from non-banking activities	-	-	-	73	73	5	**79**
Net gain / (losses) from derecognition of financial instruments measured at amortised cost	(1)	2	(2)	-	(1)	(1)	**(1)**
Net other income/ (expenses)	(2)	2	38	(4)	33	26	**59**
Total Net Income	**1,202**	**807**	**447**	**135**	**2,590**	**17**	**2,607**
Total operating expenses	(480)	(189)	(47)	(98)	(815)	(48)	**(863)**
Profit / (loss) before provisions, impairment and other credit-risk related expenses	**721**	**617**	**399**	**37**	**1,775**	**(31)**	**1,744**
Impairment (losses) / releases on loans and advances to customers at amortised cost	(4)	(76)	-	(3)	(84)	(320)	**(404)**
Other credit-risk related expenses on loans and advances to customers at amortised cost	(31)	(47)	-	-	(78)	(58)	**(136)**
Impairment losses on other assets	-	-	-	(52)	(52)	-	**(52)**
Impairment on subsidiaries and associates	-	-	-	(1)	(1)	-	**(1)**
Impairment of property and equipment and intangible assets	-	-	-	(8)	(8)	(21)	**(29)**
Impairment releases on debt securities at amortised cost	-	-	9	-	9	-	**9**
Other provision (charges)/ releases	1	(1)	-	(35)	(35)	(4)	**(38)**
Share of profit/ (loss) of associates and joint ventures	-	-	-	(2)	(2)	(14)	**(15)**
Profit/ (loss) before income tax	**687**	**494**	**408**	**(63)**	**1,526**	**(447)**	**1,078**
Income tax expense							(292)
Profit for the year from continuing operations							**786**
Profit for the year							**786**
As at 31/12/2023							
Total assets from continuing operations (excluding assets held for sale & investments in associated undertakings and joint ventures)	11,953	22,724	26,091	6,526	67,294	7,660	**74,955**
Assets held for sale	1	4	-	-	5	236	**241**
Investments in associated undertakings and joint ventures	-	-	-	37	37	1,218	**1,255**
Total assets	11,955	22,727	26,091	6,563	67,337	9,114	**76,450**
Total liabilities	44,842	14,585	5,954	3,202	68,583	514	**69,097**

1/1 - 31/12/2022 As reclassified [1]	"Core" Segments					NPE MU	Group
	Retail Banking	Corporate Banking	PFM	Other	Total		
Net interest income	536	442	245	162	1,384	(32)	**1,353**
Net fee and commission income	226	168	8	14	415	6	**421**
Income from non-banking activities	-	-	-	58	58	6	**64**
Net gain/ (losses) from derecognition of financial instruments measured at amortised cost	-	-	(17)	1	(16)	(18)	**(34)**
Net other income/ (expenses)	282	-	506	(10)	779	-	**779**
Total Net Income	**1,044**	**610**	**742**	**225**	**2,620**	**(39)**	**2,582**
Total operating expenses	(483)	(188)	(60)	(105)	(836)	(53)	**(889)**
Profit/ (loss) before provisions, impairment and other credit-risk related expenses	**561**	**421**	**683**	**119**	**1,785**	**(92)**	**1,693**
Impairment (losses) /releases on loans and advances to customers at amortised cost	12	89	1	(8)	95	(567)	**(472)**
Other credit-risk related expenses on loans and advances to customers at amortised cost	(28)	(33)	-	(1)	(63)	(80)	**(142)**
Impairment losses on other assets	-	-	-	(47)	(47)	-	**(47)**
Impairment on subsidiaries and associates	-	-	-	(2)	(2)	-	**(2)**
Impairment of property and equipment and intangible assets	-	-	-	(4)	(4)	-	**(4)**
Impairment losses on debt securities at amortised cost	-	-	(4)	-	(4)	-	**(4)**
Other provision (charges)/ releases	2	4	-	(17)	(12)	(1)	**(13)**
Share of profit / (loss) of associates and joint ventures	-	-	-	6	6	23	**29**
Profit/ (loss) before income tax	**547**	**482**	**680**	**45**	**1,753**	**(717)**	**1,037**
Income tax expense							(140)
Profit for the year from continuing operations							**897**
Profit after income tax from discontinued operations	-	-	-	51	51	-	**51**
Profit for the year							**948**
As at 31/12/2022 As reclassified [1], [2]							
Total assets from continuing operations (excluding assets held for sale & investments in associated undertakings and joint ventures)	12,037	21,817	24,371	6,331	64,556	8,660	73,216
Assets held for sale	4	12	-	17	33	373	406
Investments in associated undertakings and joint ventures	-	-	-	54	54	969	1,023
Total assets	12,042	21,829	24,371	6,401	64,643	10,002	74,645
Total liabilities	42,791	14,319	7,341	3,141	67,593	472	68,064

[1] In the second quarter of 2023, the Group amended the presentation of DTA within reportable segments. As a result, DTA is allocated in each reportable segment, instead of presenting the DTA, in its entirety, in the reported segment "Other". The comparative information has been reclassified accordingly.

[2] As of 31 December 2023, the Group offsetted derivative assets and liabilities entered into with a central counterparty clearing member against the margin collateral posted or received and reclassified accordingly the comparatives. The reportable segment affected from the said offsetting is PFM. For further information on the offsetting refer to Notes 4.8 and 49.

Geographical segment

The Group operates in the following geographical areas: a) Greece, the Company's country of domicile; b) rest of Europe, which includes Albania, Bulgaria, Romania, Serbia, Ukraine, Cyprus, United Kingdom, Germany, Netherland and Ireland; and c) other countries, which include Egypt. To this end, Greece generated 97% of the Group's net income.

The following table summarises the Group's net income and non-current assets, with its external customers, across all geographical areas. The breakdown is based on the location of the respective legal entity.

Group	Net Income		Non-current assets	
	1/1 - 31/12/2023	1/1 - 31/12/2022	31/12/2023	31/12/2022
Greece	2,527	2,548	2,550	2,431
Rest of Europe	80	34	286	127
Other countries	-		-	4
Continuing operations	**2,607**	**2,582**	**2,836**	**2,562**
Discontinued operations	**-**	**84**	**-**	**-**

6 Net interest income

Continuing operations	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Interest and similar income				
Debt securities measured at FVTOCI	41	31	-	-
Debt securities at amortised cost	248	187	103	99
Loans and advances to customers at amortised cost & Reverse repos	1,868	1,203	-	
Due from banks	24	7	-	-
Negative interest from liabilities due to ECB	-	70	-	-
Negative interest from other interest-bearing liabilities	-	4	-	-
Other	375	74	-	-
Total interest income for financial instruments not measured at FVTPL	**2,556**	**1,575**	**103**	**99**
Financial instruments measured at FVTPL	34	18	-	7
Derivative financial instruments	209	98	-	-
Total interest and similar income	**2,799**	**1,691**	**103**	**106**
Interest expense and similar charges				
Due to customers and repurchase agreements	(244)	(51)	-	-
Debt securities in issue and other borrowed funds	(138)	(96)	(69)	(69)
Due to banks	(274)	(15)	-	-
Contribution of Law 128/75	(52)	(54)	-	-
Negative interest from interest bearing assets	-	(38)	-	-
Other	(2)	(3)	-	-
Total interest expense from financial instruments not measured at FVTPL	**(710)**	**(256)**	**(69)**	**(69)**
Derivative financial instruments	(87)	(82)	-	-
Total interest expense	**(797)**	**(339)**	**(69)**	**(69)**
Net interest income	**2,003**	**1,353**	**34**	**37**

The increase in line item “Loans and advances to customers at amortised cost and reverse repos” for the year ended 31 December 2023 compared to the year ended 31 December 2022, is mainly due to interest rate increases of floating rate loans, following the consecutive ECB interest rate hikes since the second semester of 2022.

Line item “Other” of interest and similar income comprises € 333 million generated from the use of Eurosystem’s deposit facility, corresponding to overnight deposits with the Central Bank remunerated with the applicable DFR, which increased to 4.0% from 20 September 2023, following the aforementioned consecutive increases of key interest rates.

Line item “Due to banks” of interest expense and similar charges includes the interest expense streaming from ECB funding, in the context of the TLTRO III program, amounting to € 182 million. For the comparative period the respective interest amounted to a total income of € 70 million and was presented in line item “Negative interest from liabilities to ECB”.

Interest income by credit quality and product line

The table below presents interest income from loans and advances to customers at amortised cost, by credit quality and product line. During the year ended 31 December 2023 and 2022, no interest income from loans and advances to customers at amortised cost was recognised by the Company.

Group - Continuing operations	1/1 - 31/12/2023				1/1 - 31/12/2022			
	Not credit impaired	Credit impaired			Not credit impaired	Credit impaired		
	Stage 1 and 2	Stage 3	POCI	Total	Stage 1 and 2	Stage 3	POCI	Total
Retail lending	436	24	17	**477**	293	17	12	**322**
Corporate lending	1,306	59	17	**1,382**	762	97	19	**878**
Public sector lending	9	-	-	**9**	4	-	-	**4**
Total Interest income	**1,752**	**82**	**34**	**1,868**	**1,059**	**114**	**31**	**1,203**

7 Net fee and commission income

Continuing operations	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Fee and commission income				
Commercial banking	481	449	47	44
Investment banking	29	26	-	-
Asset management	44	33	-	-
Total fee and commission income	**554**	**508**	**47**	**44**
Fee and commission expense				
Commercial banking	(77)	(79)	(35)	(30)
Investment banking	(8)	(6)	-	-
Asset management	(1)	(1)	-	-
Total fee and commission expense	**(86)**	**(87)**	**(35)**	**(30)**
Net fee and commission income	**468**	**421**	**12**	**14**

a. Fee and commission income

The Group and the Company classify revenue from contracts with customers based on the type of services provided. Management believes that this classification reflects how the nature, quantity, timing and uncertainty of the Group's and the Company's income and cash flows are affected by financial factors.

The tables below present total fee and commission income from contracts with customers of the Group and the Company, for the years ended 31 December 2023 and 2022, per product type and business segment.

Group	Fee and Commission income					
1/1 - 31/12/2023	Retail Banking	Corporate Banking	PFM	Other	NPE MU	Total
Acquiring	1	1	-	-	-	2
Asset management/Brokerage	39	2	10	16	-	67
Bancassurance	39	5	-	10	1	55
Cards Issuance [1]	71	10	-	-	2	83
Deposits commissions [1]	9	1	-	-	-	10
Funds transfer	61	24	-	9	1	95
Letters of guarantee	3	42	-	1	1	47
Loans and advances to customers [1]	12	88	-	-	1	101
Payments	20	4	1	1	-	26
FX fees	23	7	1	-	-	31
Other	21	10	-	5	-	36
Total	**298**	**195**	**12**	**42**	**6**	**554**

Group	Fee and Commission income					
1/1 - 31/12/2022	Retail Banking	Corporate Banking	PFM	Other	NPE MU	Total
Acquiring	9	5	-	-	-	**14**
Asset management/Brokerage	31	3	9	8	-	**51**
Bancassurance	33	4	-	14	1	**52**
Cards Issuance [1]	60	8	-	-	2	**70**
Deposits commissions [1]	8	1	-	-	-	**9**
Funds transfer	61	17	-	3	1	**82**
Letters of guarantee	3	34	-	1	2	**40**
Loans and advances to customers [1]	10	81	-	-	1	**92**
Payments	22	5	1	-	-	**28**
FX fees	27	6	1	-	-	**34**
Other	20	12	-	4	-	**36**
Total	**284**	**176**	**11**	**30**	**7**	**508**

[1] Refers to financial assets and financial liabilities carried at amortised cost

Company	Fee and Commission income					
1/1 - 31/12/2023	Retail Banking	Corporate Banking	PFM	Other	NPE MU	Total
Bancassurance	35	5	-	7	-	47
Total	**35**	**5**	**-**	**7**	**-**	**47**

Company	Fee and Commission income					
1/1 - 31/12/2022	Retail Banking	Corporate Banking	PFM	Other	NPE MU	Total
Bancassurance	29	4	-	11	-	**44**
Total	**29**	**4**	**-**	**11**	**-**	**44**

b. Other income, within the scope of IFRS 15

As presented in the tables below, other income that falls within the scope of IFRS 15, corresponding to contracts with customers of the Group, for the year ended 31 December 2023 and 2022, amounted to € 90 million and € 44 million, respectively. The said amounts are included within line item "Net other income/ (expenses)" of the Income Statement, inclusive of other expenses, as well as losses from the sale of investment property and other assets.

Group	Other Income					
1/1 - 31/12/2023	Retail Banking	Corporate Banking	PFM	Other	NPE MU	Total
Other operating income	-	-	-	11	69	**80**
Gain from sale of investment property	-	-	-	2	-	**2**
Gain from sale of other assets	-	-	-	8	-	**8**
Total	**-**	**-**	**-**	**21**	**69**	**90**

Group	Other Income					
1/1 - 31/12/2022	Retail Banking	Corporate Banking	PFM	Other	NPE MU	Total
Other operating income	-	-	13	22	1	**36**
Gain from sale of investment property	-	-	-	2	-	**2**
Gain from sale of other assets	-	-	-	5	1	**6**
Total	**-**	**-**	**13**	**29**	**2**	**44**

For the Company, the respective income for the year ended 31 December 2023 and 2022 is immaterial.

8 Income from non-banking activities

For the year ended 31 December 2023, income from non-banking activities at Group level includes rental income from investment properties of € 73 million (31 December 2022: € 58 million), while the respective amount for the Company is nil for the years ended 31 December 2023 and 2022.

9 Net gains / (losses) from financial instruments measured at FVTPL

	Group		Company	
Continuing operations	**1/1 - 31/12/2023**	**1/1 - 31/12/2022**	**1/1 - 31/12/2023**	**1/1 - 31/12/2022**
Gains / (losses) from debt securities	21	(73)	-	-
Gains / (losses) from other financial instruments	2	432	-	(8)
Net income from financial instruments measured at FVTPL	**23**	**359**	**-**	**(8)**

Line item "Gains / (losses) from debt securities" for the year ended 31 December 2023 includes mainly gains of € 24 million, related to disposal and fair value changes of Greek Government Bonds ("GGBs") and Greek treasury bills (31 December 2022: losses of € 54 million). The variance in line item "Gains/ (losses) from other financial instruments" is mainly attributable to gains from derivatives recognised in the previous year.

10 Net gains / (losses) from financial instruments measured at FVTOCI

The Group's net gains from derecognition of financial instruments measured at FVTOCI for the year ended 31 December 2023 amounted to € 2 million (31 December 2022: € 111 million), mainly derived from the disposal of GGBs and Greek treasury bills, with total nominal value of € 498 million (31 December 2022: € 1,363 million).

11 Net other income / (expenses)

	Group		Company	
Continuing operations	**1/1 - 31/12/2023**	**1/1 - 31/12/2022**	**1/1 - 31/12/2023**	**1/1 - 31/12/2022**
Gains / (losses) from fair value remeasurement of investment property (Note 28)	21	38	-	-
Other net income / (loss)	(21)	(9)	(1)	(1)
Total net other income / (expense)	**-**	**29**	**(1)**	**(1)**

12 Staff costs

Continuing operations	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Wages and salaries	(287)	(299)	(2)	(2)
Social insurance contributions	(59)	(62)	(1)	(1)
Other staff costs	(25)	(23)	-	-
Voluntary redundancy costs	(62)	(57)	-	-
Retirement benefit charges	(5)	(5)	-	-
Share based payments	(4)	-	-	-
Total	**(442)**	**(446)**	**(3)**	**(3)**

In accordance with its strategic objectives and transformation priorities, the Group initiated in 2023 a new Voluntary Exit Scheme ("VES") for certain group of employees. As a result, voluntary redundancy costs of € 62 million increased staff costs during 2023. The Group's and the Company's FTEs from continuing operations as of 31 December 2023 was 8,087 and 30, respectively (31 December 2022: 8,658 and 33, respectively). The number of FTEs who exited voluntarily in 2023, making use of the 2023 and 2022 VES, stood at 538.

Share based payments

On 27 June 2023 the AGM approved the free offer of the Company's common shares to executives and personnel of the Company and its affiliated entities, acquired through a share buy-back program. In September 2023, the Company executed the share buy-back by acquiring 5,283,004 treasury shares at an average cost of € 2.84 per share.

On 1 December 2023, the Company, in implementation of the aforementioned AGM decision and following relevant resolutions of the BoD on 19 October 2023, established two Group share-based payment variable remuneration schemes, namely the "Top Management Retention Scheme" and the "Performance Incentive Scheme", collectively the "Free Distribution of Own Shares".

The objective of the "Top Management Retention Scheme" is to strengthen the commitment of the Group's senior management to the organization and to ensure further alignment with the long-term strategy of the Group. The total reward of the scheme was granting of 2,393,454 common shares of the Company for free, of which 40% fully vested and 60% vesting evenly throughout the next 5 years subject to service condition.

The objective of the "Performance Incentive Scheme" is to further incentivize the Group's personnel and reward their performance and contribution to the achievement of the Group's strategic objectives. The total reward of the scheme was granting 358,489 common shares of the Company for free, of which only a small part is subject to service vesting conditions throughout a 3-year period.

Both schemes are accounted for as equity settled share-based arrangements since settlement occurs in the Company's own equity instruments. The fair value of the common shares granted was determined based on the closing price of the Company's shares in the Athens Stock Exchange on 1st December 2023, the grant date of both schemes. As at 31 December 2023, the impact of the "Free Distribution of Own Shares" was an increase in the Group's staff costs and retained earnings by € 4 million, while equity was not affected.

In December 2023 the treasury shares reserve and retained earnings decreased by € 4 million for the awarding of 1,307,585 fully vested shares (refer to Note 42).

13 Administrative expenses

Continuing operations	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Taxes and duties	(71)	(75)	(1)	(1)
Promotion and advertising expenses	(28)	(25)	(1)	(1)
Fees and third-party expenses	(82)	(69)	(4)	(3)
Contributions payable to Deposit Insurance and Resolution Funds	(20)	(59)	-	-
Other administrative expenses	(115)	(109)	(1)	(1)
Total	**(315)**	**(337)**	**(7)**	**(5)**

The contributions payable to Deposit Insurance and Resolution Funds mainly comprise of € 19 million ex-ante contributions to the SRF (31 December 2022: € 25 million). The contribution under the Resolution leg of the Hellenic Deposit and Investment Guarantee Fund ("HDIGF") is nil for 2023 due to the repayment of the loan that the Resolution Scheme had obtained from the Deposit Cover Scheme (31 December 2022: € 33 million).

14 Other credit risk related expenses on loans and advances to customers at amortised cost

The Group's other credit risk related expenses on loans and advances to customers at amortised cost for the year ended 31 December 2023 amounted to € 136 million (31 December 2022: € 142 million), consisting of fees payable for having its NPE portfolio managed, namely Assets Under Management ("AUM") fees, success fees and credit protection fees payable under synthetic securitizations.

For the year ended 31 December 2023 AUM fees, success fees and credit protection fees amounted to € 20 million, € 68 million and € 48 million, respectively (31 December 2022: € 28 million, € 81 million and € 33 million, respectively).

15 Other provision (charges) / releases

The variance of € 25 million against the year ended 31 December 2022, is mainly due to the recognition of a loss amounting to € 19 million for an option agreement written by the Bank that was exercised in the second quarter of 2023, a fine imposed by the Hellenic Competition Commission ("HCC") amounting to € 13 million, and lower provision charges for outstanding legal claims by € 11 million. In 2019 the HCC conducted several dawn raids at the premises of all Greek systemic banks (including the Bank), smaller banks and the Hellenic Bank Association investigating potential competition law infringements in the financial banking sector. Following the conclusion of the settlement procedure prescribed under Greek competition law, the HCC adopted in December 2023 a decision accepting the settlement proposals submitted by said parties and imposed reduced fines for certain competition law infringements, amounting to € 42 million, of which € 13 million were attributable to the Bank.

16 Income tax benefit / (expense)

Continuing operations	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Current tax expense	(23)	(13)	-	-
Deferred tax benefit / (expense) (Note 38)	(269)	(126)	-	-
Income tax benefit / (expense)	**(292)**	**(140)**	**-**	**-**

Under the tax amendments of Greek Law 4799/2021 corporate income tax rate for legal entities, other than credit institutions, decreased to 22% for tax years as of 2021 onwards.

The corporate income tax rate applicable to financial institutions, remains at 29% for 2023 and 2022, provided that the specific provisions of art. 27A of the Greek ITC apply to those tax years.

