Annual Financial Report

31 December 2022

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.

PIRAEUS BANK

INDEX

BOARD OF DIRECTORS’ ANNUAL REPORT

Global Economic Environment and Key Developments

The year 2022 was characterized by new and significant challenges for the global economy. While economic activity gradually returned to its pre-pandemic level, favored by the lifting of restrictive measures for Covid-19 in most countries, Russia's invasion of Ukraine and the rise of inflation to a level that the Western world has not faced since the late 1970s created a completely new economic environment, with increased risks and uncertainty.

Particularly in Europe, the impact of the war was not limited to an unprecedented rise in energy prices, but also highlighted the risk of insufficient quantities of natural gas during the winter of 2022-23.

To cope with the significantly higher cost of living, the majority of countries in the Western world implemented measures to support the most vulnerable, especially households, maintaining their expansionary fiscal policy and preventing a large drop in consumer demand. At the same time, in order to tame the very high and persistent inflation, central banks proceeded with a rapid tightening of their monetary policies.

In 2022, the global economy grew at a rate of approximately 3.2% (2021: 6.0%), while for 2023, the International Monetary Fund (“IMF”) estimates a slowdown of 2.7%. At the same time, a significant de-escalation of inflation is expected, although it will remain much higher than desired.

In the US, the economic activity growth rate in 2022 is estimated to be 1.6% (2021: 5.7%), while for 2023, it is predicted to be 1.0%. At the same time, inflation rose to 8.1% (2021: 4.7%) and is expected to moderate to 3.5% in 2023, according to IMF forecasts. The Fed increased its monetary policy interest rate by a total of 4.25% in 2022 (from a range of 0.00%-0.25% to a range of 4.25%-4.50%), while according to the estimates of its members, further increases of 75 basis points (“bps”) in total are likely in 2023. At the same time, following the end of the quantitative easing program last March, the Fed started to gradually reducing its balance sheet.

In the Eurozone, based on the IMF's estimates, the 2022 growth rate decelerated to 3.1% (2021: 5.2%), while for 2023 it is estimated that it will further moderate to 0.5%. At the same time, a significant de-escalation of inflation is expected, specifically from 8.3% in 2022 to 5.7% in 2023. In 2022, the European Central Bank (“ECB”) proceeded with the completion of its quantitative easing programs (Pandemic Emergency Purchase Program, “PEPP” and Asset Purchase Program, “APP”) and the successive increase of its key interest rates by a total of 2.50%. The ECB continued interest rate hikes in early 2023 with another 50 bps increase in February 2023 and is expected to begin gradually reducing its balance sheet. However, it will continue applying flexibility in reinvesting redemptions coming due in the PEPP portfolio and will reinvest the principal payments from maturing securities purchased under the program until at least the end of 2024.

In China, the zero-tolerance Covid-19 policy significantly affected economic activity, limiting the 2022 growth rate to 3.2% (2021: 8.1%), according to estimates from the IMF. It is estimated that the 2023 growth rate will be 4.4%, positively affected by the more moderate pandemic policy announced in December 2022. Inflation is expected to remain at 2.2%. Therefore, China's central bank is expected to maintain its accommodative monetary policy stance.

(annual % change)	Real Gross Domestic Product ("Real GDP")			Inflation		
	2021	2022*	2023*	2021	2022*	2023*
World	6.0	3.2	2.7	4.7	8.8	6.5
US	5.7	1.6	1.0	4.7	8.1	3.5
Eurozone	5.2	3.1	0.5	2.6	8.3	5.7
China	8.1	3.2	4.4	0.9	2.2	2.2

*Estimate
Sources: Piraeus Bank Research, IMF (2022): "World Economic Outlook", October, p. 9, 42-44.

Developments in the Greek Economy in 2022, Prospects and Risks for 2023

Despite rising inflationary pressures and the strong uncertainty linked to the geopolitical developments and the energy crisis, the Greek economy grew at a solid pace in 2022. Real GDP in 2022 increased by 5.9% on an annual basis - largely driven by the positive contribution of the private consumption and investments – while the nominal GDP growth rate reached double digits at 14.5%. During the same period the unemployment rate declined further to 12.4%, down by 2.3 percentage points compared to the same period a year ago, while employment growth rate reached on average 5.4% on an annual basis. However, strong inflationary pressures were a key feature of 2022, both in the global markets and in Greece. In 2022, the headline national inflation (Consumer Price Index/ "CPI") reached 9.6% and the harmonized inflation ("HICP") reached 9.3%. The Greek government in order to battle the effects of inflation and support the real economy, undertook a series of fiscal interventions during the course of 2022. These took the form of subsidies of electricity consumption of households and businesses, increase of the heat allowance and extension of the eligible population, subsidies to the gas prices, and other tax cuts and subsidies for the low pensioners and weak households

Enhanced surveillance of Greece ended on 20 August 2022 and the first post-program surveillance ("PPS") report was released on 22 November 2022. For 2023, both the European Commission ("EC") and the Ministry of Finance expect that inflationary pressures will remain strong - albeit less intense - and that the real GDP growth rate will decelerate. However, the EC estimates that the growth rate will rebound to 2.2% in 2024.

	Ministry of Finance [1]	EC [2]	
	2023	2023	2024
Real GDP growth rate (%)	1.8	1.2	2.2
Inflation (HICP, %)	5.0	4.5	2.4

1. Ministry of Finance, 2023 Budget introductory report, November 2022
2. Real GDP growth rate & Inflation (HICP, %) as per EC, European Economic Forecast, Winter 2023 Institutional paper 194, February 2023

Based on the 2023 Budget introductory report the headline general government deficit (European System of Accounts, "ESA" definition) will narrow from 7.5% of GDP in 2021 to 4.1% of GDP in 2022, which corresponds to a primary deficit of 1.6% of GDP in 2022. The headline deficit is expected to decrease further to 2.0% of GDP in 2023, bringing the primary balance to a surplus of 0.7% of GDP. The general government debt to GDP ratio is expected to fall sharply from 194.5% of GDP in 2021 to 168.9% of GDP in 2022, and to remain on a downward trajectory (159.3% of GDP in 2023), supported by the nominal GDP growth rate and the move into a primary surplus position in 2023.

The implementation of the Recovery and Resilience Facility ("RRF") plan, both for its grant component, as well as the private-sector investments through the loan facility, is a key factor for the sustainable growth potentials. Greece stands to benefit from a total envelope of € 30.16 billion (€ 17.43 billion in grants and € 12.73 billion in loans) under the RRF, of which, € 11.1 billion has already been disbursed through the pre-financing and the first two (2) regular installments. Moreover, in the coming years Greece will receive support of approximately € 40 billion from the long-term Europen Union ("EU") budget 2021-2027.

The main risk factors affecting the developments of the Greek economy, the domestic banking sector in general and the Group in particular are related to the ongoing impacts of geopolitical challenges and Russia's war against Ukraine, the deterioration of supply and demand imbalances, the turmoil in global energy markets and the maintenance of high inflationary pressures resulting in lower purchasing power, the volatility of the supply chain and the uncertainty in markets, as well as delays in policy decisions during the Greek election period.

Specifically, for the Russia-Ukraine crisis, the Group has developed and implemented, in accordance with the Group's Compliance Policy provisions, all the necessary measures in order to address the restrictive measures imposed by specific organizations / authorities [i.e. EU, US Treasury (Office of Foreign Assets Control, "OFAC"), United Nations ("UN"), French Ministry of Economics and Finance ("MINEFI")].

Therefore, a possible slow and weak economic recovery, along with persistently high inflation, could potentially have a negative effect on the quality of the Group's loan portfolio, and subsequently to its profitability and capital adequacy. Management closely monitors the developments and assesses periodically the impact that these might have on the Group's operations and financial performance. The Group invests in business and technical controls to help prevent, detect and mitigate cyber threats. The Group's ability to detect and respond to attacks through round-the-clock security operations center capabilities help to reduce the impact of attacks.

Developments in the Greek Banking System

The Greek banking system in 2022 continued to recover, despite the challenging macroeconomic and geopolitical environment (war in Ukraine, energy crisis, high inflation rates).

The measures that ECB had taken to deal with the negative effects of the pandemic, mainly through the Targeted Longer Term Refinancing Operations ("TLTRO") facility, improved the funding and liquidity status of the system, while deposits continued rising in 2022. In December 2022, private sector deposits reached € 188.7 billion, up 4.9% year on year.

As at 21 December 2022 Greek banks repaid part of the TLTRO III funding, following the ECB's decision in its 27 October meeting, to recalibrate the 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. Following the repayment and as at 31 December 2022, total ECB funding to the Greek banking system had been reduced to € 35.4 billion compared to € 50.8 billion at the end of December 2021[1].

1 https://www.bankofgreece.gr/ekdoseis-ereyna/ekdoseis/anazhthsh-ekdosewn?types=365d253d-456e-488d-b23e-c569ad1fb3ef&mode=preview&years=2022&categories=fincancialStatements

Loans to the domestic private sector presented growth in 2022, following the clean-up of Greek banks' balance sheets and solid new loan origination on the back of an expanding economy. In December 2022, loans to the domestic private sector grew by 5.4% yoy to € 115 billion.

Going forward, credit expansion is expected to be positively affected by the funds of the Next Generation EU, the funding package during the period 2021-2026, sponsored by the EU, which targets to alleviate the impact of the Covid-19 pandemic. The Greek banking system is expected to leverage the EU funds in order to support the Greek economy and lay the ground for sustainable growth rates in the next years. The 6 domestic banking institutions that have signed agreements with the Ministry of Finance for the utilization of the € 12.7 billion loans from RRF have already started absorbing the first two (2) tranches and receiving approval for the third. Until the end of December 2022, 68 loan contracts have been signed, regarding an aggregate of € 3.22 billion of RRF eligible projects, while 291 projects have been submitted in total to "Greece 2.0", with their budget amounting to € 10.53 billion, out of which € 3.5 billion relates to banking financing.

Since mid-2020, Greek banks have increased their exposure on Greek sovereign debt, which has led to significant gains due to the normalization of Greek sovereign bond yields, on the back of the country's economic recovery. In 2022, Greek sovereign debt yields increased from historical low levels witnessed in August 2021, driven by ECB's decision to cease net asset purchases under the PEPP at the end of March 2022, along with the increased geopolitical uncertainty, inflationary pressures and tighter monetary policy from major central banks. Greek banks have, to a large extent, weathered the 2022 rise in Greek sovereign bond yields, as the majority of their Greek sovereign bond positions have been classified under amortized cost portfolios, while at the same time derivative hedges have been used extensively to protect the debt securities portfolios from rising yields.

During 2022 all systemic Greek Banks proceeded with the issuance of Senior Preferred Bonds of a total amount of approximately € 2.5 billion, as part of their strategy to increase their minimum requirements for own funds and eligible liabilities ("MREL").

As at 30 September 2022, the Non-Performing Exposures ("NPE") balance of the Greek banking system stood at € 14.6 billion[2] with the NPE ratio standing at 9.7%, compared to 15% a year ago. The main driver of NPE ratio decline has been Hellenic Asset Protection Scheme ("HAPS"), also called "Hercules" plan, which has been instrumental in assisting banks to reduce their NPEs between 2020-22, through securitizations of which the senior tranches bear Government's guarantee; HAPS expired in October 2022, which however does not pose a risk for the undergoing NPE securitizations that have already submitted applications for the Government's guarantee.

Significant developments that are expected to play key role in the Greek banks' priorities during 2023 are:

- The ECB's Governing Council decisions since the July 2022 meeting to raise interest rates cumulatively by 300 bps in total and the prospect for further hikes in the near future. This development is having positive implications on the banks' net interest income and therefore group profits, although it is expected to affect funding costs negatively;
- The deployment of the RRF funds for the financing of Greek businesses that is expected to mobilize € 60 billion in total investments in the country over the next five (5) years;
- The 2023 supervisory Stress Tests that have been launched in January 2023 with the publication of the macroeconomic scenarios. The results will be published by the end of July 2023. The 2023 EU-wide stress test uses a constrained bottom-up approach with some top-down elements. Balance sheets are assumed to be constant. The aim of the EU-wide stress test is to assess the resilience of EU banks to a common set of adverse economic developments in order to identify potential risks, inform supervisory decisions and increase market discipline;
- The establishment of the new MREL by the Single Resolution Board ("SRB"), which became effective from 1 January 2022 and

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

aims 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 Bank Group Developments

The most important corporate events for Piraeus Bank (hereinafter the "Bank") and for Piraeus Bank Group (hereinafter the "Group") during 2022 and up to the authorization date for issuance of the annual financial statements by the Board of Directors ("BoD"), were the following:

Project Dory - Agreement for the sale of shipping NPEs portfolio

On 4 January 2022, the Bank had reached an agreement with an entity affiliated with Davidson Kempner Capital Management LP, for the sale of a shipping NPE portfolio amounting to a gross book value of € 0.4 billion. On 4 March 2022, the sale was completed, and the total agreed consideration of the transaction reached € 0.2 billion, or 53% of the portfolio gross book value. The Transaction was completed after receiving all the required approvals, as well as the consent of the Hellenic Financial Stability Fund ("HFSF").

Controlling Stake in Trastor Real Estate Investment Company

On 21 January 2022, the Bank had reached an agreement with WRED LLC ("WRED"), a company affiliated with Värde Partners, for the acquisition of WRED's c. 52% stake in Trastor Real Estate Investment Company S.A. (hereinafter "Trastor"). The Transaction was completed on 28 February 2022, after receiving the required approvals, as well as the consent of the HFSF. The cash consideration of the transaction amounted to € 98 million (€ 1.25 per share). On 20 June 2022, the period of the mandatory tender offer by the Bank for the remaining 3.25% free float of Trastor's shares was concluded. Following the completion of the mandatory tender offer, the Bank holds 98.4% of the total shareholding of Trastor.

Piraeus Bank and Euronet Worldwide initiated their strategic cooperation in merchant acquiring services

On 16 March 2022, the Bank successfully completed the spin-off of merchant acquiring services to a new company and its subsequent sale to Euronet Worldwide Inc. The total consideration of the transaction amounted at € 300 million.

Piraeus Bank agrees to acquire Iolcus Investments

On 19 July 2022, the Bank completed the acquisition of 100% stake in Iolcus Investments AIFM ("Iolcus"), based on the relevant agreement signed on 5 April 2022, having obtained the necessary regulatory approvals. With the completion of Iolcus' acquisition, the Group's assets under management are in the order of c. € 6.9 billion as at 31 December 2022.

Rating Upgrades

On 13 January 2022, DBRS Morningstar assigned first-time public ratings to the Bank, including a long-term issuer rating of "B" and a stable outlook. On 7 December 2022, DBRS upgraded the Bank's long-term issuer rating and Senior Preferred debt rating to B (high) with a stable outlook.

On 18 February 2022, Fitch Ratings upgraded the Bank's long-term issuer rating to "B-" from "CCC+", with a positive outlook, reflecting the progress in improving asset quality and capital. The Bank's Senior Preferred debt rating was also upgraded by two

(2) notches, to "B-". Further, on 31 January 2023, Fitch Ratings upgraded the Bank's long-term issuer rating and the Bank's Senior Preferred debt rating to "B", maintaining a positive outlook.

On 30 March 2022, Moody's Investors Service upgraded the Bank's long-term deposit rating to "B2" from "B3" and maintained a positive outlook. Further, on 7 November 2022, Moody's Investors Service upgraded the Bank's long-term deposit rating to "Ba3" from "B2" and assigned a stable outlook.

On 19 July 2022, S&P Global Ratings revised the Bank's outlook to positive from stable and affirmed the "B" long term issuer credit rating.

Synthetic securitizations of performing loans in Greece

The Bank completed in 2022 four (4) synthetic securitizations of performing loans (namely Ermis Triton, Ermis Mortgage, Ermis EIF and Ermis VI), comprising mortgage, corporate/ small-medium enterprises ("SME") and shipping exposures (together the "Transactions"). In the context of the Transactions, the Bank entered into financial guarantee agreements for total € 3.8 billion gross book value securitizations of performing loan portfolios with various international counterparties. The underlying loan portfolios will continue to be presented in the financial position of the Group.

As at 31 December 2022, the Bank has received recognition of significant risk transfer ("SRT") for all four (4) aforementioned loan portfolios.

2022 EU-Wide Climate Stress Test Exercise

On 8 July 2022, the ECB announced the results of the first EU-Wide Climate Stress Test Exercise ("Exercise"), to assess supervised institutions' level of preparedness for properly managing climate risk. The Bank scored at par with the average of the European participating banks in the Exercise, demonstrating that the status of challenges that the economy faces regarding climate change are similar to those affecting the Group. The results indicated an advanced climate risk stress testing framework (module 1), where the Bank achieved a top ranking among European peers, while it also performed well on data quality.

The Bank will use the results of the Exercise to further examine how to engage with its clients in order to direct them on a low-carbon path and hence manage potential sensitivities to long-term transition risk, high concentration of corporate exposures into carbon intensive counterparties, as well as short-term transition and physical risks.

Sunrise III – HAPS Application & Agreement for the sale of Sunrise III Portfolio of NPEs amounting to gross book value € 0.5 billion

Further to the HAPS application submitted by the Bank in July 2022 for inclusion of the Sunrise III senior notes within the HAPS, the Bank entered into definitive agreements with Intrum AB (publ) and Waterwheel Capital Management LP for the sale of, in aggregate, 95% of the mezzanine and junior notes of the Sunrise III securitization (the "Transaction").

The Sunrise III portfolio comprises approximately 37 thousand retail and corporate loans with a gross book value of € 0.5 billion as at 31 December 2021. The implied valuation of the Transaction, based on the nominal value of the senior notes and the proceeds from the sale of the mezzanine and junior notes, corresponds to 34.2% of the portfolio gross book value as at 31 December 2021.

The Bank will retain 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.

Completion of the Transaction is subject to the approval by the Hellenic Republic for granting a guarantee on the senior notes amounting to € 0.16 billion, as well as to the consent of the HFSF.

Solar - Application for inclusion in the HAPS

On 2 August 2022, the Bank together with the other three (3) systemic banks submitted to the Greek Ministry of Finance a joint application for inclusion of the senior notes that will be issued in the context of the Solar securitization, of a nominal amount € 304 million, in HAPS, pursuant to Law 4649/2019. Following the rating and the binding offers received, the allocation for the Bank is at c. € 96 million, nominal amount.

Piraeus Real Estate Management

On 15 July 2022, the Bank established a new subsidiary namely "Piraeus Real Estate Management", an independent real estate management company. The Real Estate Owned (“REO”) Assets unit, in its entirety, was transferred to the new company, as well as the operations of the companies "Piraeus Real Estate" and "Piraeus Property".

Preliminary agreement for the Imithea - Euromedica merger

On 22 July 2022, Imithea Single Member S.A., owner of Henry Dunant Hospital, announced that it has reached an agreement in principle for the absorption of the Euromedica Group, with the aim of creating one of the largest health groups in Greece (at that time the Bank owned 100% of Imithea Single Member S.A. and 29.35% of the associate company Euromedica).

Reclassification of debt securities

During the third quarter of 2022, the Executive Committee approved the termination of the business line of acquiring debt securities issued by corporations and financial institutions for the purposes of trading, due to the significant operational restructuring triggered by the acquisition of Iolcus. The nominal value and carrying amount of the debt securities affected by the aforementioned change of business model is € 672 million and € 667 million as of the reclassification date, respectively. Such change in the objective of the business model requires reclassification of all affected financial assets from Fair value through Other Comphrehensive Income (“FVTOCI “) to amortised cost, in accordance with International Financial Reporting Standard (“IFRS”) 9. The reclassification date for the Group and the Bank is 1 January 2023.

Agreement with Resolute for real estate servicing

On 11 October 2022, the Bank reached an agreement with Resolute for the latter to provide the Bank with real estate services in Greece. The agreement refers to real estate servicing, real estate valuation services, and asset and property management of the Bank’s own-use and non-core properties in Greece. For the Bank, the transaction is part of its strategy for further cost efficiencies and targeted assets utilization, bringing cost savings of more than € 5 million per annum.

Repayment of € 500 million of a 5-year covered bond

On 31 October 2022, the Bank repaid € 500 million of a 5-year Covered Bond Series bearing a floating coupon of 3-month Euribor + 250bps. The bond was issued under the € 10 billion Covered Bond Programme and was privately placed and fully subscribed by the European Investment Bank, the European Investment Fund and the European Bank for Reconstruction and Development. The funds raised from the issuance were used to finance Greek SMEs from all sectors of the economy.

Piraeus Bank successfully priced a Senior Preferred Bond amounting to € 350 million

In November 2022, the Bank successfully completed the issuance of a € 350 million Senior Preferred Bond at a coupon of 8.25% and a yield of 8.50%, attracting the interest of a large number of institutional investors. The Bond has a maturity of four (4) years, an embedded issuer call option after three (3) years and is listed on the Luxembourg Stock Exchange's Euro MTF market. The issuance is part of the Bank's strategy to increase MREL, which is a supervisory requirement for all banks.

Piraeus Bank contributed to Strix Holdings LP bond loans of total gross book value € 421 million

In November 2022, the Bank contributed into Strix Holdings LP, two (2) bond loans of total gross book value € 421 million (carrying amount € 329 million), in exchange for additional limited partnership interests in Strix Holdings LP. As a result of this contribution, the Bank's cost of investment in Strix Holdings LP increased by an equivalent amount. No gain or loss was recognized by the Group, as a result of the said contribution.

Agreement for the sale of a leasing NPE portfolio (Project Sunshine) amounting to € 0.5 billion gross book value

On 23 December 2022, the Bank had reached an agreement with Bain Capital Credit, for the sale of 100% of the Group's leasing subsidiary Sunshine Leases ("Sunshine"), including a classified as held-for-sale ("HFS") portfolio of leasing NPEs, of a gross book value of € 0.5 billion (the "Transaction"). The total consideration of the Transaction corresponds to approximately 26% of gross book value. The Transaction is subject to the ordinary terms and approvals by the competent Greek authorities.

Voluntary Exits

In accordance with its strategic objectives and transformation priorities, the Group initiated in 2022 a new Voluntary Exit Scheme ("VES") for a certain group of employees. As a result, a corresponding provision of € 57 million was booked within 2022, increasing equally the staff cost of the Group. The number of full-time equivalents ("FTE") that exited during the year 2022, making use of the 2022 VES, as well as the 2021 VES stood at 633.