The income tax benefit / (expense) recognized in the income statement differs from the tax credit /(charge) that would apply if all profits / (losses) had been taxed at nominal corporate income tax rates, as follows:

	Group		Company	
	2023	2022	2023	2022
Profit / (loss) before income tax / (expense)	1,078	1,037	101	103
Tax calculated based on current tax rate	(237)	(228)	(22)	(23)
Non taxable income	80	275	23	23
Non tax deductible expenses and other permanent differences	(68)	(123)	-	-
Effect of different tax rates applied	(64)	(71)	-	-
Effect of results of investments in associates	(3)	6	-	-
Income tax benefit / (expense)	**(292)**	**(140)**	**-**	**-**
Effective tax rate for the year	**27.1%**	**13.0%**	**0.0%**	**0.0%**

As at 31 December 2023, the Group recognised a DTA of € 5,703 million (31 December 2022: € 5,974 million) and a deferred tax liability of € 9 million (31 December 2022: € 10 million). For further information, refer to Note 38.

Effective from tax year 2021 onwards, par. 3A of article 27 of the Greek ITC (L. 4172/2013) applies, as added with article 125 of Greek Law 4831/2021, regarding the treatment and order of offsetting the debit difference defined under article 27 of the ITC. According to par. 1 of the same article, any debit difference outstanding at the end of the twenty-year amortization period is classified as a loss and carried forward for five years.

The income tax benefit / (expense) of the Group's foreign subsidiaries is estimated based on the respective nominal corporate income tax rates applicable in 2023 and 2022 (Bulgaria: 10%, Romania: 16%, Egypt: 22.5%, Serbia: 15%, Ukraine: 18% and temporarily solely for the tax year 2023, for the banks only is increased to 50%, Cyprus: 12.5%, Albania: 15%, Netherlands 25.8%, Germany 15.825% and United Kingdom: 19% until 31 March 2023 and 25% from 1 April 2023 and onwards).

According to article 82 of Greek Law 4472/2017 credit institutions and other legal entities scoped into the provisions of article 27A of the ITC are required to pay an annual fee of 1.5% on the excess amount guaranteed by the Greek State of DTA arising from the difference between the tax rate applicable under Greek Law 4334/2015 (Gazette A' 80/16/7/2015) retrospectively from 1 January 2015 onwards (29%), and the tax rate applicable on 30 June 2015 (26%). The corresponding amount for the Group for the year ended 31 December 2023 and 2022 amounted to € 6 million and has been charged

within line item “net other income / (expenses)" of the Income Statement.

Under the provisions of article 52 of Law 5045/2023, as amended and currently in effect, the exemption from the income tax on the interest from Greek sovereign bonds that applied to individuals and foreign tax resident entities, was extended to legal entities that have their headquarter or maintain a permanent establishment in Greece, with the exception of credit institutions based in Greece.

In 2024 Greece is expected to incorporate in its domestic legislation the Council Directive 2022/2523 (Pillar II), within the context of the OECD’s initiative against the tax Base Erosion and Profit Shifting (“BEPS”). Pillar Two Directive will implement internationally agreed rules and methodology for establishing common measures for the minimum effective taxation of multinational enterprise (MNE) groups and large-scale domestic groups. Specifically, all MNEs, with consolidated revenue of over € 750 million, should be subject to an effective tax rate of at least 15% in each jurisdiction in which they have presence. Management expects the legislative incorporation of the Council Directive in Greece and in the countries where the Group operates, while it has already set-up a relevant project, in order to assess the impact of the new framework and to implement it within the Group. According to the initial assessment, no significant impact is expected for the Group.

17 Earnings per share

Basic earnings per share (“EPS”) are calculated by dividing the profit after tax attributable to the ordinary shareholders of the parent, by the weighted average number of ordinary shares in issue during the year, excluding the average number of ordinary shares held by the Group.

	1/1 - 31/12/2023	1/1 - 31/12/2022
Profit for the year attributable to ordinary shareholders of the parent from continuing operations	788	899
Profit for the year attributable to ordinary shareholders of the parent from discontinued operations	-	51
Profit for the year attributable to ordinary shareholders of the parent from continuing and discontinued operations	**788**	**950**
Weighted average number of ordinary shares in issue (basic and diluted earnings)	1,248,386,766	1,249,647,205
Basic and diluted EPS in € from continuing operations	0.63	0.72
Basic and diluted EPS in € from discontinued operations	-	0.04
Basic and diluted EPS in € from continuing and discontinued operations	**0.63**	**0.76**

Following the Free Distribution of Own Shares, the Company holds a total of 3,975,419 of its own shares. As at 31 December 2023, the weighted average number of ordinary shares has been adjusted accordingly. Refer also to Notes 12 and 42.

18 Tax effects relating to other comprehensive income / (expense) for the period

Group - Continuing operations	1/1 - 31/12/2023			1/1 - 31/12/2022		
	Gross	Tax	Net	Gross	Tax	Net
Items that may be reclassified subsequently to profit or loss						
Change in reserve from debt securities measured at FVTOCI	31	(9)	22	(175)	46	(129)
Change in currency translation reserve	(1)	-	(1)	(9)	-	(9)
Change in cash flow hedge reserve	2	-	2	-	-	-
Items that will not be reclassified subsequently to profit or loss						
Change in reserve from equity instruments measured at FVTOCI	(30)	9	(21)	32	(9)	23
Change in property revaluation reserve	2	-	2	10	(3)	7
Change in reserve of actuarial gains / (losses)	(3)	1	(2)	10	(3)	7
Other comprehensive income / (expense) from continuing operations	**1**	**1**	**2**	**(132)**	**31**	**(101)**

19 Cash and balances with central banks

	Group	
	31/12/2023	31/12/2022
Cash in hand	729	693
Deposits in central banks	9,208	8,361
Cheques clearing system – central banks	30	25
Cash and balances with central banks (Note 45)	**9,967**	**9,080**
Mandatory reserves with central banks	601	573
Total cash and balances with central banks	**10,567**	**9,653**

The increase in line item “Deposits in central banks” is mainly due to the funds raised by the Bank from the debt securities issuance within the year and due to the increase of customer deposits.

BoG requires all banks established in Greece to maintain deposits in the central bank with an average balance equal to 1.0% of total customer deposits, as defined by the ECB. Similar requirements apply to the Company’s banking subsidiary in Ukraine, namely JSC Piraeus Bank ICB. The Bank’s mandatory deposits at BoG bear interest set equal to the ECB DFR (4.0% as of 31 December 2023), while the interest on any excess average balance of the relevant account is nil. The corresponding deposits of JSC Piraeus Bank ICB are non-interest bearing.

20 Due from banks

	Group		Company	
	31/12/2023	31/12/2022 As reclassified	31/12/2023	31/12/2022
Sight and time deposits with banks	156	238	34	45
Securities purchased under agreements to resell	51	52	-	-
Placements with banks	32	70	-	-
Collateral posted in margin accounts (as reclassified - refer to Note 49)	793	1,055	-	-
Due from banks over 90 days	1	-	-	-
Total due from banks	**1,034**	**1,415**	**34**	**45**
of which:				
Current	1,033	1,414	34	45
Non-current	1	1	-	-

21 Derivative financial instruments

	Group 31/12/2023			Group 31/12/2022 As reclassified		
	Notional amount	Fair value		Notional amount	Fair value	
Derivatives held for trading		Assets	Liabilities		Assets	Liabilities
IRSs	12,203	528	462	9,259	656	531
Currency swaps	1,443	4	28	1,454	5	11
FX forwards	1,212	8	9	923	11	18
Options and other derivative instruments	6,313	74	63	6,805	104	83
Cross Currency Interest Rate Swaps	540	17	16	540	17	17
	21,711	**631**	**578**	**18,981**	**794**	**660**
Derivatives held for hedging (fair value hedges)						
IRSs	13,134	1,329	25	3,496	1,077	-
Total Gross Derivatives	**34,845**	**1,960**	**603**	**22,477**	**1,871**	**660**
Offsetting (Note 4.8)	**-**	**(1,769)**	**(308)**	**-**	**(1,651)**	**(250)**
Net amount in the Statement of Financial Position	**34,845**	**191**	**295**	**22,477**	**220**	**410**

IRSs held for trading mainly include transactions with the Group's clientele and their offsetting positions engaged by the Group with other counterparties in order to economically hedge its interest rate risk exposure.

Fair Value Hedge accounting

The Group enters into derivative transactions in order to mitigate the risk of changes in interest rates on the fair value of financial assets and financial liabilities. The Group matches the said derivatives with the respective financial assets/liabilities and designates them into FVH accounting relationships. Post designation, the offsetting effects of fair values changes in the designated hedging instruments and the designated hedged items, or group of items, are recognised directly in profit or

loss.

Specifically, the Group hedges the benchmark interest rate risk component by entering into IRSs with critical terms that match those of the hedged item. This hedging objective is consistent with the Group's overall interest rate risk management strategy (refer to Note 4.11). The hedging instruments exclusively comprise IRSs. The hedged items pertain to Greek and other sovereign fixed rate debt securities, as well as portfolios of non-maturing deposits ("NMDs"). The inclusion of the latter under FVH accounting was done in accordance with the EU carve-out version of IAS 39 and occurred in the fourth quarter of 2023.

The Group assesses hedge effectiveness on a prospective and retrospective basis by comparing the changes in fair value of the hedged item, resulting from movements in the benchmark interest rate, with the changes in fair value of the IRSs used to hedge the exposure.

The Group has identified the following sources of ineffectiveness:

- Credit risk of the counterparty, which is not offset by the hedged item. The Group minimizes CCR by entering into derivatives with clearing members of central clearing counterparties ("CCPs") and CCPs or bilaterally under ISDA master netting agreements and CSA annexes.
- Use of different discounting curves when measuring the fair value of the hedged items and hedging instruments.

The maturity profile of IRSs designated by the Group as hedging instruments in FVH accounting relationships and which were effective as of the end of the reporting period, is illustrated below:

31/12/2023	Group			
	Due less than 1 year	Due between 1 to 5 years	Due after 5 years	Total
Notional amount of IRSs	700	5,690	6,744	13,134

31/12/2022	Group			
	Due less than 1 year	Due between 1 to 5 years	Due after 5 years	Total
Notional amount of IRSs	-	5	3,491	3,496

The tables below summarize the balance sheet and income statement figures related to hedging instruments and hedged items, respectively, in FVH accounting relationships, and are presented on a gross, i.e. pre-offsetting basis (refer to Note 4.8) and net of accruals.

31/12/2023	Group				
Interest Rate Risk		Fair Value			
Derivative hedging instruments	Notional Amount	Asset	Liability	Statement of financial position line item	Changes in fair value used for calculating hedge ineffectiveness
IRSs	13,134	1,316	23	Derivative financial instruments	(84)

31/12/2022	Group				
Interest Rate Risk		Fair Value			
Derivative hedging instruments	Notional Amount	Asset	Liability	Statement of financial position line item	Changes in fair value used for calculating hedge ineffectiveness
IRSs	3,496	1,077	-	Derivative financial instruments	1,444

31/12/2023	Group				
Interest Rate Risk					
Hedged Items	Nominal Amount	Carrying amount	Accumulated hedge adjustments in the carrying amount of hedged item	Statement of financial position line item	Changes in fair value used for calculating hedge ineffectiveness
Debt securities at amortised cost	5,739	5,858	(868)	Investment Securities	153
Debt securities at FVTOCI	395	433	n/a	Investment Securities	24
Non-maturing deposits	7,000	7,000	94	Fair Value changes of hedged items in portfolio hedges of interest rate risk	(94)

31/12/2022	Group				
Interest Rate Risk					
Hedged Items	Nominal Amount	Carrying amount	Accumulated hedge adjustments in the carrying amount of hedged item	Statement of financial position line item	Changes in fair value used for calculating hedge ineffectiveness
Debt securities at amortised cost	3,294	3,409	(999)	Investment Securities	(1,373)
Debt securities at FVTOCI	202	200	n/a	Investment Securities	(52)

"Changes in fair value used for calculating hedge ineffectiveness" includes also FVH adjustments recognised in the Group's Income Statement related to discontinued hedges until their de-designation date.

The cumulative FVH adjustment of the discontinued relationships, that is still outstanding in the Group's Statement of Financial Position, by reducing the carrying amount of the hedged items, amounted to € 490 million as at 31 December 2023 (31 December 2022: € 533 million). Hence the said amount is not included in the aforementioned tables.

The hedge ineffectiveness, determined as the difference between the hedging gains or losses of the hedging instruments and the hedged items recognised in profit or loss of the Group for the year ended 31 December 2023, amounted to a loss of € 1 million (31 December 2022: gain of € 19 million).

22 Financial assets at fair value through profit or loss

a) Financial assets at FVTPL

	Group	
	31/12/2023	31/12/2022
Greek government bonds and T-bills	475	154
Foreign government bonds and T-bills	97	370
Corporate bonds	4	4
Bonds issued by financial institutions	1	-
Equity securities	32	19
Total	**609**	**548**

As at 31 December 2023 and 2022, the Company did not hold any Financial assets at FVTPL.

b) Financial assets mandatorily measured at FVTPL

	Group	
	31/12/2023	31/12/2022
Contingent consideration assets	67	42
Bonds issued by financial institutions	2	2
Unlisted shares	35	33
Mutual Funds	130	105
Total	**234**	**182**

Line item “contingent consideration assets” primarily comprises contingent and variable claims recognised following the disposal of loan portfolios and other assets, previously classified as HFS. Refer to Note 4.15.

As at 31 December 2023 and 2022, the Company did not hold any Financial assets mandatorily measured at FVTPL.

23 Loans and advances to customers at amortised cost

	Group	
	31/12/2023	31/12/2022
Mortgages	6,453	6,877
Consumer, personal and other loans	1,221	1,403
Credit cards	437	485
Retail Lending	**8,111**	**8,766**
Corporate and Public Sector Lending	**29,746**	**29,484**
Collateralised loan obligations (CLOs)	**466**	**502**
Total gross loans and advances to customers at amortised cost	**38,323**	**38,751**
Less: ECL allowance	(796)	(1,385)
Total	**37,527**	**37,367**
of which:		
Current	6,403	6,180
Non current	31,124	31,186

For the purposes of this disclosure, both the gross carrying amount and the ECL allowance for impairment losses have not been grossed up with the PPA adjustment. As such, the respective amounts reported above do not reconcile to Note 4.3.1.

At Group level, the senior notes of the securitizations Phoenix, Vega I, II, III and Sunrise I, II, III, with a gross carrying amount of € 5,984 million as at 31 December 2023 (31 December 2022: € 6,075 million), are included within line item “Corporate and Public Sector Lending” (refer to Note 2.4.19). The ECL allowance on the aforementioned notes is insignificant as at the reporting date.

A reconciliation of the gross carrying amount and the ECL allowance of loans and advances to customers at amortised cost, as defined in Note 4.3.1, against the values presented in the aforementioned table is provided below, taking into account the unamortised PPA as of the reporting date. For the purposes of this reconciliation, CLOs are presented within line item “Corporate and Public Sector Lending”.

	Group	
	31/12/2023	31/12/2022
Mortgages (grossed up with PPA adjustment)	6,454	6,879
Less PPA adjustment	(1)	(2)
Mortgages	**6,453**	**6,877**
Consumer, personal and other loans (grossed up with PPA adjustment)	1,224	1,410
Less PPA adjustment	(3)	(6)
Consumer, personal and other loans	**1,221**	**1,403**
Credit cards (grossed up with PPA adjustment)	437	485
Less PPA adjustment	-	-
Credit cards	**437**	**485**
Retail Lending (grossed up with PPA adjustment)	8,115	8,774
Less PPA adjustment	(4)	(9)
Retail Lending	**8,111**	**8,766**
Corporate and Public Sector Lending (grossed up with PPA adjustment)	30,231	30,013
Less PPA adjustment	(19)	(27)
Corporate and Public Sector Lending	**30,212**	**29,986**
Total gross loans and advances to customers at amortised cost (grossed up with PPA adjustment)	38,346	38,787
Less PPA adjustment	(23)	(36)
Total gross loans and advances to customers at amortised cost (A)	**38,323**	**38,751**
Less: ECL allowance (grossed up with PPA adjustment)	(819)	(1,421)
Less PPA adjustment	23	36
Less: ECL allowance (B)	**(796)**	**(1,385)**
Net loans and advances to customers at amortised cost (A) + (B)	**37,527**	**37,367**
of which:		
Current	6,403	6,180
Non current	31,124	31,186

Loans and advances to customers at amortised cost include finance lease receivables, broken down as follows:

Group - Finance lease receivables	31/12/2023	31/12/2022
No later than one year	193	231
One to five years	483	436
Later than five years	446	435
Gross investment in finance leases	**1,121**	**1,102**
Unearned finance income	(298)	(211)
Net investment in finance leases	**823**	**891**
of which:		
No later than one year	143	193
One to five years	349	339
Later than five years	331	359

As at 31 December 2023 and 2022, the Group recognized an ECL allowance of € 44 million and € 76 million, respectively, on its finance lease receivables.

24 Investment Securities

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Financial assets at FVTOCI				
Greek Government Bonds	630	237	-	-
Foreign Government Bonds and Treasury Bills	297	1	-	-
Greek Treasury Bills	408	558	-	-
Debt securities at FVTOCI	**1,335**	**796**	**-**	**-**
Equity securities at FVTOCI	49	101	2	2
Total financial instruments at FVTOCI	**1,383**	**897**	**2**	**2**
Debt securities measured at amortised cost				
Greek Government Bonds	7,718	7,535	-	
Corporate Bonds	357	346	-	-
Bonds issued by financial institutions	1,091	526	855	819
Foreign Government Bonds	2,510	2,468	-	-
Greek Treasury Bills	4	3	-	-
Gross carrying amount of debt securities measured at amortised cost	**11,681**	**10,878**	**855**	**819**
Less: ECL allowance for impairment losses	(21)	(34)	(7)	(23)
Carrying amount of debt securities measured at amortised cost	**11,659**	**10,844**	**848**	**796**
Total investment securities	**13,042**	**11,741**	**850**	**798**
Current debt securities	769	594	-	-
Non-current debt securities	12,225	11,045	848	796
Total debt securities	**12,994**	**11,640**	**848**	**796**

The cumulative ECL allowance recorded in other comprehensive income reserve related to debt securities at FVTOCI amounted to € 1 million for the year ended 31 December 2023 (31 December 2022: € 1 million).

Out of the ECL allowance of debt securities measured at amortised cost, € 17 million pertains to debt securities classified in Stage 1 and the remaining € 4 million relates to debt securities classified in Stage 3 (31 December 2022: Stage 1 and Stage 2 amounted to € 30 million and € 4 million, respectively).

The movement of debt securities measured either at FVTOCI or at amortised cost, is illustrated below:

Movement of debt instruments at FVTOCI	Group		
	Stage 1	Stage 2	Total
Opening balance at 1/1/2022	**2,277**	**22**	**2,299**
Additions	2,028	-	2,028
Coupon collections	(35)	(1)	(36)
Disposals / maturities	(2,716)	(4)	(2,720)
Transferred from Stage 1 to Stage 2	(9)	9	-
Transferred from Stage 2 to Stage 1	3	(3)	-
Interest income	29	2	30
Gain / (loss) from changes in fair value	(192)	(4)	(196)
Reclassification to debt securities at amortised cost	(589)	(21)	(610)
Closing balance 31/12/2022	**796**	**-**	**796**
Additions	2,256	-	2,256
Coupon collections	(13)	-	(13)
Disposals / maturities	(1,802)	-	(1,802)
Interest income	41	-	41
Gain / (loss) from changes in fair value	57	-	57
Closing balance 31/12/2023	**1,335**	**-**	**1,335**

Movement in gross carrying amount of debt securities measured at amortised cost	Group				Company	
	Stage 1	Stage 2	Stage 3	Total	Stage 1	Total
Opening balance at 1/1/2022	**9,219**	**-**	**-**	**9,219**	**786**	**786**
Additions	2,518	-	-	2,518	-	-
Coupon collections	(185)	-	-	(185)	(67)	(67)
Disposals / maturities	(172)	(15)	-	(187)	-	-
Interest income	186	-	-	186	99	99
Foreign exchange differences and other movements	(4)	-	-	(4)	-	-
Changes due to fair value hedging	(1,373)	-	-	(1,373)	-	-
Reclassification from debt securities at FVTOCI	678	26	-	704	-	-
Closing balance 31/12/2022	**10,867**	**11**	**-**	**10,878**	**819**	**819**
Additions	764	-	-	764	-	-
Coupon collections	(250)	-	-	(250)	(67)	(67)
Disposals / maturities	(109)	(4)	-	(113)	-	-
Transferred from Stage 2 to Stage 3	-	(7)	7	-	-	-
Interest income	248	-	-	248	103	103
Foreign exchange differences and other movements	-	1	-	1	-	-
Changes due to fair value hedging	153	-	-	153	-	-
Closing balance 31/12/2023	**11,673**	**-**	**7**	**11,681**	**855**	**855**

Refer to Note 4.6 for information on the credit rating and stage allocation of the debt securities classified at FVTOCI and debt securities measured at amortised cost.