Mandatory Tender Offers ("MTOs") for the common shares in MIG and Attica

On 6 February 2023, the Bank acquired 47,242,062 shares in Marfin Investment Group Holdings S.A. ("MIG"), bringing its total shareholding in MIG to 340,308,728, representing 36.22% of the total common shares outstanding. As a result, in line with provisions of Law 3461/2006, the Bank, on 9 February 2023, launched a mandatory tender offer for the remaining common registered voting shares of MIG, with an offer price of € 0.1668 per share. Further, up to 1 March 2023, the Bank had acquired additional MIG shares corresponding to 17.91% of its voting rights, bringing the total voting rights of MIG held by the Bank, at 54.13%. The shareholding acquired in excess of one third of MIG's outstanding shares is subject to regulatory approval by the Hellenic Competition Commission ("HCC") and as a result, pursuant to the relevant provisions of antitrust law, the voting rights arising from such shares are not currently exercisable. The highest price paid by the Bank for the acquisition of MIG shares, stood at € 0.2170 per share, therefore the provisions of article 9 para. 2 of Law 3461/2006 shall apply to the tender offer. Following the increase of its shareholding in excess of one third of MIG's outstanding shares, the Bank launched on 22 February 2023 a corollary MTO to the shareholders of Attica Holdings S.A. holding a total stake of 20.62%, in order to purchase their shares at a price of € 1.855 per share.

Organizational Structure of the Group

The Chief Executive Officer ("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.

Corporate Banking – includes Large Corporates, Shipping, SME 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 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 and Sunrise II securitized portfolios, this reportable segment includes also the senior and subordinated notes issued by the securitization special purpose vehicles 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 Fair Value through Profit or Loss ("FVTPL"), and certain associates (i.e. Strix Asset Management Ltd, Strix Holdings LP and Strix Holdings NC 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 2022

The Group has a systemic position in the Greek banking market in terms of total assets, which amount to € 75.4 billion as at 31 December 2022. The Group holds the most extensive footprint in Greece with 389 branches (plus another 16 branches in 2 countries abroad) and a wide customer base of 5.7 million active customers. The branch network in Greece was reduced by 25 units during 2022. As at 31 December 2022, the Bank's headcount in Greece totaled 8,218 employees.

Balance Sheet

Regarding the financial position of the Group as at 31 December 2022, total assets amounted to € 75.4 billion compared to € 79.6 billion as at 31 December 2021.

Customer deposits of the Group continued to increase, reaching € 58.3 billion as at 31 December 2022, corresponding to an increase of 5.3% compared to 31 December 2021. The Group holds 28% domestic market share in deposits as at 31 December 2022.

Selected Balance Sheet Figures	31/12/2022	31/12/2021	YoY
Gross Loans (grossed up with PPA adjustments)	38,738	38,420	0.8%
Less: Expected credit losses (“ECL”) allowance (grossed up with PPA adjustment)	(1,412)	(1,924)	-26.6%
Net Loans	37,326	36,497	2.3%
Financial Assets	12,443	12,687	-1.9%
Other Assets	25,634	30,402	-15.7%
Total Assets	**75,403**	**79,586**	**-5.3%**
Due to Banks	6,922	14,850	-53.4%
Due to Customers	58,331	55,385	5.3%
Other Liabilities	3,638	3,496	4.1%
Total Liabilities	**68,891**	**73,731**	**-6.6%**
Total Equity	**6,511**	**5,855**	**11.2%**

Utilisation of the Eurosystem funding stood at € 5.4 billion as at 31 December 2022, following the repayment of € 9 billion of the TLTRO facility on the back of the ECB’s decision in its 27 October meeting, to recalibrate the TLTRO III terms. Interbank repo funding remained low at € 298 million as at 31 December 2022.

The Group’s financial assets portfolio has declined marginally to € 12.4 billion as at 31 December 2022, compared to € 12.7 billion as at 31 December 2021, mainly the result of lower balances in the Group’s trading securities book.

Gross loans as at 31 December 2022 amounted to € 38.7 billion compared to € 38.4 billion as at 31 December 2021, while net loans stood at € 37.3 billion as at 31 December 2022, compared to € 36.5 billion as at 31 December 2021, with the Group’s seasonally adjusted net loans to deposits ratio at 61.5%, lower compared to 31 December 2021 (63.3%) driven by the strong deposit increase during 2022.

The Bank’s NPEs reduced further to € 2.7 billion as at 31 December 2022, compared to € 5.1 billion as at 31 December 2021. The NPEs over total gross loans ratio for the Bank stood at 7.0% as at 31 December 2022 from 12.9% as at 31 December 2021, declining to single digit NPE ratio due to the continuous efforts of the Group to improve its asset quality, mainly through the utilization of the HAPS NPE securitizations. As at 31 December 2022, the Group NPE coverage ratio increased to 51.5% from 37.9% as at 31 December 2021.

Profit & Loss

The Group’s net interest income amounted to € 1,304 million in 2022, practically flat compared to 2021. Net fee and commission income and income from non-banking activities amounted to € 436 million (income from non-banking activities amount to € 64 million), in 2022, 13.2% higher compared to 2021. Other income rose to € 775 million in 2022 compared to € 718 million in 2021.

Total net income in 2022 amounted to € 2.5 billion presenting an increase of 4.4% compared to 2021. The Group’s total operating expenses, in 2022 stood at € 867 million, compared to € 872 million in 2021.

Selected Profit & Loss Figures	31/12/2022	31/12/2021 as reclassified[1]	YoY
Net Interest Income	1,304	1,307	-0.2%
Net Fee & Commission Income[2]	436	385	13.2%
Other Income	775	718	7.8%
Total Net Income	**2,516**	**2,410**	**4.4%**
Staff Costs	(435)	(395)	10.1%
Administrative expenses	(328)	(368)	-10.9%
Depreciation and amortization	(104)	(109)	-4.6%
Total Operating Expenses	**(867)**	**(872)**	**-0.6%**
Profit Before Provisions, Impairment and other credit risk related expenses	**1,649**	**1,538**	**7.2%**
ECL impairment losses and other credit risk related expenses on loans and advances to customers at amortised cost	(665)	(627)	6.1%
Other impairment and provisions	(70)	(45)	55.6%
Share of profit/ (loss) of associates and joint ventures	29	18	61.1%
Profit / (Loss) Before Income Tax	**943**	**884**	**6.7%**
Income tax benefit / (expense)	(130)	(485)	-73.2%
Profit/ (Loss) for the Period	864	392	120.4%
Profit/ (Loss) attributable to the equity holders of the Bank (from Continuing Operations)	814	399	104.0%
Profit / (Loss) attributable to the equity holders of the Bank (from Discontinued Operations)	51	(7)	-

(1) The comparative figures have been reclassified to reflect the amendments in the presentation of income from non-banking activities and of fees payable for having the NPE portfolio managed. Refer to notes 8 and 15 for further information.

(2) The 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 2022 amounted to € 1.6 billion, compared to € 1.5 billion in 2021, an increase of 7.2%. The results of the period ended 31 December 2022 were burdened by ECL impairment charges on loans plus other credit risk related expenses amounting to € 665 million, whereas the results of the comparative period, were burdened by € 627 million ECL impairment losses on loans.

The Group's profit before income tax in 2022 amounted to € 943 million compared to € 884 million in 2021, while profit from continuing operations attributable to equity holders of the Bank amounted to € 814 million compared to € 399 million in 2021.

Capital

As at 31 December 2022, the Bank's total equity amounted to € 6.5 billion, compared to € 5.8 billion as at 31 December 2021, as a result of the recovered profitability of the Bank. The Bank's Basel III total capital adequacy ratio ("TCR") stood at 18.20% compared to 16.35% on 31 December 2021. The Common Equity Tier 1 ("CET 1") ratio stood at 13.56% vis-à-vis levels of 12.00% at 31 December 2021.

The amount of deferred tax assets included in the regulatory capital in accordance with the provisions of Greek Laws 4172/2013, 4302/2014, 4340/2015, stood at € 3.5 billion as at 31 December 2022, compared to € 3.6 billion as of 31 December 2021. The Bank's fully loaded CET1 and TCR ratios stood at 12.05% and 16.76%, respectively as at 31 December 2022.

Following the conclusion of the Supervisory Review and Evaluation Process ("SREP"), the ECB informed the Group of its Overall Capital Requirement ("OCR"), valid for 2023. The Bank's OCR stands at 11.50%, 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 fully loaded capital conservation buffer of 2.50% under Greek Law 4261/2014, and (c) the transitional Other Systemically Important Institutions ("O-SII") capital buffer of 1.00% under Greek Law 4261/2014.

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 solid economic growth in 2022, and the prospects for a sustainable rate of growth of GDP in the medium term, taking also into account the deployment of the RRF funds to the Greek economy and the continued recovery of the residential and commercial real estate prices, despite of the high level of inflation and energy prices;

b) the Group's effective liquidity risk management leading to a robust liquidity position as evident by the Liquidity Coverage Ratio ("LCR") as of 31 December 2022, 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;

c) the capital adequacy of the Bank, which exceeded the OCR -including Pillar II Guidance ("P2G") - and the MREL ratio of the Group, which exceeded the Intermediate Guidance of 19.08% effective from 1 January 2023. It is estimated that for the next 12 months the Bank's capital adequacy ratios and the Group's MREL ratio will remain higher than the required minimum regulatory levels;

d) the geopolitical developments, specifically the Russia / Ukraine conflict and the persistent inflationary pressures;

e) the net profit attributable to the equity holders of the Bank, which recovered significantly in 2022 and amounted to € 814 million, compared to € 399 million in 2021 and the NPE ratio dropping to 7.0% as at 31 December 2022 from 12.9% as at 31 December 2021.

Based on the analysis performed, Management has_concluded that that there are no material uncertainties which may 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 the Annual Financial Statements were authorized for issue. For this reason, the Group continues to adopt the going concern basis of accounting for preparing the financial statements.

Non-Financial Information 2022 (Greek Law 4403/2016)

The non-financial information of the Group have been included in non-financial information of the Annual Financial Report of the parent company Piraeus Financial Holdings S.A. ("the Company") and this non-financial information was prepared in accordance to Greek Law 4403/2016. The link to the Company's Annual Financial Report is provided here www.piraeusholdings.gr.

Information according to article 6 of law 4374/2016

Based on article 6 of law 4374/2016 "Transparency among credit institutions, media companies and subsidized persons" the Bank as a credit institution domiciled in Greece publishes on a consolidated basis the below information:

a) payments conducted during the year 2022 due to promotion and advertising expenses directly or indirectly to media companies and its related parties, according to International Accounting Standard ("IAS") 24, communication and advertising companies (par. 1, article 6 of Law 4374/2016);

b) payments conducted during the year 2022 due to Grants, Donations and Sponsorships to individuals and legal entities (par. 2, article 6 of Law 4374/2016).

Refer to section “Information on a consolidated basis for the year 2022 according to article 6 of Law 4374/2016” of the Annual Financial Report for further information

Related Party Transactions

With reference to the transactions of the Group with related party, 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 2022. Detailed information is included in the 2022 Annual Financial Statements in Note 47, which is incorporated herein by reference.

Risk Management

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

The Group is exposed to interest rate risk due to the changes in interest rates on the fair value of fixed rate debt securities. In order to mitigate this risk the Group enters into Interest Rate Swaps (“IRSs”) and hedges the benchmark interest rate risk component by entering into IRSs with critical terms that match those of the debt instrument hedged. This hedging objective is 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 2022).

Moreover, the Group faces market and liquidity risks incorporated herein by reference to Notes 4.9 and 4.12 of the Annual Financial Statements for the year 2022.

The RM function is not limited to the activities of the Group Risk Management (“GRM”) and the Chief Credit Officer (“CRO”) but refers to the processes performed by all 3 lines of defense, 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 lines of defense, 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, 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 a strong Risk Culture.

During 2022, GRM continued strengthening of the Group's risk management framework which interacts with the Group planning processes in alignment with the in force regulatory framework, the supervisory expectations and the strategic guidelines/ plan.

Indicatively, 2022 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 European Banking Authority ("EBA") New Definition of Default;
- ✓ Value at Risk ("VaR") methodologies enhancements;
- ✓ Interest Rate Risk in the Banking Book ("IRRBB") initiatives;
- ✓ Operational risk ("OR") framework and control enhancement.

Key Committees with Risk participation

Board Committees

- Risk Committee
- Audit Committee

Executive Committees

- Executive Committee
- ALCO
- Provisioning Committee
- Resolution Planning Committee
- Resolution Committee
- Operational Risk 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
- Real Estate Committees

The GRM reports to the CRO, with main responsibilities per function for 2022 briefly described below:

CRO's office| Function main responsibilities:

- The function is responsible to manage, coordinate, advice on and monitor various risk initiatives and projects and consolidate overall view on figures, responses, alignment of stakeholders. Additionally, it undertakes and coordinates the operations of the BoD Risk Committee's Secretariat.

Credit Risk Management | Function main responsibilities:

- During 2022 GRM organizational chart was modified. Credit Risk Management Unit, having direct reporting line to the Group's CRO, was expanded in order to better address all emerging credit risk related issues in the scope of the Group's continuous effort to strengthen its RM framework.
- Credit Risk Management engages in the early recognition and effective management of Credit Risk through an integrated framework of policies, methodologies, procedures and systems that allow the development of a profitable loan portfolio within the acceptable risk profile.
- It has the responsibility for the planning, specialization and implementation of strategy and policies in credit risk management issues. 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 2022 to facilitate and enhance RM practices as presented in Table 1.

Capital Management, Risk Strategy, 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 Risk and Capital Strategy as well as the Risk Adjusted Framework of the Group, in accordance with the Risk Committee and BoD's directions and guidance;
- Additionally, the establishment of dedicated unit aims to manage effectively risks related to Environmental, Social and Governance ("ESG") issues;
- 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.

During 2022, Capital Management, Risk Strategy, Market, Liquidity & ALM Risks unit has undertaken a number of strategic risk initiatives, as presented in the below Table 1.

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

- Group Control and Risk Data & Solutions unit 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 ("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 OR Management Framework ("ORMF") and the ICS of the Group, with the aim to defend the business objectives and limit the risks undertaken to the acceptable levels defined by the Management;
- The function contributes to the mitigation of risks arising from potential limitations in the development, implementation 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 line of defence, 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 2022, 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 2022

Function	Key initiatives
Credit Risk Management	▪ Providing guidance regarding the systemic implementations for asset quality indicators under the supervisory guidelines of Loan Origination framework ▪ EWS model, framework and infrastructure development project coordination for corporate and retail loan portfolios ▪ Performed sensitivity scenarios on the Group's loan portfolio regarding credit risk impact of the prevailing inflationary pressures and the identification of vulnerable sectors as a result of macro-environment turbulence ▪ On Site Inspection on IFRS 9 compliance and implementation ▪ Revision of the credit rating assessment models of the wholesale portfolio (SME, shipping), to incorporate the new Definition of Default
Risk and Capital Strategy	▪ Further advance Risk Appetite Framework ("RAF") introducing additional metrics and limits and further cascading, reflecting evolving business plan aspirations and risk profile. ▪ EBA Stress Test 2023 preparation – launched preparations for the EBA 2023 Stress Test ▪ Synthetic securitizations – continue to provide guidance and support on the structuring and execution of major synthetic securitization transactions with regards to SRT
Additional Liquidity Monitoring, Market, Liquidity Risks	▪ Completion of Additional Liquidity Monitoring software upgrade project for IRRBB improving capabilities ▪ Completion of the enhancement of the Stress Testing Framework

Function	Key initiatives
Group Control and Risk Data & Solutions	▪ Alignment and efficiency improvement of the 3 lines of defense central project of the Control functions (3 Lines of Defense Control functions alignment & efficiencies). ▪ Enhancement of Information and Communication Technology ("ICT") risk management in second line of defense ▪ Implementation of a platform within the OR system for the management of internal control deficiencies in the ICS, across the Group ▪ Enhancement and maintenance of the Model Validation Framework, including the new quarterly follow-up process of model validation findings in cooperation with Unit and Segment Controllers ▪ Enhancement of the IFRS 9 validation reports, regarding the assessment of the Lifetime Probability of Default and Cure Rate 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 1st and 2nd lines of defense functions ▪ Initiation of a Senior Credit Committees 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 2023

Economic growth in Greece remained solid in 2022, with GDP rising 5.9% year on year, despite the undergoing energy crisis in Europe. Greek GDP growth is underpinned by the structural reforms that have taken place during the past years and a strong inflow of foreign direct investment in 2022. Greek debt to GDP in 2022 is projected to have one of the largest drops worldwide, while similar trend is expected to continue in 2023.

On the back of these developments, three (3) major rating agencies have upgraded the Greek sovereign debt rating to BB+, one notch away from investment grade level, which is expected to be achieved within 2023.

The Greek economy remains on a path of moderate economic expansion into 2023, reflecting the different phase that it finds itself in the current economic cycle, assisted by its improved resilience and competitiveness.

According to the Winter 2023 Economic Estimates of the EC, Greek GDP is expected to grow by 1.2% this year and accelerate to 2.2% in 2024. Inflation on the other hand is projected to slowdown to 4.5% in 2023 and further to 2.4% in 2024. The deployment of the RRF in the Greek economy might provide extra upside to growth. The total RRF resources that have been disbursed or approved amounts to € 11 billion, ranking Greece among the top of the list in the EU.

2022 was another milestone year for the Group, which continues to unlock the value of its franchise, underpinned by the completion of the Group's balance sheet clean-up. The Group has delivered strong financial results, outperforming its targets across the board.

In 2022, the Group generated € 814 million profit. The Group has achieved steady business loan growth, risk-adjusted profitability, continued cost discipline and accelerated capital build-up.

The enhanced organic capital generation has driven our fully-loaded CET1 ratio to 12.05%, up by approximately 100 bps in the quarter and by approximately 250 bps in the last 12 months.

The Group's performing loan portfolio has grown by € 2.7 billion in the full year 2022, with net credit expansion of € 550 million in the fourth quarter. The remaining NPE book continues to be managed actively, reaching a NPE ratio 7% at year-end 2022 from 13% a year ago.

Our cost containment efforts continued unabated in 2022, notwithstanding inflationary challenges, and resulted in an impressive 11% year on year reduction in administrative expenses.

We are proud to have recently received an MSCI ESG 'A' level rating. At the same time, we have been included in the Bloomberg Gender Equality Index for the 2nd consecutive year. The Bank is also the only Greek company in the Financial Times list of Europe's climate leaders for year 2022 and is the first bank in Greece to have had its 2030 targets validated by the Science Based Targets Initiative for the reduction of both operational and financed CO2 emissions.

In late January 2023, the Bank communicated its new financial targets for 2023. The key elements comprise a sustainable return on tangible equity of 10%, further boost to total capital to above 17.3%, and approximately € 1.7 billion net credit expansion.

With regards to potential risks, the persistence of inflationary pressures is driving major central banks to exert aggressively restrictive monetary policies. Increasing interest rates are benefiting banks' currently, as the positive impact from higher loan spreads outweighs the negative effects stemming from inflation and greater funding costs. However, higher for longer interest rates may result in economic slowdown and tighter credit expansion, with negative secondary effects on the asset quality of the banks' loan portfolios. The potential of new NPE generation would result in an increase of future provisions, burn of capital buffers, which could materially affect our financial position, capital adequacy and operating results. Therefore, in addition to maintaining the Group's balance sheet well positioned to benefit from interest rate increases, management is extremely mindful of the importance of good credit risk management and will focus on operational efficiency and cost control to navigate this environment.

The global economy continues to face challenging times ahead. The war in Europe is continuing, Covid-19 is still a threat in large parts of the world, and considerable pressure continues on households and businesses from rising costs.

It is at times like that we must make sure that our strategy embeds a higher standard of operational performance and demonstrates measurable progress to shareholders. It is only with consistent performance that we can build a track record for sustainable earnings delivery.

Athens, 30 March 2023

On behalf of the Board of Directors

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

CORPORATE GOVERNANCE STATEMENT

This Corporate Governance Statement of Piraeus Bank 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 2022 and the subsequent period up to the publication date of the Annual Financial Report.

The Bank is in compliance with the legal and regulatory framework governing the operation of credit institutions and applies best corporate governance principles. Chapter I describes the institutional and regulatory framework that the Bank applies in terms of corporate governance and operation as well as the elements of its Internal Corporate Governance and Operating Regulation (the "Internal Regulation"). Chapter II includes the analysis of the composition and manner of operation of the Bank's management, administrative and supervisory bodies and committees, including the ICS, compliance and RM system implemented by the Bank.

I. APPLICATION OF INSTITUTIONAL FRAMEWORK AND CORPORATE GOVERNANCE STRUCTURE AND OPERATING REGULATIONS

The Bank, in its capacity as a Société Anonyme applies the provisions of corporate law and of its Articles of Association. Furthermore, as a credit institution, supervised by the ECB, applies the special provisions of Greek Law 4261/2014 and of the Bank of Greece ("BoG") Governor's Act 2577/9.3.2006 regarding principles of operation of credit institutions and the criteria for evaluating their ICS. In parallel, the EBA Guidelines on internal governance are taken into consideration.

Furthermore, the Bank has drawn up and applies its Internal Regulation, which was revised in early 2023. The Internal Regulation incorporates the provisions and practices arising from the mandatory institutional framework (especially Greek Law 4261/2014, BoG Governor's Act 2577/9.3.2006) and adopts international corporate governance practices.

The main objectives of the Internal Regulation are to:

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

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

iii) ensure the Bank'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 Bank 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 Bank's sound and responsible management and operations.

The organisational structure of the Bank complies with the current principles of the institutional framework governing the operation of credit institutions 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 Bank, constitutes the basis upon which the functions and operations of the Bank 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 Bank'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 Bank assumes or may undertake within the framework of its activities.

The Bank 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 Bank, contributing to its efficient and safe operation.

The Internal Regulation of the Bank refers in detail to the area of responsibilities and to the operation of the BoD and key committees and functions of the Bank, in particular the Audit Committee, the Risk Committee, the Remuneration Committee, the BoD Nomination Committee, the Strategy Committee, the Group Executive Committee and also to the Group Internal Audit (“GIA”), the RM and the Compliance Units.

Moreover, in the context of being subject to the provisions of Greek Law 3864/2010, as same has been amended in mid-2022, the Bank 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 in the Bank.

II. MANAGEMENT, ADMINISTRATIVE AND SUPERVISORY BODIES AND COMMITTEES

1. General Meeting of Shareholders

1.1 The responsibilities of the General Meeting

The General Meeting (“GM”) of the Shareholders of the Bank is its supreme body and it is responsible, inter alia, for electing the members of the BoD and the statutory auditors and for the approval of the Annual Financial Report that incorporates the BoD Management Report and the Consolidated and Separate Financial Statements. The responsibilities of the GM are as provided by the legislative provisions in force and the Bank’s Articles of Association.

1.2 Convening of General Meeting

The GM of Shareholders must meet at the Bank's registered office, or within the boundaries of any other municipality in the registered office's prefecture, or within those of an adjacent municipality, at least once (1) each fiscal year, in accordance with the applicable Greek Law and the Bank's Articles of Association. The GM is convened at least twenty (20) days prior to the session (not including the days of invitation and session) by BoDs’ invitation to the shareholders.

The invitation of the GM shall include at least the place and precise address, date and time of the meeting, the agenda items clearly defined, the shareholders entitled to participate, as well as precise instructions on the manner in which shareholders shall be able to participate in the meeting and exercise their rights in person or by proxy or even remotely. The notice shall be published through registration in the Bank’s entry in GEMI. In the event of an iterative GM of Shareholders, the invitation is announced as described above, at least ten (10) days before the meeting. No notice of further convocation is required if the initial convocation states the location and timing of the iterative meeting, if no quorum is met, provided that at least five (5) full days elapse between the postponed meeting and the iterative one.

The BoD may resolve that the GM will not convene at any place but will convene in full with the participation of the shareholders remotely by electronic means in accordance with the terms and conditions of the Law, as in force. The BoD may also resolve that 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 in accordance with the provisions and under the conditions of the Law, as in force. In the abovementioned cases, shareholders and other interested parties are specifically informed of the process through the Invitation of the GM. In any case, each shareholder can request the meeting to be held by teleconference with him/her, if he/she resides in a country other than the one where the GM takes place or if there is another important reason, in particular illness, disability or pandemic.

Furthermore, from the day of the announcement of the invitation of the GM of Shareholders until the day of the GM the following minimum information is available on the Bank's seat:

- the notice to the GM;
- form of proxy for the participation and voting in the GM via representative;
- total number of shares and voting rights, as existing at the convocation date of the Bank's shareholders to the GM.

The GM is in quorum and takes decisions on the issues of the daily agenda, which are considered valid, if the shareholders representing at least one fifth (1/5) of the paid-up share capital are present or represented. In the absence of a quorum, the GM is convened again within twenty (20) days from the date of the cancelled session, provided that it has been invited at least ten (10) days before the convening. At the iterative session, the meeting is in quorum and takes decision for the issues of the initial daily agenda, which are considered valid, irrespective of the represented part of the paid-up share capital.

On an exceptional basis, for the decisions concerning the change of the Bank's nationality, change of the Bank's main activity, augmentation of shareholders' liabilities, share capital increase that is not provided for in the Articles of Association, according to para.1 and 2 of art.24 of Greek Law 4548/2018 unless it is dictated by Greek Law or performed by capitalization of reserves, share capital decrease unless it is performed according to the paragraph 5 of the article 21 or paragraph 6 of article 49 of Greek Law 4548/2018, change of the way of allocating the profits, merger, spin off conversion, revival, extension of duration or winding-up of company, renewal of BoD's power or granting the BoD power to increase the share capital, according to para. 1 of the art. 24 of Greek Law 4548/2018, and in any other case as specified by the Greek Law, the meeting is in quorum and takes valid decisions on the issues of the daily agenda, when the shareholders representing half (1/2) of the paid-up share capital are present or represented in it.

If no quorum is reached, at the repeating session, the meeting is in quorum and takes valid decisions on the above issues of the initial daily agenda, when at least the 1/3 of the paid-up share capital is represented. In case of a share capital increase, the iterative meeting is quorate if attended in person or by proxy by shareholders representing at least one fifth (1/5) of the paid up capital.

The GM's decisions are taken by an absolute majority of the votes represented in the session. On an exceptional basis, the decisions provided for in para. 3 of the art. 130 of Greek Law 4548/2018 are taken by a majority of two third (2/3) of the votes represented in the session.

1.3 Right to participate and vote

Shareholders having the right to participate and vote in the GM are those demonstrably holding the capacity of the shareholder as at the date of the GM. Proof of the shareholder capacity may be evidenced by all legal means.

1.4 Procedure for participation and voting by proxy

Shareholders participate in the GM either in person or by proxy who they can appoint and revoke in accordance with the provisions of Greek Law as in force. The notification to the Bank of the appointment or the revocation of the proxy of the shareholder may be effected by electronic means, and in particular by sending all relevant documents by e-mail to the e-mail address which is published in the GM's Invitation to the shareholders.

1.5 Shareholder Minority Rights

Shareholders of the Bank have, inter alia, the rights provided for in par. 2 art. 141 of Greek Law 4548/2018:

- Shareholders representing one twentieth (1/20) of the paid-up share capital may request the BoD to call an extraordinary GM of shareholders, appointing a day for this meeting, that must not be more than forty-five (45) days after the date upon which the chairman of the Board received such request. The items of the agenda must be cited in the request. Where the GM is not convened by the BoD within twenty (20) days from service of the request, it shall be convened by the applicant shareholders at the Bank's expense by decision of a court rendered under the interim relief procedure. Such decision shall specify the place and time of the meeting and the items of the agenda. The decision shall not be open to appeal. The BoD shall call a GM in accordance with the general provisions or under the procedure described in art. 135 of Law 4548/2018, unless the requesting shareholders have precluded that possibility.
- Shareholders representing at least one twentieth (1/20) of the paid-up share capital may request that the BoD includes additional items on the agenda of the GM by means of an application submitted at least fifteen (15) days prior to the date of the GM. The additional items must be published or notified by the BoD in accordance with art. 122 of Law 4548/2018 at least seven (7) days before the GM. If the additional items are not published as described above, the requesting shareholders are entitled to ask for the postponement of the GM, according to par.5 of art.141 of Law 4548/2018 and proceed themselves to the publication at the expense of the Bank.
- At the request of shareholders representing one twentieth (1/20) of the paid up capital, the chairman of the GM shall adjourn only once the adoption of decisions at any ordinary or extraordinary GM for all or part of the agenda, setting as at the date of resumption of the meeting the date indicated in the shareholders' request, which may not be more than twenty (20) days for from the date of adjournment.
- Following a request submitted by any Shareholder to the Bank at least five (5) full days before the GM, the BoD must provide to the GM the requested specific information on the Bank' s affairs, to the extent that the requested information is useful for the actual assessment of agenda items. The BoD may give a comprehensive reply to Shareholders' applications with the same content. Information disclosure liability does not exist, in the case that the relevant information is already available on the Bank's webpage, particularly in the form of questions and answers.
- At the request of Shareholders representing one twentieth (1/20) of the paid up share capital, submitted at least five (5) full days before the GM, the BoD must announce to the Ordinary GM, the amounts that have been paid during the last two (2) years to each member of the Board or the Bank's directors as well as any benefits that were granted to the above persons for any reason or on the basis of their agreement with the Bank. In all of the above cases, the BoD may decline the provision of information for an adequate and substantial reason, mentioned in the minutes.
- Following a request of Shareholders representing one tenth (1/10) of the paid up share capital, submitted at least five (5) full days prior to the GM, the BoD must provide to the GM information on the progress of corporate affairs and the Bank's assets. The BoD may decline to provide the requested information for an adequate and substantial reason, mentioned in the minutes.
- At the request of any shareholder(s) filed with the Bank any time, the BoD shall inform the requesting shareholder(s) within twenty (20) days of the value of the Bank's share capital at the time, the classes of shares and the number of shares per class, in particular the number of preference shares, and the number of any blocked shares, including the type of restrictions applicable upon such shares. The requesting shareholder(s) may also request information on how many and what type of shares he/she owns according to the shareholders' book. If the requested information is available on the Bank's website, the shareholder's request may be denied as long as guidance is offered as to how such information can be accessed.

In all of the cases referred to above, requesting shareholders must prove their capacity as a shareholder during the exercise of such a right.

2. The Board of Directors

2.1 Composition

In accordance with article 8 of its Articles of Association, as in force today, the Bank is managed by a BoD consisting of nine (9) to fifteen (15) members. The Board consists of executive and non-executive members. 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 and the Relationship Framework Agreement ("RFA")[3].

2.2 Policy on the Nomination of Board Members

The BoD has adopted a Policy on the Nomination of Board Members. Such Policy is based on the regulatory obligations of the Bank and incorporates the following: a) the provisions of Greek Law 4261/2014, b) EBA Guidelines on the assessment of the suitability of BoD members, and c) the provisions of the RFA (as in force at the date of the adoption of the Policy) as well as international best practices. The Policy describes the general principles, the procedure and the criteria of the nomination of BoD members (excluding the HFSF Representative), which include, inter alia, the following: (i) fit and proper criteria, (ii) criteria for the avoidance of conflicts of interest, (iii) criteria on the availability and dedication of sufficient time for the operations of the BoD, (iv) criteria with respect to financial experience within the banking sector, commitment on the application of international best banking practices with particular emphasis on RM, compliance and the ICS, sufficient knowledge of the regulatory and business environment in which the Bank operates, as well as criteria concerning the independence, ethics and the personality of the candidate member.

More specifically, in order for a person to be considered an eligible candidate by the BoD and the Nomination Committee ("NomCo"), such person:

- must meet the suitability criteria (fit and proper) set out under (a) below;
- may have no potential conflicts of interest with the Bank;
- must be able to commit sufficient time to the BoD of the Bank depending on the position for which they are recommended, and
- should have one or more of the qualifications set forth under (d) below.

(a) Suitability criteria (fit and proper)

- **Honesty, integrity and reliability:** Candidates, based on their background, must be able to inspire the trust required for a member's accession to the highest management body of the Bank. The NomCo ensures that all candidates have an impeccable reputation.

- **Expertise and prior Professional Experience:** Candidates must possess adequate expertise and have a successful career in their line of business. They must be able to provide relevant evidence of their prior professional experience in satisfaction of the requirements set out herein.

[3] Currently under revision following the amendment of Law 3864/2010

- **Independence of mind:** Candidates should be able to form opinion and express their independent opinion on all issues undertaken by the BoD.

(b) No conflict of interest – Director ineligibility

The NomCo and the BoD ensure that candidate Directors possess such professional capacities as are compatible with the role of Director of the Bank, and that their personal, business and/or professional interests are not in conflict with the interests of the Bank or the Group, in accordance with the provisions of the Bank's Internal Regulation and the legal and regulatory framework, applicable from time to time. All candidates must, prior to their final election, submit a statement that no conflict of interest with the Bank will arise following their election as Members of the BoD.

(c) Commitment of time

All candidates must be able to dedicate sufficient time and energy to the performance of their duties. In the case of non- executive Directors, special attention should be paid to the number of directorships and other commitments they may hold outside of the Bank.

Pursuant to art. 83 para. 3 of Greek Law 4261/2014 (article 91.3 of Directive 2013/36/EU) and notwithstanding para.4 and 5, of said article, Directors may not hold more than one of the following combinations of directorships at the same time: (a) one position as executive member of a BoD and two (2) positions as non-executive members of BoD; or (b) four (4) positions as non-executive members of BoD.

(d) Desired Director skillset

It is desirable that each candidate possesses one or more of the following attributes, and that the BoD collectively possesses the following skillset:

- **Financial experience in the banking sector:** Adequate understanding of the banking operations (with emphasis on loans and NPE management), financial services sector and special features of financial institutions;

- **Financial experience:** Adequate understanding of auditing and accounting as well as financial information issues;

- Strong commitment to the implementation of **internationally recognised best banking practices** with emphasis on corporate governance, RM, compliance and ICS;

- **Regulatory framework and governance:** Adequate knowledge of the prudential supervision regulatory framework (e.g. national and European financial sector), corporate governance issues and legal liabilities;

- **Risk Management: Ability to oversee the RM framework including the RM culture and risk appetite.** Ability to identify, assess and rate the key risks that the Bank faces. Understanding of the fundamental issues pertaining to RM and asset management;

- **Strategy:** Understanding of the environment where the Bank operates, including the ability to recognize the interests of stakeholders (e.g. shareholders, Supervisory Authorities, employees), financial dependencies, as well as other external influences to the organization's capacity to achieve its targets;

- **Leadership:** Experience in large Groups of companies (listed or non-listed), in different sectors, preferably in leadership positions (e.g. Chairman, Managing Director or other role at Senior Management level);

- **Will to argue constructively during the decision making of the BoD:** Will as well as moral and mental stature to constructively challenge the decisions and actions of the Bank's executive management, preserving at the same time the necessary team spirit and avoiding tensions;

- **Gender balance:** Satisfactory gender balance in the composition of the BoD, in accordance with the applicable regulatory framework;

- **Independence:** In the event of an independent non-executive position, candidates must fulfill all the formal independence criteria under Greek Law.

Additional criteria for Executive Directors: Persons to be assessed for Executive Directors must additionally be willing to enter into a full-time employment or services contract with the Bank. They must also have demonstrated, both in their current and past positions, that they possess the experience, ability and integrity as executive members to lead the Bank and the Group in achieving their strategic goals.

It is noted that according to the regulatory framework of the Single Supervisory Mechanism ("SSM") of the ECB, each Member of the Board of the Bank 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 Bank; which also appoints the independent non- executive members. At the election of Board members, the GM also may elect as members persons who are not shareholders of the Bank.

The term of office for the members of the Bank's BoD is three (3) years, and is extended until the Annual Ordinary GM, which convenes following the expiry of their term. The current, first BoD was defined by the Articles of Association on the incorporation of the Bank on 30 December 2020 and consequently its term of office expires on 30 December 2023, to be extended according to the aforementioned.

According to the Bank'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 Bank without replacing the missing members if the remaining members are at least nine (9). The decision of the election shall be published as per corporate law, and the BoD shall announce it at the next GM.

As at 31 December 2022 and on the date of publication of the 2022 Annual Financial Report, the BoD has the following composition:

BOARD OF DIRECTORS	
George Handjinicolaou	Chairman of the Board, Non-Executive BoD Member
Karel De Boeck	Vice Chairman of the Board, Independent Non-Executive BoD Member
Christos Megalou	CEO, Executive BoD Member
Vasileios Koutentakis	Executive BoD Member
Venetia Kontogouri	Independent Non-Executive BoD Member
Francesca Tondi	Independent Non-Executive BoD Member
Enrico Cucchiani	Independent Non-Executive BoD Member
David Hexter	Independent Non-Executive BoD Member
Solomon Berahas	Independent Non-Executive BoD Member
Andrew Panzures	Independent Non-Executive BoD Member
Anne Weatherston	Independent Non-Executive BoD Member
Alexander Blades	Non-Executive BoD Member
Periklis Dontas	Non-Executive BoD Member, Representative of the HFSF to the BoD pursuant to Greek Law 3864/2010

Ms. Francesca Tondi was elected independent Non-Executive member of the Board, by virtue of a resolution of the Annual Ordinary GM of Shareholders held on 22 July 2022, in replacement of the resigned Mr. Arne Berggren.

Ms. Lydia Papadopoulou was appointed Corporate Secretary and Board Secretary by virtue of the Board decision on 23 February 2022, in replacement of the resigned Ms. Dimitra Pallikari.

The BoD of the Bank consists of members with international leadership expertise and know-how, as well as in depth knowledge and experience of the banking market. They actively contribute to the improvement of the corporate governance framework, driving the respective required amendments whilst participating in the creative debates and the quest for solutions to the challenges faced by the Bank.

Short Curriculum Vitaes ("CV's") of the BoD members are available on the Group's website.

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 Bank'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 Bank 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 Bank 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 by NomCo. Additionally, an independent evaluation of the Board will be held at a minimum every three (3) years 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' 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 fit and proper 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, necessary for the effective oversight of the Bank.

Succession planning process for the Chief Executive Officer

The Succession Planning process for the CEO is governed by a separate policy, namely the CEO Succession Planning Policy. 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 on 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 Human Resources 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 Bank'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 Bank'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. 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 Bank 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 ready for the position of the CEO, an external search for a permanent replacement follows.

2.4 Diversity of the BoD members

The BoD has adopted the BoD Diversity Policy, which records the basic principles and the criteria as to the nomination procedure of the BoD members. The policy is applied in conjunction with the Policy on the Nomination of Board members, as mentioned above and is also considered in the implementation of the non-executive Board members and CEO succession planning.

The Bank recognizes and embraces the importance and the benefits of diversity for safeguarding and improving its competitive advantage and innovation, as well as for the 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, race, gender, age and other qualities, which may vary depending on the identified weaknesses and the business or strategy needs of the Bank.

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 exercise appropriate oversight to the Management.

The appointment of the first BoD by the Articles of Association of the Bank was based (in addition to the applicable at the time strict criteria of Greek Law 3864/2010), on the general principles and criteria set out in the BoD Diversity Policy with particular focus on areas related to skills and educational and professional background. The BoD of the Bank constitutes of members with international recognized experience on areas of strategic importance such as banking, auditing, RM, NPE management and restructuring, Public Interest Organization ("PIO") management and financial management etc.

Due to certain restrictions, which were applicable until mid-2002, and resulting difficulties in identifying, attracting and nominating women for Board positions, gender diversity to the BoD does not currently fully fulfill the Bank's aspirations; however the Bank makes effort to gradually increase the under-represented gender (women) in the BoD to minimum 25%, calculated on the total BoD size by the end of the year 2023. The Bank has already made progress to that direction during 2022, nominating Ms. Tondi as an independent Non-Executive member and thus achieving a 23% female representation instead of 15% in 2021. 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 a 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 Board 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 beeing 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 to a capable, specialized and experienced Corporate Secretary, who is appointed by it and attends its meetings.

The BoD is convoked by its Chairman or his deputy and convenes at least once a month at the Bank'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 Bank pursues business activities or has a subsidiary (an affiliate) financial institution.

The Board is in a quorum and convenes validly when at least half of its members plus one are present or represented. However, the number of members present in person 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 or the present Articles of Association. 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.

Discussions and resolutions of the BoD are recorded in summary in a special book that may also be kept by electronic means. Upon request of a Board member, the Chairman is obliged to record an exact summary of such member's opinion in the minutes. A list of Board members present or represented at a meeting is also recorded in this book. The minutes of the BoD are signed by all present Board members and by the Secretary of the Board. Copies or extracts of such minutes are officially issued by the Chairman or other person, appointed for that purpose by a Board resolution, without any other validation. The signatures of the BoD members or their representatives may be replaced by an exchange of e-mails, according to the relevant Law in force.

The BoD held seventeen (17) meetings during the year 2022.

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

	Board Of Directors		Risk Committtee		Nomination Committee		Remuneration Committee		Audit Committee		Strategy Committee	
	Average Participation	Total Number of Meetings	Average Participation	Total Number of Meetings	Average Participation	Total Number of Meetings	Average Participation	Total Number of Meetings	Average Participation	Total Number of Meetings	Average Participation	Total Number of Meetings
	100%	17	97%	12	100%	2	97%	5	97%	13	96%	9
Name	Attendance Rate	Number of Meetings	Attendance Rate	Number of Meetings	Attendance Rate	Number of Meetings	Attendance Rate	Number of Meetings	Attendance Rate	Number of Meetings	Attendance Rate	Number of Meetings
George Handjinicolaou	100%	17/17	-	-	-	-	-	-	-	-	-	-
Karel De Boeck	100%	17/17	100%	12/12	-	-	-	-	92%	12/13	89%	8/9
Christos Megalou	100%	17/17	-	-	-	-	-	-	-	-	-	-
Vassileios Koutentakis	100%	17/17	-	-	-	-	-	-	-	-	-	-
Venetia Kontogouris	100%	17/17	-	-	100%	2/2	100%	2/2	-	-	100%	9/9
Arne Berggren[1]	100%	9/9	-	-	100%	2/2	100%	5/5	-	-	100%	5/5
Enrico Cucchiani	94%	16/17	-	-	100%	2/2	80%	4/5	-	-	89%	8/9
David Hexter	100%	17/17	83%	5/6	100%	1/1	-	-	92%	12/13	89%	8/9
Solomon Berahas[2]	100%	17/17	100%	12/12	-	-	100%	5/5	100%	13/13	-	-
Anne Weatherston	100%	17/17	100%	6/6	-	-	-	-	100%	11/11	100%	9/9
Andrew Panzures[3]	100%	17/17	100%	12/12	100%	1/1	100%	3/3	100%	13/13	100%	9/9
Francesca Tondi[4]	100%	8/8	-	-	-	-	-	-	-	-	-	-
Alexander Blades	100%	17/17	100%	12/12	100%	2/2	100%	3/3	-	-	100%	9/9
Periklis Dontas	100%	17/17	100%	12/12	100%	2/2	100%	5/5	100%	13/13	100%	9/9

*1. **A. Berggren**: resigned in June 2022 from the BoD*

*2. **S. Berahas**: was appointed Vice-Chair of the Audit Committee on 23 June 2022*

*3. **A. Panzures**: was appointed Chairman of the Remuneration Committee and member of the NomCo on 23 June 2022 and ceased to be Vice-Chair of the Audit Committee*

*4. **F. Tondi:** was appointed member of the Audit Committee and the Remuneration Committee*

2.6 HFSF role in the Bank

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 Bank'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 Bank;

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 Bank, 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 Bank;

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 Bank.

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

2.7 Roles and Responsibilities

Pursuant to article 15 of the Bank's Articles of Association, the BoD represents the Bank and is authorized to resolve, without restriction, on any issue relating to the Bank'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 Bank's Articles of Association, the Bank is represented by its BoD, which may delegate authority relating to the representation of the Bank 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 Bank and the limits within which the authorized representatives can act.

The Bank's Internal Regulation states that the prime obligation and duty of the Board Members is the continuous pursuit of enhancing the Bank's long-term economic value and the protection of the general corporate interests. It is also stated that 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 Bank itself and for the Group.

Principal activities and significant issues considered during 2022

In the performance of its duties for 2022, the Bank's BoD, inter alia:

<u>In relation to Corporate Governance issues</u>

- performed the annual CEO's evaluation for 2021 and the mid-year CEO's evaluation for 2022;
- set and approved the key performance indicators ("KPI's") of the CEO for 2022;

- approved the implementation of a VES in 2022;
- approved changes in the BoD Committee's composition;
- was updated on Board Committee's issues on a monthly basis.

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

- the Action Plan for 2022 of Group's Internal Audit and Compliance Units;
- the Group Compliance Annual Report for 2022;
- the Group Internal Audit Annual Report on the ICS for 2021 and its assessment;
- the Annual Report of the Responsible Officer (Money Laundering Reporting Officer, "MLRO") on Anti Money Laundering/ Combating the Financing of Terrorism ("AML/CFT") for 2021;
- the Report on the assessment of the suitability of the measures taken by the Bank in connection with the safeguarding of financial instruments and clients' funds, as well as the use of clients' financial instruments, according to Law 4514/2018 (as specified in BoG Executive Committee's Act 147/27.07.2018);
- the revision of the Group's Compliance Policy; and
- the Conflict of Interests Framework Review.