The Group holds certain equity securities designated at FVTOCI, the fair value of which is presented in the following table:

Group - Fair value of equity securities at FVTOCI	31/12/2023	31/12/2022
Attica Holdings S.A.	9	59
Ideal Group	-	9
Atlantic Insurance Public Limited Company	7	6
Attica Bank S.A.	8	-
Other	25	27
Total	**49**	**101**

In 2023, the Group derecognized a 11.8% shareholding in Attica Holdings S.A. and its 5.2% shareholding in Ideal Group ("Ideal"), which were both contributed to Strix Holdings LP in the third quarter of 2022, in exchange for additional limited partnership interests. Refer to Notes 25B and 46.3 for further information on Attica Holdings S.A. The legal transfer of the Group's stake in Ideal did not meet at that time the IFRS 9 derecognition requirements, however, such requirements were met prior to the reporting date, resulting to accounting derecognition of the said asset in the current year. The Group's cost of investment in Strix Holdings LP increased by an equal amount and profit before tax was not affected by the said derecognitions. The total fair value of the disposed equity securities as of their derecognition date amounted to € 80 million, while the cumulative gain transferred within equity amounted to € 34 million. Refer to Note 43 for the cumulative gain or loss transferred within equity from "Reserve from financial assets at FVTOCI" to "Retained Earnings".

25 Investments in consolidated companies

The Group's and the Company's investments in consolidated companies as at 31 December 2023, are provided below:

A. Subsidiaries (full consolidation method)

a/a	Company	Activity	Country	Unaudited tax years [1]	Group	Company
					% holding	% holding
1.	Piraeus Bank S.A.	Banking activities	Greece	2020-2023	100.00%	100.00%
2.	Piraeus Leasing Single Member S.A.	Financial leasing	Greece	2022-2023	100.00%	-
3.	Piraeus Property Real Estate Management Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
4.	Dynamic Asset Operating Leasing S.A.	Operating leasing	Greece	2018-2023	100.00%	-
5.	Piraeus Securities S.A.	Stock exchange services	Greece	2018-2023	100.00%	-
6.	Piraeus Factoring Single Member S.A.	Corporate factoring	Greece	2018-2023	100.00%	-
7.	Piraeus Capital Management Single Member S.A.	Management of venture capital fund	Greece	2018-2023	100.00%	-
8.	Piraeus Jeremie Technology Catalyst Management Single Member S.A.	Management of venture capital fund	Greece	2018-2023	100.00%	-
9.	Piraeus Asset Management Single Member M.F.M.C. S.A.	Mutual funds management	Greece	2018-2023	100.00%	-

a/a	Company	Activity	Country	Unaudited tax years [1]	Group	Company
					% holding	% holding
10.	Geniki Information Single Member S.A.	Assessment and collection of commercial debts	Greece	2018-2023	100.00%	-
11.	Kosmopolis A' Shopping Centers Single Member S.A.	Shopping center's management	Greece	2018-2023	100.00%	-
12.	ND Development Single Member S.A.	Property management	Greece	2018-2023	100.00%	-
13.	New Up Dating Development Real Estate and Tourism Single Member S.A.	Property, tourism & development company	Greece	2018-2023	100.00%	-
14.	Picar Single Member S.A.	City Link areas management	Greece	2018-2023	100.00%	-
15.	P.H. Development	Property management	Greece	2018-2023	100.00%	-
16.	General Construction and Development Co. S.A.	Property development/ holding company	Greece	2018-2023	66.66%	-
17.	Entropia Ktimatiki S.A.	Property management	Greece	2018-2023	66.70%	-
18.	Komotini Real Estate Development Single Member S.A.	Property management	Greece	2018-2023	100.00%	-
19.	Piraeus Development Single Member S.A.	Property management	Greece	2018-2023	100.00%	-
20.	Piraeus Real Estate Single Member S.A.	Real estate development	Greece	2018-2023	100.00%	-
21.	Pleiades Estate Single Member S.A.	Property management	Greece	2018-2023	100.00%	-
22.	Piraeus Agency Solutions Single Member S.A.	Insurance agency	Greece	2018-2023	100.00%	100.00%
23.	Mille Fin S.A.	Trading of boat vehicles, cars and equipment	Greece	2018-2023	100.00%	-
24.	Multicollection S.A.	Assessment and collection of commercial debts	Greece	2009-2023	51.00%	-
25.	Centre of Sustainable Entrepreneurship Excelixi Single Member S.A.	Consulting Services - Hotel - Training & Seminars	Greece	2018-2023	100.00%	-
26.	PROSPECT M.C.P.Y.	Yachting management	Greece	2018-2023	100.00%	-
27.	Ianos Properties Single Member S.A.	Property management	Greece	2018-2023	100.00%	-
28.	Lykourgos Properties Single Member S.A.	Property management	Greece	2018-2023	100.00%	-
29.	Thesis Cargo Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
30.	Thesis Hermes Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
31.	Thesis Agra Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
32.	Thesis Schisto Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
33.	Thesis Stone Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
34.	Trastor Real Estate Investment Company	Real estate investment property	Greece	2018-2023	97.78%	-
35.	Sinoris Single Member S.A.	Property management	Greece	2023	100.00%	-
36.	Iolcus Investments Alternative Investments Funds Managers S.A.	Alternative investments funds management	Greece	2018-2023	100.00%	-
37.	Snappi S.A.	Digital banking products and services	Greece	2022-2023	69.27%	69.27%

a/a	Company	Activity	Country	Unaudited tax years [1]	Group	Company
					% holding	% holding
38.	Synthis Single Member S.A.	Property management	Greece	2022-2023	100.00%	-
39.	MIG Holdings S.A.	Holding company	Greece	2018-2023	87.79%	-
40.	Athenian Investments Holdings S.A.	Holding company	Greece	2018-2023	87.79%	-
41.	MIG Media S.A.	Advertising services	Greece	2018-2023	87.79%	-
42.	Kynouria Ktimatiki Single Member S.A.	Property management	Greece	2018-2023	97.78%	-
43.	Sirrus Single Member S.A.	Property management	Greece	2023	100.00%	-
44.	Cielo Consultancy Sh.P.K.	Property management	Albania	2014-2023	99.09%	-
45.	Euroinvestment & Finance Public Ltd	Asset management, real estate operations	Cyprus	2018-2023	90.90%	2.21%
46.	R.E. Anodus Two Ltd	Holding and investment company	Cyprus	2019-2023	99.09%	-
47.	Tellurion Ltd	Holding company	Cyprus	2019-2023	100.00%	-
48.	Tellurion Two Ltd	Holding company	Cyprus	2017-2023	99.09%	-
49.	Trieris Two Real Estate LTD	Holding, Investment and Real Estate Portfolio Management	Cyprus	2011-2023	100.00%	-
50.	R.E. Anodus Ltd	Consultancy services for real estate development and investments	Cyprus	2017-2023	100.00%	-
51.	Lakkos Mikelli Real Estate Ltd	Property management	Cyprus	2018-2023	50.66%	-
52.	Philoktimatiki Public Ltd	Land and property development	Cyprus	2018-2023	53.32%	-
53.	Sunholdings Properties Company Ltd	Land and property development	Cyprus	2018-2023	26.66%	-
54.	Philoktimatiki Ergoliptiki Ltd	Construction company	Cyprus	2018-2023	53.32%	-
55.	MIG Leisure Ltd	Holding company	Cyprus	2009-2023	87.79%	-
56.	MIG Aviation Holdings Ltd	Holding company	Cyprus	2009-2023	87.79%	-
57.	Passerat Company Ltd	Holding company	Cyprus	2018-2023	100.00%	-
58.	JSC Piraeus Bank ICB	Banking activities	Ukraine	2023	99.99%	99.99%
59.	Akinita Ukraine LLC	Real estate development	Ukraine	2014-2023	100.00%	-
60.	Sinitem LLC	Sale and purchase of real estate	Ukraine	2013-2023	99.94%	-
61.	Solum Enterprise LLC	Property management	Ukraine	2012-2023	99.94%	-
62.	Solum Limited Liability Company	Property management	Ukraine	2018-2023	99.94%	-
63.	Piraeus Leasing Romania S.A.	Monitoring and collection services for loans disbursed by the company	Romania	2003-2023	100.00%	-
64.	Daphne Real Estate Consultancy SRL	Real estate development	Romania	2014-2023	99.09%	-
65.	Proiect Season Residence SRL	Real estate development	Romania	2018-2023	100.00%	-
66.	R.E. Anodus SRL	Real estate development	Romania	2013-2023	99.09%	-
67.	Piraeus Rent Doo Beograd	Operating leases	Serbia	2007-2023	100.00%	-
68.	JSC Robne Kuce Beograd ("RKB")	Property management	Serbia	2007-2023	87.79%	-
69.	Piraeus Real Estate Egypt LLC	Property management	Egypt	2011-2023	100.00%	-
70.	Trieris Real Estate Management Ltd	Management of real estate companies	British Virgin Islands	-	100.00%	-

a/a	Company	Activity	Country	Unaudited tax years [1]	Group	Company
					% holding	% holding
71.	Piraeus Group Capital Ltd	Debt securities' issuance	United Kingdom - Jersey Channel Islands	-	100.00%	100.00%
72.	Piraeus Group Finance PLC	Debt securities' issuance	United Kingdom	2012-2023	100.00%	-
73.	Piraeus SNF DAC	SPV for securitization of corporate, mortgage and consumer loans	Ireland	-	-	-
74.	Magnus NPL Finance DAC	SPV for securitization of corporate loans	Ireland	-	-	-

[1] *In accordance with Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority, the tax position of entities domiciled in Greece that have not been notified by the local tax authorities for a tax audit, is deemed to be final only after a five-year period has elapsed since the end of each fiscal year.*

The subsidiaries duly numbered 73 - 74 are SPVs for securitization of loans and advances to customers and issuance of debt securities. The investment numbered 53 is a subsidiary due to majority representation in the company's BoD.

Furthermore, as at 31 December 2023 the subsidiaries duly numbered 10, 23, 24, 30-33 and 41 were under liquidation.

The following subsidiaries, that in aggregate are immaterial to the Group's financial position and results of operations, are not consolidated but recognized at cost: a) "Hellenic Information Systems HIS S.A."; b) "The Museum Ltd" and c) "Kion Holdings Ltd". The full consolidation of the aforementioned companies would not have a significant effect on the Consolidated Financial Statements since the sum of their total net income, total equity and total assets comprises less than 0.01% of the Group's respective balances, based on their most recent financial statements.

The movement of the Company's investments in subsidiaries during the year is provided below:

	Company	
	31/12/2023	31/12/2022
Opening balance	5,558	5,539
Additions	-	44
Participation in share capital increases / decreases of Piraeus Bank and other subsidiaries	15	-
Disposals	-	(25)
Closing balance	**5,573**	**5,558**

Acquisition of MIG

As at 31 December 2022, the Bank's 31.2% equity interest in MIG was classified as an associate. Since 6 February 2023, the Bank gradually increased its shareholding to 87.8% for a total cash consideration of € 105 million. The shareholding acquired through the Athens Stock Exchange, in excess of one third of MIG's outstanding shares, was subject to regulatory approval by the HCC, therefore, pursuant to the relevant provisions of antitrust law, the voting rights arising from such shares were not exercisable until the HCC's approval date, i.e. 13 April 2023. The Bank's shareholding in MIG as at 13 April 2023 was 62.2% and the cash consideration paid by the Bank for the additional 31% equity interest in MIG up to that date amounted to € 53 million. As the Bank held a non-controlling interest in MIG up to 13 April 2023, the additional investment of € 53 million was recognized under the equity method, i.e. the cost of the Bank's investment in associates was increased by an equivalent amount. In line with the requirements of Greek Law 3461/2006, the Bank launched a mandatory tender offer ("MTO") in order to acquire the remaining MIG common shares held by third parties at a price of € 0.217 per share. The MTO was completed on 21 April 2023 and the Bank's shareholding in MIG increased by 25.6% to 87.8%, as at that date. The cash consideration paid by the Bank for the acquisition of the 25.6% interest amounted to € 52 million and the previously held 62.2% interest which was accounted for as an associate and which was increased to an 87.8% controlling interest through a business combination, was remeasured to fair value.

In November 2022, the Bank contributed into Strix Holdings LP, two (2) bond loans due from MIG of total carrying value € 329 million, in exchange for additional limited partnership interest. On 13 December 2022, MIG announced that its BoD had accepted a proposal submitted by Strix Holdings LP for the exchange of the entirety of the bonds owned by Strix Holdings LP pertaining to the aforementioned two bond loans for MIG's total direct and indirect stake in Attica Holdings S.A. (i.e. total shareholding of 79.4%), the "Debt-to-Asset Swap". The proposed transaction was subject to two conditions precedent, namely: a) Strix Holdings LP being granted regulatory approval by the HCC for the acquisition of a controlling stake in Attica Holdings S.A.; and b) approval of the proposed Debt-to-Asset Swap by MIG's shareholders. Both conditions had been met prior to 13 April 2023, hence the scope of MIG's identifiable net assets as at the acquisition date did not include: a) Attica Holdings S.A. and its subsidiaries; and b) MIG's bond loan liabilities due to Strix Holdings LP. The Debt-to-Asset Swap was executed on 12 May 2023.

The acquisition of MIG underpins the Group's strategy to achieve synergies from the Bank's holdings portfolio and to maximize the returns for the benefit of the Company's shareholders. The acquisition is expected to enhance the Group's strategy for revenue diversification and entails the following key benefits: i) enrichment of the Group's investment property portfolio, ii) geographical dispersion of the Group's activities; and iii) opportunities for the development of new business activities.

The fair value of each major class of identifiable assets acquired and liabilities assumed at the acquisition date is provided below:

	MIG Holdings S.A. Consolidated amounts
ASSETS	
Due from banks	15
Investment property	203
Other assets	4
Total Assets	**222**
LIABILITIES	
Due to banks	92
Other liabilities	7
Total Liabilities	**99**
Net assets **(A)**	123
*of which pre-existing relationships **(B)***	*(82)*
Identifiable net assets recognized (C) A-B	**205**
Consideration paid	52
Effective settlement of pre-existing relationships	82
Non controlling interest	15
Fair value of previously held interest (Note 25B)	76
Total (D)	**226**
Goodwill D-C	**21**

Management assessed that goodwill was impaired, given that the Group's investment in the acquiree is not expected to generate cash inflows that would be significantly higher from the fair value of the acquiree's underlying assets, therefore, an impairment loss of € 21 million was charged in the income statement. The fair value remeasurement of the previously held 62.2% interest in MIG resulted to a gain of € 34 million, which was recognized in line item "Net gains / (losses) from loss of control over subsidiaries / disposal of associates and joint ventures" of the Consolidated Income Statement. The cash and cash equivalents acquired at the acquisition date, net of intercompany balances, amounted to € 6 million. During the year ended 31 December 2023, the Group recognized in the income statement a net loss of € 15 million from its total equity stake in MIG, broken down as follows:

	€ million
Share of MIG's loss under the equity method up to 13 April 2023	(24)
Gain from fair value remeasurement of the previously held 62.2% interest (Note 25B)	34
Recycling of loss recognized in other comprehensive income under the equity method up to 13 April 2023	(4)
Impairment of goodwill	(21)
Total loss recognized in the income statement	**(15)**
of which: due to acquisition of the 56.6% stake in 2023	*(3)*
of which: due to pre-existing 31.2% stake	*(12)*

MIG's total revenue and loss before tax accounted for under the full consolidation method after 13 April 2023 and up to the reporting date is immaterial. The impact of the MIG acquisition on the Group's total net income and profit before income tax, had it been recognized on 1 January 2023, is insignificant.

Annual financial statements of subsidiaries

The annual financial statements of the Group's subsidiaries for the year ended 31 December 2023, which have been issued prior to approval of the Annual Financial Statements, are available on the Company's web site at www.piraeusholdings.gr in section Investor Relations, subsection Financial Data - Financial Statements and Other Information - Consolidated Companies. The annual financial statements of the remaining subsidiaries will be available on the Company's web site upon their issuance.

Significant restrictions of subsidiaries

With respect to subsidiaries, except for inherent restrictions applied under the regulatory framework based on which they operate, no other significant legal, contractual, or regulatory restrictions are imposed regarding the transfer of cash in the form of dividends, the transfer of funds, as well as the repayment of intragroup loans.

Consolidated structured entities

As of 31 December 2023, following derecognition of the Sunrise III portfolio, the Group controlled, thus, consolidated one SPV, namely Magnus NPL Finance DAC, which was established for the securitization of an NPE portfolio.

Furthermore, the Group controls, therefore, consolidates PIRAEUS SNF DAC (retained securitization of mortgage, corporate and consumer NPEs). The underlying loans are recognized on the Group's Statement of Financial Position.

The following table presents the outstanding amount of debt securities held by the Group, that were issued by the SPVs, though not recognized on the Group's Statement of Financial Position:

SPV	Outstanding amount of debt securities held	
	31/12/2023	31/12/2022
Sunrise III NPL Finance DAC	-	174
Magnus NPL Finance DAC	4	11
Total	**4**	**185**

Interests in unconsolidated structured entities

As at 31 December 2023, the Group has investments in open-ended mutual funds that are managed by its wholly owned subsidiary Piraeus Asset Management Single Member M.F.M.C. S.A. with independent management and organizational structure, licensed by the HCMC. The assets of these funds are equal to € 3.2 billion, while the clientele includes 75,858 customers.

The management of mutual funds is performed under the investment framework defined for each mutual fund. The Group acts as an agent acting on behalf of its clients and does not control the mutual funds. On this basis, the interests in mutual funds are classified and measured at FVTPL.

As of 31 December 2023, the Bank's assets in open-ended mutual funds are valued at € 118 million.

Mutual funds	Total Assets	
	31/12/2023	31/12/2022
Domestic Mutual Funds	68	58
Abroad Mutual Funds	50	46

The following table presents the carrying amount of the mutual funds' assets that the Group manages, per asset class, as at 31 December 2023 and 2022:

Mutual funds	Total Assets	
	31/12/2023	31/12/2022
Equity funds	520	393
Balanced funds	153	156
Bond funds	1,984	778
Money Market funds	209	198
Fund of Funds	372	518
Total	**3,238**	**2,043**

In the context of the Group's NPE de-risking plan implemented in the previous years, the Group established seven (7) separate SPVs named "Phoenix NPL Finance DAC", "Vega I NPL Finance DAC", "Vega II NPL Finance DAC", "Vega III NPL Finance DAC", "Sunrise I NPL Finance DAC", "Sunrise II NPL Finance DAC" and "Sunrise III NPL Finance DAC", one for each NPE portfolio securitization.

The NPE portfolios were transferred to the SPVs, on or after their establishment, and the SPVs issued three (3) tranches of structured notes (i.e. Senior, Mezzanine and Junior) which were fully subscribed by the Group. The Group lost control over the SPVs, following the transfer to third parties of 95% of the mezzanine and junior notes issued by the SPVs. The Group maintained 100% of the senior notes which are classified within loans and advances to customers measured at amortised cost and 5% of the mezzanine and junior notes which are classified within loans and advances to customers mandatorily measured at FVTPL. The following table sets out an analysis of the carrying amounts of said assets held by the Group. The maximum exposure to loss is equal to the carrying amount of the assets held.

Securitization SPVs	Total Assets	
	31/12/2023	31/12/2022
Loans and advances to customers at amortised cost		
Senior Notes	5,984	6,075
Loans and advances to customers mandatorily measured at FVTPL		
Mezzanine and Junior Notes	6	6

B. Associates and joint ventures (equity method)

B.1 Associates

The Group's and the Company's associates as at 31 December 2023 are the following:

s/n	Company	Activity	Country	Unaudited tax years [1]	Group	Company
					% Holding	% Holding
1	Piraeus - TANEO Capital Fund	Close end venture capital fund	Greece	-	50.01%	-
2	PJ Tech Catalyst Fund	Close end venture capital fund	Greece	-	30.00%	-
3	APE Commercial Property Real Estate Tourist and Development S.A.	Holding company	Greece	2018-2023	27.80%	-
4	Omicron Cyclos Ena Symmetohiki S.A. [2]	Holding company	Greece	2018-2023	28.10%	-
5	APE Investment Property S.A.	Real estate, development/ tourist services	Greece	2018-2023	28.92%	-
6	Olganos Real Estate S.A.	Property management/electricity production from renewable energy resources	Greece	2018-2023	32.27%	-
7	Pyrrichos S.A.	Property management	Greece	2018-2023	55.95%	-
8	Exodus S.A. [2]	Information technology & software	Greece	2018-2023	49.90%	-
9	Evros Development Company S.A.	European community programs management	Greece	2018-2023	30.00%	-
10	Gaia S.A.	Software services	Greece	2019-2023	24.92%	-
11	Crete Scient & Tech. Park Manag. & Dev. Co. S.A.	Scientific and technology park management	Greece	2018-2023	30.45%	-
12	Intrum Hellas REO Solutions S.A.	Real estate	Greece	2019-2023	19.96%	-
13	Intrum Hellas Credit Servicing S.A.	Credit and loan servicing	Greece	2019-2023	20.00%	-
14	Teiresias S.A.	Interbanking company of development, operation and management of information systems	Greece	2023	23.53%	-
15	Piraeus Direct Services S.A.	Support & e-commerce services, trade of time renewal cards	Greece	2018-2023	49.90%	-
16	Perigenis Business Properties S.A.	Property management	Greece	2020-2023	20.61%	-
17	Abies S.A. [2]	Property management	Greece	2018-2023	40.14%	-
18	ETVA Industrial Parks S.A.	Development/ management of industrial areas	Greece	2018-2023	1.00%	-
19	Euromedica Societe Anonyme for provision of medical services	Hospital and health services	Greece	2023	29.35%	-
20	Trieris Real Estate Ltd	Property management	British Virgin Islands	2018-2023	18.41%	-
21	Strix Holdings LP	Holdings limited partnership	Ireland	-	100.00%	-
22	Strix Asset Management Ltd	Asset management	Ireland	-	25.00%	-
23	Strix Holdings II LP	Holdings limited partnership	Ireland	-	100.00%	-

[1] In accordance with Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority, the tax position of entities domiciled in Greece that have not been notified by the local tax authorities for a tax audit, is deemed to be final only after a five-year period has elapsed since the end of each

fiscal year.

(2) Placed under liquidation as at 31 December 2023.

The Group's associate NGP Plastic S.A., is immaterial to the Group's financial position and results of operations, therefore, is not consolidated under the equity method but recognised at cost. The contribution of this non-significant associate is approximately 0.20%, 0.03% and 0.03% of the Group's total net income, total equity and total assets, respectively, based on the most recent available financial statements.

Following completion of the Debt-to-Asset Swap, the Group derecognized its 11.8% equity investment in Attica Holdings S.A., which was measured at FVTOCI and carried at € 62 million. Refer to Note 25A for further information on the Debt-to-Asset Swap. The asset was contributed to Strix Holdings LP in July 2022, however, the legal transfer did not meet at that time the IFRS 9 derecognition requirements. The Group's cost of investment in Strix Holdings LP increased by an equal amount and profit before tax was not affected by the said derecognition.

Although the Group owns more than half of Piraeus – TANEO Capital Fund, Pyrrichos S.A., Strix Holdings LP and Strix Holdings II LP, Management has determined that the Group does not control these entities. Strix Holdings LP and Strix Holdings II LP (the "Partnerships") are limited partnerships established in Ireland who own equity participations unrelated to the financial sector in general and specifically to the Group's principal activity. The Bank is the sole limited partner investor in the Partnerships and their business objective is to enhance the value of their assets through: (i) monitoring, cost optimization, strategic reorganisation, corporate transformation, business development and changes in management; (ii) disposing of such assets in structured disposal processes aimed at maximising sale proceeds with the assistance of external asset management; and (iii) engaging in such other activities as the general partner deems necessary. The Partnerships are material associates of the Group. The Group does not have power over the Partnerships because it cannot direct their relevant activities either through voting rights or through other substantive rights stemming from contractual agreements and there are no other parties acting on its behalf. Further, the Group has significant influence in Intrum Hellas REO Solutions S.A., ETVA Industrial Parks S.A. and Trieris Real Estate Ltd even though its shareholding does not exceed 20%.

Refer to Note 47 for further information on changes in the Group's subsidiaries and associates.

B.2 Joint ventures

The Group's and the Company's joint ventures as at 31 December 2023 are the following:

s/n	Company	Activity	Country	Unaudited tax years [1]	Group	Company
					% Holding	% Holding
1	AEP Elaiona S.A.	Property management	Greece	2018-2023	50.00%	-
2	Peirga Kythnou P.C.	Real estate	Greece	2019-2023	50.00%	-
3	Sunrise III Real Estate Single Member S.A.	Property management	Greece	-	100.00%	-
4	Sunrise III NPL Finance DAC	SPV for securitization of corporate loans	Ireland	-	-	-

(1) In accordance with Ministerial Decision 1208/20.12.2017 of the Independent Public Revenue Authority, the tax position of entities domiciled in Greece that have not been notified by the local tax authorities for a tax audit, is deemed to be final only after a five-year period has elapsed since the end of each fiscal year.

The total carrying value of the Group's interests in non-significant associates and joint ventures as at 31 December 2023 and 2022, amounted to € 120 million and € 191 million, respectively.

The following table presents in total the proportion of the Group in the after-tax results and total comprehensive income for the year, of its associates as at 31 December 2023 and 2022. The below condensed financial information reported by the associates for the purposes of being accounted for under the equity method, is prepared in accordance with IFRS and adjusted (if necessary) in conformity with the Group's accounting policies.

Condensed financial information	2023	2022
Share of profit / (loss) of associates and joint ventures, after tax	(15)	29
Other comprehensive income	2	-
Items that may be reclassified subsequently to profit or loss	2	-
Total comprehensive income	**(13)**	**29**

Other information on associates and joint ventures

The Group discontinues to recognise its share of accumulated losses in associates, when its share of losses equals or exceeds its interest in the associate. The cumulative unrecognised losses from associates as at 31 December 2023 amounted to € 50 million (31 December 2022: € 49 million). In case the associate subsequently reports profits, the Group resumes recognizing its share of those profits only after its share of the profits equals the share of losses not previously recognized.

Movement of investment in associates and joint ventures during the year

The movement of the Group's investments in associates and joint ventures during the year is provided below:

	Group	
	31/12/2023	31/12/2022
Opening balance	1,023	630
Contribution of equity interests	229	135
Contribution of debt assets	15	329
Disposals	-	(1)
Share of profit / (loss) of associates and joint ventures, after tax	(16)	29
Gain from fair value remeasurement of associates (Note 25A)	34	-
Acquisition of controlling interests (Note 25A)	(76)	(79)
Transfers to FVTOCI portfolio	(1)	-
Impairment	-	(2)
Additions, cash contributions / capital returns and other adjustments	47	(18)
Closing balance	**1,255**	**1,023**

In December 2023, the Bank contributed to Strix Holdings LP a convertible bond loan of total carrying value € 15 million, due from ASCL Healthcare Single Member S.A., in exchange for additional limited partnership interests. An amount of € 3 million was distributed by Strix Holdings LP in 2023 and an amount of € 18 million was distributed by Strix Holdings II LP in 2023.

Basic financial information of the associates and joint ventures for 2023 and 2022

s/n	Company	Country	31/12/2023				
			Participation %	Profit / (loss) before tax	Total Revenues	Total assets	Total liabilities
1	Crete Scient. and Tech. Park Manag. and Dev. Co. S.A.	Greece	30.45%	-	-	-	-
2	Evros' Development Company S.A.	Greece	30.00%	-	-	-	-
3	APE Commercial Property Real Estate Tourist and Development S.A.	Greece	27.80%	2	-	6	-
4	Trieris Real Estate LTD	British Virgin Islands	18.41%	-	-	1	-
5	APE Investment Property S.A.	Greece	28.92%	-	-	61	8
6	Omicron Cyclos Ena Symmetohiki S.A.	Greece	28.10%	-	-	115	140
7	Exodus S.A.	Greece	49.90%	-	-	-	2
8	Piraeus - TANEO Capital Fund	Greece	50.01%	-	-	2	-
9	Teiresias S.A.	Greece	23.53%	(1)	18	18	17
10	PJ Tech Catalyst Fund	Greece	30.00%	(2)	-	6	-
11	Pyrrichos S.A.	Greece	55.95%	-	-	5	20
12	Piraeus Direct Services S.A.	Greece	49.90%	-	15	3	1
13	Gaia S.A.	Greece	24.92%	1	8	21	17
14	Olganos S.A.	Greece	32.27%	-	-	7	10
15	Abies S.A.	Greece	40.14%	-	-	-	-
16	ETVA Industrial Parks S.A.	Greece	1.00%	4	19	365	22
17	Euromedica Societe Anonyme for provision of medical services	Greece	29.35%	(19)	47	191	213
18	Intrum Hellas REO Solutions S.A.	Greece	19.96%	(3)	5	55	7
19	Intrum Hellas Credit Servicing S.A.	Greece	20.00%	114	227	411	131
20	Perigenis Business Properties S.A.	Greece	20.61%	(1)	-	47	-
21	Strix Holdings LP	Ireland	100.00%	12	-	741[10]	-
22	Strix Asset Management Ltd	Ireland	25.00%	7	-	7	-
23	Strix Holdings II LP	Ireland	100.00%	(15)	-	393[11]	-
24	AEP Elaiona S.A.	Greece	50.00%	1	-	115	118
25	Peirga Kythnou P.C.	Greece	50.00%	-	-	4	1
26	Sunrise III Real Estate Single Member S.A.	Greece	100.00%	-	-	13	13
27	Sunrise III NPL Finance DAC	Ireland	-	-	-	161	174

[10] of which € 14 million and € 727 million relate to current assets and non current assets, respectively

[11] of which € 393 million relate to non current assets

			31/12/2022				
s/n	Company	Country	Participation %	Profit/ (loss) before tax	Total revenues	Total assets	Total liabilities
1	Crete Scient. and Tech. Park Manag. and Dev. Co. S.A.	Greece	30.45%	-	-	-	-
2	Evros' Development Company S.A.	Greece	30.00%	-	-	-	-
3	APE Commercial Property Real Estate Tourist and Development S.A.	Greece	27.80%	(1)	-	6	1
4	APE Fixed Assets Real Estate Tourist and Development S.A.	Greece	27.80%	-	-	49	5
5	Trieris Real Estate LTD	British Virgin Islands	26.35%	-	-	5	-
6	APE Investment Property S.A.	Greece	28.92%	-	-	173	8
7	Omicron Cyclos Ena Symmetohiki S.A.	Greece	28.10%	-	-	115	140
8	Exodus S.A.	Greece	49.90%	(1)	2	-	2
9	Piraeus - TANEO Capital Fund	Greece	50.01%	5	-	2	-
10	Teiresias S.A.	Greece	23.53%	-	17	18	15
11	PJ Tech Catalyst Fund	Greece	30.00%	5	-	11	-
12	Pyrrichos S.A.	Greece	55.95%	(1)	-	6	21
13	Piraeus Direct Services S.A.	Greece	49.90%	1	19	4	1
14	Gaia S.A.	Greece	24.92%	(1)	5	14	10
15	Olganos S.A.	Greece	32.27%	-	-	7	10
16	Abies S.A.	Greece	40.14%	-	-	-	-
17	ETVA Industrial Parks S.A.	Greece	1.00%	(2)	8	218	20
18	Euromedica Societe Anonyme for provision of medical services	Greece	29.35%	(15)	47	198	204
19	Neuropublic S.A.	Greece	5.00%	1	6	24	12
20	MIG Holdings S.A.	Greece	31.19%	(22)	10	1,251	1,161
21	Intrum Hellas REO Solutions S.A.	Greece	19.96%	(3)	5	58	7
22	Intrum Hellas Credit Servicing S.A.	Greece	20.00%	107	230	601	172
23	ANEK Lines S.A.	Greece	27.68%	(20)	185	273	335
24	Perigenis Business Properties S.A.	Greece	20.61%	-	-	47	-
25	Strix Holdings LP	Ireland	100.00%	16	-	587[12]	-
26	Strix Asset Management Ltd	Ireland	25.00%	-	-	7	-
27	Strix Holdings II LP	Ireland	100.00%	-	-	250[13]	4
28	AEP Elaiona S.A.	Greece	50.00%	(4)	-	108	110
29	Peirga Kythnou P.C.	Greece	50.00%	1	-	4	1
30	Sunrise III Real Estate Single Member S.A.	Greece	100.00%	-	-	-	-

[12] of which € 2 million and € 585 million relate to current assets and non current assets, respectively

[13] of which € 250 million relate to non current assets

26 Intangible assets

	Group			
	Goodwill	Software	Other intangible	Total
Cost				
At 1 January 2022	9	744	50	803
Opening balance of newly consolidated companies	14	5	-	19
Additions	-	71	-	71
Transfers	3	8	-	11
At 31 December 2022	**27**	**828**	**50**	**904**
Opening balance of newly consolidated companies (Note 25A)	21	1	-	22
Additions	-	92	-	92
Transfers	-	7	1	8
Disposals and write-offs	-	(5)	-	(5)
Derecognitions	-	(2)	-	(2)
Impairment (Note 25A)	(21)	-	-	(22)
At 31 December 2023	**26**	**920**	**51**	**997**
Accumulated amortisation				
At 1 January 2022	-	(491)	(45)	(536)
Amortisation charge	-	(55)	(1)	(56)
At 31 December 2022	**-**	**(546)**	**(46)**	**(592)**
Opening balance of newly consolidated companies	-	(1)	-	(1)
Amortisation charge	-	(59)	(1)	(60)
Disposals and write-offs	-	1	-	1
Derecognitions	-	2	-	2
At 31 December 2023	**-**	**(603)**	**(46)**	**(650)**
Net book value				
At 31 December 2022	**27**	**282**	**4**	**312**
At 31 December 2023	**26**	**317**	**5**	**347**

27 Property and equipment

Group	Land and buildings	Equipment and other tangible assets	Right of use assets	Assets under construction / development	Leasehold improvements	Total
Cost						
At 1 January 2022	683	282	178	33	174	1,349
Acquisition of subsidiaries	62	1	(24)	-	-	40
Additions	5	25	23	6	5	64
Transfers	(226)	-	(10)	(8)	-	(244)
Disposals and write-offs	(2)	(9)	(11)	-	(7)	(29)
Derecognitions	(1)	-	(1)		-	(3)
Revaluations	10	-	-	-	-	10
Impairment	(1)	-	-	-	(3)	(4)
Other movements	-	(1)	(1)	-	-	(2)
At 31 December 2022	**530**	**298**	**153**	**31**	**169**	**1,181**
Acquisition of subsidiaries	28	93	1	1	-	124
Additions	7	20	28	9	7	71
Transfers	6	2	(8)	(8)	(1)	(9)
Disposals and write-offs	(3)	(4)	(23)	-	(7)	(37)
Derecognitions	(29)	(96)	(1)	(2)	(1)	(129)
Revaluations	-	-	-	-	-	-
Impairment	(1)	-	-	-	(7)	(8)
Other movements	-	(1)	-	-	-	(1)
At 31 December 2023	**538**	**312**	**151**	**31**	**160**	**1,192**
Accumulated depreciation						
At 1 January 2022	(78)	(206)	(94)	-	(81)	(459)
Acquisition of subsidiaries	-	(1)	9	-	-	9
Depreciation charge for the year	(8)	(19)	(18)	-	(5)	(49)
Transfers	14	-	8	-	-	23
Disposals and write-offs	-	8	3	-	6	17
Derecognitions	-	-	2	-	-	2
Other movements	-	5	-	-	-	5
At 31 December 2022	**(72)**	**(212)**	**(89)**	**-**	**(80)**	**(453)**
Acquisition of subsidiaries	(22)	(65)	(1)	-	-	(88)
Depreciation charge for the year	(7)	(14)	(20)	-	(4)	(46)
Transfers	(2)	-	6	-	-	4
Disposals and write-offs	-	4	21	-	7	32
Derecognitions	22	69	1	-	1	93
Other movements	-	(2)	-	-	-	(2)
At 31 December 2023	**(81)**	**(221)**	**(81)**	**-**	**(77)**	**(460)**
Net book value						
At 31 December 2022	**458**	**86**	**64**	**31**	**89**	**728**
At 31 December 2023	**458**	**91**	**70**	**31**	**83**	**732**

Refer to Note 25A for information on the subsidiaries acquired in 2023.

At the end of the reporting period the Group's "Right of use assets" includes an amount of € 57 million (31 December 2022: € 60 million) relating to leases of land and buildings. Line item "Derecognitions" mainly refers to loss of control over subsidiaries that occurred in 2023. Refer to Note 47 for further information.

28 Investment property

	Group		
	Owned property	Right-of-use assets	Total
At 1 January 2022	**977**	**64**	**1,041**
Acquisition of subsidiaries	250	27	278
Net gain / (losses) from fair value measurement (Note 11)	43	(6)	38
Additions	66	-	66
Transfers	121	2	123
Disposals and write-offs	(17)	-	(17)
Other movements	(4)	-	(4)
Derecognitions	(2)	-	(2)
At 31 December 2022	**1,434**	**88**	**1,522**
Acquisition of subsidiaries	247	-	247
Net gain/ (losses) from fair value measurement (Note 11)	32	(11)	21
Additions	33	-	33
Transfers	91	(33)	58
Disposals and write-offs	(52)	-	(52)
Other movements	(1)	-	(1)
Derecognitions	(72)	-	(72)
At 31 December 2023	**1,712**	**44**	**1,757**

For information on rental income recognised from investment property, refer to Note 8. Direct operating expenses arising from investment property generating rental income for the Group for the year ended 31 December 2023 amounted to € 7 million (31 December 2022: € 4 million) and € 3 million for the properties not rented, for both 2023 and 2022

The fair value measurements of investment property are classified within Level 3 of the fair value hierarchy. Refer to Note 3.1 for additional information on how the Group determines the fair value of its investment property.

Refer to Note 25A for information on the subsidiaries acquired in 2023.

29 Assets held for sale

As at 31 December 2023, the carrying amount of the Group's HFS assets was € 241 million (31 December 2022: € 406 million), mainly comprising loans and advances to customers. Refer to Note 5 for the breakdown of such HFS assets across business segments. The total amount charged to the income statement in 2023 was € 273 million, of which € 262 million, € 8 million and € 3 million, recognised in line items "Impairment (losses) / releases on loans and advances to customers at amortised cost", "Other credit-risk related expenses on loans and advances to customers at amortised cost" and " Impairment (losses) / releases on other assets", respectively. Further information on significant events and transactions during the year is set out below:

Material NPE portfolios classified as HFS during the reporting period

Delta: Portfolio Delta, which primarily includes NPEs originated in Romania, was classified as HFS in June 2023. As at 31 December 2023, the carrying amount of the portfolio was written down to € 34 million, while the corresponding impairment loss charged in the Group's income statement was € 42 million. The sale is expected to be completed in the second quarter of 2024.

Monza: The said portfolio mainly comprises SME, corporate, mortgage, small business and consumer loans. The HFS criteria were met in December 2023 and following the HFS classification, the Group recognized an impairment loss of € 52 million. The sale is expected to be completed in the second quarter of 2024. Refer to Note 3 for further information.

NPE portfolios classified as HFS and sold during the reporting period

Senna: The sale of the portfolio was initiated and completed in the second quarter of 2023. The Group recognized a total loss of € 123 million, as a result of the HFS classification and write-down to fair value prior to completion of the sale.

Wheel II: The Group initiated and completed the sale process of an NPE corporate loan portfolio, namely "Wheel II", in 2023. The Group recognized an impairment loss of € 19 million as a result of the portfolio's write-down prior to completion of the sale in July 2023.

Assets classified as HFS in previous reporting periods and derecognized during the current reporting period

Sunshine: Sunshine Leases Single Member S.A., a subsidiary of the Bank established in May 2022 following a corporate demerger whose assets and liabilities were classified as HFS, was sold in August 2023. The carrying amount of the assets as at 31 December 2022 was € 95 million, while the corresponding impairment loss charged in the Group's income statement during 2023 was € 12 million.

Sunrise III portfolio: The Sunrise III portfolio of securitized NPEs was classified as HFS in 2022 and its carrying amount as of 31 December 2022 was € 169 million. During 2023, the Group recognized an impairment loss of € 25 million. Refer to Note 3 for further information.

Other portfolios: During 2023, the Group sold certain NPE portfolios, namely Trinity IX, Trinity XI and other NPEs that were classified as HFS in the fourth quarter of 2022. The total carrying amount of these portfolios as of 31 December 2022, amounted to € 26 million.

Portfolios classified as held for sale in prior years

The total carrying amount of NPEs classified as HFS prior to 2023, mainly comprising portfolios Solar and Navy, amounted to € 117 million and € 116 million as at 31 December 2023 and 2022, respectively. The Group remains committed to its plan, hence, these portfolios are expected to be sold throughout the next twelve months.