The Board was also updated on the progress of the special audits of the Internal Audit Unit.

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

- the completion of various major transactions ("ERMIS EIF" and "ERMIS VI" synthetic securitizations, project "Trinity XI" relating to the sale of corporate loans exposure and receivables, project "Magnus'' relating to the sale of a portfolio of written-off loans receivables);
- the "Sunrise III" securitization transaction and the submission of relevant application for its inclusion in the HAPS;
- the issuance of Senior Preferred Notes under the Euro Medium-Term Note ("EMTN") Programme, in the context of meeting MREL requirements;
- credit requests, accounting write-offs and loans' restructurings of various companies, following respective submissions of the competent Units.

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

- the Bank 's and the Group's Annual Financial Report for the fiscal year 2021;
- the Annual Variable Incentives Schemes for the Performance Year 2021 Bonus Pool;
- the amendments in the Directors' Remuneration Policy.

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

2.8 Induction and Training of Board members

The Bank implements an induction procedure for newly elected/ appointed Board members aiming to facilitate the Board members' understanding of the Group and the Bank's structure, business model, risk profile, governance arrangements and the role of the member(s) within them. In that context, the Bank ensures that they are provided with all the information and training necessary to enable them to contribute appropriately to the operations of the Board and to the accomplishment of its mission.

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 Bank Secretary, accompanied by a detailed induction pack (a living document which provides them with a wide range of information about the Bank 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 Bank, with the opportunity to ask questions with reference to the Bank 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 fit and proper 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 Bank.

The Bank 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 Human Resources Division, 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 Bank or on legal, regulatory, market and industry requirements and standards. 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. Personalised educational programs may be designed and implemented, where needed.

2.9 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 the legal and regulatory framework applicable to the Bank as well as the Directors' Remuneration Policy.

Detailed information on the remuneration of the members of the BoD are provided in the Remuneration Report of the Company and the Directors' Remuneration Policy, available in the Group's website.

2.10 Board Self-assessment

According to the Bank's "Self-Assessment Policy for the BoD, Board members and Board Committees", taking into consideration relevant provisions of the Board Nomination 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 Bank'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 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 Chairman of the Board has a leading role, which entails the evaluation and processing of the outcome.

The conclusions of the self-assessment are summarized by the NomCo in a report together with any recommendation or changes the Committee deems appropriate.

Board self-assessment for year 2022

In January 2023, the Bank appointed Nestor Advisors, a global advisory firm specializing in corporate governance, sustainability and organizational design, to support the self-assessment exercise for the BoD for the 2022 period. All Board members took part in the Board self- assessment exercise by completing a questionnaire covering a large scope of evaluation themes such as strategy, risk governance, internal control, strategic human recources issues, sustainability and stakeholder engagement, BoD nomination and composition, BoD functioning and dynamics, BoD Secretariat support, Information flows, Chair performance, BoD interaction with management and effectiveness of all BoD Committees.

The results of the aforementioned BoD self-assessment exercise indicate that the BoD is perceived to function well. BoD members are committed to their role, work well together and provide appropriate oversight. Among the strengths highlighted by the assessment are included the highly efficient cooperation between the CEO and the BoD, the excellent execution of his duties by the Chairman, the acknowledgement that the CEO is appropriately empowered to execute the strategy and agenda agreed by the BoD, the good and open communication lines between the BoD and the senior management, the smooth operation of the BoD Committees and their effective role in supporting the BoD.

Considering areas of further improvement, the BoD members focused on remuneration and the retention and attraction of talent, succession planning, ESG and gender diversity.

3. Committees

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

A. Board of Directors Committees

1) Audit Committee

On 31 December 2022 and on the date of the publication of the 2022 Annual Financial Report, the composition of the Audit Committee is as follows:

AUDIT COMMITTEE	
Anne Weatherston	Chairman, Independent Non-Executive BoD Member
Solomon Berahas	Vice-Chairman, Independent Non-Executive BoD Member
Karel De Boeck	Member, Independent Non-Executive BoD Member
David Hexter	Member, Independent Non-Executive BoD Member
Francesca Tondi	Member, Independent Non-Executive BoD Member
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative pursuant to Law 3864/2010

During 2022, the following changes were made to the composition of the Committee: On 23 June 2022, Mr. Andrew Panzures ceased to be a member and Ms. Francesca Tondi was elected as a new member. On the same day, Mr. Solomon Berahas was designated as Vice Chairman of the Committee.

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 Audit Committee is governed by the BoG Governor's Act 2577/2006, art. 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"), Group Chief Audit Executive ("CAE"), Group Compliance Officer, Group Chief Risk Officer ("CRO"), Group Chief Operating Officer ("COO"), Group Controller, Senior Advisor on Internal Control and Audit Issues 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.

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

In 2022, the Audit Committee convened thirteen (13) times and all its decisions were taken unanimously based on the thorough examination of the 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 meeting following respective request. In addition, the Audit Committee Chair maintained regular contact with the audit partner throughout the year.

Role 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

Bank prior to their publication. Supervising of the audit and review of the Group's and the Bank'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 the 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) no. 575/2014 in conjunction with article 44 of Greek Law 4449/2017 and article 13 of Greek Law 3864/2010;
- Monitoring and annual evaluation of the adequacy and effectiveness of the ICS of the Group and the Bank;
- Evaluating the work of the GIA, 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;
- Reviewing and monitoring the level of OR in the Group and the Bank through monthly reporting by RM, ensuring a good understanding of how the Group and the Bank identify, manage and mitigate significant OR;
- 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 Group Compliance Division;
- Monitoring and evaluating on an annual basis the report on "Anti-Money Laundering and Terrorist Financing" prepared by the Group Chief Compliance Officer;
- Updating the BoD for the results of the special and regular audits and other significant matters arisen and its role in the whole process.

How the Committee discharged its responsibilities during 2022

Regarding **Financial Statements and relevant notifications,** the Audit Committee:

- Reviewed the Group and the Bank's critical accounting estimates and judgments and their application to the Group's and the Bank's quarterly interim financial information and annual financial statements;
- Reviewed the quarterly interim financial information 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 pre-approved the appointment of Deloitte as the Group's statutory auditor for the financial year 2022;

- Reviewed and proposed to the Board the fees for audit and permissible non-audit services to Deloitte for the year ended 31 December 2022, as disclosed in Note 49 of the Annual Financial Statements;

- Considered Deloitte independent. Deloitte, in accordance with professional ethical standards, provided the Audit Committee with written confirmation of its independence for the financial year 2022;

- Was updated on the impact on Deloitte's audit plan and audit approach, in relation to climate related risks, cyber risk and supply chain disruption risk.

Regarding **Internal Control System and Risk Management,** the Audit Committee:

- Promoted the continuous strengthening of the ICS as a strategic priority for the BoD and Management of the Group and the Bank, 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 any 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;

  - Examined and discussed reports and information regarding the ICS pursuant to the quarterly reports prepared by the Internal Audit;

  - Reviewed and pre-approved the ICS annual evaluation report for 2021 and its final assessment in respect to the operation of the ICS that was submitted to the BoG – in accordance with the provisions of BoG's Governor's Act 2577/2006 – in June 2022. The report was also submitted to the BoD for further approval. The respective report for 2022 will be reviewed by the Audit Committee and will be submitted to the BoG in June 2023;

- Approved the audit scope of the project "Assessment of the adequacy of the ICS in accordance with the BoG Governor's Act 2577/2006" and the appointment of the firm of external auditors to carry out this assessment;

- Obtained an overview (jointly with the Risk Committee) of the OR and control matters:

  - Was notified on OR assessment processes and focused on a common risk oriented approach among GIA, Compliance and Risk functions;

  - Was notified on the Annual Plan of Control Functions;

  - Was notified on the level of operational losses being incurred in the Group and the Bank;
  - Was ensured that the Management takes adequate corrective steps to reduce the level of OR and to mitigate significant OR where necessary;

- Acquired a full understanding of the RM Unit through the participation of some of Committee's members in the Risk Committee;
- Was updated on the process, results, and statistics data of Whistleblowing cases;
- Was updated on the decisions, requirements and corrective actions on the SREP by the Joint Supervisory Team in order for the Group and the Bank to improve its existing procedures and practices;

Regarding **Internal Audit,** the Audit Committee:

- Monitored the implementation of the Internal Audit Annual Action Plan for year 2022 and concluded that the Internal Audit was effective;
- Was notified of the GIA Annual Action Plan for year 2023, 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;
- Reviewed the report on the 'IT Systems Audit and Operations based on BoG Governor's Act 2651 & GIA's expertise in the areas of IT and Cyber Security' and was updated on the audits and findings of IT Systems (IT Audit) and their operations. In 2022, special focus was given on critical IT areas and incidents;
- Reviewed the performance and effectiveness of the Group CAE. The Audit Committee Chairman held several meetings with the CAE without other Management members being present;
- Ensured that Internal Audit has the appropriate skillset and capacity to audit and evaluate the effectiveness of the internal control framework, with special emphasis on the areas of risk and data security as well as financial control.

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

- Monitored the implementation of the Compliance Annual Action Plan for year 2022 and concluded that Compliance Function was effective;
- Reviewed and pre-approved the Annual Report of Compliance Manager on AML and Anti-Terrorism financing for 2021 based on BoG Decision 281/5/2009 and submitted it to the Board for further approval. The respective report for 2022 was reviewed and approved in February 2023;
- Was notified of the Compliance Annual Action Plan for year 2023, pre-approved its implementation and submitted it for approval to the BoD;
- Reviewed the independent Assessment of the appropriateness of Bank's measures regarding the safeguarding of customers' assets required by Law 4514/2018;
- Reviewed and pre-approved the updated Group Compliance Policy;
- Was updated on the "AML system upgrade" project;

- Reviewed and approved the updated Conflict of Interests questionnaire.

Information on the responsibilities and the operation of the Audit Committee is available on the Bank's website.

2) Risk Committee

On 31 December 2022 and on the date of publication of the 2022 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
Solomon Berahas	Vice Chairman, Independent Non-Executive BoD Member
Andrew Panzures	Member, Independent Non-Executive BoD Member
Anne Weatherston	Member, Independent Non-Executive BoD Member
Alexander Blades	Member, Non-Executive BoD Member
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative

Governance - Operation

The Risk Committee consists of non-executive BoD members and is 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 total members of the BoD. The majority of the members (rounded to the nearest integer number) should meet the criteria for the independence of Board Members, in accordance with Greek Law. 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 Members of the Risk Committee should process adequate knowledge and previous experience in the financial services and banking industry, with at least one member having solid risk and capital management experience, as well as familiarity with the local and international regulatory framework.

The Risk Committee is supported by an Executive Secretary and a Secretary. The Executive Secretary is appointed by the BoD and is the CRO of the Group, performing the duties set out in the regulatory framework in force (BoG Governor's Act 2577/2006). He/she is independent, reports directly to the Risk Committee and is subject to audit by the Internal Audit.

The term of office of the Risk Committee's members cannot exceed the term of office of the BoD (three (3) years), but the BoD is entitled to cease or replace them at any time.

The Committee convenes, upon its Chairman's invitation when this is deemed necessary to carry out its duties, but no less than once per month. In order to fulfill its duties, the Risk Committee held twelve (12) meetings during 2022.

Members' attendance rates in the Risk Committee meetings are depicted in the Board members Participation in the BoD and the respective Committees table in section 2.5 above.

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

- The Group and the Bank have a well-defined risk and capital strategy and risk appetite. The Group and the Bank's risk appetite is structured through a number of quantitative and qualitative statements, including specific limits, for the material undertaken risks;
- All forms of risk connected to the activity of the Group and the Bank are effectively identified, assessed, measured, controlled, mitigated and monitored;
- The Group and the Bank's risk appetite is clearly communicated to the entire Bank and its subsidiaries and constitutes the basis for the development of RM policies and risk appetite limits at the Group and the Bank level;
- The integrated control and management of risks is soundly implemented at Group and Bank level.

Roles and Responsibilities

The Risk Committee is responsible to perform the duties set out in the internal Operating Regulation, in order to assist the BoD in its duties, especially in relation to:

- Monitoring, assessing and being up to date 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 Group and the Bank;
- Evaluating 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 Group and the Bank current activity;
- Overseeing (jointly with the Audit Committee) and providing update to the BoD with respect to the implementation progress of the major initiatives related to OR as well as internal control enhancements.

Additionally, the Risk Committee controls the independence, adequacy and effectiveness of the operation of the GRM unit.

How the Risk Committee discharged its responsibilities during 2022

- Evaluated and made recommendations to the BoD, when required, in respect to major risk related to strategic/priority actions that required the approval of the latter, including, indicatively and not exhaustively, the:
  - 2022 EBA Climate Stress Test Exercise;
  - Securitization Transactions;
  - Action Plans on Regulatory/Supervisory Assessments and Reviews (including ESG matters).
- Assessed the adequacy and effectiveness of the OR and control framework and relevant policies and in particular compliance with the established risk appetite limits and early warning levels;
- Evaluated and made recommendation to the BoD in respect to credit proposals that required the approval of the latter, both for performing and non-performing exposures;
- Obtained an overview and provided update to the BoD on RM's reports regarding, indicatively, the profile of the material risks undertaken and the evolution of the risk indicators in accordance with risk appetite limits, as well as the main risk focus areas and monitoring actions;
- Obtained an overview and provided update to the BoD on the loan portfolio management and performance, including both performing and non-performing exposures;

- Obtained an overview and provided update to the BoD in respect to the supervisory and regulatory developments and the implementation progress of the Action Plans related to relevant assessments/reviews;
- Obtained an overview (jointly with Audit Committee) and provided update to the BoD in respect to the implementation progress of the major initiatives related to OR and internal control enhancement;
- Evaluated and provided recommendation to the BoD, when required, in respect to risk related Policies, including indicatively Credit Control Policy;
- Evaluated and provided recommendation to the BoD (jointly with Remuneration Committee) in respect to the CRO's compensation.

Information on the responsibilities and the operation of the Risk Committee is available on the Bank's website.

3) Remuneration Committee

On 31 December 2022 and on the date of the publication of the 2022 Annual Financial Report, the composition of the Remuneration Committee is as follows:

REMUNERATION COMMITTEE	
Andrew Panzures	Chairman, Independent Non-Executive BoD Member
Francesca Tondi	Member, Independent Non-Executive BoD Member
Enrico Cucchiani	Member, Independent Non-Executive BoD Member
Solomon Berahas	Member, Independent Non-Executive BoD Member
Alexander Blades	Member, Non-Executive BoD Member
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative

During 2022, the following changes were made to the composition of the Committee: On 23 June 2022, Mr. Andrew Panzures was appointed Chairman of the Committee, role which was previously held by Mr. Arne Berggren, who resigned from the BoD. On the same day, Ms. Francesca Tondi was elected member of the Committee.

Governance - Operation

According to its Terms of Reference, the Remuneration Committee is appointed by the BoD of the Bank 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 Bank's Risk and Capital Strategy.

The Remuneration Committee shall meet at the invitation of the Chairperson 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 nine (9) meetings during 2022. 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 Remuneration Committee is, *inter alia*, responsible to:

- Review annually the Group's Remuneration Policy;
- Evaluate on a regular basis the remuneration of Executive and Non-Executive BoD Members as well as the senior executive management;
- Make a recommendation to the BoD, on an annual basis, regarding the remuneration of executive and non-executive BoD members for the coming period;
- Assess the compliance of proposed variable remuneration schemes to current legislation, as well as their consistency with the Bank´s risk appetite and strategies;
- Assess whether the proposed remuneration packages for senior executives of the Bank´s independent control functions are compliant with the Group´s remuneration policy;
- Regularly monitor pay equality and presence of discrimination based on gender, age or Bank of origin;
- Review and propose to the Board 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 2022

- Reviewed and recommended to the BoD the annual Variable Incentive Scheme as well as the 2022 VES of the Group;
- Reviewed and recommended to the BoD for approval the Annual Remuneration Report for 2021;
- Reviewed and recommended to the BoD for approval i) the amendment of Directors' Remuneration Policy and ii) the BoD's remuneration for 2021 and advance payment of 2022 remuneration, in order to be submitted to the Annual GM of Shareholders;
- Reviewed the Committee's 2022 Activity Report & Annual Plan for 2023.

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

4) Board of Directors Members Nomination Committee

On 31 December 2022 and on the date of the publication of the 2022 Annual Financial Report, the composition of the Board of Directors Members Nomination Committee is as follows:

NOMINATION COMMITEE	
David Hexter	Chairman, Independent Non-Executive BoD Member
Enrico Cucchiani	Vice-Chairman, Independent Non-Executive BoD Member
Venetia Kontogouris	Member, Independent Non-Executive BoD Member
Andrew Panzures	Member, Independent Non-Executive BoD Member
Karel De Boeck	Ex officio Member, Independent Non-Executive BoD Member
Alexander Blades	Member, Non-Executive BoD Member
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative

During 2022, the following changes were made to the composition of the Committee: On 23 June 2022, Mr. Arne Berggren ceased to be a member following his resignation from the BoD and Mr. Andrew Panzures was elected member of the Committee.

Governance - Operations

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

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 including the HFSF Representative. Decisions of the Committee are taken with the majority of the members present or represented at the meeting.

The NomCo held five (5) meetings during 2022. Members' attendance rates in the Committee's meetings are depicted in the Board Members Participation in the BoD and the respective Committees table in section 2.5 above.

Roles and Responsibilities

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

The 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;
- Establish a candidate's "independence" in the context of 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 over the longer term, in order to ensure Board and Management continuity;
- Adopt and periodically review a Nomination Criteria Policy for Board members;
- Adopt a Diversity Policy for Board members and review it on a three (3) year basis;
- Conduct an annual assessment of the effectiveness of the Board and its Committees; also ensure that an annual performance evaluation is conducted for the CEO and the other Board executives which will be reported to the Board;
- Evaluate the independence of the incumbent non-executive Board members once a year;
- Adopt, periodically review and monitor the application of an Induction and Training Policy for Board members;
- Oversee the induction and training programs for members of the Board.

How the Nomination Committee discharged its responsibilities during 2022

- Performed the self-evaluation process of the BoD and its Committees for 2021 and reviewed its results;
- Reviewed and ensured that no conflicts of interest exist between the Bank and the BoD;
- Assessed the independence of 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;
- Recommended for approval to the BoD amendments of the composition of the Board and its Committees (namely changes of Chairmanship of certain Committees and members' changes in certain Committees), due to the replacement of a resigned Member by a new one;
- 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 2021 and the CEO's Mid-Year Assessment for 2022;
- Recommended for approval by the BoD the nomination of a candidate to replace a resigned Independent non-executive Member of the BoD.

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

5) Strategy Committee

As at 31 December 2022 and on the date of publication of 2022 Annual Financial Report, the Committee's composition was the following:

STRATEGY COMMITTEE	
Enrico Cucchiani	Chairman, Independent Non-Executive BoD Member
David Hexter	Vice-Chairman, Independent Non-Executive BoD Member
Karel De Boeck	Member, Independent Non-Executive BoD Member
Anne Weatherston	Member, Independent Non-Executive BoD Member
Andrew Panzures	Member, Independent Non-Executive BoD Member
Venetia Kontogouris	Member, Independent Non-Executive BoD Member
Alexander Blades	Member, Non-Executive BoD Member
Periklis Dontas	Member, Non-Executive BoD Member, HFSF Representative

Governance- Operation

The Strategy Committee is appointed by the BoD of the Bank and is comprised of Non-Executive members of the BoD. The Representative of the HFSF participates as a Member in the Committee with full voting rights. The Committee is supported by an Executive Secretary who is appointed by the BoD.

The competencies of the Strategy Committee refer both the Bank and its subsidiaries.

The Strategy Committee meets on a monthly basis, at the time and place and with the daily agenda determined by its Chairman. The Chairman may decide to convene an extraordinary meeting of the Strategy Committee or to alter the day or frequency of regular meetings.

Each member of the Strategy Committee has the right to propose or add issues to be further discussed by the Committee. The issues are brought to the attention of the Chairman of the Committee in order to be added into the agenda of the next scheduled or extraordinary meeting of the Committee.

The meetings of the Strategy Committee may be conducted using video conferencing technologies, which do not require the physical presence of members on the same site.

In addition to the members of the Strategy Committee, the following persons are called upon to attend the meetings without voting rights:

(a) the Board Chairman;

(b) the CEO;

(c) the members of the Group Executive Committee, following respective request by the CEO;

(d) the management or executives responsible for various issues tabled for discussion by the Committee, following the request of the CEO;

(e) the Chairman’s advisor who is responsible on strategy issues.

Minutes are kept for all meetings of the Strategy Committee and are certified by the Chairman and the Executive Secretary of the Committee.

The Strategy Committee takes decisions with a quorum of at least half its members and a 2/3 majority of the members present.

Roles and Responsibilities

The Strategy Committee is responsible for performing the duties set out in the internal operating regulation, so as to be able to assist the BoD in its work concerning:

- defining the objectives of the Bank's Strategic Plan and provides guidelines on the Bank's Business Plan which will be drawn up by the CEO and the Group Executive Committee and submitted for approval to the BoD;
- monitoring and controlling the implementation of the approved Business Plan;
- following up on a regular basis, analyzing and submitting its suggestion to the BoD on issues concerning strategic choices of the Bank (e.g. capital increases or decreases, acquisitions, mergers, investments or liquidation of strategic participations, strategic alliances, etc.), assigning to managers' special missions for the achievement of targets and, when necessary, submitting a respective proposal to the BoD;
- monitoring, tracking and analyzing arising risks in the implementation of the approved Business Plan and submitting to the BoD recommendations on how to address them;
- proposing the above issues for inclusion on the Daily Agenda of the BoD or of the GM of the Bank;
- monitoring and submitting suggestions to the BoD on all issues of strategic importance for the Group;
- operating as a crisis management committee.

In order to fulfill its duties, the Strategy Committee held ten (10) meetings during 2021. Members' attendance rates in the Committee's meetings are depicted in the Board Members Participation in the BoD and the respective Committees table in section 2.5 above.

How the Strategy Committee discharged its responsibilities during 2022

Inter alia, it:

- Reviewed the Group's 2022-2025 business plan guidelines ahead of March 2022 finalisation;
- Was updated on
    i) the current performance and future strategy ahead of the Bank's stock brokerage activities;
    ii) the credit expansion dynamics for the period 2022-2025 per area of business;
    iii) the retail transformation of the Group;
    iv) the Corporate and Investment Banking transformation plan;
    v) the Real Estate portfolio breakdown, the relevant controls and processes and the Strategy ahead, and
    vi) the activities' progress of the Bank's Transformation Plan
- Was updated on a regular basis on the share price status, ahead of each financial 3month disclosure;
- Was updated on the General and Administrative costs of the Group and on the design of an action plan ahead;
- Was updated on the market view post of the 1st quarter of 2022 results; and in comparison with EU banks results;
- Reviewed the 2023 Budget Dimensions

Information on the responsibilities and the operation of the Strategy Committee is available on the Bank's website.