30 Other assets

	Group		Company	
	31/12/2023	31/12/2022 As reclassified	31/12/2023	31/12/2022
Inventories - property	1,309	1,391	-	-
Accumulated impairment of inventories - property	(142)	(131)	-	-
Net amount of inventories - property (A)	**1,167**	**1,260**	**-**	**-**
Other inventories	97	69	-	-
Accumulated impairment of other inventories	(6)	(1)	-	-
Net amount of other inventories (B)	**91**	**68**	**-**	**-**
Total net amount of inventories (A) + (B)	**1,258**	**1,328**	**-**	**-**
Prepaid expenses	29	44	-	-
Accrued income	47	21	20	20
Claims from tax authorities and the Greek State	13	16	-	-
Credit Cards-settlement account	63	54	-	-
Deposit and Investment Guarantee Fund (HDIGF)	342	582	-	-
Other	257	282	51	51
Total other non financial assets	752	1,000	71	71
Accumulated impairment of other non financial assets	(102)	(97)	(58)	(56)
Net amount of other non financial assets (C)	**650**	**903**	**13**	**15**
Claims from the Greek State	541	597	-	-
Credit Cards	89	83	-	-
Accrued income	11	14	6	13
Receivables	94	93	18	16
Other	549	512	-	-
Total other financial assets	1,285	1,300	24	29
ECL allowance of other financial assets	(196)	(174)	-	-
Net amount of other financial assets (D)	**1,089**	**1,125**	**24**	**29**
Other assets (A) + (B) + (C) + (D)	**2,996**	**3,357**	**37**	**44**
of which (excluding inventory):				
Current	792	756	24	29
Non-current	947	1,272	13	15

The loss of € 52 million reported under line “Impairment (losses) / releases on other assets” of the Income Statement, mainly includes impairment charges of inventory property of € 20 million included in line “Accumulated impairment of inventories – property” and ECL impairment of other financial assets amounting to € 24 million, included in line “ECL allowance of other financial assets”.

Inventory property mainly comprises real estate property acquired through auctions. The accumulated impairment of inventory refers to the monetary difference between cost and net realisable value. As at 31 December 2023, the carrying amount of inventory property that was written down to its net realizable value amounted to € 442 million and is included in line “Net amount of inventories – property” (31 December 2022: € 650 million).

Other non-financial assets

Line item “Deposit and Investment Guarantee Fund (HDIGF)” refers to the Bank’s participation in assets of HDIGF.

More specifically:

- In accordance with art. 9, par. 1 of Greek Law 4370/2016, the cap for the amount of deposits guaranteed by the HDIGF is € 100 thousand per client.
- Article 144 of Greek Law 4972/2022, which adds Article 25a to Law 4370/2016, provides that the Supplementary Deposit Cover Fund ("SDCF") is an asset of the credit institutions based on their proportional participation. It outlines that the SDCF assets will be gradually returned to the credit institutions in three annual installments throughout 2022-2024. The Bank received in December 2023 the second installment, which amounted to € 248 million.
- In accordance with article 13 of Greek Law 4370/2016, HDIGF compensates investor-clients for a maximum protection limit of € 30 thousand for the aggregate investment services provided by a participating credit institution, in default. The participating credit institutions paid their first contributions in 2010. The said contributions are made in a dedicated contributions reserve account which is jointly owned by the credit institutions. Each credit institution participating in the Investment Cover Scheme (“ICS”) has an individual share in the said reserve account which is proportional to its participation in the ICS assets, in accordance with article 30 of Greek Law 4370/2016.
- In accordance with article 36, par. 1 to 3 of Greek Law 4370/2016, the source of HDIGF’s Resolution Scheme funds, comprises recurring ex ante contributions, non-recurring ex post contributions and alternative means of funding, pursuant to internal articles 98 to 100 of article 2 of Greek Law 4355/2015.
- Under Regulation (EU) 806/2014, the Bank is subject to annual ex-ante contributions, calculated by the SRB.

Line item “Other” primarily comprises prepayment assets and transitional accounts expected to be settled in the following period.

Other financial assets

Line item “claims from the Greek State” mainly comprises amounts claimed by the Bank from the Greek State relating to loans guaranteed by the latter, whilst line item “Other” mainly relates to trade receivables and receivables from guarantees given.

The credit cards receivable, included in other financial assets, mainly refers to unsettled transactions as well as installments not yet due by the cardholders, which have been advanced to merchants.

The tables below illustrate the movement of line item “ECL allowance of other financial assets” for the Group in 2023 and 2022.

Group	Movement of ECL allowance			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1/1/2023	1	1	172	**174**
Reversal of unutilised impairment allowance	-	-	(2)	**(2)**
Charge for the year	-	2	22	**24**
At 31/12/2023	**1**	**3**	**192**	**196**

Group	Movement of ECL allowance			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1/1/2022	1	1	165	**167**
Reversal of unutilised impairment allowance	-	-	(4)	**(4)**
Charge for the year	-	-	11	**11**
Write-off of impairment losses	-	-	(1)	**(1)**
Other movements	-	-	1	**1**
At 31/12/2022	**1**	**1**	**172**	**174**

As of 31 December 2023 and 2022 the Company has not recognised any ECL allowance on other financial assets.

Ageing analysis of other financial assets

Group	Days past due - Gross Carrying Amount											
31/12/2023	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denoun-ced	Total	Stage 1	Stage 2	Stage 3	Total
Claims from the Greek State	60	4	-	-	1	476	-	**541**	474	15	53	**541**
Credit cards	89	-	-	-	-	-	-	**89**	89	-	-	**89**
Receivables	181	85	28	133	33	194	-	**654**	449	39	166	**654**
Total	**330**	**89**	**28**	**133**	**34**	**670**	**-**	**1,285**	**1,011**	**54**	**219**	**1,285**

Group	Days past due - Gross Carrying Amount											
31/12/2022 As reclassified	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denoun-Ced	Total	Stage 1	Stage 2	Stage 3	Total
Claims from the Greek State	82	7	2	1	129	375	-	**597**	538	16	42	**597**
Credit cards	83	-	-	-	-	-	-	**83**	83	-	-	**83**
Receivables (as reclassified – refer to Note 49)	221	115	55	57	2	169	-	**620**	417	36	168	**620**
Total	**386**	**122**	**57**	**58**	**131**	**544**	**-**	**1,300**	**1,038**	**53**	**211**	**1,300**

Company	Days past due - Gross Carrying Amount										
31/12/2023	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denoun-ced	Total	Stage 1	Stage 2	Stage 3	Total
Receivables	-	20	-	-	-	4	-	**24**	20	-	4	**24**

Company	Days past due - Gross Carrying Amount										
31/12/2022	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denoun-ced	Total	Stage 1	Stage 2	Stage 3	Total
Receivables	-	18	-	11	-	-	-	**29**	18	-	11	**29**

31 Due to banks

	Group	
	31/12/2023	31/12/2022 As reclassified
Amounts due to ECB and central banks	3,590	5,443
Interbank deposits	61	159
Securities sold to credit institutions under agreements to repurchase	435	298
Other (as reclassified – refer to Note 49)	532	285
	4,618	**6,185**
of which:		
Current	4,175	2,518
Non-current	443	3,667

Line item “Amounts due to ECB and central banks” includes the funding liabilities of the Bank due to ECB, in the context of the TLTRO III program. As at 31 December 2023, funding from the ECB through TLTRO decreased to € 3.5 billion from the previously outstanding amount of € 5.5 billion, since the Group repaid € 2 billion tranche following its maturity in December 2023.Interest expense regarding the TLTRO III funding for the year ended 31 December 2023 amounted to € 182 million (31 December 2022: € 70 million) and was recognized in line item “Net Interest Income”. Refer to Note 6.

Line item “Other” mainly comprises: i) long term borrowings from European Investment Bank and ii) cash collateral received by the Bank in the context of derivative transactions engaged under ISDA and CSA agreements.

32 Due to customers

	Group	
	31/12/2023	31/12/2022
Corporate		
Current and sight deposits	13,593	14,101
Term deposits	3,543	3,120
Blocked deposits, guarantee deposits and other accounts	399	324
Total (A)	**17,536**	**17,545**
Retail		
Current and sight deposits	7,765	7,672
Savings accounts	24,184	25,795
Term deposits	9,962	7,210
Blocked deposits, guarantee deposits and other accounts	40	39
Total (B)	**41,952**	**40,717**
Cheques payable and remittances (C)	**79**	**110**
Total due to customers (A)+(B)+(C)	**59,567**	**58,372**
of which:		
Current	59,516	58,345
Non-current	51	27

As at 31 December 2023 the Group's due to customers (excluding cheques payable and remittances) bearing variable interest rate and fixed interest rate amounted to € 45.9 billion and € 13.6 billion, respectively (31 December 2022: € 47.8 billion and € 10.5 billion, respectively).

33 Debt securities in issue

		Group	
	Weighted Interest Rate (%)	31/12/2023	31/12/2022
Senior Preferred Bond	3.875%	501	501
Senior Preferred Bond	8.250%	374	349
Senior Preferred Bond	7.250%	514	-
Senior Preferred Bond	6.750%	497	-
Total debt securities in issue		**1,886**	**849**

The financial terms of the Group's debt securities held by third parties as of the end of the reporting period, are as follows:

Issuer	Description	Underlying Loan Type	Issue Date	Maturity Date	Currency	Weighted Interest Rate on Total Outstanding Amount/ Coupon Frequency	Nominal value	Outstanding nominal amount	Redem-ptions	Nominal amount own held by the Bank	Nominal amount held by third party	Carrying value	Weighted Interest Rate
31/12/2023													
Senior Preferred Bond													
Piraeus Bank S.A.	Fixed Rate Senior Preferred Bond	-	3-Nov-21	3-Nov-27	EUR	3.875% / Annual	500	500	-	-	500	501	3.875%
Piraeus Bank S.A.	Fixed Rate Senior Preferred Bond	-	28-Nov-22	28-Jan-27	EUR	8.250% / Annual	350	350	-	-	350	374	8.250%
Piraeus Bank S.A.	Fixed Rate Senior Preferred Bond	-	13-Jul-23	13-Jul-28	EUR	7.250% / Annual	500	500	-	-	500	514	7.250%
Piraeus Bank S.A.	Fixed Rate Senior Preferred Bond	-	5-Dec-23	5-Dec-29	EUR	6.750% / Annual	500	500	-	-	500	497	6.750%

Issuer	Description	Underlying Loan Type	Issue Date	Maturity Date	Currency	Weighted Interest Rate on Total Outstanding Amount/ Coupon Frequency	Nominal value	Outstanding nominal amount	Redemptions	Nominal amount own held by the Bank	Nominal amount held by third party	Carrying value	Weighted Interest Rate
31/12/2022													
Senior Preferred Bond													
Piraeus Bank S.A.	Fixed Rate Senior Preferred Bond	-	3-Nov-21	3-Nov-27	EUR	3.875% / Annual	500	500	-	-	500	501	3.875%
Piraeus Bank S.A.	Fixed Rate Senior Preferred Bond	-	28-Nov-22	28-Jan-27	EUR	8.250% / Annual	350	350	-	-	350	349	8.250%

The transactions regarding debt securities in issue during the year ended 31 December 2023 are as follows:

On 5 December 2023, the Bank issued Senior Preferred Notes of nominal value € 500 million, maturing in December 2029, bearing an annual fixed interest rate of 6.75% for the first 5 years and reset once thereafter, at the prevailing mid swap rate plus 3.837% per annum. The Senior Preferred Notes may be redeemed at par by the issuer on 5 December 2028. The Senior Preferred Notes were issued under the Euro Medium Term Notes ("EMTN") Programme.

On 13 July 2023, the Bank issued Senior Preferred Notes of nominal value € 500 million, maturing in July 2028, bearing an annual fixed interest rate of 7.25% for the first 4 years and reset once thereafter, at the prevailing mid swap rate plus 3.692% per annum. The Senior Preferred Notes may be redeemed at par by the issuer on 13 July 2027. The Senior Preferred Notes were issued under the EMTN Programme.

The accrued interest of the debt securities in issue for the year 2023 and 2022 is € 49 million and € 6 million, respectively.

The following table includes the financial terms of debt securities retained by the Group as of the end of the reporting period:

Issuer	Description	Underlying Loan Type	Issue Date	Maturity Date	Currency	Weighted Interest Rate/ Coupon Frequency	Nominal value	Outstanding nominal amount	Redemptions	Accumulated Cancellations
31/12/2023										
Covered Bonds										
Piraeus Bank S.A.	Floating rate covered bond Series 3	Mortgage loans	16-Feb-17	16-Nov-26	EUR	1m Euribor + 150bp / Monthly	1,000	500	-	500
Piraeus Bank S.A.	Floating rate covered bond Series 5	Mortgage loans	20-Nov-17	20-May-24	EUR	3m Euribor + 150bp / Quarterly	1,000	500	-	500
Piraeus Bank S.A.	Floating rate covered bond Series 6	Mortgage loans	31-Jan-18	31-Jan-26	EUR	3m Euribor + 150bp / Quarterly	1,000	500	-	500
Piraeus Bank S.A.	Floating rate covered bond Series 7	Mortgage loans	11-May-18	11-Feb-27	EUR	3m Euribor + 150bp / Quarterly	1,000	1,000	-	-

Issuer	Description	Underlying Loan Type	Issue Date	Maturity Date	Currency	Weighted Interest Rate/ Coupon Frequency	Nominal value	Outstanding nominal amount	Redemptions	Accumulated Cancellations
31/12/2022										
Covered Bonds										
Piraeus Bank S.A.	Floating rate covered bond Series 3	Mortgage loans	16-Feb-17	16-Nov-26	EUR	1m Euribor + 150bp / Monthly	1,000	500	-	500
Piraeus Bank S.A.	Floating rate covered bond Series 5	Mortgage loans	20-Nov-17	20-May-24	EUR	3m Euribor + 150bp / Quarterly	1,000	500	-	500
Piraeus Bank S.A.	Floating rate covered bond Series 6	Mortgage loans	31-Jan-18	31-Jan-26	EUR	3m Euribor + 150bp / Quarterly	1,000	500	-	500
Piraeus Bank S.A.	Floating rate covered bond Series 7	Mortgage loans	11-May-18	11-Feb-27	EUR	3m Euribor + 150bp / Quarterly	1,000	1,000	-	-

As at 31 December 2023 and 2022 the carrying amount of loans and advances to customers at amortised cost that have been pledged as collateral under the terms of the covered bonds programme is € 3,341 million and € 3,779 million, respectively.

For further information about Covered bonds refer to the Company's website in the Investor Relations and Base Prospectus *(Covered Bonds | Piraeus Financial Holdings (piraeusholdings.gr)*).

34 Other borrowed funds

Other borrowed funds for both the Group and the Company comprise solely of two (2) Tier 2 subordinated notes of nominal value € 400 million and € 500 million, maturing in June 2029 and February 2030, respectively. As at 31 December 2023, the carrying value of the said notes for the Group amounted to € 419 million and € 520 million, respectively (31 December 2022: € 418 million and € 519 million, respectively), including total accruals of € 44 million (31 December 2022: € 44 million). The aforementioned notes may be redeemed by the issuer, at par, on 26 June 2024 and 19 February 2025, respectively, subject to prior regulatory approval. Furthermore, the said notes bear annual fixed rates of 9.75% and 5.5% for the first five years and reset once thereafter at the prevailing 5 year mid swap rate plus 9.952% and 5.774%, respectively.

During the year ended 31 December 2023, the Group did not proceed with any repurchases or new issuances of other borrowed funds. In January 2024 the Group executed a partial repurchase of the Tier 2 subordinated notes due in June 2029, simultaneously issuing new Tier 2 subordinated notes of nominal value € 500 million (for more information refer to Note 52).

35 Other liabilities

	Group		Company	
	31/12/2023	31/12/2022 As reclassified	31/12/2023	31/12/2022
Deferred income	14	29	-	-
Accrued expenses	110	108	35	3
Lease liabilities	91	104	1	1
Liabilities from transactions via DIAS	532	259	-	-
Non-income taxes payable and social security contributions	46	40	1	1
Creditors and suppliers	72	79	2	27
Collections for third parties	303	193	-	-
Other	290	302	21	23
	1,459	**1,113**	**60**	**55**
of which:				
Current	1,088	864	60	55
Non-current	371	249	-	-

The following table summarises the lease liabilities:

Lease liabilities	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
No later than one year	28	24	-	-
One to five years	61	64	1	-
Later than five years	11	29	-	1
Gross lease liabilities	**100**	**117**	**1**	**1**
Discounting	(9)	(13)	-	-
Lease liabilities	**91**	**104**	**1**	**1**
of which:				
No later than one year	24	19	-	-
One to five years	56	57	-	-
Later than five years	11	28	1	1

Refer to Note 40 for further information on lease liabilities.

36 Provisions

The movement of the Group's provisions during the year is summarized below:

	Group			
	Litigations	Other	ECL allowance on credit commitments	Total
At 1 January 2022	29	4	103	136
Provision charge / (release)	20	27	(11)	36
Provision utilised	(21)	(26)	-	(47)
Other movements	(1)	-	-	(2)
At 31 December 2022	**26**	**5**	**92**	**124**
Provision charge / (release)	9	45	(11)	43
Provision utilised	(1)	(3)	-	(4)
Other movements	-	1	-	1
At 31 December 2023	**34**	**48**	**82**	**164**

The Group establishes provisions for all litigations, for which it believes it is probable that a loss will incur in the future and the amount of the loss can be reasonably estimated. These provisions may change from time to time, as appropriate, in light of additional information. Management, following consultation with its legal advisors has concluded that the amount of recognized provisions for outstanding litigations is sufficient.

The ECL allowance on credit commitments is estimated based on the same methodology applied for loans and advances to customers at amortised cost. Refer to Note 4.3.1.

37 Tax receivables

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Tax receivables	204	197	7	12
Accumulated impairment of tax receivables	(43)	(51)	-	-
Net tax receivables	161	145	7	12

Net tax receivables for the Group as at 31 December 2023 amounted to € 161 million (31 December 2022: € 145 million), of which € 152 million and € 7 million are attributable to the Bank and the Company, respectively, and € 2 million to other subsidiaries of the Group.

Piraeus Bank S.A.

Net tax receivables comprise the following:

a) Receivables from withholding taxes on interest of bonds and treasury bills of € 62 million relating to financial years 2009, 2011, 2012 and 2013 (tax years 2008, 2010, 2011 and 2012). Under the provisions of Greek Law 4605 (article 93, par.1 and 2), as published at Gazette A' 52 on 1 April 2019, an amendment was introduced into the ITC, clarifying the status of the aforementioned withholding tax receivables of the Bank , as follows:

- Withholding taxes of € 26 million, in accordance with the provisions of para. 8 of article 12 of Greek Law 2238/1994, for the financial year 2013 (tax year 2012), are offset as a priority when income tax is incurred and to the extent that such income tax is sufficient for the purposes of the above set-off. In addition, an amount of € 7 million, withheld on the same basis, for the financial year 2010 (tax year 2009) is claimed from the Greek State; and

- Withholding taxes of € 29 million, which are subject to the provisions of para. 6 of article 3 of Greek Law 4046/2012 and not offset within five (5) years, can be netted off against tax liabilities of the Bank in equal instalments within 10 years, starting from 1 January 2020.

b) Withholding taxes of € 30 million deriving from interest income earned on Greek Government treasury bills, which were withheld after 1 January 2013. Such tax receivables are offset against income tax available in the five (5) financial years following the financial year in which the income tax was withheld. Upon completion of the five-year period, any remaining withholding tax is netted off against current tax liabilities.

c) Withholding taxes of € 55 million arising from corporate bonds, which are refundable by the Greek State.

d) Various other tax claims of € 5 million.

38 Deferred Taxes

Deferred taxes for the Group and the Company are calculated on all temporary differences under the liability method. The nominal tax rates of Group subsidiaries are different compared to the nominal tax rate of the Company (Note 16).

The Group's deferred tax assets and liabilities are attributable to the following items:

	Group	
	31/12/2023	31/12/2022
Deferred tax liabilities		
Investment securities valuation adjustment	1	-
Investment property fair value adjustment	8	9
Other temporary differences	-	1
Total	**9**	**10**

	Group	
	31/12/2023	31/12/2022
Deferred tax assets		
Pensions and other post retirement benefits	13	14
Loans and advances to customers	4,593	4,808
Derivative financial instruments valuation adjustment	105	98
Investment property fair value adjustment	55	41
Depreciation of property and equipment	(49)	(28)
Amortisation of Intangible assets	(22)	(16)
Recognition of tax losses carried forward	4	2
Impairment of Greek government bonds (PSI)	995	1,050
Investments	3	5
Other temporary differences	14	(2)
Reserve from financial assets at FVTOCI	(7)	3
Total	**5,703**	**5,974**
Net deferred tax asset	**5,694**	**5,964**

Management estimated that the tax losses carried forward of € 16 million for the Group as at 31 December 2023 can be used to offset future taxable profits and thus the Group recognised a DTA amounting to € 4 million (31 December 2022: € 2 million). In relation to the tax losses of € 16 million, for the amount of € 6 million there is no predefined time horizon for being netted off against taxable income, whereas the amount of € 10 million can be netted off in the five (5) financial years following the financial year in which the income tax was withheld.

DTA on tax losses carried forward is recognised only when it is probable that future taxable profits will be available, against which these carried forward tax losses can be utilised. On this base the Group and the Company have unused tax losses as at 31 December 2023 of € 3,845 million and € 1,732 million, respectively (31 December 2022 : € 1,944 million and € 1,762 million for the Group and the Company, respectively), for which no DTA was recognized in the Statement of Financial Position. The variance of € 1,901 million is mainly attributable to the acquisition of MIG Holdings S.A. Refer to Note 25A for further details. Furthermore, temporary differences, for which no DTA was recognized in the Statement of Financial

Position, arising from written off loans, amounted to € 1,071 million as of 31 December 2023 and 2022 for the Group.

The Group and the Company have offset the DTA and deferred tax liabilities on an entity per entity basis, based on the legally enforceable right to set off the recognised amounts i.e. offset current tax assets against current tax liabilities, as well as the DTA and deferred tax liabilities when such taxes relate to the same fiscal authority.

	Group	
	1/1 - 31/12/2023	1/1 - 31/12/2022
Net deferred tax asset at 1/1	**5,964**	**6,060**
Deferred tax benefit / (expense)	(269)	(126)
Financial assets at FVTOCI (Note 18)	-	36
Actuarial gains / (losses) (Note 18)	1	(3)
Derecognition of subsidiaries	(2)	-
Property revaluation reserve (Note 18)	-	(3)
Other	1	-
Net deferred tax asset at 31/12	**5,694**	**5,964**

During 2023, deferred taxation directly recognized in equity for the Group amounted to € 1 million, relating to the valuation of financial assets at FVTOCI and actuarial gains/ (losses) (Note 18).

The deferred tax recognised in the Income Statement is attributed to temporary differences between the tax and accounting base, the effect of which is analysed in the table below:

Deferred tax (Income Statement)	Group	
	1/1 - 31/12/2023	1/1 - 31/12/2022
Pensions and other post retirement benefits	(2)	(3)
Loans and advances to customers	(215)	(263)
Derivative financial instruments valuation adjustment	7	101
Investment property fair value adjustment	17	34
Depreciation of property and equipment	(21)	14
Amortisation of Intangible assets	(6)	15
Recognition of tax losses carried forward	2	1
Impairment of Greek government bonds (PSI)	(55)	(55)
Investments	(2)	4
Other temporary differences	17	9
Reserve from financial assets at FVTOCI	(10)	19
Total	**(269)**	**(126)**

Net deferred tax asset analysis	Group	
	31/12/2023	31/12/2022
Current	316	256
Non-current	5,387	5,719
Total	**5,703**	**5,974**

Net deferred tax liability analysis	Group	
	31/12/2023	31/12/2022
Current	1	-
Non-current	8	9
Total	**9**	**10**

39 Retirement and termination benefit obligations

Retirement indemnities

Most of the Group's subsidiaries are required by local law to offer a lump sum amount upon retirement. In Greece, this is defined by Greek Law 2112/1920 as modified by Greek Law 4093/2012. Such lump sum payments are usually based on the final salary and years of service, the calculation of which depends on the jurisdiction in which the subsidiary operates and the employee's occupation (e.g. Greek law provides for different retirement benefits to salaried employees, wages earners and lawyers). In some cases, certain subsidiaries provide by law for additional benefits to employees in excess of the floor defined under statutory requirements.

A summary of the Group's defined benefit plans is provided below:

1. Lump sum retirement benefit according to Greek Law 2112/1920 and Greek Law 4093/2012

Lump sum retirement benefit is provided to the majority of employees of the Company, the Bank and Greek subsidiaries as per the terms set out below:

In accordance with Greek Law 4046/2012 and Board of Ministers' Decision (6/28/2/2012), from 14 February 2012 onwards, the employment contracts that lapse on attainment of the normal retirement age or based on the particular retirement conditions, are considered as indefinite duration employment contracts and therefore, the provisions for employee's statutory retirement indemnity of Greek Law 2112/1920, are applicable.

On 12 November 2012, Greek Law 4093/2012 (GG A' 222) decreased the statutory indemnity scale set by Greek Law 2112/1920 in case of employee dismissal or normal retirement. Employees having more than 16 full years of service to the same employer as at 12 November 2012, are entitled to a statutory indemnity for all the years employed until that date. Employees having less than 17 full years of service to the same employer as at 12 November 2012, the maximum statutory indemnity is 12 actual salaries. In both conditions and in case of normal retirement, employees receive 40% of the statutory indemnity scale set by Greek Law 2112/1920 and Greek Law 4093/2012. No indemnity is granted in the event of disability before the standard retirement age or in the case of early retirement.

As per Law 4194/2013, lawyers receive a retirement benefit of 100%. In the event of voluntary resignation, the benefit is paid as follows: 100% after 28 years of service, 66.67% after 20 years of service and 50% after 15 years of service.

2. Lump Sum benefit according to Piraeus Bank Collective Agreement

A lump sum benefit is granted to certain employees of the Bank and the Company. The lump sum benefit is payable when the member is eligible for full pension by the social security fund. The lump sum benefit is based on a pre-defined number of salaries at 100% of the average salary of the last 3 months of active service prior to retirement. No lump sum benefit is paid in case of death, disability or termination before reaching the standard retirement age.

3. Lump Sum benefit according to employee contracts of Former Nat West Bank Employees

Certain employees of the former Nat West Bank, currently working in the Bank and hired prior to 31 December 1991, are entitled to a lump sum benefit. This benefit is payable when the employee becomes eligible for full pension through the social security fund or in the event of death. The lump sum benefit amounts to 100% of the retirement benefit as specified in Greek Law 2112/1920 and Greek Law 4093/2012.

4. Lump Sum benefit according to the Agreement of Former Macedonia Thrace Bank Employees

Certain former employees of Macedonia Thrace Bank, who are currently employed in the Bank, are entitled to a lump sum benefit as outlined in a collective agreement. The lump sum benefit becomes payable when the individual qualifies for full pension from the social security fund.

5. Lump Sum benefit to former Macedonia Thrace Children's Account

The lump sum benefit is paid to the children of former Macedonia Thrace Bank employees based on the calculation of the predetermined liability when the child turns 25, or earlier under specific conditions. If the child passes away, the amount is paid to the parent. In the event of the parent leaving the Bank, the amount contributed by the employee (not the Bank) is refunded without interest. Should the departure be due to retirement, the plan can be sustained and funded by the ex-employee's pension salary, with the Bank continuing to pay contributions.

6. Lump Sum benefit according to the insurance policy of certain Key Management Members

The Bank maintains an insurance contract regarding the lump sum benefit to be paid to certain members of Management. This benefit is determined by the calculation of a predetermined liability and is payable upon termination of employment in all cases, except for instances of fraud.

Piraeus Financial Holdings S.A. and Piraeus Financial Holdings Group

The present value of the defined benefit obligation is determined by an independent actuary by applying the "projected unit credit method", according to which, the charge for pension plans to the income statement is allocated over the service lives of the related employees. The defined benefit obligation is determined by the present value of cash outflows using interest rates of high-quality corporate bonds, with a residual maturity similar to the term of the related liability.

The Group's employees are entitled to compensation upon termination of service, based on their service, salary and classification group.

Any benefits paid under the voluntary redundancy schemes for years 2023 and 2022 are included in the disclosures pertaining to non-funded plans.

The tables below present the amounts recognized in the Statement of Financial Position and the Income Statement for the Group and the Company, broken down by funded and non-funded plans.

Amounts recognised in the Statement of Financial Position	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Pension schemes – funded	3	4	-	-
Other post retirement benefits - non-funded	49	51	-	-
Total	**52**	**55**	**-**	**-**

Amounts recognised in Equity	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Funded				-
Liability gain / (loss) due to changes in assumptions	-	1	-	-
Total funded	**-**	**1**	**-**	**-**
Non-funded				
Liability gain / (loss) due to changes in assumptions	(3)	9	-	-
Liability experience gain / (loss) arising during the year	-	(1)	-	-
Total non-funded	**(3)**	**8**	**-**	**-**
Total	**(3)**	**9**	**-**	**-**

Amounts recognised in the Income Statement	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Total pension schemes – funded	-	-	-	-
Other post retirement and termination benefits of non-funded				
Current service cost	4	4	-	-
Interest cost	2	-	-	-
Settlement/ Curtailment/ Termination loss/ (gain)	56	58	-	-
Total other post retirement and termination benefits of non-funded	**62**	**62**	**-**	**-**
Total	**62**	**62**	**-**	**-**

The difference between the amount of € 56 million relating to Settlement/ Curtailment/ Termination loss/ (gain) and the amount of € 62 million reported as VES cost in Staff Cost (Note 12) is due to an additional provision charge for VES of € 5 million.

A) Pension schemes - funded

The net liability in the Statement of Financial Position is determined as follows:

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Present value of funded obligations	5	5	-	-
Fair value of plan assets	(2)	(1)	-	-
Total	**3**	**4**	**-**	**-**

In funded plans, the Group follows the recommendations of the insurance company concerning the amount of contributions. The expected contributions to funded post-employment defined benefit plans for 2024, amount to € 0.1 million. There are no commitments arising from the law concerning the level of funding for post-employment defined benefit plans provided by the Group.

The movement of the gross defined benefit obligation is analysed as follows:

	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Opening balance	5	7	-	-
Benefits paid from the fund	(1)	(1)	-	-
Actuarial (gains) / losses	-	(1)	-	-
Closing balance	**5**	**5**	**-**	**-**

The movement in the fair value of plan assets for the Group and the Company is analysed as follows:

	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Opening balance	1	2	-	-
Employer contributions	1	-	-	-
Benefits paid from the fund	(1)	(1)	-	-
Closing balance	**2**	**1**	**-**	**-**
Return on plan assets	**-**	**-**	**-**	**-**

The plan assets, which are not quoted, are invested as follows:

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Mutual funds	97.7%	97.6%	-	-
Bonds	0.0%	0.0%	-	-
Deposits	2.3%	2.4%	-	-

The net liability movement of funded pension schemes for the Group and the Company, is outlined below, broken down into expenses, contributions, benefits and amounts recognized in equity:

	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Opening balance	4	5	-	-
Employer contributions	(1)	-	-	-
Amount recognised in equity	-	(1)	-	-
Closing balance	**3**	**4**	**-**	**-**

B) Other non-funded post retirement and termination benefits

The amounts recognised in the Statement of Financial Position are analysed as follows:

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Present value of unfunded obligations	49	51	-	-
Liability in the Statement of Financial Position	**49**	**51**	**-**	**-**

The movement in the defined benefit obligation is analysed as follows:

	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Opening balance	51	70	-	-
Current service cost	4	4	-	-
Interest cost	2	-	-	-
Settlement/ Curtailment/ Termination loss/ (gain)	56	58	-	-
Benefits paid directly by the employer	(68)	(73)	-	-
Actuarial (gains) / losses	3	(8)	-	-
Derecognition of subsidiaries	-	(1)	-	-
Closing balance	**49**	**51**	**-**	**-**

The movement in the liability recognised in the Statement Financial Position for the Group and the Company, broken down into expenses, contributions, benefits and amounts recognized in equity is analysed as follows:

	Group		Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Opening balance	51	70	-	-
Total expense recognised in Income statement	62	63	-	-
Benefits paid by the employer	(68)	(73)	-	-
Amount recognised in equity	3	(8)	-	-
Derecognition of subsidiaries	-	(1)	-	-
Closing balance	**49**	**51**	**-**	**-**

The expected weighted average duration of the defined benefit obligation is 5.8 years for the Group and 8.7 years for the Company.

The actuarial assumptions used are as follows:

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Discount rate	3.2%	3.8%	3.2%	3.9%
Price inflation	2.0%	2.6%	2.0%	2.6%
Expected return on plan assets	3.2%	3.7%	-	-
Future increase in salaries	2.5%	2.0%	2.5%	2.0%
Mortality table applied	Eurostat mortality table specific to Greece		Eurostat mortality table specific to Greece	

According to IAS 19, the rate used to calculate the expected return on plan assets is the discount rate that is used to discount the post-employment benefit obligation.

Sensitivity analysis in defined benefit obligation

The sensitivity analysis for the significant assumptions in the post-employment defined benefit obligation is as follows:

Main assumptions	Effect in defined benefit obligation (Group)			Effect in defined benefit obligation (Company)		
	Change in the assumptions	Increase	Decrease	Change in the assumptions	Increase	Decrease
Discount rate	+/-0.50%	-2.7%	2.9%	+/-0.50%	-4.0%	4.3%
Future increase in salaries	+/-0.50%	2.6%	-2.5%	+/-0.50%	4.3%	-4.0%
Voluntary withdrawal rate	increase/ decrease by 50%	0.4%	-0.3%	increase/ decrease by 50%	0.5%	-0.5%

The aforementioned sensitivity analysis is based on changing each assumption, while holding the other assumptions constant. Nevertheless, in an economic environment, assumptions typically do not change in isolation and are often influenced simultaneously. The method adopted for the sensitivity analysis is the one used for the determination of the defined benefit obligation in the Statement of Financial Position. The ultimate cost of defined benefit plans depends on the actual future experience relating to the actual pay increases, as well as other factors that affect the cost, such as employee mobility and recruitment.

Defined contribution plans

Total contributions to social security funds, state run plans and defined contribution plans for 2023 for the Group and the Company amounted to € 60 million and nil, respectively (2022: € 63 million for the Group and nil for the Company).

Below is a summary of the defined contribution plans of the Group:

1. Piraeus Financial Holdings S.A. and domestic subsidiaries pension and state health plan

The Company's main post retirement and health plan is a defined contribution plan that is run by the Greek State sponsored social security fund EFKA. Contribution by the employer and employee to the Greek state is defined by law and amounts to 22.29% and 13.87% respectively, of the employees' salaries with a cap. The state health plan offers health benefits to employees before and after their retirement, and to insured family members.

2. Piraeus Bank state pension plan

The Bank's main post retirement pension plan is a defined contribution plan that is run by the Greek state sponsored social security fund EFKA. Contribution by the employer and employee to the State post retirement pension plan is defined in the law and amounts to 17.74% and 11.32% respectively, of the employees' salaries with a cap.

3. Piraeus Bank state health plan

Defined contribution to the state health plan amounts to 4.55% of the employees' salary for the employer and 2.55% contribution of employees' salary. Additional contributions are paid for insured members of the employees' families (such as spouse that does not work and children) and are increased further in the event that the insured spouse is employed or that members of the paternal family are also insured. Contribution of retired employees' amount to a percentage of their

pension, while additional contributions are paid for other insured members of their families. The state health plan offers health benefits to employees before and after retirement, and to insured family members.

4. Piraeus Bank S.A. and Piraeus Financial Holdings S.A. private pension plan

In November 2020 the Company established the Institution for Occupational Retirement, Life and Medical Provision ("IORP"), a non-profit legal entity under private law jurisdiction, which aims to provide supplementary insurance protection to its members, beyond the primary coverage provided by social security funds.

With the establishment of IORP, a single fund has been created to provide all employees (the Company's, the Bank's and the Greek subsidiaries' mentioned in paragraph 7 below) with a supplementary lump sum, thereby enhancing their retirement benefits. Employee participation in the IORP is voluntary and their contribution is optional, ranging from zero to 20% of gross monthly salary. The Bank and the Company, in their capacity as employers, contribute 2% of the monthly gross salary for 14 months annually to the individual employee's account. This contribution is effective from the date of registration in the IORP and there is no obligation for the employee to make a separate contribution. Moreover, the Bank and the Company maintain a defined contribution insurance plan to disburse a specified amount at the end of the employment relationship. This applies to certain members of Management in all cases except those involving fraud.

5. Group child savings private defined contribution plans

The Bank and the Company offer three (3) defined-contribution plans to their employees with regard to their children, all of which share the same terms and requirements.

The cumulative amount collected throughout the insurance period (i.e. employee and employer contributions plus accrued interest) is disbursed as a lump sum. The payment is directed either to the child, subject to specific conditions (such as marriage, employment, reaching the age of 25, or to the event of the death of the employee-parent), or to the employee-parent in cases such as retirement, participation in VES, permanent or total disability, and the death of the insured child. If an employee resigns, they receive their contributions including interest.

6. Piraeus Bank S.A. and Piraeus Financial Holdings S.A. private insurance health plan

Furthermore, the Bank and the Company provide a Life and Health Care Insurance Plan to their employees and their families (spouse and children with specific age limits respectively), through IORP. This plan includes employee life insurance, reimbursement for employee permanent and total disability due to accident or sever illness, as well as coverage for employee and/or dependent hospital care, outpatient care, surgery / hospitalisation allowance, maternity allowance and check-up. The Bank and the Company pay fixed monthly premiums to the insurance company for the well-being of the employee and their relatives. A percentage of the salary is allocated for life and disability insurance benefits. If a spouse or child, not covered by social health insurance under the employee, is insured in the plan, the insurance covers hospital and outpatient care benefits. The employee pays a fixed monthly amount per insured person, deducted from their monthly salary.

7. Defined Contribution Pension Plans of Greek subsidiaries

Piraeus Asset Management Single Member M.F.M.C. S.A., Piraeus Leasing Single Member S.A., Piraeus Factoring Single Member S.A., Piraeus Securities S.A., Iolcus Investments Alternative Investments Funds Managers S.A. and Piraeus Agency

Solutions Single Member S.A. provide their employees with the opportunity to enroll in the Group's IORP. Participation in the IORP is voluntary for employees, and their contribution is optional, ranging from zero to 20% of gross monthly salary. The employer's contribution is fixed to 2% of the monthly gross salary for 14 months on an annual basis.

MIG Holdings S.A. offers a group pension plan to its employees. The contribution from participating employees is voluntary, ranging from zero to 15% of gross monthly salary. The company, in its capacity as employer, contributes an additional 2% of the gross monthly salary for 14 months annually to the individual accounts of the employees. Both the company and the employees have the right to make supplementary contributions once per year.

Furthermore, Piraeus Agency Solutions Single Member S.A. provides employees with a defined contribution plan, subject to the same terms and conditions. Employee participation in this plan is optional.

8. Defined contribution pension plans of foreign branches and subsidiaries

For two (2) Cypriot subsidiaries, Philoktimatiki Public Ltd and Philoktimatiki Ergoliptiki Ltd, contributions to the state social insurance fund are made by both the employer and employees, calculated based on the employees' salaries. Additionally, these subsidiaries maintain a defined contribution plan, with the plan's assets held in a separate fund managed by a Committee. The plan is funded from contributions made by both the employer and employees.

In the case of Piraeus Group Finance PLC, a UK subsidiary, contributions to the state social security fund are made by both the employer and employees, calculated on the basis of the employees' salaries. Moreover, as required under UK law, the subsidiary maintains a defined contribution plan through a private insurance company, "Scottish Widows". This plan is funded by mandatory contributions from the employer, determined as a percentage of the monthly salary, and voluntary contributions from the employees. The employees decide on the individual funds for investment, and each employee's funds are held separately within the plan.

9. Child savings private defined contribution plans of Greek subsidiaries

Piraeus Agency Solutions Single Member S.A. and Snappi S.A. offer defined-contribution plans to the children of their employees, with identical terms and requirements.

The total amount accumulated during the insurance period, comprising both employee and employer contributions, along with accrued interest, is disbursed as a lump sum. The benefit is directed either to the child, subject to specific conditions being met (such as the child's marriage, employment, reaching the age of 25, or the death of the employee-parent), or to the employee-parent in instances such retirement, resignation, participation in VES, permanent or total disability and death of the insured child.

10. Private Health plans of Greek subsidiaries

Snappi S.A., Piraeus Leasing Single Member S.A., Piraeus Real Estate Single Member S.A., Piraeus Agency Solutions Single Member S.A., Piraeus Factoring Single Member S.A., Piraeus Securities S.A., Piraeus Asset Management Single Member M.F.M.C. S.A., Piraeus Capital Management S.A., Piraeus Jeremy Technology Catalyst Management Single Member S.A., MIG Holdings S.A. and Piraeus Bank Group Cultural Foundation, offer group health plans to their employees. These plans include employee life insurance, reimbursement for permanent and total disability due to accident or severe illness, as well

as coverage for employee and/or dependent's hospital care, outpatient care, surgery/hospitalisation allowance, and maternity allowance. The subsidiaries pay monthly or annual premiums to the insurance companies for these health plans.

In the case of Piraeus Real Estate Single Member S.A., employees contribute by paying monthly premiums per insured person, and these premiums are deducted from their monthly salary. For Piraeus Capital Management S.A., Snappi S.A. and Piraeus Jeremy Technology Catalyst Management Single Member S.A, if a spouse or child is insured in the plan and is not covered under the employee's social health insurance, the employee is responsible for paying a fixed monthly amount per insured person. This amount is deducted from the employee's monthly salary.

11. Private Health Plans of foreign branches and subsidiaries

JSC Robne Kuce Beograd (RKB) provides its employees with an annual check-up, not offered through a contract with an insurance company. Moreover, there is a life insurance contract in force, along with coverage in case of severe illness or accident.

JSC Piraeus Bank ICB and Solum LLC in Ukraine offer group health plans for hospital and outpatient care to their employees. Premiums for these plans are paid per quarter.

Piraeus Leasing Romania S.A. provides employees with a check-up on an annual basis or more frequently under specific circumstances (e.g. long-term leave of an employee due to illness). This benefit is not provided through an insurance contract.