B. Group Executive Committee

On the date of publication of 2022 Annual Financial Report, the Committee's composition was the following:

GROUP EXECUTIVE COMMITTEE	
Christos Megalou	Chairman, Managing Director, CEO
Athanasios Arvanitis	Member, Executive General Manager
Georgios Georgopoulos	Member, Executive General Manager
Theodoros Gnardellis	Member, Executive General Manager
Achilleas Kontogouris	Member, Executive General Manager
Vasileios Koutentakis	Member, Executive General Manager
Charalampos Margaritis	Member, General Manager
Emmanouil Bardis	Member, Executive General Manager
Chryssanthi Berbati	Member, General Manager
Ioannis Stamoulis	Member, Executive General Manager
Theodoros Tzouros	Member, Executive General Manager

During the reporting period, the following changes were made to the composition of the Committee: Ms Eleni Vrettou, (former) Executive General Manager, ceased to be a member on 17 February 2022 following the completion of her cooperation with the Group. Moreover, Mr. George Kormas (former) Executive General Manager and Mr. Konstantinos Paschalis, (former) General Manager, ceased to be members of the Committee by virtue of a BoD resolution dated 24 February 2022. In addition, Mr. Dimitrios Mavrogiannis, (former) Executive General Manager, ceased to be member of the Committee by virtue of a BoD resolution dated 23 February 2023 following the completion of his cooperation with the Group.

Short CVs of the Bank Group Executive Committee's members are available on the Group's website (www.piraeusholdings.gr)

Governance- Operation

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

The Committee meets every second Monday upon the invitation of its Chairman, and extraordinarily whenever convened by its Chairman. The invitation sets the agenda, the time and place of the meeting of the Group Executive Committee.

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.

Group Executive Committee decisions are taken with a 2/3 majority of the members present and represented. The presence, participation and voting of a Committee member during the discussion of an issue in which he has a conflict of interest is not permitted. Decisions that concern the establishment of policy, procedures, terms or criteria for RM or other issues of general application do not fall under the previous prohibition.

The Group Executive Committee has the right to invite any Bank employees, executives or advisors it deems expedient or useful to its meetings.

Minutes are kept for all Group Executive Committee meetings and are certified by the Chairman, the Executive Secretary and the Secretary.

The responsibilities of the Group Executive Committee relate to both the Bank and its subsidiaries.

Roles and Responsibilities

Authorised by the BoD of the Bank, the Group Executive Committee has the following responsibilities, which it may delegate or assign to administrative Committees, Committee Members or Bank executives:

- monitors the implementation of both the Business Plan of the Bank and of 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;
- establishes Administrative Committees and determines their composition and competencies;
- approves, complements or amends the Group's Accounting Policies, following a recommendation by the Group's Financial Management;
- determines the interest rate policy and the pricing of the products and services offered by the Bank;
- approves the introduction of new and significant changes to existing products and services of the Bank, 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 proposed partnerships in sectors or fields of the economy, following a recommendation by the Heads of the competent Business Units or Support Units;
- approves the principles and rules of Credit Policy, as well as the regulations, manuals, policies and procedures of Credit Policy, which enter into force for the implementation of these principles, as well as any of their amendments, following the agreement with the Group CRO, except for the amendments of Risk Appetite, which are approved by the Risk Committee;
- monitors and supervises the observance of Corporate Governance rules and programs and decides on taking regulatory compliance measures following the recommendation of competent Units or Committees;
- approves human resources programs (voluntary departure, fees, insurance and other contributions), always within the framework of the approved Group Remuneration Policy;
- approves the Executive's promotions to a grade higher than the one of Director;
- sets, within the range of its own approval limits, the approval limits of the Bank's Management Committees and executives on issues not related to credit approvals;
- Informs the Board via its Chairman at least once every quarter that the operation of the Group Executive Committee is in accordance with the Bank's operational strategy and risk strategy.

4. Internal Control System

The ICS is a set of detailed documented control mechanisms embedded in policies and procedures covering continuously every activity and transaction and contributing to the Group and the Bank’s effective and efficient operations.

Management is responsible for establishing and maintaining an adequate and effective ICS within the Group as well as relevant procedures and practices. Management also monitors, systematically the adequacy and effectiveness of the existing ICS and implements promptly any actions required for a sustainable response to and mitigation of inherent risk, while at the same time takes care of the development and enhancement of the ICS on a Group and Bank level. Moreover, with appropriate EWS, Management monitors the consistent application of the ICS in the Units, as well as the full compliance of all concerned parties with the principles and objectives of the ICS.

The establishment of the ICS aims in particular to:

- the consistent implementation of the business strategy of the Group and the Bank with effective use of existing resources;
- the identification and management of risk exposures and potential risks;
- ensure the completeness and reliability of the data, which are necessary for the preparation of reliable financial statements in accordance with IFRS and generally for the accurate and timely determination of the financial position of the Group and the Bank;
- the compliance with legislative and regulatory framework governing the operations of the Group and the Bank;
- conduct periodic and/or occasional audits by the relevant Units of the GIA to establish consistent application of prescribed rules and procedures by all business Units of the Bank and its Group.

Under the current institutional framework, the Bank's ICS is supported by an integrated communications and Management Information System (MIS), also by inter-complementary mechanisms, forming an integrated system for controlling and auditing both the Bank's organizational structure and operations.

The Audit Committee monitors and evaluates on a yearly basis the adequacy and effectiveness of the ICS at a Bank and at Group level, based on the relevant data and information of the GIA, the Compliance and the findings and observations of the statutory auditors and supervisory authorities. The Bank’s Audit Committee also reviews the effectiveness of the Bank's compliance procedures with the laws, rules and regulations of the supervisory authorities.

Periodically and at least every three (3) 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. The relevant evaluation report is communicated to the supervisory authorities within the first half of the year following the expiration of the three (3) years.

IT security risks

The Group and the Bank 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 Bank'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 Bank 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 (IdM);
- Implementation of special security mechanisms in order to manage, log and monitor, privileged access rights;
- Periodic user access reviews;
- 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 and ISO 27001).

For the smooth operation of the Main Data Centre and the support of all technological infrastructure, the Bank has implemented a large number of policies and procedures to guarantee the quality of IT services provided throughout the Group and the Bank. All system interfaces and critical data flows/jobs are monitored by a dedicated operator's team on a continuous basis and based on formalized schedules and execution guidelines. Identified issues are documented and followed up as appropriate until successfully resolved. Among other things, the Bank has designed and implemented the following:

- Maintenance and technical support of systems based on manufacturer's specifications and other needs that come across;
- System Updates with newer software versions and security patches;

- Operating system parameters managing procedures;
- Work planning procedures;
- Monitoring of daily IT operations (system interfaces, scheduled data flows/jobs and system backups);
- Logging and troubleshooting procedures;
- Capacity, load and performance management procedures for systems and networks;
- Continuous monitoring of the availability of systems and networks;
- Adequate back-up procedures.

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

Group Internal Audit Division

Exclusively GIA conducts internal audits in the Group. The Internal Audit Units / Officers which operate in the Group's subsidiaries in Greece 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 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 is responsible for the entire Internal Audit function within the Group. In this respect, is responsible for supervising and coordinating the activity of the Internal Audit Units / Officers of the Group's subsidiaries.

GIA represents the "Internal Audit Unit" referred in Chapter V.a. of the BoG Governor's Act 2577/2006 and operates in accordance with the provisions of this Act, the EBA Guidelines on Internal Governance under Directive 2013/36/EU as well as the related legislative and regulatory framework in force.

GIA activity is adherenced to the mandatory elements of 'The Institute of Internal Auditors' International Professional Practices Framework ("IPPFs") and more specifically:

- the Definition of Internal Auditing;
- the Core Principles for the Professional Practice of Internal Auditing;
- the International Standards for the Professional Practice of Internal Auditing;
- the Code of Ethics.

The Head of GIA (Chief Audit Officer) reports periodically to the Senior Management and the Audit Committee the conformance with the Code of Ethics and the Standards.

The CAE reports functionally to the BoD through the Audit Committee and administratively to the CEO.

GIA:

- 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 and any transfer of a member of its staff to other unit is subject to CAE's approval and notification of the Audit Committee.

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; and
- 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 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 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 from any source (e.g. staff, systems, physical archives etc.) all information and explanations required for carrying out their audit mission using all available means. In the case of highly confidential or sensitive information, only the CAE 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 Auditors.

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. The Audit Cycle is approved and amended only upon decision of the Audit Committee.

In accordance with the Audit Cycle and the outcome of the risk assessment process, GIA is compiling the Annual Audit Plan – which is approved by the Audit Committee – by giving priority to the high-risk areas.

The Annual Audit Plan incorporates the subsidiaries that are going to be covered by the audit plan within the reference year, the annual audit targets, the assessment on the coverage of the Group's activities according to the significance of the respective risks, the scheduled audit engagements on Group's activities and on critical outsourced activities, the needs in terms of audit staff and the Budget of the Unit including among others the transportation and training costs. 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 deemed valid by the CAE.

The CAE informs periodically on the implementation status of the Annual Audit Plan the Audit Committee, which approves any potential revision upon respective request by the CAE.

The Auditors conduct any type of audits in all the Bank's units, activities and providers of critical outsourced activities as well as any of the Group's subsidiaries, in order to formulate a reasonable, objective, independent and documented opinion on the adequacy and effectiveness of the Group's ICS.

GIA assesses, inter alia, whether:

- The risks related to the achievement of the strategic objectives are appropriately identified and managed;
- The staff actions comply with the established policies, procedures as well as the applicable laws, regulations and governance

standards;

- Operations are carried out based on an adequate ICS;
- Information and the means used to identify, measure, analyze, classify, and report it are reliable, accurate and complete;
- Resources and assets are safely managed.

The audit results and especially the recommendations for improving the effectiveness of governance, RM and control processes are appropriately communicated to the Senior Management.

The Auditors participate through their advisory role, upon request of the Senior Management or in the context of ensuring the effective functioning of the Audit Committee, in various stages of the development process of policies, procedures and information systems and in general provide their opinion on the on-going improvement and development of an adequate ICS. The participation as well as the respective results are not considered as audit engagement.

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

The Bank expects from GIA staff to demonstrate good faith, sound judgment and due diligence in the performance of their duties.

The Auditors ought to comply with the Group's Code of Conduct and the rules set out in the Internal Audit Regulation. The strict adherence to the operational framework contributes to the achievement of Internal Audit function's consistency, cohesion, stability and reliability.

The operating framework of GIA, is in alignment with the relevant Code of Conduct of the International Institute of Internal Auditors, and incorporates both the principles for the Internal Audit function and the rules of conduct that the Auditors should apply during the execution of their duties.

The Auditors are expected to apply and uphold the following principles:

- Integrity
- Objectivity
- Confidentiality
- Competency

Group Compliance Division

The Group Compliance Division was established in the context of complying with the rules of the Basel II supervisory framework and the provisions of the BoG Governor's Act 2577/2006 as an independent unit, responsible for implementing the policy adopted by the Bank's BoD, in order to comply with the relevant applicable legal and regulatory framework. The Group Compliance Division reports to the BoD through the Audit Committee, it has unrestricted access to all data and information necessary to carry out its duties and is managed by a person selected to be the Group Compliance Officer possessing sufficient knowledge of banking and investment activities.

Group Compliance has the following competences and responsibilities:

- It develops and implements appropriate procedures and prepares a related annual Compliance Action Plan, with the objective of achieving timely and continuous compliance of the Group and the Bank with the regulatory framework in force, and the Group and the Bank's internal rules, having at any given time a complete view of the degree of achievement of the said objective;

- It informs Senior Management and the BoD of the Bank of any identified significant violation regarding compliance with the regulatory framework in force or any serious deficiencies of adherence to the requirements imposed by the aforementioned framework;
- In case of amendments of the regulatory framework in effect, it provides, with the assistance of legal Services and / or the local legal consultants of the subsidiaries abroad, relative instructions for the adjustment of internal procedures and internal rules applied by the Group Business Units;
- In cooperation with the Human Recources, it ensures that the staff is timely updated on amendments of the regulatory framework on the AML/CFT, by developing appropriate procedures and training programs;
- It coordinates and evaluates the work of the Heads of Compliance Units (Compliance Officers) of the branches abroad and of the subsidiary banks and other subsidiaries in Greece and abroad, so that all Group companies fully comply with the regulatory provisions applicable at the time;
- It ensures, by implementing appropriate procedures, that deadlines for the fulfillment of the obligations stipulated by the regulative framework in force are met and for this purpose provides to the BoD, written assurance through its reports;
- It ensures that the Group and the Bank comply with the regulatory framework regarding the prevention of using the banking system for the legalization of proceeds from criminal activities and terrorist financing. For this purpose, it examines the compliance of the Organizational Units regarding money laundering issues and adherence to the obligations regarding the combating of terrorism, and sets up the proper environment for the prompt detection, prevention, investigation and reporting of relevant actions;
- It participates (at least) on an advisory basis in the design of new products and processes, regarding business decision making, and, the assessment of the OR arising from significant changes (mergers, acquisitions, etc.), so as to ensure compliance with the regulatory framework in force. At the same time, the GIA and the Operational and Market RM participate in order to establish appropriate control and RM mechanisms;
- It expresses an opinion on the selection and suitability of the Heads of the relevant Units of the subsidiaries, and evaluates their efficiency;
- Examines and responds, according to the current legislation along with the support of the legal Services, to Competent Authorities requests related to the provision of information and/or the restriction of account/safety deposit box movement;
- Gives opinion on new financing and loan restructuring to the relevant, senior, approval committee of the Bank;
- Monitors participations in the Bank Share Capital Increases against direct and indirect funding;
- Participates in the evaluation of outsourcing services and ensures compliance with the provisions of the institutional framework.

Risk Management

The BoD and Management places particular emphasis on the effective monitoring and management of risk, at both the Group and Bank level, with a view to maintain stability and continuity of its operations.

The thorough implementation and continuous enhancement of the RM framework remains a priority and are taken into account in setting up the Bank's business and strategic plans.

The BoD has the overall responsibility for defining and overseeing the RM framework.

The RM function is not limited to the activities of the GRM and the CRO, but refers to the processes performed by all 3 lines of defense, based on the assigned responsibilities, in the context of an enhanced RM as set out below.

The Bank has established policies, procedures and adequate mechanisms for RM, at the level of all three (3) lines of defense, in order to identify, manage, monitor and report risks. The procedures in place promote the independence of risk-taking, RM and control activities. The existing organizational structure adequately ensures the separation of tasks and aims to prevent situations that could lead to conflicts of interest.

Through the Risk and Capital Strategy and the individual RM Policies (Risk), the principles of an integrated RM and RM framework are defined in order to support the achievement of the Group's strategic and business objectives, as defined by the Board.

The broader RM framework at Group level is constantly evolving, taking into account the current economic environment, 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.

The effectiveness of the RM framework and the risk profile of the Group is monitored through a set of indicators / measurements by type of risk that is systematically monitored by GRM, as the 2nd line of defense, and informs the Management. This operation is subject to the control of the competent Internal Audit Unit of the Group.

At the same time, the 1st line of defense (business and support units) retains the responsibility of managing the risks arising from its activities in accordance with the strategic directions / limits and policies regarding RM. For this purpose, it develops appropriate control mechanisms for the timely identification and response to risks as well as their continuous monitoring and reporting to the Management and other lines of defense.

The 3rd line (Internal Audit Unit) is completely independent of operations that perform business activities and is responsible for conducting regular audits on the effectiveness of the RM framework and compliance with the approved framework.

In addition, the Group is supervised and evaluated by the competent authorities in relation to corporate governance and the RM framework. It is noted that since November 2014, the Bank, as well as the other Greek systemic banks, is under the supervision of the SSM which consists of the ECB and the National Competent Authority (BoG).

The following committees are mainly involved in the process of planning, monitoring the broader RM function, as well as assessing the adequacy of equity and liquidity in relation to the amount and form of the risks undertaken.

- Risk Committee
- Audit Committee
- Provisioning Committee
- Group Planning & Monitoring Committee (“GCP")
- Credit Committees
- Assets and Liabilities Management Committee
- Risk Model Oversight Committee (“RMOC”)
- Operational Risk Committee (“ORCO”)

The GRM Unit is independent from business units which are responsible for transactions and transaction recording, and reports to the CRO. The GRM Unit performs its duties under the provisions of BoG Governor's Act 2577/2006. Credit Control Unit fullfils the duties of RM in accordance with the BoG Governor's Act number 2589/2007 and the BoG Governor's Act 2594/2007. The Group CRO supervises the GRM and reports to the Risk Committee and through it to the BoD. The Group CRO reports to the CEO and to the Risk Committee, with direct access to the Risk Committee Chair, as deemed necessary. The GRM Unit is subject to audit by the GIA Division as to the adequacy and effectiveness of RM procedures.

In order to conduct its duties effectively, the competent officers of the GRM Unit have access to all the activities and units of the Bank, and to all information and records of the Bank and the Group, which are necessary for performing their duties.

5. **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 par.1 d) of art. 152 of Greek Law 4548/2018 is not required since the provisions of said Directive are not applicable to the Bank.

6. **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, Closed circuit television ("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 shall legally process personal data, provided that processing:
    - is necessary for servicing, supporting and monitoring business transactions and proper execution of any agreements between the data subject and the Bank/ 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 Bank/ 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 protects in every way the processing of personal data from loss or leakage, alteration, transmission or their unlawful processing in any other way;
- 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, 30 March 2023

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

ALTERNATIVE PERFORMANCE MEASURES (APMs) AT GROUP LEVEL & BANK LEVEL

In addition to the financial information that is reported under IFRS, this BoD Annual Report contains also financial metrics that constitute alternative performance measures which aim to follow the guidelines of APMs issued by the European Securities and Markets Authority ("ESMA") on 5 October 2015 and are in force since 3 July 2016. According to the ESMA definition, a non-IFRS financial measure is a metric that measures historical or future financial performance, financial position or cash flows but which excludes or includes amounts that would not be so adjusted in the most comparable IFRS measure.

The below APMs provide a basis for transparent monitoring and comparison of the Group's periodic financial performance and results of operations through metrics which although are commonly used to convey the management's view to the end user, however they are not explicitly defined under IFRS.

The definitions laid out hereinafter through these non-IFRS measures should be considered as supplemental in nature and not as a substitute to the IFRS measures and should not be used for comparability purposes with other companies.

A. APMs

No	APM	APM Definition – Calculation –Relevance of use	FY 2021*	FY 2022
1	Financial Assets	The sum of: financial assets at FVTPL, financial assets mandatorily at FVTPL, loans and advances to customers measured mandatorily at FVTPL, financial assets at FVTOCI, debt securities at amortised cost Relevance of use: Standard banking terminology	12,687	12,443
2	Loans to Deposits Ratio (LDR) – (Seasonally Adjusted)	Seasonally Adjusted Net Loans over (/) Deposits Relevance of use: Liquidity metric	63.3%	61.5%
3	Non-Performing Exposures (NPEs) (Bank)	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 period; plus (+) c) loans to customers mandatorily measured at fair value through profit or loss that are credit impaired as of the end of the reporting period. Relevance of use: Asset quality – credit risk metric	5,071	2,745
4	NPE Ratio (Bank)	NPEs over (/) gross loans grossed up with PPA adjustments Relevance of use: Asset quality – credit risk metric	12.9%	7.0%
5	NPE (Cash) Coverage Ratio (Bank)	ECL allowance grossed up with PPA adjustment over (/) NPEs Relevance of use: Asset quality – credit risk metric	37.9%	51.5%
6	Other Assets	Balancing Item: equals (=) Total Assets minus (-) Net Loans minus (-) Financial Assets Relevance of use: Standard banking terminology	30,402	25,634

No	APM	APM Definition – Calculation –Relevance of use	FY 2021*	FY 2022
7	Other Income	Balancing item: equals (=) Total net Income minus (-) Net Interest Income minus (-) Net Fee and Commission Income and income from non-banking activities Relevance of use: Profitability metric	719	775
8	Other Liabilities	Balancing Item: equals (=) Total Liabilities minus (-) Due to Banks minus (-) Customer Deposits Relevance of use: Standard banking terminology	3,496	3,638
9	Total Regulatory Capital (fully loaded)	Total capital, as defined by Regulation (EU) No 575/2013 Relevance of use: Capital position regulatory metric	14.00%	16.76%
10	CET1 Capital Ratio (fully loaded)	CET1 capital, as defined by Regulation (EU) No 575/2013 Relevance of use: Capital position regulatory metric	9.53%	12.05%

* Specific APMs have been restated for the year 2021 for comparative purposes.

B. APMs Components

Balance Sheet

No	APM Component	APM Definition – Calculation[1]	31/12/2021	31/12/2022
1	Deposits or Customer Deposits	Due to Customers	55,385	58,331
2	Due to Banks	Amounts owed to Banks	14,850	6,922
3	ECL Allowance grossed up with PPA adjustment	ECL allowance for impairment losses on loans and advances to customers at amortised cost	(1,924)	(1,413)
4	Gross Loans grossed up with PPA adjustment (Bank)	Loans and advances to customers at amortised cost before ECL allowances for impairment on loans and advances to customers and loans mandatorily measured at FVTPL	39,295	39,347
5	Net Loans	Loans and advances to customers at amortised cost	36,497	37,326
6	Seasonally Adjusted Net Loans	Net loans and advances to customers at amortised cost plus loans and advances to customers mandatorily measured at FVTPL minus (-) OPEKEPE seasonal funding facility of € 1,474 million as at 31 December 2021 and € 1,517 million as at 31 December 2022. The OPEKEPE seasonal agri loan refers to loan facility related to subsidies provided to the beneficiaries	35,073	35,861

(1) Relevance of use: Standard Banking terminology

Income Statement

No	APM Component	APM Definition – Calculation – Relevance of use	FY 2021*	FY 2022
1	Impairment Charges	ECL Impairment Losses on loans and advances to customers at amortised costs plus (+) Other credit-risk related expenses on loans and advances to customers at amortised cost. Relevance of use: Standard banking terminology	(627)	(665)
2	Net Results - Net Profit	Profit / (loss) for the period from continuing operations attributable to shareholders of the Bank Relevance of use: Profitability metric	399	814
3	Operating Expenses (Opex)	Total operating expenses Relevance of use: Efficiency metric	(872)	(867)

* Specific APMs have been restated for the year 2021 for comparative purposes.