Philoktimatiki Public Ltd and Philoktimatiki Ergoliptiki Ltd in Cyprus offer to their employees a group health plan, including employee life insurance and reimbursement in case of permanent and total disability due to accident or severe illness. Premiums are paid monthly by the subsidiaries.

Piraeus Group Finance PLC, in the United Kingdom, offers its employees private health insurance covering hospital and outpatient care. Premiums for this insurance are paid annually, and the coverage extends to spouses and children under 25. Additionally the company provides employees with insurance covering income protection in various circumstances, including permanent and total disability due to accident or severe illness. Life insurance, based on the employee's annual salary, is offered with premiums paid annually. The company also provides complimentary travel insurance and annual health check-ups at a private clinic.

40 Leases

The table below presents the contractual undiscounted cash flows of the gross lease liabilities. The Group and the Company have elected to take a recognition exemption for short-term leases; hence, the analysis below does not include any leases with a term lower than 12 months.

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Up to 1 year	28	24	-	-
From 1 to 5 years	61	64	-	-
More than 5 years	11	29	-	-
Total undiscounted gross liabilities	**100**	**117**	**-**	**-**

As at 31 December 2023, the present value of lease liabilities amounts to € 91 million for the Group (31 December 2022: € 104 million) and nil for the Company.

Lease liabilities are included in line item “Other liabilities”.

a. Lease liabilities

Amounts recognized in profit or loss	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Interest on lease liabilities	2	2	-	-
Depreciation charge for the year	20	18	-	-
Expenses relating to short-term leases	12	14	-	-

b. Lease receivables

Gross investments in finance leases	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Up to 1 year	193	231	-	-
From 1 to 5 years	483	436	-	-
More than 5 years	446	435	-	-
Total undiscounted lease payments receivable	**1,121**	**1,102**	**-**	**-**
Less: Unearned finance income	298	211	-	-
Net investment in the lease	**823**	**891**	**-**	**-**

Future income from operating leases	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Up to 1 year	31	40	-	-
From 1 to 5 years	88	159	-	-
More than 5 years	13	24	-	-
Total undiscounted lease payments receivable	132	223	-	-

41 Contingent liabilities, assets pledged, transfers of financial assets and commitments

41.1 Legal proceedings

Litigation is a common occurrence in the Banking industry due to the nature of the business undertaken. The Group has formal controls and policies for managing legal claims. Once professional advice has been obtained and the amount of loss reasonably estimated, the Group makes adjustments to account for any adverse effects that the claims may have on its financial position.

As at 31 December 2023, the Group and the Company provided for cases under litigation an amount of € 34 million and nil, respectively (31 December 2022: € 26 million and nil for the Group and the Company, respectively) which represents Management's best estimate on the probable loss to be incurred upon finalization of these pending legal cases.

The Group has been advised by its legal advisors that it is possible, but not probable, that the final decision of certain legal cases referring mainly to unjust enrichment damages, nullity of debt contract, labor disputes, moral damage and compensation claims, may not be in favor of the Group. Accordingly, no litigation provision for such claims has been established as at 31 December 2023. The contingent liability that could potentially result from such litigations, based on the current status of the legal proceedings and Management's best estimate, is not expected to exceed € 223 million for the Group and nil for the Company (31 December 2022: € 231 million and nil for the Group and the Company, respectively), while the timing of the outflow is uncertain. It is noted that based on historical data, this category of legal cases has resulted in non-significant losses for the Group.

Following the acquisition of a controlling stake in MIG that was completed in April 2023, Management assisted by its legal advisors, reviewed the possible and present obligations under IAS 37 arising from past litigations and claims against MIG and its subsidiaries and concluded on the basis of the information and input provided by MIG, that no provision should be

recognised by the Group on its balance sheet. Further, no significant financial impact is expected from the contingent liabilities of MIG and its subsidiaries as per the above stated information and input.

41.2 Pending tax audits

The Company has been audited by the tax authorities up to and including the year 2010.

For the years 2011 - 2016, all Greek Societe Anonyme Companies were required to receive tax compliance reports issued by their statutory auditors, under Greek Law 2190/1920 and in accordance with article 82 of Greek Law 2238/1994 and article 65A of Greek Law 4174/2013, as in force at that time.

From 2016 onwards, the requirement to obtain a tax compliance report became optional, however Management has opted for the Company and the Group's Greek subsidiaries to continue receiving such reports from the statutory auditors. The Tax Administration retains its right to proceed with a tax audit, within the applicable statute of limitations, in accordance with article 36 of Greek Law 4174/2013, as currently in force.

In the Bank's tax compliance report for fiscal year 2013, an emphasis of matter was expressed on applicable provisions of Greek Tax Law regarding the acquisition of assets and liabilities of Greek branches of credit institutions domiciled in other EU member countries, according to which the above-mentioned transactions are not subject to tax.

In regards to the Group's Greek subsidiaries, the respective tax compliance reports for the fiscal years up to 2022 have been issued and they were unqualified.

Fiscal year 2023 of the Company and its Greek subsidiaries is currently being examined by Deloitte Certified Public Accountants S.A. and the final outcome of the tax compliance reports is not expected to have a material effect on the Annual Financial Statements.

The unaudited tax years of the Group's subsidiaries, associates and joint ventures, are included in Note 25 and therefore their tax liabilities for these years may not be considered as final.

Additional taxes and penalties may be imposed for the unaudited tax years, however, no material impact is expected on the financial position of the Group.

41.3 Commitments

In the normal course of business, the Group enters into contractual credit commitments towards their customers to facilitate their financing needs or obligations. Due to their nature, credit commitments are treated as off-balance sheet items. These credit commitments consist of letters of guarantees, letters of credit and irrevocable undrawn committed credit facilities. Typically, letters of guarantee and letters of credit ensure payment to a third party for a customer's trade transactions or guarantee the performance of a customer to a third party. Irrevocable undrawn committed credit facilities are agreements to lend to a customer as long as there is no violation of the conditions established in the contract. The credit risk associated with these commitments is measured by applying the same Credit Policy, approval process and monitoring procedures employed for Loans and advances to customers at amortised cost.

As at 31 December 2023 and 2022 the Group had undertaken the following commitments:

	Group	
	31/12/2023	31/12/2022
Financial guarantees	5,680	4,789
Letters of credit	121	114
Irrevocable undrawn credit commitments	1,961	1,624
Total credit commitments	**7,762**	**6,527**
Other commitments	-	110
Total commitments	**7,762**	**6,637**

As of 31 December 2023 and 2022 the Company had not undertaken any commitments.

The irrevocable undrawn committed credit facilities are included in the Risk Weighted Assets calculation for capital adequacy purposes under regulatory rules currently in force. An ECL allowance is measured for letters of guarantee, letters of credit and irrevocable undrawn credit commitments.

Group	Financial guarantees - Internal rating grade						
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	4,737	-	-	-	4,737	4	4,733
Recommended	583	-	-	-	583	2	581
Substandard	-	187	-	-	187	1	186
Default	-	-	172	-	172	69	103
Total	**5,320**	**187**	**172**	**-**	**5,680**	**76**	**5,604**

Group	Financial guarantees - Internal rating grade						
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	4,233	-	-	-	4,233	6	4,228
Recommended	317	-	-	-	317	1	316
Substandard	-	37	-	-	37	1	37
Default	-	-	202	-	202	80	122
Total	**4,550**	**37**	**202**	**-**	**4,789**	**87**	**4,702**

Group	Financial guarantees - Movement in nominal amount				
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2023	**4,550**	**37**	**202**	**-**	**4,789**
New off balance sheet items originated or purchased	2,800	40	25	-	**2,866**
Off balance sheet items repaid / matured	(1,873)	(51)	(50)	-	**(1,975)**
Off balance sheet items derecognized (excluding write offs)	-	-	-	-	**(1)**
Transferred from Stage 1 to Stage 2	(196)	196	-	-	**-**
Transferred from Stage 1 to Stage 3	(1)	-	1	-	**-**
Transferred from Stage 2 to Stage 1	41	(41)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	-	-	-	**-**
Transferred from Stage 3 to Stage 2	-	6	(6)	-	**-**
Gross carrying amount as at 31/12/2023	**5,320**	**187**	**172**	**-**	**5,680**

Group	Financial guarantees - Movement in nominal amount				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2022	**3,444**	**96**	**224**	**-**	**3,764**
New off balance sheet items originated or purchased	2,841	24	35	-	**2,900**
Off balance sheet items repaid / matured	(1,744)	(81)	(49)	-	**(1,874)**
Off balance sheet items derecognized (excluding write offs)	(1)	-	-	-	**(1)**
Transferred from Stage 1 to Stage 2	(103)	103	-	-	**-**
Transferred from Stage 1 to Stage 3	(3)	-	3	-	**-**
Transferred from Stage 2 to Stage 1	116	(116)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	(3)	3	-	**-**
Transferred from Stage 3 to Stage 2	-	14	(14)	-	**-**
Gross carrying amount as at 31/12/2022	**4,550**	**37**	**202**	**-**	**4,789**

Group	Financial guarantees - Movement in ECL allowance				
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2023	**6**	**1**	**80**	**-**	**87**
Transferred from Stage 1 to Stage 2	-	-	-	-	**-**
Transferred from Stage 2 to Stage 1	-	-		-	**-**
Transferred from Stage 3 to Stage 2	-	-	-	-	**-**
ECL Impairment charge/ (release) for the year (P&L)	-	-	(10)	-	**(11)**
ECL allowance as at 31/12/2023	**6**	**1**	**69**	**-**	**76**

Group	Financial guarantees - Movement in ECL allowance				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
ECL allowance as at 1/1/2022	**12**	**1**	**77**	**-**	**90**
Transferred from Stage 2 to Stage 1	1	(1)		-	**-**
Transferred from Stage 3 to Stage 2	-	4	(4)	-	**-**
ECL Impairment charge/ (release) for the year (P&L)	(6)	(5)	7	-	**(4)**
ECL allowance as at 31/12/2022	**6**	**1**	**80**	**-**	**87**

Group	Letter of credit - Internal rating grade						
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	71	-	-	-	71	-	71
Recommended	50	-	-	-	50	1	50
Total	**121**	**-**	**-**	**-**	**121**	**1**	**120**

Group	Letter of credit - Internal rating grade						
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	112	-	-	-	112	1	112
Recommended	2	-	-	-	2	-	2
Total	**114**	**-**	**-**	**-**	**114**	**1**	**113**

Group	Letters of credit - Movement in nominal amount				
31/12/2023	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Gross carrying amount as at 1/1/2023	**114**	**-**	**-**	**-**	**114**
New off balance sheet items originated or purchased	140	-	-	-	**140**
Off balance sheet items repaid/ matured	(131)	(1)	-	-	**(132)**
Transferred from Stage 1 to Stage 2	(1)	1	**-**	**-**	**-**
Gross carrying amount as at 31/12/2023	**121**	**-**	**-**	**-**	**121**

Group	Letters of credit - Movement in nominal amount				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Gross carrying amount as at 1/1/2022	**41**	**1**	**1**	**-**	**42**
New off balance sheet items originated or purchased	228	-	-	-	**228**
Off balance sheet items repaid/ matured	(155)	(1)	(1)	-	**(156)**
Gross carrying amount as at 31/12/2022	**114**	**-**	**-**	**-**	**114**

Group	Irrevocable Undrawn Credit Commitments - Internal rating grade						
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	1,827	-	-	-	1,827	3	1,824
Recommended	93	-	-	-	93	-	93
Substandard	-	34	-	6	40	2	39
Total	**1,920**	**34**	**-**	**6**	1,961	**5**	**1,956**

Group	Irrevocable Undrawn Credit Commitments - Internal rating grade						
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	1,430	-	-	-	**1,430**	2	1,428
Recommended	106	-	-	-	**106**	1	105
Substandard	-	78	-	6	**85**	2	83
Default	-	-	3	-	**3**	-	3
Total	**1,536**	**78**	**3**	**6**	**1,624**	**5**	**1,619**

Group	Irrevocable Undrawn Credit Commitments - Movement in ECL allowances				
31/12/2023	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2023	**4**	**2**	**(1)**	**-**	5
Transferred from Stage 2 to Stage 1	2	(2)	-	-	-
ECL Impairment charge/ (release) for the year (P&L)	(1)	1	-	-	-
ECL allowance as at 31/12/2023	**4**	**2**	**(1)**	**-**	5

Group	Irrevocable Undrawn Credit Commitments - Movement in ECL allowances				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2022	8	4	-	-	**12**
Transferred from Stage 1 to Stage 2	(1)	1	-	-	-
Transferred from Stage 2 to Stage 1	5	(5)	-	-	-
ECL Impairment charge/ (release) for the year (P&L)	(8)	2	(1)	-	**(7)**
ECL allowance as at 31/12/2022	**4**	**2**	**(1)**	**-**	**5**

41.4 Assets pledged

	Group	
	31/12/2023	31/12/2022
Due from banks (as reclassified)	825	1,084
Financial assets at FVTPL	1	55
Loans and advances to customers measured at amortised cost	6,498	7,055
Financial assets at FVTOCI	2	-
Debt securities measured at amortised cost	3	41
	7,330	**8,236**

The aforementioned financial assets are mainly pledged either for drawing liquidity from the Eurosystem, under the general terms applying to such agreements, or for margins in regards with a) derivative transactions engaged under ISDA master netting agreements and CSA contracts and b) repurchase transactions covered by GMRA contracts.

In the context of interbank repurchase agreement (repo) transactions, securities with a total nominal value of € 515 million (31 December 2022: € 389 million) are used for liquidity purposes. The said amount includes GGBs of total nominal value € 71 million (31 December 2022: € 162 million).

In addition to the above, as at 31 December 2023 and 2022 the Bank had pledged an amount of € 168 million, with respect to written guarantee for the non-payment risk of the Greek State, included within balance sheet line item “Due from banks”.

The Bank’s minimum reserve requirement, concerning the average funds held in its current accounts with BoG over the current maintenance period, stands at € 585 million.

There are no pledged assets for the Company.

42 Share capital and share premium

	Number of shares		
	Company		Group
	Issued shares	Treasury shares	Net number of shares
Opening balance at 1/1/2022	**1,250,367,223**	**(1,256,654)**	**1,249,110,569**
Purchases of treasury shares	-	(20,275,861)	(20,275,861)
Sales of treasury shares	-	21,272,717	21,272,717
Balance at 31/12/2022	**1,250,367,223**	**(259,798)**	**1,250,107,425**
Opening balance at 1/1/2023	**1,250,367,223**	**(259,798)**	**1,250,107,425**
Purchases of treasury shares	-	(32,141,238)	(32,141,238)
Sales of treasury shares	-	27,156,011	27,156,011
Balance at 31/12/2023	**1,250,367,223**	**(5,245,025)**	**1,245,122,198**

The Company's share capital as at 31 December 2023 and 2022 amounted to € 1,163 million, divided into 1,250,367,223 common registered shares, with a nominal value of € 0.93 each.

On 27 June 2023, the AGM approved a share buyback programme for the acquisition of up to 20,000,000 own common shares of the Company in a price range between € 0.75 (minimum price) to € 5.00 (maximum price) per share, provided that at the time of acquisition, the conditions set out in the legislative and regulatory framework are met. As at 30 September 2023 after having first obtained the required regulatory approvals, the Company acquired 5,283,004 treasury shares with a total cost of € 15 million.

On 1 December 2023, the Company distributed 1,307,585 of its own common shares for free under the Free Distribution of Shares. These shares, valued at € 4 million, were provided to 137 beneficiaries through OTC transactions as part of the Group's variable remuneration schemes. The valuation was based on the share's closing price of € 3.226 on 1 December 2023. Refer to Note 12.

After the aforementioned transactions, the Company owned a total of 3,975,419 of its own shares, corresponding to a percentage of 0.32% of its total shares.

Apart from the above, the remaining purchases and sales of treasury shares that occurred during the current year and in 2022, as well as the treasury shares owned as at 31 December 2023 and 2022, relate to transactions executed by the Group's subsidiary Piraeus Securities S.A. in the context of its market making operations. As at 31 December 2023, Piraeus Securities S.A. held 1,269,606 of the Group's common shares.

The AGM also approved the offsetting of an amount of € 301 million in the Company's "share premium" account by writing-off an equivalent amount of accumulated losses carried forward, for which the required regulatory approval was provided on 21 July 2023.

43 Other reserves and retained earnings

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Legal reserve	88	85	69	69
Reserve from financial assets measured at FVTOCI	40	38	-	-
Currency translation reserve	(64)	(63)	-	-
Cash flow hedge reserve	2	-	-	-
Property revaluation reserve	9	7	-	-
Other reserves	40	33	27	27
Non-taxed reserves	411	351	351	351
Total other reserves	**525**	**451**	**447**	**447**
Retained earnings	**1,771**	**784**	**50**	**(301)**
Other reserves and retained earnings	**2,296**	**1,235**	**497**	**147**

The table below illustrates the movement of the reserve from financial assets measured at FVTOCI. The movement of other reserves and retained earnings is provided in the Statement of Changes in Equity.

	Group	
	31/12/2023	31/12/2022
Opening balance	**38**	**144**
Gains / (losses) from the valuation of debt securities	33	(50)
Gains from the valuation of equity securities	4	31
ECL on debt securities	-	(13)
Recycling of valuation adjustments and accumulated impairments upon disposal	(36)	(110)
Deferred taxation	-	36
Closing balance	**40**	**38**

44 Dividend per share

The Company and the Group have adopted and follow a discretionary distribution policy, wherein the BoD assesses various factors, including the Company's and the Group's financial performance, liquidity position, capital position and future capital requirements, and Group's Business Plan in order to determine the type and amount of dividends to be distributed. For the year ended 31 December 2023, as the provisions of article 159 of the Greek Law 4548/2018 (Reform of the Law of Sociétés Anonymes) are met, the Company's BoD will recommend to the AGM the distribution of dividend up to the amount of € 79 million in cash (or/and with other distribution forms e.g. treasury shares buy buck), subject to approval by the AGM in 2024. The proposed dividend represents 10% of the Group's profit attributable to the equity holders of the Company for the year ended 31 December 2023. Moreover, the Company is required to obtain ECB's approval prior to making any dividend distribution to its shareholders.

45 Cash and cash equivalents

For the Cash Flow Statement, "Cash and Cash Equivalents" comprise the following outstanding balances as at 31 December 2023 and 2022 with a maturity of three months or less from their initial recognition date.

	Group		Company	
	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Cash and balances with Central Banks (excluding mandatory reserves)	9,967	9,080	-	-
Due from banks	208	290	34	45
Financial assets at FVTPL	38	3	-	-
Financial assets at FVTOCI	29	28	-	-
	10,242	**9,401**	**34**	**45**

46 Related party disclosures

Related parties of the Group and the Company include:

a) Key Management Personnel";

b) Close family members of Key Management Personnel;

c) Entities having transactions with the Company, that are controlled or jointly controlled by Key Management Personnel and their close family members;

d) the Company's subsidiaries;

e) the Company's associates and their subsidiaries;

f) the Company's joint ventures and their subsidiaries; and

g) HFSF, which holds ordinary shares in the share capital of the Company and benefits from the special rights stated in article 10 of Law 3864/2010, as amended and in force.

Loans and advances granted to related parties, as well as letters of guarantee issued in favor of related parties, were executed in accordance with the Group's approved credit policies and procedures in terms of interest rates, collaterals and non-payment risk.

46.1 Key Management Personnel and other related parties

The tables below present the Group's and Company's transactions with Key Management Personnel and the related parties referred to in points (b) and (c) above, including the HFSF. No transactions occurred with the HFSF during the years ended 31 December 2023 and 2022.

Group	31/12/2023		31/12/2022	
(amounts in thousand €)	Key Management Personnel	Other related parties	Key Management Personnel	Other related parties
Loans and advances to customers at amortised cost (Gross carrying amount)	3,981	414	3,394	407
Due to customers	2,800	1,176	4,587	2,018

Group	1/1 - 31/12/2023		1/1 - 31/12/2022	
(amounts in thousand €)	Key Management Personnel	Other related parties	Key management personnel	Other related parties
Income	115	58	58	36
Expense	36	3	104	-

The Company has no transactions with Key Management Personnel and other related parties during the years ended 31 December 2023 and 2022.

Key Management Personnel benefits	Group		Company	
(amounts in thousand €)	1/1 - 31/12/2023	1/1 - 31/12/2022	1/1 - 31/12/2023	1/1 - 31/12/2022
Short-term benefits	9,440	7,917	1,173	553
Contributions to the Institution for Occupational Retirement, Life and Medical Provision	100	83	13	3
Post-employment benefits	118	92	6	4
Share based payments	1,171	-	57	-

Short-term benefits of Key Management Personnel include wages, salaries, employer's share of social contributions and other charges, while "Post-employment benefits" include the cost of post-employment benefit programs.

The total provision established for post-employment benefits to Key Management Personnel as at 31 December 2023 and 2022 amounted to € 1 million, and is recognised in line item "Retirement and termination benefit obligations" in the Statement of Financial Position.