The BoD Report contains financial information and measures as derived from the Group and the Bank's Annual Financial Statements for the year ended 31 December 2021 and 31 December 2022, 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 MIS. For instance, financial items are categorized as foreign or domestic on the basis of the jurisdiction of organization of the individual Group entity whose separate financial statements record such items.

Moreover, it contains references to certain measures which are not defined under the IFRSs. These measures are non-IFRS financial measures. A non-IFRS financial measure is a measure that measures historical or future financial performance, financial position or cash flows but which excludes or includes amounts that would not be so adjusted in the most comparable IFRS measure. Management believes that the non-IFRS financial measures used, present a more meaningful analysis of the Group's financial condition and results of operations. However, the non-IFRS financial measures presented are not a substitute for IFRS measures.

Deloitte Certified Public
Accountants S.A.
3a Fragkokklisias & Granikou str.
Marousi Athens GR 151-25
Greece

Tel: +30 210 6781 100
www.deloitte.gr

TRUE TRANSLATION FROM THE ORIGINAL IN GREEK

INDEPENDENT AUDITOR'S REPORT

To the Shareholders of Piraeus Bank S.A.

Report on the Audit of the Separate and the Consolidated Financial Statements

Opinion

We have audited the accompanying separate and consolidated financial statements of Piraeus Bank S.A. (the Bank and the Group), which comprise the separate and consolidated statement of financial position as at 31 December 2022, and the separate and consolidated statements of Income and comprehensive income, changes in equity and cash flows for the year then ended, including a summary of significant accounting policies and other explanatory notes to the separate and consolidated financial statements.

In our opinion, the accompanying separate and consolidated financial statements present fairly, in all material respects, the separate and consolidated financial position of Piraeus Bank S.A and its subsidiaries (the Group) as at 31 December 2022 and their separate and consolidated financial performance and their 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 Bank and the Group 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 related 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.

Deloitte.

Key audit matters	How our audit addressed the Key audit matters
Allowance for expected credit losses (ECL) for loans and advances to customers at amortized cost	
Loans and advances to customers at amortized cost of the Bank and the Group amounted to € 37,753 million and €37,326 million, respectively as at 31 December 2022, (€37,149 million and € 36,497 million as at 31 December 2021) and allowance for expected credit losses amounted to € 1,496 million for the Bank and € 1,377 million for the Group, as at 31 December 2022 (€ 1,977 million for the Bank and € 1,818 million for the Group as at 31 December 2021). Measurement of ECL on loans at amortized cost is considered a key audit matter as the determination of assumptions used especially for Retail and Corporate loans 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 credit risk parameters, such as Loss Given Default (LGD), Probability of Default (PD) and the Exposure at Default (EAD) as well as the modelling assumptions and data used to build and run the credit risk models that calculate the Expected credit losses. • 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 inputs and the assumptions used to determine the macroeconomic factors, the scenarios and scenario weights used to estimate the impact of the multiple economic scenarios. • 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 amortized cost and management of credit risk in Notes 2.4.18, 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 tested the operating effectiveness 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, - inspected model code and reperforming the calculation of certain components of the credit risk models (including stage allocation), - 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.

Key audit matters	How our audit addressed the Key audit matters
Allowance for expected credit losses (ECL) for loans and advances to customers at amortized cost *(continued)*	
	• 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 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.

Key audit matters	How our audit addressed the Key audit matters
Recoverability of Deferred Tax Asset (DTA)	
The Bank and the Group recognized a deferred tax asset of € 5,934 million and € 5,958 million, respectively as at 31 December 2022 (€ 5,992 million for the Bank and € 6,022 million for the Group million as at 31 December 2021). 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 2.4.32, 3.2, 4.17, 16 and 39 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 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 adequacy of the disclosures in the financial statements including the appropriateness of the assumptions disclosed.

Key audit matters	How our audit addressed the Key audit matters
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" in Section 4 of the Corporate Governance Statement included in the Board of Directors' Report for the year 2022.	Based on our risk assessment, we have tested 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.

Other information

Management is responsible for the other information. The other information, included in the Annual Financial report comprises the Board of Directors' Annual Report, referred to in the section "Report on Other Legal and Regulatory Requirements" and the Corporate Governance Statement. Other information 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 identified above 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 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 the 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 Bank'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 Bank and the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee (article 44 of Greek Law 4449/2017) of the Bank and the Group is responsible for overseeing the Bank's and Group's financial reporting process.

Deloitte.

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 they 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 they have been incorporated into the 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 Bank's and the 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 Bank's and the 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 Bank 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 group audit. We remain solely responsible for our audit opinion.

Deloitte.

Auditor's responsibilities for the audit of the separate and consolidated financial statements – *continued*

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 we communicate to them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

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 Report**

Taking into consideration that Management is responsible for the preparation of the Board of Director's 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 Director's Report includes the Corporate Governance Statement, which provides the information required by article 152 of Greek Law 4548/2018.

b) In our opinion, the Board of Director's Report has been prepared in accordance with the applicable legal requirements of articles 150, 151, 153 and 154 and paragraph 1 (cases c and d) of article 152 of Greek Law 4548/2018 and its content is consistent with the accompanying separate and consolidated financial statements for the year ended 31 December 2022.

c) Based on the knowledge we obtained during our audit of the Bank and the Group and its environment, we have not identified any material inconsistencies in the Board of Director's Report.

2) **Additional Report to the Audit Committee**

Our audit opinion on the separate and consolidated financial statements is consistent with the additional report provided to the Audit Committee of the Bank and the Group referred to in article 11 of the European Union (EU) Regulation 537/2014.

3) **Non Audit Services**

We have not provided to the Bank and the Group any prohibited non-audit services referred to in article 5 of the EU Regulation No 537/2014. The allowable non-audit services we have provided to the Bank and the Group during the year ended 31 December 2022 are disclosed in Note 49 to the separate and consolidated financial statements.

4) **Appointment**

We were first appointed as statutory auditors of Piraeus Bank S.A. based on article 28 of its Articles of Association. The year ended 31 December 2022 is the third year we have been appointed as statutory auditors by the Annual General Assembly of the Shareholders of the Bank held on 6 October 2022.

Athens, 30 March 2023

The Certified Public Accountant

Alexandra V. Kostara
Reg. No. SOEL:19981
Deloitte Certified Public Accountants S.A.
3a Fragoklissias & Granikou Str.
151 25 Maroussi
Reg. No. SOEL: E120

Income Statement

€ Million	Note	Group Year ended 31/12/2022	Group Year ended 31/12/2021 As reclassified	Bank Year ended 31/12/2022	Bank Year ended 31/12/2021 As reclassified
CONTINUING OPERATIONS					
Interest and similar income	6	1,667	1,696	1,662	1,694
Interest expense and similar charges	6	(363)	(389)	(360)	(389)
NET INTEREST INCOME		**1,304**	**1,307**	**1,302**	**1,305**
Fee and commission income	7	453	445	414	415
Fee and commission expense	7	(80)	(100)	(72)	(91)
NET FEE AND COMMISSION INCOME		**372**	**345**	**342**	**324**
Income from non-banking activities	8	64	40	23	16
Dividend income		2	3	15	18
Net gains/ (losses) from financial instruments measured at fair value through profit or loss ("FVTPL")	9	364	88	362	88
Net gains/ (losses) from financial instruments measured at fair value through other comprehensive income ("FVTOCI")	10	112	87	112	87
Net gains/ (losses) from derecognition of financial instruments measured at amortised cost		(36)	327	(36)	327
Net gains/ (losses) from loss of control over subsidiaries/ disposal of associates and joint ventures	26	278	184	343	199
Net other income/ (expenses)	11	55	30	36	24
TOTAL NET INCOME		**2,516**	**2,410**	**2,500**	**2,387**
Staff costs	12	(435)	(395)	(413)	(376)
Administrative expenses	13	(328)	(368)	(309)	(349)
Depreciation and amortisation	27, 28	(104)	(109)	(106)	(106)
TOTAL OPERATING EXPENSES		**(867)**	**(872)**	**(829)**	**(830)**
PROFIT/ (LOSS) BEFORE PROVISIONS, IMPAIRMENT AND OTHER CREDIT-RISK RELATED EXPENSES		**1,649**	**1,538**	**1,671**	**1,557**
ECL impairment (losses)/ releases on loans and advances to customers at amortised cost	4	(523)	(486)	(528)	(509)
Other credit-risk related expenses on loans and advances to customers at amortised cost	15	(142)	(141)	(141)	(141)
Impairment (losses)/ releases on other assets	31	(47)	12	(36)	11
ECL impairment (losses)/ releases on debt securities measured at FVTOCI	44	1	(11)	1	(11)
Impairment on subsidiaries and associates	26	(2)	(23)	(8)	(30)
Impairment of property and equipment and intangible assets	27, 28	(4)	(13)	(3)	(13)
Impairment on debt securities at amortised cost		(5)	(19)	(5)	(19)
Other provision (charges)/ releases	37	(12)	9	(7)	9
Share of profit/ (loss) of associates and joint ventures	26	29	18	-	-
PROFIT/ (LOSS) BEFORE INCOME TAX		**943**	**884**	**940**	**854**
Income tax benefit/ (expense)	16	(130)	(485)	(115)	(477)
PROFIT/ (LOSS) FOR THE PERIOD FROM CONTINUING OPERATIONS		**813**	**399**	**825**	**377**
DISCONTINUED OPERATIONS					
Profit/ (loss) after income tax from discontinued operations	14	51	(7)	-	-
PROFIT/ (LOSS) FOR THE PERIOD		**864**	**392**	**825**	**377**
From continuing operations					
Profit/ (loss) attributable to the equity holders of the Bank		814	399	-	-
Non controlling interest		(1)	(1)	-	-
From discontinued operations					
Profit/ (loss) attributable to the equity holders of the Bank		51	(7)	-	-
Non controlling interest		-	-	-	-
Earnings/ (losses) per share attributable to the equity holders of the Bank (in €):					
From continuing operations					
- Basic & Diluted	17	0.15	0.07	-	-
From discontinued operations					
- Basic & Diluted	17	0.01	-	-	-
Total					
- Basic & Diluted	17	0.16	0.07	-	-

The notes on pages 82 to 325 form an integral part of the Financial Statements

Statement of Comprehensive Income

€ Million	Note	Group		Bank	
		Year ended		Year ended	
		31/12/2022	31/12/2021	31/12/2022	31/12/2021
CONTINUING OPERATIONS					
Profit for the year (A)		**813**	**399**	**825**	**377**
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	(183)	(104)	(183)	**(104)**
Change in currency translation reserve	18	(4)	2	-	-
Items that will not be reclassified subsequently to profit or loss					
Change in reserve from equity instruments measured at FVTOCI	18	23	(32)	23	(32)
Change in property revaluation reserve	18	7	-	7	-
Change in reserve of actuarial gains/ (losses)	18	7	-	6	(1)
Other comprehensive expense, net of tax (B)	18	**(150)**	**(135)**	**(147)**	**(137)**
Total comprehensive income, net of tax (A)+(B)		**662**	**264**	**678**	**239**
- Attributable to the equity holders of the Bank		663	265	-	-
- Non controlling interest		(1)	(1)	-	-
DISCONTINUED OPERATIONS					
Profit/ (loss) for the year		**51**	**(7)**	**-**	**-**
Total comprehensive income/ (expense), net of tax		**51**	**(7)**	**-**	**-**
- Attributable to the equity holders of the Bank		51	(7)	-	-
- Non controlling interest		-	-	-	-

Statement of Financial Position

€ Million	Note	Group 31/12/2022	Group 31/12/2021	Bank 31/12/2022	Bank 31/12/2021
ASSETS					
Cash and balances with Central Banks	19	9,591	15,484	9,591	15,484
Due from banks	20	729	1,332	674	1,297
Financial assets at FVTPL	22	548	908	528	886
Financial assets mandatorily measured at FVTPL	22	182	196	182	196
Derivative financial instruments	21	1,830	593	1,830	593
Reverse repos with customers		-	-	-	-
Loans and advances to customers at amortised cost	23	37,326	36,497	37,753	37,149
Loans and advances to customers mandatorily measured at FVTPL		52	51	52	51
Financial assets measured at FVTOCI	24	1,485	2,349	1,485	2,349
Debt securities at amortised cost	25	10,176	9,183	10,173	9,183
Assets held for sale	30	406	435	411	419
Investment property	29	1,522	1,041	823	473
Investments in subsidiaries	26	-	-	515	399
Investments in associated undertakings and joint ventures	26	1,023	630	981	603
Property and equipment	28	723	883	668	877
Intangible assets	27	301	266	278	255
Tax receivables	38	133	139	131	138
Deferred tax assets	39	5,958	6,022	5,934	5,992
Other assets	31	3,418	3,464	3,214	3,257
Assets from discontinued operations	14	-	114	-	-
TOTAL ASSETS		**75,403**	**79,586**	**75,225**	**79,599**
LIABILITIES					
Due to banks	32	6,922	14,850	6,809	14,837
Due to customers	33	58,331	55,385	58,573	55,651
Derivative financial instruments	21	656	393	656	393
Debt securities in issue	34	849	971	849	971
Other borrowed funds	35	819	786	819	786
Current income tax liabilities		6	4	-	-
Deferred tax liabilities	39	10	9	-	-
Retirement and termination benefit obligations	40	55	75	54	73
Provisions	37	122	135	112	129
Liabilities held for sale		2	3	-	3
Other liabilities	36	1,120	1,092	932	965
Liabilities from discontinued operations	14	-	28	-	-
TOTAL LIABILITIES		**68,891**	**73,731**	**68,804**	**73,808**
EQUITY					
Share capital	43	5,345	5,345	5,345	5,345
Share premium	43	1,715	1,715	1,715	1,715
Other equity instruments		600	600	600	600
Other reserves and retained earnings	44	(1,167)	(1,821)	(1,240)	(1,869)
Capital and reserves attributable to the equity holders of the Bank		**6,494**	**5,840**	**6,420**	**5,792**
Non controlling interest		18	16	-	-
TOTAL EQUITY		**6,511**	**5,855**	**6,420**	**5,792**
TOTAL LIABILITIES AND EQUITY		**75,403**	**79,586**	**75,224**	**79,599**

The notes on pages 82 to 325 form an integral part of the Financial Statements

Statement of Changes in Equity

Group		Attributable to equity shareholders of the Bank										
€ Million	Note	Share Capital	Share Premium	Other equity instruments	Currency Translation Reserve	Reserve from financial assets at FVTOCI	Revaluation surplus	Other reserves	Retained earnings	Total	Non controlling interest	Total
Opening balance as at 1/1/2021		**5,400**	**-**	**-**	**(17)**	**281**	**-**	**17**	**(576)**	**5,105**	**106**	**5,211**
Restatement effect following the adoption of IFRIC decision of IAS 19, net of tax		-	-	-	-	-	-	-	43	43	-	43
Opening balance as at 1/1/2021 (as restated)		**5,400**	**-**	**-**	**(17)**	**281**	**-**	**17**	**(533)**	**5,148**	**106**	**5,255**
Other comprehensive income/ (expense), net of tax	18	-	-	-	2	(137)	-	-	-	(135)	-	(135)
Profit, net of tax for the year		-	-	-	-	-	-	-	392	392	(1)	392
Total comprehensive income/ (expense) for the year		**-**	**-**	**-**	**2**	**(137)**	**-**	**-**	**392**	**257**	**(1)**	**257**
Share capital increase, net of issue costs		2	1,715	-	-	-	-	-	-	1,717	-	1,717
Share capital decrease in kind		(56)	-	-	-	-	-	-	-	(56)	-	(56)
AT1 capital instrument, net of issue costs		-	-	600	-	-	-	-	(5)	595	-	595
Payment to the holders of AT1 capital instrument		-	-	-	-	-	-	-	(26)	(26)	-	(26)
Loss from the derecognition of the Sunrise I and Sunrise II portfolios, net of tax		-	-	-	-	-	-	-	(1,863)	(1,863)	-	(1,863)
Transfer between reserves and retained earnings		-	-	-	-	-	-	1	(1)	-	-	-
Transfer of the accumulated reserve from equity securities measured at FVTOCI to retained earnings upon disposal		-	-	-	-	-	-	-	62	62	-	62
Disposals and movements in participating interests		-	-	-	-	-	-	2	3	5	(90)	(86)
Balance as at 31/12/2021		**5,345**	**1,715**	**600**	**(15)**	**144**	**-**	**20**	**(1,970)**	**5,840**	**16**	**5,855**
Opening balance as at 1/1/2022		**5,345**	**1,715**	**600**	**(15)**	**144**	**-**	**20**	**(1,970)**	**5,840**	**16**	**5,855**
Other comprehensive income/(expense), net of tax	18	-	-	-	(4)	(160)	7	-	7	(151)	-	(151)
Profit/ (loss) net of tax for the year		-	-	-	-	-	-	-	864	864	(1)	864
Total comprehensive income/ (expense) for the year		**-**	**-**	**-**	**(4)**	**(160)**	**7**	**-**	**871**	**714**	**(1)**	**713**
Payment to the holders of AT1 capital instrument		-	-	-	-	-	-	-	(53)	(53)	-	(53)
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)	3	(4)
Balance as at 31/12/2022		**5,345**	**1,715**	**600**	**(19)**	**(16)**	**7**	**20**	**(1,159)**	**6,494**	**18**	**6,511**

The notes on pages 82 to 325 form an integral part of the Financial Statements

Bank € Million	Note	Share Capital	Share Premium	Other equity instruments	Reserve from financial assets at FVTOCI	Revaluation surplus	Retained earnings	Total
Opening balance as at 1/1/2021		**5,400**	**-**	**-**	**281**	**-**	**(596)**	**5,086**
Restatement effect following the adoption of IFRIC decision of IAS 19, net of tax		-	-	-	-	-	37	37
Opening balance as at 1/1/2021 (as restated)		5,400	-	-	281	-	(558)	5,123
Other comprehensive expense, net of tax	18	-	-	-	(137)	-	(1)	(137)
Profit, net of tax for the year		-	-	-	-	-	377	377
Total comprehensive income/ (expense) for the year		**-**	**-**	**-**	**(137)**	**-**	**376**	**239**
Share capital increase, net of issue costs		2	1,715	-	-	-	-	1,717
Share capital decrease in kind		(56)	-	-	-	-	-	(56)
AT1 capital instrument, net of issue costs		-	-	600	-	-	(5)	595
Payment to the holders of AT1 capital instrument		-	-	-	-	-	(26)	(26)
Loss from the derecognition of the Sunrise I and Sunrise II portfolios, net of tax		-	-	-	-	-	(1,863)	(1,863)
Transfer of the accumulated reserve from equity securities measured at FVTOCI to retained earnings upon disposal		-	-	-	-	-	62	62
Balance as at 31/12/2021		**5,345**	**1,715**	**600**	**144**	**-**	**(2,013)**	**5,792**
Opening balance as at 1/1/2022		**5,345**	**1,715**	**600**	**144**	**-**	**(2,013)**	5,792
Other comprehensive income/ (expense), net of tax	18	-	-	-	(160)	7	6	(147)
Profit, net of tax for the year		-	-	-	-	-	825	825
Total comprehensive income/ (expense) for the year		**-**	**-**	**-**	**(160)**	**7**	**831**	**678**
Payment to the holders of AT1 capital instrument		-	-	-	-	-	(53)	(53)
Transfer of the accumulated reserve from equity securities measured at FVTOCI to retained earnings upon disposal		-	-	-	-	-	(1)	(1)
Absorption of subsidiaries		-	-	-	-	-	4	4
Balance as at 31/12/2022		**5,345**	**1,715**	**600**	**(16)**	**7**	**(1,232)**	**6,420**

The notes on pages 82 to 325 form an integral part of the Financial Statements

Cash Flow Statement

€ Million	Note	Group Year ended 31/12/2022	Group Year ended 31/12/2021 As reclassified	Bank Year ended 31/12/2022	Bank Year ended 31/12/2021 As reclassified
Cash flows from operating activities					
Profit before income tax		993	878	940	854
Adjustments to profit before income tax:					
Add: provisions and impairment		594	533	590	561
Add: depreciation and amortisation charge		106	112	106	106
Add: retirement benefits and cost of voluntary exit scheme	12	62	29	61	27
Net (gain)/ losses from valuation of financial instruments measured at FVTPL		382	(17)	383	(18)
Net (gain)/ losses from financial instruments measured at FVTOCI		(112)	(87)	(112)	(87)
(Gains)/ losses from investing activities		(401)	(210)	(380)	(233)
Accrued interest from investing and financing activities		97	55	94	52
Cash flows from operating activities before changes in operating assets and liabilities		1,722	1,293	1,682	1,263
Changes in operating assets and liabilities:					
Net (increase)/ decrease in cash and balances with Central Banks		(565)	-	(565)	-
Net (increase)/ decrease in financial instruments measured at FVTPL		405	(355)	401	(345)
Net (increase)/ decrease in financial assets mandatorily measured at FVTPL		4	(33)	4	(34)
Net (increase)/ decrease in debt securities at amortised cost		(2,371)	(4,425)	(2,368)	(4,425)
Net (increase)/ decrease in amounts due from banks		653	(171)	657	(169)
Net (increase)/ decrease in loans and advances to customers		(1,796)	(998)	(1,599)	(992)
Net (increase)/ decrease in reverse repos with customers		-	8	-	8
Net (increase)/ decrease in other assets		137	(261)	278	(271)
Net increase/ (decrease) in amounts due to banks		(8,000)	3,489	(8,261)	3,496
Net increase/ (decrease) in amounts due to customers		2,954	5,124	2,922	5,127
Net increase/ (decrease) in other liabilities		(90)	(143)	(152)	(148)
Net cash flow from operating activities before income tax payment		(6,946)	3,528	(7,001)	3,509
Income tax paid		(9)	(2)	(2)	-
Net cash inflow/ (outflow) from operating activities		**(6,955)**	**3,526**	**(7,003)**	**3,509**
Cash flows from investing activities					
Purchases of property and equipment		(97)	(78)	(43)	(54)
Proceeds from disposal of property and equipment and intangible assets		20	11	4	7
Purchases of intangible assets	27	(71)	(47)	(70)	(47)
Proceeds from disposal of assets held for sale other than loans and advances to customers		300	-	300	-
Purchases of financial assets at FVTOCI		(1,997)	(4,456)	(1,997)	(4,456)
Proceeds from disposal of financial assets at FVTOCI		2,707	4,841	2,707	4,841
Acquisition of subsidiaries net of cash and cash equivalents		(102)	2	(115)	(6)
Proceeds from disposal of subsidiaries, net of cash and cash equivalents disposed		7	26	3	27
Acquisition, establishment and participation in share capital increases of associates and joint ventures		-	(2)	-	(2)
Proceeds from disposal of associates		8	-	8	-
Dividends received		8	18	16	19
Net cash inflow from investing activities		**783**	**316**	**813**	**330**
Cash flows from financing activities					
Net proceeds from the issue of ordinary shares		-	1,717	-	1,717
Proceeds from the issue of AT 1 capital instrument		-	595	-	595
Repayment of AT 1 capital instrument		(53)	(26)	(53)	(26)
Proceeds from issue of debt securities and other borrowed funds		346	498	346	498
Repayment of debt securities and other borrowed funds		(470)	-	(470)	-
Interest paid on debt securities and other borrowed funds		(91)	(29)	(91)	(29)
Repayments of lease liabilities		(25)	(33)	(23)	(24)
Net cash inflow/ (outflow) from financing activities		**(293)**	**2,723**	**(291)**	**2,731**
Effect of exchange rate changes on cash and cash equivalents		(35)	12	(34)	11
Net increase/ (decrease) in cash and cash equivalents (A)		**(6,500)**	**6,577**	**(6,515)**	**6,582**
Cash and cash equivalents at the beginning of the year (B)		**15,816**	**9,239**	**15,782**	**9,200**
Cash and cash equivalents at the end of the year (A) + (B)	46	**9,316**	**15,816**	**9,267**	**15,782**

As of 31 December 2022, the Group and the Bank have changed the presentation of proceeds from disposal of loan portfolios. In particular, proceeds of € 216 million for both the Group and the Bank (31 December 2021: € 254 million for the Group and € 251 million for the Bank) have been reclassified from cash flows from investing activities (line item "Proceeds from disposal of assets held for sale"), to cash flows from operating activities (line item "Net (increase)/ decrease in loans and advances to customers").