The ECL allowance on loans and advances to customers at amortised cost granted from the Group to Key Management Personnel and other related parties as at 31 December 2023 and 2022 amounted to less than € 0.1 million.

As at 31 December 2023 Key Management Personnel and other related parties held 747 thousand ordinary shares of the Company, compared to 247 thousand as at 31 December 2022 following the Free Distribution of Own Shares. Refer to Note 12.

46.2 Subsidiaries

The Company's related party transactions with subsidiaries are presented below:

(amounts in million €)	Company	
	31/12/2023	31/12/2022
Assets		
Due from banks	34	45
Debt securities at amortised cost (Gross carrying amount)	855	819
Other assets	1	1
Total	**890**	**865**
Liabilities		
Other liabilities	52	47
Total	**52**	**47**

(amounts in million €)	Company	
	1/1 - 31/12/2023	1/1 - 31/12/2022
Income		
Interest and similar income	103	99
Fee and commission income	-	-
Dividend income	53	53
Net other income / (expenses)	(1)	(1)
Total	**155**	**150**
Expenses		
Interest expense and similar charges	-	-
Fee and commission expense	(30)	(25)
Operating expenses	(1)	(1)
Total	**(31)**	**(26)**

The carrying amount of the Company's debt securities measured at amortised cost, regarding the fully subscribed Back-to-Back Tier 2 Notes issued by the Bank, amounted to € 848 million as at 31 December 2023 (31 December 2022: € 796 million). This amount includes an ECL allowance of € 7 million (31 December 2022: € 23 million). During the current year there was an ECL release of € 16 million (31 December 2022: release of € 6 million). Line item "Interest and similar income" refers to interest income from the fully subscribed Back-to-Back Tier 2 notes.

Line item "Other Liabilities" as at 31 December 2023 and 2022 includes an amount of € 1 million, which relates to lease liabilities of the Company's subsidiaries.

Line item "Dividend income" refers to interest income from the internal AT 1 capital instrument issued by the Bank and fully subscribed by the Company.

46.3 Associates

The Group's and Company's related party transactions with associates are presented below:

(amounts in million €)	Group	
	31/12/2023	31/12/2022
Loans and advances to customers at amortised cost (Gross carrying amount)	46	433
Other assets	7	3
Due to customers	187	254
Other liabilities	6	16

(amounts in million €)	Group	
	1/1 - 31/12/2023	1/1 - 31/12/2022
Total expense and capital expenditure	(88)	(106)
Dividends, interest income and other income	35	48

As of 31 December 2023 the Company has no transactions with associates, while the Company's transactions with associates as of 31 December 2022 were immaterial.

The ECL allowance on loans and advances to customers at amortised cost granted from the Group and the Company to their associates as at 31 December 2023 amounted to € 3 million and nil, respectively (31 December 2022: € 75 million for the Group and nil for the Company). The ECL charge on loans and advances to customers at amortised cost for the year ended 31 December 2023 amounted to € 7 million for the Group and nil for the Company (31 December 2022: € 46 million for the Group and nil for the Company).

As at 31 December 2023, the letters of guarantee issued in favor of associates amounted to € 8 million for the Group and nil for the Company (31 December 2022: € 14 million for the Group and nil for the Company).

Line item "Dividends, interest income and other income" includes dividend income received from associates amounting to € 18 million for the Group and nil for the Company, for the year 2023 (31 December 2022: € 5 million for the Group and nil for the Company).

During the year ended 31 December 2023, the Group contributed to Strix Holdings LP and Strix Holdings II LP certain equity investments and cash. The cash contributed amounted to a total amount of € 50 million and € 18 million, respectively, in exchange for additional limited partnership interests. Refer also to Note 47.B.

As at 31 December 2023, the Group and the Company have not undertaken commitments to associates (31 December 2022: € 110 million for the Group and nil for the Company).

46.4 Joint ventures

The Group's related party transactions with joint ventures are presented below:

(amounts in million €)	Group	
	31/12/2023	31/12/2022
Loans and advances to customers at amortised cost (Gross carrying amount)	55	54
Other assets	-	-
Due to customers	6	-

(amounts in million €)	Group	
	1/1 - 31/12/2023	1/1 - 31/12/2022
Total income	1	1

As of 31 December 2023 and 2022, the Company has no transactions with joint ventures.

The ECL allowance on loans and advances to customers at amortised cost granted from the Group and the Company to joint ventures as at 31 December 2023 amounted to € 40 million and nil, respectively (31 December 2022: € 40 million for the Group and nil for the Company).

Letters of guarantee to joint ventures as at 31 December 2023 amounted to € 20 million (31 December 2022: nil).

47 Changes in the portfolio of consolidated companies

The changes in the Group's subsidiaries, associates and joint ventures that occurred in the year ended 31 December 2023, in excess of € 10 million, are set out below:

a) Changes in subsidiaries

In the first quarter of 2023, the Bank fully covered the share capital of its subsidiary, Novus Symmetoches Single Member S.A. ("Novus"), through cash and contribution in kind, for a total amount of € 47 million. In the context of the rehabilitation agreement of the Greek Sugar Industry, the said subsidiary acquired in the current reporting period a wholly owned shareholding in companies Fabrika Secera Sajkaska Doo and Crvenka Fabrika Secera Doo for € 17 million and € 28 million, respectively. Novus and the aforementioned equity participations were accounted for as subsidiaries under the full consolidation method until September 2023, when the Group lost control over Novus, following its contribution to Strix Holdings II LP, upon approval of the Serbian Commission for Protection of Competition.

Similarly, in November 2023, the Group lost control over its subsidiaries Aleva Single Member S.A., Arpis Single Member S.A. and Achaia Clauss Estate S.A., following contribution of its participation in the aforementioned equity holdings to Strix Holdings II LP. Concerning Achaia Clauss Estate S.A., there was a prior share capital increase, consisting mainly of the capitalization of a loan from the Bank of € 70 million, which led to an increase in the Bank's shareholding to 99.41%.

In December 2023, under the said rehabilitation agreement, the Bank established Sirrus Single Member S.A. and fully covered its share capital through cash and contribution in kind, for a total amount of € 11 million.

During 2023, the Bank fully subscribed in the share capital increase of its subsidiaries Varna Asset Management EOOD (31 January 2023) and Bulfina E.A.D. (24 March 2023), through in-kind contribution for an amount of € 30 million and € 86 million, respectively. Both companies were accounted for as subsidiaries under the full consolidation method until June 2023, when the Group lost control over the entities, along with the subsidiaries of the Bulfina E.A.D. group, namely Asset Management Bulgaria EOOD, Besticar Bulgaria EOOD, Besticar EOOD, Beta Asset Management EOOD, Bulfinace E.A.D., Delta Asset Management EOOD, Piraeus Nedvizhimi Imoti EOOD and Ekaterina Project EOOD, following their contribution to Strix Holdings II LP.

On 23 February 2023, Trastor Real Estate Investment Company's ("Trastor") BoD resolved the issuance of a mandatorily convertible bond, for a total amount of up to € 55 million. The bond will be subscribed in its entirety by the Bank. Up to the reporting date, an amount of € 44 million had been issued. The bond meets the definition of an equity instrument under IAS 32 and was classified as such in Trastor's balance sheet. The Bank increased the cost of its investment in Trastor by an equal amount. The said issuance has no effect at Group level.

On 15 December 2023, Trastor acquired a 100% shareholding in Kynouria Ktimatiki Single Member S.A. for a consideration of € 20 million, which subsequently became a subsidiary of the Group.

Since 13 April 2023, MIG is accounted for as a subsidiary under the full consolidation method, hence, MIG's subsidiaries, namely MIG Leisure Ltd, MIG Real Estate (Serbia) B.V., JSC Robne Kuce Beograd (RKB), Athenian Investments S.A. Holdings, MIG Aviation Holdings Ltd, Tower Technology Holdings (Overseas) Ltd and MIG Media Advertising Services S.A. also became subsidiaries of the Bank. With regards to the changes in the Bank's shareholding in MIG that occurred throughout the reporting period, please refer to Note 25A for a detailed recount.

Additionally, within 2023, JSC Robne Kuce Beograd ("RKB") capitalized part of its debt liability due to its parent company, MIG, of € 150 million.

The Company covered an amount of € 11 million in the share capital increase of its subsidiary Snappi S.A., totaling € 13 million, thus increasing its shareholding to 69.27%.

b) Changes in associates and joint ventures

In June 2023, the Bank lost its significant influence on associate APE Fixed Assets Real Estate Tourist and Development S.A., following the participation's contribution to Strix Holdings II LP. Additionally during June 2023, Intrum Hellas Credit Servicing S.A. executed a share capital decrease of € 155 million, of which an amount of € 31 million was distributed to the Bank. Following the said capital return, the Bank decreased its cost of investment in Intrum Hellas Credit Servicing S.A. by an equal amount.

As a result of the merger through absorption of the Bank's associate ANEK Lines S.A. by Attica Holdings S.A., the latter issued new ordinary shares, which began trading in the Athens Stock Exchange on 8 December 2023. The Bank's participation in Attica Holdings S.A. is classified in the portfolio measured at FVTOCI.

In December 2023, the Bank derecognised its equity investment in IDEAL Holdings, which was measured at FVTOCI and carried at € 15 million, as it was contributed to Strix Holdings LP. Refer to Note 24 for further details.

c) Liquidations, disposals and merges

Refer to the following table for the Group's liquidations, disposals, and merges during the year ended 31 December 2023:

Entity	Group Participation	Event
Exodus S.A.	Associate	Liquidation (initiated)
Praxis I Finance PLC (SPV)	Subsidiary	Dissolution
Tower Technology Holdings (Overseas) Ltd	Subsidiary	Liquidation (completed)
Geniki Single Member S.A. Financial & Consulting Services	Subsidiary	Liquidation (completed)
Piraeus Electronic Loan Documentation Single Member S.A.	Subsidiary	Disposal
Neoris Single Member S.A.	Subsidiary	Disposal
MIG Real Estate (Serbia) B.V.	Subsidiary	Liquidation (completed)
Sunshine Leases Single Member S.A.	Subsidiary	Disposal
Tirana Leasing Sh.A	Subsidiary	Liquidation (completed)
Piraeus Direct Solutions Single Member S.A	Subsidiary	Disposal
Thesis Agra Single Member S.A.	Subsidiary	Liquidation (initiated)
Thesis Hermes Single Member S.A.	Subsidiary	Liquidation (initiated)
Thesis Schisto Single Member S.A.	Subsidiary	Liquidation (initiated)
Thesis Stone Single Member S.A.	Subsidiary	Liquidation (initiated)

Additionally, during the year ended 31 December 2023, Piraeus Nedvizhimi Imoti EOOD, 100% subsidiary of the Group, disposed of its total participation in its subsidiaries, namely Emerald Investments EOOD and Botstile EOOD, while Trastor absorbed its wholly owned subsidiary company, Pileas Real Estate - Commercial S.A.

48 Independent Auditors' fees

On 27 June 2023, the Ordinary GM of the Shareholders appointed Deloitte Certified Public Accountant S.A. as the principal independent public accountant for the year ended 31 December 2023. The following table presents the aggregated fees for professional statutory audit fees, tax compliance report fees, other audit related fees and other non-audit related fees for the years 2023 and 2022, by the Group's principal accounting firm Deloitte (a member firm of the Deloitte Network), other member firms of the Deloitte Network and their respective affiliates (collectively, "Deloitte").

	Group		Company	
(amounts in thousand €)	31/12/2023	31/12/2022	31/12/2023	31/12/2022
Statutory audit fees	2,358	2,482	210	205
Other audit related fees (Including tax compliance reports fees)	868	1,071	366	505
Other non-audit related fees	174	272	56	91
Total	**3,400**	**3,825**	**632**	**801**

49 Reclassification of comparatives

The reclassifications reflected in the Statement of Financial Position and Statement of Changes in Equity are presented

below.

Statement of Financial Position

During the current period, the Group amended the presentation of derivative financial instruments and their corresponding accruals in the Statement of Financial Position. Previously, the Bank did not offset derivative assets and liabilities entered into with a central counterparty clearing member against the margin collateral posted or received. However, in the context of the Annual Financial Statements and in line with industry practice, the Group revisited its judgment relating to the enforceability of the respective clearing agreements and concluded that the IAS 32 offsetting criteria were met. Additionally, the Group used to present the carrying amount of derivatives net of accrued interest, which was previously included within the “other assets” and “other liabilities” line items. In the current period the Group presents the carrying amount of derivatives on a gross basis, with accrued interest receivable and payable netted off at deal level and classified within derivative assets or derivative liabilities based on the classification of each derivative. As at 31 December 2023 and 2022 the Company did not hold any ISDA contracts or similar master netting agreements.

Further, the Group and the Company changed the presentation of financial assets measured at FVTOCI and debt securities at amortised cost by combining them now into a single line item “Investment securities”.

Consequently, the Group’s and the Company’s Statement of Financial Position as of 31 December 2022 was reclassified as follows, in order to conform to current year presentation.

€ Million	Group				
	31/12/2022 Reclassifications				
	As published	Derivatives and margin collateral offsetting	Accrued interest of derivatives	Invesment securities	As reclassified
ASSETS					
Due from banks	750	665			1,415
Derivative financial instruments	1,830	(1,651)	41		220
Investment securities	-			11,741	11,741
Financial assets measured at FVTOCI	897			(897)	-
Debt securities at amortised cost	10,844			(10,844)	-
Other assets	3,427		(70)		3,357
TOTAL ASSETS	**75,661**	**(986)**	**(29)**	**-**	**74,645**
LIABILITIES					
Due to banks	6,922	(737)		-	6,185
Derivative financial instruments	656	(249)	4	-	410
Other liabilities	1,147		(33)	-	1,113
TOTAL LIABILITIES	**69,080**	**(986)**	**(29)**	**-**	**68,064**
TOTAL EQUITY	**6,581**	**-**	**-**		**6,581**
TOTAL LIABILITIES AND EQUITY	**75,661**	**(986)**	**(29)**	**-**	**74,645**

€ Million	Company		
	31/12/2022 Reclassifications		
	As published	Investment securities	As reclassified
ASSETS			
Investment securities	-	798	798
Financial assets measured at FVTOCI	2	(2)	-
Debt securities at amortised cost	796	(796)	-
TOTAL ASSETS	**798**	**-**	**798**

Statement of Changes in Equity

€ Million	Group								
	Non- taxed reserves	Retained earnings	Total	Non- taxed reserves	Retained earnings	Total	Non- taxed reserves	Retained earnings	Total
	As published			Reclassifications			As reclassified		
Opening balance as at 1/1/2022	**351**	**(14,669)**	**5,787**	**37**	**(37)**	**-**	**388**	**(14,706)**	**5,787**
Balance as at 31/12/2022	**351**	**784**	**6,553**	**37**	**(37)**	**-**	**388**	**747**	**6,553**

The Bank changed the presentation of certain types of reserves, after taking into account their nature and purpose in accordance with the applicable legal and tax framework in Greece. In particular, reserves of € 37 million, which were formed prior to 2022, and relate mainly to dividends and gains from the sale of participations, formerly classified under retained earnings, are now presented as “Non-taxed reserves”. Comparative information has been reclassified to ensure consistency

with the aforementioned changes in presentation of non- taxed reserves and retained earnings. The Company did not have any corresponding reclassifications for the year 2022.

50 Disclosures of Greek Law 4261/5.5.2014

According to article 81 of Greek Law 4261/2014, which incorporates into the Greek legislation article 89 of EU Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013, according to which, it is adopted for the first time the obligation for the Group to disclose information, on a consolidated basis, for each country in which it operates.

Disclosed information includes: name of the subsidiary, nature of business, geographical location, turnover, number of employees on a FTE basis, profit or loss before tax, tax on profit or loss and public subsidies. Turnover, profit or loss before tax, as well as tax on profit or loss are prepared on the same basis as the relevant figures reported in the financial statements for the years ended 31 December 2023 and 2022, which are prepared in accordance with IFRS as issued by the IASB and endorsed by the EU.

Neither the Company nor the Group's subsidiaries have received any public subsidies during the year ended 31 December 2023. Information presented above is analyzed in the following tables:

A) Country specific information

Country	31/12/2023			
	Total net income[3]	Profit / (loss) before tax	Income tax benefit / (expense)	Number of staff
Greece[1]	2,583	1,076	(288)	7,724
Romania	(1)	(3)	-	4
Bulgaria	(1)	(2)	-	-
Egypt	-	-	-	1
Cyprus	1	-	-	4
Serbia	11	6	(2)	45
Albania	-	-	-	1
Ukraine	14	4	(2)	308
Other countries[2]	-	(3)	-	-
Group	**2,607**	**1,078**	**(292)**	**8,087**

(1) The amounts reported include the operations of the Bank's branches operating in foreign countries and SPVs incorporated in the U.K and Ireland.

(2) Other countries include British Virgin Islands, Ireland and Netherlands.

(3) Total net income includes net interest income, net fee and commission income, income from non-banking activities, dividend income, net gains/ (losses) from financial instruments measured at FVTPL, net gains/ (losses) from financial instruments measured at FVTOCI, net gains/ (losses) from derecognition of financial instruments measured at amortised cost, net gains/ (losses) from loss of control over subsidiaries/ disposal of associates and joint ventures and net other income/ (expenses).

Country	31/12/2022			
	Total net income[3]	Profit/ (loss) before tax	Income tax benefit/ (expense)	Number of staff
Greece[1]	2,651	1,081	(139)	8,338
Romania	-	-	-	4
Bulgaria	2	(5)	-	8
Egypt	-	-	-	1
Cyprus	(2)	(3)	-	4
Serbia	2	3	-	5
Albania	-	-	-	2
Ukraine	14	(3)	-	293
Other countries[2]	(1)	15	-	3
Group[4]	**2,666**	**1,087**	**(139)**	**8,658**

(1) The amounts reported include the operations of the Bank's branches operating in foreign countries and SPVs incorporated in the U.K and Ireland.

(2) Other countries include U.K., British Virgin Islands and Ireland.

(3) Total net income includes net interest income, net fee and commission income, income from non-banking activities, dividend income, net gains/ (losses) from financial instruments measured at FVTPL, net gains/ (losses) from financial instruments measured at FVTOCI, net gains/ (losses) from derecognition of financial instruments measured at amortised cost, net gains/ (losses) from loss of control over subsidiaries/ disposal of associates and joint ventures and net other income/ (expenses).

(4) The amounts reported include both continuing and discontinued operations.

B) Group's subsidiaries based on the nature of their business and their geographical location

The Group's subsidiaries based on the nature of their business and their geographical location are presented in Note 25A.

Greek Law 4261/2014, article 82, which incorporated into Greek legislation the article 90 of Directive 2013/36/EU of the European Parliament and of the Council on 26 June 2013, established the requirement to disclose the total return on assets ratio. This ratio for the Company and the Group for the year ended 31 December 2023 amounted to 1.57% and 1.04%, respectively (31 December 2022: 1.60% and 1.16%, respectively).

51 Disclosures of Greek Law 4151/2013

In accordance with the provisions of article 8 par. 3 of Greek Law 4151/2013, every credit institution operating in Greece has the obligation to remit to the Greek State the outstanding cash balances, plus interest, for all dormant deposits, for which a period of 20 years has passed until the end of April of each year. In this context, on 24 April 2023, the Bank remitted to the Greek State the amount of € 10,461,366.26.

52 Events Subsequent to the End of the Reporting Period

- On 10 January 2024, the Company issued € 500 million Subordinated Tier 2 Bond (hereinafter also called the "Bond") with a coupon of 7.250%. The Bond has a maturity of 10.25 years and an embedded issuer call option between year 5 and 5.25, with settlement taking place on 17 January 2024. The Bond was listed on the Luxembourg Stock Exchange's Euro MTF market and was rated B1 / B by Moody's and Fitch, respectively. In conjunction with the new issuance, the Company announced a cash tender offer on its 9.750% Non-Call June 2024 Subordinated Tier 2 notes. In aggregate, the principal amount of the notes that were validly tendered pursuant to the offer stood at € 294 million. The funds raised through the new issue have been used by the Bank for financing the tender offer and for solidifying its capital position.

- After the reporting period and up to the date of authorization for issuance of these annual financial statements, the Bank engaged in additional receiver swaps, for hedging part of its NMDs for changes in market interest rates, with a notional amount of € 3 billion. Hence, the total nominal value of NMDs currently hedged by the Group is € 10 billion.

Athens, 27 February 2024

CHAIRMAN OF THE BOARD OF DIRECTORS	MANAGING DIRECTOR	GROUP CHIEF FINANCIAL OFFICER	DEPUTY CHIEF FINANCIAL OFFICER
GEORGE P. HANDJINICOLAOU ID No X 501829	CHRISTOS I. MEGALOU ID No AE 011012	THEODOROS CH. GNARDELLIS ID No AI 662109	GEORGE TH. MARINOPOULOS ID No AP 154589 License No Class A 0137758

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