1 General information

Piraeus Bank S.A. (hereinafter “the Bank”) is a credit institution operating in the form of a Société Anonyme under the direct supervision of the European Central Bank (“ECB”) and the Bank of Greece (“BoG”), in accordance with the provisions of Greek Laws 4261/2014 and 4548/2018, as currently in force, and the applicable regulatory framework on the operation of credit institutions. According to its Articles of Association, the Bank’s business scope is all banking activities permitted or imposed by the applicable law in force.

Piraeus Bank S.A. is incorporated and domiciled in Greece. The address of its registered office is 4 Amerikis str., 105 64 Athens, GEMI number 157660660000. The duration of the Bank is indefinite. The Bank and its subsidiaries (hereinafter ‘’the Group”) provide services in Southeastern and Western Europe. As of 31 December 2022, the Group’s headcount is 8,292 full time employees (“FTEs”), of which 54 FTEs refer to operations that are planned to be disposed.

The Board of Directors (“BoD) of the Bank, on 30 March 2023, the date that the separate and consolidated financial statements of Piraeus Bank S.A., for the year ended 31 December 2022 (the “Annual Financial Statements”), were 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
Francesca A. Tondi	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
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 Bank's articles of association and the current regulatory framework, the members of the Bank's BoD are elected by the general meeting 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 general meeting 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 and the Bank's codified articles of association, the respective replacement applies solely to the remaining term of the member being replaced. Pursuant to the article 78 para. 2 of Law 4548/2018 and the Bank's articles of association, the term of the current Board of Directors expires on 30 December 2023.

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 50) 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 held at fair value through profit or loss ("FVTPL") or at fair value through other comprehensive income ("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 solid economic growth in 2022 and the prospects for a sustainable rate of growth of Gross Domestic Product ("GDP") in the medium term, taking also into account the deployment of the Recovery and Resilience Facility ("RRF") funds to the Greek economy and the continued recovery of the residential and commercial real estate prices, despite of the high level of inflation and energy prices;

b) the Group's effective liquidity risk management leading to a robust liquidity position, as evident by the Liquidity Coverage Ratio ("LCR") as of 31 December 2022 (refer to the Liquidity section below), 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;

c) the capital adequacy of the Bank, which exceeded the Overall Capital Requirement ("OCR") (refer to the Capital Adequacy section below) -including Pillar II Guidance ("P2G") - and the Minimum Requirement for own funds and Eligible Liabilities ("MREL") ratio on a Group level, which exceeded the Intermediate Guidance of 19.08% effective from 1 January 2023. It is estimated that for the next 12 months the Bank's capital adequacy ratios and the Group's MREL ratio will remain higher than the required minimum regulatory levels;

d) the geopolitical developments, specifically the Russia / Ukraine conflict and the persistent inflationary pressures;

e) the net profit attributable to the equity holders of the Bank, which recovered significantly in 2022 and amounted to € 814 million, compared to € 399 million in 2021 and the Bank's non performing exposures ("NPE") ratio dropping to 7.0% as at 31 December 2022 from 12.9% as at 31 December 2021.

Based on the analysis performed, Management has concluded that that there are no material uncertainties which may 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 the Annual Financial Statements were authorized for issue. For this reason, the Group continues to adopt the going concern basis of accounting for preparing the financial statements.

Macroeconomic environment

Despite rising inflationary pressures and the strong uncertainty linked to the geopolitical developments and the energy crisis, the Greek economy grew at a solid pace in 2022. Real GDP in 2022 increased by 5.9% on an annual basis - largely driven by the positive contribution of the private consumption and investments – while the nominal GDP growth rate reached double digits at 14.5%. During the same period the unemployment rate declined further to 12.4%, down by 2.3 percentage points compared to the same period a year ago, while employment growth rate reached on average 5.4% on an annual basis. However, strong inflationary pressures were a key feature of 2022, both in the global markets and in Greece. In 2022, the headline national inflation (Consumer Price Index/ "CPI") reached 9.6% and the harmonized inflation ("HICP") reached 9.3%. The Greek government in order to battle the effects of inflation and support the real economy, undertook a series of fiscal interventions during the course of 2022. These took the form of subsidies of electricity consumption of households and businesses, increase of the heat allowance and extension of the eligible population, subsidies to the gas prices, and other tax cuts and subsidies for the low pensioners and weak households.

Enhanced surveillance of Greece ended on 20 August 2022 and the first post-program surveillance ("PPS") report was released on 22 November 2022. For 2023, both the EC and the Ministry of Finance expect that inflationary pressures will remain strong - albeit less intense - and that the real GDP growth rate will decelerate. However, the EC estimates that the growth rate will rebound to 2.2% in 2024.

	Ministry of Finance [1]	**EC [2]**	
	2023	**2023**	**2024**
Real GDP growth rate (%)	1.8	1.2	2.2
Inflation (HICP, %)	5.0	4.5	2.4

1. Ministry of Finance, 2023 Budget introductory report, November 2022

2. Real GDP growth rate & Inflation (HICP, %) as per EC, European Economic Forecast, Winter 2023 Institutional paper 194, February 2023

Based on the 2023 Budget introductory report the headline general government deficit (European System of Accounts, “ESA” definition) will narrow from 7.5% of GDP in 2021 to 4.1% of GDP in 2022, which corresponds to a primary deficit of 1.6% of GDP in 2022. The headline deficit is expected to decrease further to 2.0% of GDP in 2023, bringing the primary balance to a surplus of 0.7% of GDP. The general government debt to GDP ratio is expected to fall sharply from 194.5% of GDP in 2021 to 168.9% of GDP in 2022, and to remain on a downward trajectory (159.3% of GDP in 2023), supported by the nominal GDP growth rate and the move into a primary surplus position in 2023.

The implementation of the RRF plan, both for its grant component, as well as the private-sector investments through the loan facility, is a key factor for the sustainable growth potentials. Greece stands to benefit from a total envelope of € 30.16 billion (€ 17.43 billion in grants and € 12.73 billion in loans) under the RRF, of which, € 11.1 billion has already been disbursed through the pre-financing and the first two (2) regular installments. Moreover, in the coming years Greece will receive support of approximately € 40 billion from the long-term EU budget 2021-2027.

The main risk factors affecting the developments of the Greek economy, the domestic banking sector in general and the Group in particular are related to the ongoing impacts of geopolitical challenges and Russia’s war against Ukraine, the deterioration of supply and demand imbalances, the turmoil in global energy markets and the maintenance of high inflationary pressures resulting in lower purchasing power, the volatility of the supply chain and the uncertainty in markets, as well as delays in policy decisions during the Greek election period.

Specifically, for the Russia-Ukraine crisis, the Group has developed and implemented, in accordance with the Group’s Compliance Policy provisions, all the necessary measures in order to address the restrictive measures imposed by specific organizations / authorities [i.e. EU, US Treasury (“OFAC”), United Nations (“UN”), French Ministry of Economics and Finance (“MINEFI”)].

Therefore, a potential slow and weak economic recovery, along with persistently high inflation, could potentially have a negative effect on the quality of the Group’s loan portfolio, and subsequently to its profitability and capital adequacy. Management closely monitors the developments and assesses periodically the impact that these might have on the Group’s operations and financial performance. The Group invests in business and technical controls to help prevent, detect and mitigate cyber threats. The Group’s ability to detect and respond to attacks through round-the-clock security operations center capabilities help to reduce the impact of attacks.

Liquidity

As at 31 December 2022, Group’s deposits increased by 5.3% compared to 31 December 2021, to € 58.3 billion, mainly due to the significant increase of private sector deposits.

The ECB’s Governing Council decided to its meetings held in July, September, October, and December 2022 and again in January and March 2023 to raise the key ECB interest rates by 350 basis points (“bps”) cumulatively. As a result, the main refinancing rate currently stands at 3.50% and the Deposit Facility Rate (“DFR”) at 3.00%. This recent development has the potential of adversely affecting cost of funding.

In 2020, as a response to Covid-19 pandemic’s effects on the European economy, the ECB announced easing off the conditions for Targeted Longer Term Refinancing Operations (“TLTRO”), in order to leverage its use by credit institutions. The Group, between 2019 and 2022, has drawn an amount of € 14.5 billion of TLTRO funding. During 2022, the Group repaid an amount of € 9 billion of TLTRO funding, out of the previously outstanding amount of € 14.5 billion, an action that did not affect the Group’s LCR. As of 31 December 2022, the Group’s funding under TLTRO auctions amounted to € 5.5 billion. Funding from the interbank market stood at € 0.3 billion as at 31 December 2022, stable compared to 31 December 2021.

Regarding the maturity profile of the aforementioned TLTRO funding, an amount of € 2.0 billion matures in 2023 and the rest in 2024. The Group has the capacity to repay the upcoming TLTRO maturities due to the ample position of € 9.6 billion in cash and balances with central banks.

The Group's balance sheet deleveraging, coupled with the medium-term customer deposits restoration trend, alongside the funding accumulated through Tier 2 issuances (in 2019 and early 2020), as well as Additional Tier 1 ("AT1") Capital instrument, a Green Senior Preferred Bond issued in 2021 and a Senior Preferred Bond issued in November 2022, improved the Group's funding mix, and increased its high-quality liquid assets ("HQLA") buffer. As at 31 December 2022, the Group's LCR stood at 197% (thus, almost 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

The Bank's Basel III Common Equity Tier 1 ("CET1") ratio as at 31 December 2022 stood at 13.56%, while the total regulatory capital ratio (TCR) stood at 18.20% as at the same date. The Bank's fully loaded CET1 and TCR ratios stood at 12.05% and 16.76%, respectively as at 31 December 2022.

Following the conclusion of the Supervisory Review and Evaluation Process ("SREP"), the ECB informed the Group of its OCR, valid for 2023. The Bank's OCR stands at 11.50%, 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 ("CCB") of 2.50% as per Regulation 575/2013/EU, and (d) the fully loaded Other Systemically Important Institutions ("O-SII") capital buffer of 1.00% under Greek Law 4261/2014.

Refer to Note 4.16 for further details on the capital adequacy.

2.3 Adoption of International Financial Reporting Standards

The following amendments and annual improvements to existing IFRSs, effective from 1 January 2022, 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

IFRS 3 (Amendment) "Business Combinations". The amendment updates a reference in IFRS 3 to the Conceptual Framework for Financial Reporting without changing the accounting requirements for business combinations.

IAS 16 (Amendment) "Property, Plant and Equipment". The amendment prohibits the deduction from the cost of property, plant and equipment of amounts received from selling items produced while the company is preparing the asset for its intended use. Instead, such sale proceeds and related cost are recognised in profit or loss.

IAS 37 (Amendment) "Provisions, Contingent Liabilities and Contingent Assets". The amendment specifies which costs a company includes when assessing whether a contract is loss making.

Annual Improvements 2018-2020

IAS 1 (Annual Improvement) “Presentation of Financial Statements”. The amendment permits a subsidiary that applies paragraph D16(a) of IFRS 1 to measure cumulative translation differences using the amounts reported by its parent, based on the parent’s date of transition to IFRSs.

IFRS 9 (Annual Improvement) “Financial Instruments”. The amendment clarifies which fees an entity includes when it applies the ‘10 percent’ test in paragraph B3.3.6 of IFRS 9 in assessing whether to derecognise a financial liability.

IFRS 16 (Annual Improvement) “Leases”. The amendment to Illustrative Example 13 accompanying IFRS 16 removes from the example the illustration of the reimbursement of leasehold improvements by the lessor.

The adoption of the amendments and annual improvements did not have any material impact on the Group and the Bank’s annual financial statements.

Amendments to standards that have been issued by the IASB and have been endorsed by the EU, but they are not effective in 2022 nor have they been early adopted by the Group and the Bank:

IAS 1 (Amendment) “Presentation of Financial Statements” and IFRS Practice Statement 2: Disclosure of Accounting Policies. The amendments to IAS 1 require companies to disclose their material accounting policy information rather than their significant accounting policies. The amendments to IFRS Practice Statement 2 provide guidance on how to apply the concept of materiality to accounting policy disclosures.

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.

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 Group and the Bank have not early adopted the above amendments, however it is not expected any material impact on the Group and the Bank’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 Bank:

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.

2.4 Significant accounting policies

2.4.1 Consolidation

The consolidated financial statements incorporate the financial statements of the Bank and its subsidiaries (including structured entities), which are entities controlled by the Bank. Control is achieved, if and only if, the Bank 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 Bank's 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 Bank 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 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 Bank 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 Bank assess 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. Where 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 Bank, 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 recognized. 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 Bank.

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 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 classified as 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 entities 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 entity'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 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.

In particular, the following apply for financial assets:

- 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 loans 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 Fees and commission income and expense

The Group applies the following five 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.

Fees and commission income/ expense are 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 or 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 Dividend income

Dividend income is recognised when the right to receive payment is established.

2.4.13 Financial assets 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 Bank 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).

2.4.14 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 effective interest 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.

2.4.15 Investment Securities measured at FVTOCI

Debt securities

A financial asset is measured at FVTOCI if both of the following conditions are met:

- The 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 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 other 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, classified at amortised cost unless they fail the SPPI test.

Equity instruments

At initial recognition, the Group and the Bank 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 Bank'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 Bank; 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.

2.4.16 Derivative financial instruments

Derivative financial instruments mainly include currency and interest rate swaps, 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 fair value through profit or loss. 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.

2.4.17 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

Changes in the fair value of derivatives that are designated and qualify as fair value hedges are recorded in the income statement, together with any changes in the fair value of the hedged asset or liability that are attributable to the hedged risk. If the hedge no longer meets the criteria for hedge accounting, the adjustment to the carrying amount of a hedged item for which the effective interest method is used, is amortised to profit or loss over the period to maturity. The amortisation is based on the recalculated EIR at the date the amortisation commences. The unamortised adjustment to the carrying amount of a non-interest bearing hedged item is recognised immediately in the income statement.

2.4.18 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 Bank 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 ("CLO") 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 Bank recognise an ECL impairment on loans and advances to customers at amortised cost when it is estimated that it will not be in a position to receive all payments due, as defined by the contract of the loan. The amount of the ECL allowance for 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 significant increase in credit risk 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 Bank apply the European Banking Authority ("EBA") NPE definition. In accordance with the Group's and the Bank'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 is assessed:

- On a contract level for retail portfolio.
- On an obligor level for non-retail portfolios.

The determination of a significant increase in credit risk 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 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 Bank 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

- In 2020, the Group and the Bank introduced additional SICR criteria, without relaxing any of the existing thresholds, in order to effectively allocate the exposures affected by the pandemic. The additional criteria considered probabilities of default, industry characteristics and pre-pandemic performance. As of 31 December 2022, the aforementioned criteria have been revised in order to include sectors vulnerable 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 Bank 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.

2.4.19 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 Bank 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.

2.4.20 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 Bank 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 asset have expired when for example:

- a loan receivable is repaid;
- a purchased option expires unexercised.

The Group and the Bank transfer a financial asset if, and only if, are 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 different types 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".

2.4.21 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.

2.4.22 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.

2.4.23 Property and equipment

The Group holds property and equipment for use in the supply of services or for administrative purposes. Property and equipment includes: land, own-use buildings, leasehold improvements, furniture and other equipment, right of use assets and transportation means.

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
Means of transportation	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.

2.4.24 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.

If an investment property becomes owner-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.

2.4.25 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.

2.4.26 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.

2.4.27 Leases

A. The Group is the Lessee

The Group and the Bank 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 Bank 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 Bank 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 Bank recognise right of use assets and lease liabilities for all their lease contracts that fulfil the definition of a lease.

The Group and the Bank applying IFRS 16 for all leases:

a) recognise lease liabilities in the statement of financial position;
b) recognise right-of-use assets in the statement of financial position;
c) recognise depreciation of right-of-use assets and impairment based on IAS 36 "Impairment of Assets" in the income statement;
d) recognise finance cost on lease liabilities; and
e) separate the total amount of cash paid into a principal portion (presented within financing activities) and finance cost (presented within operating 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 Bank 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 Bank 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.

2.4.28 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.

2.4.29 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.

2.4.30 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 Bank, 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 effective interest method.

2.4.31 Employee benefits

A. Funded post employment benefit plans

The funded pension schemes operated by the Group and the Bank are financed through payments to grouped insurance contracts or social security funds. The Group's and the Bank's pension obligations relate both to defined contribution plans as well as defined benefit plans.

The Group and the Bank 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 Bank'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 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 Bank, 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 Bank 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.

2.4.32 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 Bank'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.

Deferred tax assets 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 deferred tax assets 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.

For the purposes of measuring deferred tax liabilities and deferred tax assets for investment property that are measured using the fair value model, the carrying amounts of such property are presumed to be recovered entirely through sale, unless the presumption is rebutted. The presumption is rebutted when the investment property is depreciable and is held within a business model whose objective is to consume substantially all of the economic benefits embodied in the investment property over time, rather than through sale. Management reviewed the Bank's investment property portfolios and concluded that none of the Bank's investment property are held under a business model whose objective is to consume substantially all of the economic benefits embodied in the investment property over time, rather than through sale. Therefore, Management has determined that the "sale" presumption set out in the amendments to IAS 12 "Income Taxes" is not rebutted. As a result, the Group and the Bank have recognised deferred taxes on changes in fair value of the investment property as the Bank is subject to income taxes on the fair value changes of the investment property on disposal.

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.

2.4.33 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 Bank 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.

2.4.34 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.

2.4.35 Securitization

The Group securitizes 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.

2.4.36 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 General Meeting of the Bank's Shareholders. Interim dividends are recognised as a deduction in the Bank'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 Bank are not eligible to receive cash dividends.

2.4.37 Related party transactions

Related parties of the Group and the Bank include:

a) Members of the Bank's BoD and the Executive Committee, the Group Chief Internal Auditor, the Group Chief Compliance Officer and the CEOs of the significant subsidiaries, collectively "key management personnel" of the Bank;

b) close family members of key management personnel;

c) entities having transactions with the Bank, that are controlled or jointly controlled by the key management personnel and their close family members;

d) Bank's parent entity, namely Piraeus Financial Holdings S.A.;

e) the Bank's subsidiaries;

f) the Bank's associates and the subsidiaries of its associates;

g) the Bank's joint ventures and the subsidiaries of its joint ventures; and

h) the HFSF which holds ordinary shares in the share capital of the Parent entity of the Bank and benefits from the special rights stated in article 10 of Law 3864/2010, as amended and in force.

2.4.38 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.

2.4.39 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.

2.4.40 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 and liabilities, income and expense. The estimates and associated assumptions are based on historical experience and other factors that are considered relevant and are reviewed on an ongoing basis. Judgements and estimates that may result in an adjustment in the figures described above, are presented below. Changes to accounting estimates are recognised in the period in which the estimate is revised, if the revision affects only that period. 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 it concerns SICR, 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 property: 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 € 5 million. The total carrying amount of the individually significant properties as of 31 December 2022 was € 0.9 billion. The fair value of properties not assessed by independent appraisers, is determined using extrapolation techniques. The total carrying amount of investment and inventory property not individually valued by independent appraisers, for the Group and the Bank, as of 31 December 2022 is € 0.6 billion and € 1.0 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 Bank's equity shareholdings in Group companies: The Bank 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 Bank 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.

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 2021. 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 captures expected changes in credit quality. As at 31 December 2021, the Group considered additional SICR criteria based on probabilities of default, industry characteristics and pre-pandemic performance in order to capture the remaining uncertainty derived from the Covid-19 pandemic. As of 31 December 2022, the aforementioned criteria have been revised in order to include sectors vulnerable to high energy prices and inflation. The aforementioned approach increased the gross balance scoped under lifetime ECL calculation by € 762 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 2022, 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 pre-Covid-19 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, 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 was shifted significantly compared to the year ended 31 December 2021. The Optimistic and Pessimistic scenarios were weighted with a 20% probability each (31 December 2021: 5% each) while a 60% probability weight was assigned to the Base scenario (31 December 2021: 90%) 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 2022-2025 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 2022.

ECL Key drivers Scenario	31/12/2022 %	31/12/2021 %
Real GDP growth		
Optimistic	6.5	7.3
Base	4.2	5.6
Pessimistic	2.1	4.0
Unemployment rates		
Optimistic	10.2	11.3
Base	12.2	12.9
Pessimistic	14.1	14.3
Price index (Residential)		
Optimistic	8.6	7.2
Base	6.7	6.1
Pessimistic	4.9	4.9
Price index (Non Residential)		
Optimistic	5.5	5.4
Base	3.4	4.1
Pessimistic	1.4	2.7

Following the recession of the Greek economy in 2020 attributable to the Covid-19 pandemic, economic activity recovered in 2021 and is expected to recover further in 2022-2025. The solid foundations that have been created through stimulating demand, increasing employment, boosting exports, increasing savings funds, combined with the benefit from the utilization of European resources, the implementation of the reforms included in the National Recovery and Resilience Plan, the rationalisation of budget surpluses and the relaxation of Greece's fiscal consolidation requirements provide credible prospects for rapid economic recovery and sustainable growth. The unemployment rate is expected to be lower in the coming years, despite the impact of the Covid-19 pandemic, as well as the current turnoil in global energy markets ad inflation, reflecting the fact that the labor market is progressively improving in recent years and employment is following a steady growth path. Both residential and non-residential (offices) price indices are continuing to follow a highly positive path for the next four (4) years.

The Russia-Ukraine war may have an impact on Greek economic activity and inflation through higher energy and commodities prices, contraction of international trade and lower household and business confidence. However, the extent of these effects will depend on the manner of the war progressing, as well as the impact of current and future sanctions. The uncertainty about the scale and time horizon of the resulting economic consequences is expected to resolve in the upcoming future, depending on the evolution of the war. However, the rapid recovery of the Greek economy from the pandemic is also indicative of the improved resilience of the economy to shocks. The economic growth of 2023 depends on the developments in the supply and demand imbalances, the turmoil in global energy markets and the maintenance of high inflationary pressures resulting in lower purchasing power, the geopolitical developments, the volatility of the supply chain and the uncertainty in markets, as well as delays in policy decisions during the Greek election period.

As at 31 December 2022, the Group's forecasts of the aforementioned economic variables across, for each scenario for 2022 and 2023 are the following:

ECL Key drivers Scenario	2022 Optimistic	2022 Base	2022 Pessimistic	2023 Optimistic	2023 Base	2023 Pessimistic
Real GDP growth	8.3	5.8	4.1	5.4	3.6	1.9
Unemployment rates	12.0	13.2	14.1	10.7	12.4	14.2
Price index (Non Residential)	4.8	3.4	2.1	4.7	2.8	0.9
Price index (Residential)	8.9	7.9	7.0	8.5	6.7	5.0

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 € 39 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 Bank’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 property 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 using 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.

As described in Note 2.2, the speed of recovery, the deterioration of supply and demand imbalances, the turmoil in global energy markets and the maintenance of high inflationary pressures resulting in lower purchasing power, the volatility of the supply chain and the uncertainty in markets will be decisive factors affecting the Greek economy, the banking sector and the Group in particular. Further, geopolitical developments and specifically the Russia / Ukraine conflict in the beginning of 2022 and a potential resurgence of migration flows and the impact in the world economy remain an additional source of uncertainty. Management closely monitors the developments and assesses periodically the impact that these might have on the Group’s operations and financial performance.

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.

Held-for sale classification

Sunrise III portfolio: The uncertainty relating to the outcome of the regulatory approval process, that affects the Group’s intent to execute the aspired sale of the portfolio through securitization, has been significantly reduced during the second quarter of 2022, following the substantial completion of the Bank’s three (3) synthetic securitizations i.e., shipping, mortgages, loans to small and medium and large enterprises and other loans that aim to enhance the capital position of the Group. On this basis, the aforementioned portfolio was classified as held for sale and its carrying amount was written down to fair value less cost to sell. During the fourth quarter of 2022, the Bank securitized the Sunrise III portfolio and entered into definitive agreements for the sale of 95% of the Mezzanine and Junior Notes. The completion of the NPE securitization transaction is subject to the ordinary terms and approvals by the competent authorities. The ECL impairment charge recognised in the Consolidated Income Statement for the year ended 31 December 2022, as a result of the aforementioned write-down of its carrying amount, stood approximately to € 160 million.

Solar portfolio: Project Solar is a joint securitization with other Greek financial institutions under the Hellenic Asset Protection Scheme ("HAPS"). The Group's stake in the joint securitized portfolio is € 329 million. During the second quarter of 2022, the transaction progressed significantly. Management assessed and concluded that the IFRS 5 criteria are met. Therefore, the said portfolio has been classified as held for sale and its carrying amount was written down to fair value less cost to sell. The ECL impairment charge recognised in the Consolidated Income Statement for the year ended 31 December 2022, as a result of the aforementioned write-down of portfolios' carrying amount, stood at € 70 million.

4 Financial Risk Management

4.1 Risk Management Framework

Effective risk management is a key factor of the Group's Risk Management Framework ("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 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 its 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 specified in its charter, in order to assist the BoD in its duties concerning the:

- 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 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") in line with its business goals as well as with the available human and technical resources. 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

Group Risk Management is an independent unit in relation to other units of the Group and the Bank, which 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.

Group Risk Management 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 Group and Bank's activities for all types of risk. Group Risk Management is subject to review by Group Internal Audit as to the adequacy and effectiveness of the RMF (policies, methodologies and procedures).

The Group's Chief Risk Officer ("CRO") is the Head of Group Risk Management and is appointed by the BoD upon recommendation and endorsement of the Risk Committee. CRO's appointment or replacement is communicated to BoG and Single Supervisory Mechanism ("SSM"). 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 Group Risk Management 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 Group Risk Management, a 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, in alignment with the Bank-wide implementation of the Internal Control System Enhancement initiative, the Segment Controller role was established with a discrete reporting line to CRO (segment Head).

The key responsibilities of Group Risk Management 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 ad hoc in case there are (a) changes in Group's strategy or business model, or (b) changes in the regulatory framework, business environment or/and in the macroeconomic conditions. In particular, Group Risk Management 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,

- 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 harmonization of the subsidiaries' RMFs with the Group's RMF and practices,

- develop awareness about risk exposure, promote risk management culture and support in risk matters all units across the Group,

- participate in the development of the Group and the Bank's Credit Policy, which is approved with the consent of Group Risk Management,

- 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,

- 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.

Group Risk Management 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 that end, the unit deploys proper methods, including models, that allow the identification, measurement and monitoring of the aforementioned risks. Furthermore, Credit Risk Management produces risk-related information (reporting) to Management, corresponding Committees as well as to the supervisory authorities. Following the Covid-19 outbreak, Credit Risk Management developed and led a series of initiatives targeting to assess and effectively manage the credit impact, attributable to the pandemic, in the Group's loan portfolio. Such initiatives indicatively comprise:

- Development of Covid-19 related reporting infrastructure to timely monitor and assess evolution;
- Analysis to assess financial resilience per economic sector;
- Engagement in the development of policies, processes and supportive products accommodating EBA related guidance;
- Design along with key stakeholders the lending and underwriting strategy for 2022.

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 Bank'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 Bank'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. The 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 to embed a culture of operational risk management and ensure the design and implementation of an effective internal control system within the segment of his/her responsibility, aiming at the achievement of operational excellence and remediation of control deficiencies in the segment. Furthermore, the Segment Controller reviews, supplements and comments on unit Controllers' operational risk assessment.

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 operational aspects of Group Risk Management. In addition, the unit serves as the Risk Committee's Secretariat and facilitates in discharging its responsibilities.

Risk Culture

A formal Risk Culture Program has been launched under the supervision of the CRO, channeling the Group's commitment to enhance risk awareness and fine tune the balance between risk taking and required returns. The Risk Culture Program is sponsored by the CEO and a cross-functional Steering Committee comprised of senior Management members, who monitor its implementation.

The scope of the Risk Culture Program is to exemplify the desired behaviors and routines that reinforce solid judgement about risk taking and encourage ethical conduct towards all stakeholder groups. The Group has taken a number of actions to safeguard that any risk-taking activities beyond its 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. In addition, it reviews and approves temporary adjustments on the credit risk parameters.

Provisioning Committee: The Provisioning Committee is responsible for the approval of the quarterly ECL allowance estimates on loans and advances to customers at amortised cost of the Bank and the Group, where required. 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, and 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 or following approval bodies' disagreement, request for exceptions / overrides addressed by the Business Units' Heads (NPE Unit, Credit Risk etc.);

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: The Risk Models Oversight Committee ("RMOC") is chaired by the CRO and is mainly responsible for the appropriate implementation of the Model Management and Governance Framework, 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 adherence to the agreed timetable for implementation of remediating 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 persistent management is a top priority for senior management. The continuous development of infrastructure, systems and methodologies aiming at quantification and evaluation of credit risk is a prerequisite for timely and efficiently supporting Management and the business units in relation to the decision-making, the policy formulation and the 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 amount 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, that describes the principles of the Group's credit risk management, ensures effective and uniform credit risk monitoring and control. Management applies a uniform 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 to provide early identification of potential changes in the creditworthiness of counterparties, including regular collateral revaluations. Counterparty limits are established by the use of a credit risk classification system, which assigns a risk rating to each counterparty. Risk ratings are subject to regular revision. The credit quality review aims to allow Management assessing the potential loss as a result of the risks to which it is exposed and consequently to take timely corrective actions.

Analysis of Concentration Risk

Concentration risk may arise from various types of portfolio incomplete diversification, such as the concentration risk on large borrowers, economic sectors, geographical areas and types of collateral, and is being monitored on a regular basis.

In addition to monitoring of supervisory limits, the Group has set internal limits within the RAF, which are reassessed 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's and the Bank's earnings and/or capital. It includes sovereign, transfer and political risks.

Management has established internal country limits within the RAF, which are revised annually.

Counterparty Credit Risk

Counterparty credit risk ("CCR") is defined as the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. 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.

As far as credit risk mitigation techniques are concerned, Management has in place comprehensive and enforceable legal contracts with its counterparties such as International Swap Derivatives Association Agreement ("ISDA"), Credit Support Annex ("CSA") and Global Master Repurchase Agreement ("GMRA") enabling 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 on 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 entity 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

From 1 January 2021 and onwards the Group applies and is fully compliant with the new Definition of Default (hereinafter "DoD") regulatory requirements issued by EBA (EBA/GL/2016/07) aiming at the convergence of the default definitions 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 and the Bank's Impairment Policy a financial asset is considered as credit impaired and is classified into Stage 3 when it is classified as NPE. Under the new DoD, the terms NPE, Defaulted and Impaired are aligned.

This constituted a change in an accounting estimate as per IAS 8.

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 (2) 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, 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 operate their internal rating models. More specifically, they run separate models for its corporate portfolios in which its customers are rated from 1 to 19 using internal grades. 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.

A) Lending Portfolio

The following are performed at a counterparty level, 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 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 19 rating grades 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
1-6	Very Strong	Develop relationship	GUIDELINES
7-10	Strong	Develop relationship	
11-12	Good	Develop relationship	
13-14	Satisfactory	Careful development of the relationship with adequate collaterals or maintain relationship	
15-16	Weak	Careful development of the relationship or maintain relationship with unsecured risk less than 30%	POLICY RULES
17-19	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	RA for Corporate customers that keep “C” category accounting books and have a turnover more than € 2.5 million	19-grade
	RA for Corporate customers that keep “C” category accounting books and have a turnover up to € 2.5 million	19-grade
	Small Business Lending Scorecard (small business or personal companies)	Score
	Agricultural Lending Scorecard for agricultures (small business or personal companies)	Score
Specialised Lending	Project Finance PD Scorecard	19-grade
	Object Finance (Shipping) Scorecard	19-grade
	Manual Rating	19-grade

Manual Rating is applied for customers that no other available rating system can be applied: these are customers with no financial data [i.e. newly established companies, Special Purpose Vehicles (“SPVs”)] or brokerages and insurance companies. In exceptional cases, manual rating is used as a rating override, when based on Relationship Officers’ view, the rating does not represent the creditworthiness of the borrower.

Business Rating Models incorporate the following information in order to quantify the client 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 varies based on the exposure of the Group and the Bank, the complexity and size of the customer. For the small business loans, as well as the agricultural loans, Behavioral Scorecards are being used. The Behavioral Scorecards are based exclusively on historical data of client behavior regarding the Bank's products and are the result of the implementation of statistical analysis. They are tailored specifically 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 re-rated on at least an annual basis. The ratings are also updated in cases where there is available information that may have a significant impact on the level of credit risk.

Retail Lending

Regarding the retail credit portfolio, there are scorecards of client credit assessment in the Retail Banking portfolio covering different stages of the credit cycle, as follows:

1. **Application Scorecards**

The Application Scorecards are exclusively based on historical data of applications and behavior and are the result of the implementation of statistical analysis. They are tailored specifically to the Group and the Bank's clients and are customized on a product and purpose basis. Thus, we have five (5) products - based application scorecards and three (3) 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 tailored specifically 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 one scorecard evaluating the Group's and the Bank's clients' behavior in the market at the moment 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 tailored specifically to the Group and the Bank's clients and is not customized on a product basis.

4. **Overall Application Scorecards**

These are scorecards which are part of the origination process and combine in essence the above three (3) scorecards. 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 (5) 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 usage of this particular model has improved the performance of the existing models.

The policy that is taken into account in the approval process and determine the willingness as well as the ability of the applicant to fulfill his obligations is also based on a range of credit criteria (apart from the aforementioned credit scoring models), 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

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, challenger 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 debtor's 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 greater the collateral/ security required, so that the recovery rate is as high as possible in case of borrower's default on their contractual obligations to the Group and the Bank.

Exposure at Default

EAD is equal to the on-balance sheet exposure of the defaulted account on the date of default. 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 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[4] 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 according to its quality is segmented on the following categories for both retail and corporate portfolio:

- 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 14

- 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 14

[4] For Non-retail portfolios the cure rate models include both self-cure rate and via modification probability estimates.

- 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 (among the categories the PD levels differ).

Significant Increase in Credit Risk

The assessment of SICR is key element in establishing the point of switching between the requirement to measure an allowance based on 12-month or life time ECL (excluding POCI financial asset for which refer to the paragraph “Purchased or Originated Credit Impaired” below). If, following this assessment, a SICR occurs, the Group and the Bank recognize a loss allowance amount equal to the ECL over the lifetime of that financial asset.

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 assess whether there is a SICR for an exposure are outlined below.

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
- In 2020, the Group introduced additional SICR criteria, without relaxing any of the existing thresholds, in order to effectively allocate the exposures affected by the pandemic. The additional criteria considered probabilities of default, industry characteristics and pre-pandemic performance. As of 31 December 2022, the aforementioned criteria have been revised in order to include sectors vulnerable to high energy prices and inflation (Refer to Note 3.2).

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. Assessment at individual level is performed for loans and advances to customers at amortised cost identified as individually significant, which satisfy all 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 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, additional exposures may be individually assessed, irrespectively of their level of exposure, at the discretion of the Bank's Provisioning Committee.

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 particular 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.
- $\boldsymbol{P_i}$: 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=100%.
- **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 applies three (3) 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 (forecasts of future economic conditions that confirm the forward-looking concept of the process), 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 elements 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 eligible to use for the debt repayment.

- **Existing collateral and guarantees**: The current value of the obligor's existing collaterals and guarantees as well as their eligibility to liquidate are assessed under a forced liquidation scenario or under a scenario of voluntary surrender or sale.

- **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 contractual obligation regarding its debt to the Group and the Bank is taken account of.

- **Personal Guarantees of the obligor:** In exceptional cases, those mainly denoting exposures of prominent customers, the value of personal guarantees in favor of the obligor may be taken into consideration. Usage of such personal guarantees in the individual assessment is subject to the assessment of the Bank's review levels during the impairment assessment process.

- **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.

The calculation of the expected future cash flows is carried out in accordance with the following two (2) approaches, which are defined in following sub-sections: The Going Concern Approach and Gone Concern Approach.

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 are considering different approaches depending on the specific borrower when 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 this is 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).
- When cash flows are based on the realisation of some assets of the debtor, the Group and the Bank estimate the expected selling price in order to reflect the future expected cash flows derived from the sale of assets less the estimated costs associated with the realization. Collateral may be exercised to the extent it does not influence operating cash flows. In addition, where a "two-step" approach is used (i.e. period by period analysis followed by an estimation of the terminal value), a "gone concern" approach can 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.

Additionally, the Group, in alignment with the ECB guide on how institutions are expected to consider Climate and Environmental ("C&E") risks has planned initiatives that are presented in Note 2.2.

Gone Concern Approach

ECL allowance is measured on a "gone concern" basis when Management determines that the operating cash flows of the debtor 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 into consideration 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 debt against the ECL allowance in cases of:

- irrecoverable claims, meaning the claims for which i) all required legal actions, foreclosure procedures and recovery collection efforts against the borrower, co-borrowers or guarantors have been exhausted; ii) it is considered that the continuation of in court or out-of-court legal actions are not expected to lead to a positive outcome for the Bank; iii) the recovery cost is economically less favorable compared to the benefit,

- uncollectable claims, meaning the claims resulting from the difference between the IFRS claim and the sum of the operating cash flows, expected to be received and the cash flows resulting from the liquidation of the collateral/security as well as of any other unencumbered assets of all involved parties.

The Group and the Bank proceed to forbearance - resolution and closure treatments with debt forgiveness when it is proven the optimum treatment against other alternative forbearance - resolution and closure treatments, within the framework of managing borrowers with financial difficulties.

The Provisioning Committee approves accounting write-offs while the BoD or other authorized bodies approve debt forgiveness requests.

The contractual amount of loans that were written off during 2022 and are still subject to enforcement activity is € 148 million as at 31 December 2022. The comparative figure for the prior reporting period is € 475 million.

B) Debt securities and other short term Treasury products

The Group and the Bank recognise impairment allowances on debt securities and other short-term Treasury products that are measured at amortised cost or at FVTOCI.

The amount of ECL recognized as an impairment loss allowance depends on the extent of credit deterioration since initial recognition. The assessment of significant deterioration is key in establishing the point of switching between the requirement to measure an allowance based on 12-month ECL and one that is based on 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 acquisition date or b) increase (decrease) in the 12-month PD since the acquisition 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 spreads evolution. Any increase in credit spreads above an indicative spread threshold since initial recognition, triggers an internal review process of the affected 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 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 (2) 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 = 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. The EAD is estimated assuming that cash flows occurring in all future time periods will not be received and in return, the Bank will receive a recovery amount. EAD is the sum of the discounted cash flows as of the reporting date, using the EIR of the transaction.

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 financial assets that are credit-impaired on initial recognition. In contrast to credit-impaired financial assets, the corresponding assessment for POCI-assets is performed at initial recognition instead of subsequent periods.

For POCI asset, the amortised cost will always reflect its lifetime ECL. POCI assets remain in POCI category for their entire lifetime, and are not assessed for stage allocation or any stage transfers, therefore, any POCI assets that have ceased to be credit impaired as of the end of the reporting period are still presented within this category for classification purposes in Note 4.3.1 and Note 6.

Analysis of inputs to the ECL model under multiple economic scenarios

The Economics and Investments Strategy Unit of the Group and the Bank 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 (31 December 2021: 90%), 20% optimistic (31 December 2021: 5%) and 20% pessimistic (31 December 2021: 5%). 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.

Differentiation in the models for the ECL calculation due to high energy prices and inflation

The Group and the Bank did not change structurally any of the existing models which are used in the ECL calculation. All the model inputs, as per the normal process, have been reassessed during the year in order to capture any recent changes including the effects of high energy prices and inflation, where appropriate.

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 2022. The sensitivity analysis was performed assuming a "favorable" and an "adverse" shift in the three (3) forward-looking scenarios for GDP by 1 percentage point, 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 of the Group and the Bank as of 31 December 2022 and 2021, 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 31/12/2022 (Group)	ECL impact			
	Stage 1	Stage 2	Stage 3	Total
Higher GDP (+1%)	(3)	(9)	(13)	**(25)**
Lower GDP (-1%)	2	8	10	**20**

Alternative scenario assumed as at 31/12/2022 (Bank)	ECL impact			
	Stage 1	Stage 2	Stage 3	Total
Higher GDP (+1%)	(3)	(9)	(13)	**(25)**
Lower GDP (-1%)	2	8	9	**19**

Alternative scenario assumed as at 31/12/2021 (Group)	ECL impact			
	Stage 1	Stage 2	Stage 3	Total
Higher GDP (+1%)	(4)	(10)	(14)	**(28)**
Lower GDP (-1%)	4	11	14	**29**

Alternative scenario assumed as at 31/12/2021 (Bank)	ECL impact			
	Stage 1	Stage 2	Stage 3	Total
Higher GDP (+1%)	(4)	(10)	(14)	**(28)**
Lower GDP (-1%)	4	11	14	**29**

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 Bank as at 31 December 2022 and 2021, without taking account of any collateral held or other credit enhancements attached. 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		Bank	
	31/12/2022	31/12/2021 As restated	31/12/2022	31/12/2021 As restated
Due from banks (Note 20)	729	1,332	674	1,297
Derivative financial instruments (Note 21)	1,830	593	1,830	593
Financial assets at fair value through profit or loss (Note 22)	548	908	528	886
Loans and advances to customers at amortised cost (Note 23)	37,326	36,497	37,753	37,149
Debt securities at FVTOCI (Note 24)	1,386	2,282	1,386	2,282
Debt securities at amortised cost (Note 25)	10,176	9,183	10,173	9,183
Assets held for sale (Note 30)	400	428	411	412
Other assets (Note 31)	2,090	2,209	2,013	2,278
Credit commitments (Note 42)	6,526	4,855	6,821	5,057
Total	**61,010**	**58,286**	**61,589**	**59,137**

The below tables show the gross amounts of the Group and the Bank credit exposures, per staging, for financial instruments at amortised cost or at FVTOCI and other financial assets, as well as the off-balance credit exposures.

Group	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2022			Collective	Individual	Collective	Individual	
Due from banks	729	-	-	-	-		729
Loans and advances to customers at amortised cost	31,908	3,774	799	1,475	595	187	38,738
Retail Lending	**5,763**	**2,040**	**526**	**47**	**393**	**6**	**8,774**
Mortgages	4,551	1,677	306	20	319	5	6,879
Consumer, Personal and Other	876	263	172	27	71	-	1,410
Credit Cards	336	99	48	-	3	-	485
Corporate and Public Sector Lending	**26,145**	**1,734**	**273**	**1,429**	**202**	**181**	**29,964**
Large Corporate	17,791	531	6	654	67	34	19,085
SMEs	6,739	1,203	267	770	132	147	9,257
Public Sector	1,615	-	-	5	2	-	1,623
Debt securities measured at FVTOCI	1,383	3	-	-	-	-	1,386
Debt securities at amortised cost	10,199	-	-	-	-	-	10,199
Other assets - Financial assets	1,136	40	-	200	-	-	1,376
Total on balance sheet credit exposures	**45,355**	**3,817**	**799**	**1,676**	**595**	**187**	**52,428**
Financial guarantees	4,549	37	202	-	-	-	4,788
Letters of credit	114	-	-	-	-	-	114
Irrevocable undrawn credit commitments	1,536	78	3	-	6	-	1,623
Total off balance sheet credit exposures	**6,199**	**115**	**204**	**-**	**6**	**-**	**6,526**

Group	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2021			Collective	Individual	Collective	Individual	
Due from banks	1,332	-	-	-	-	-	**1,332**
Loans and advances to customers at amortised cost	27,939	5,123	1,055	3,287	714	303	**38,420**
Retail Lending	**5,805**	**2,271**	**608**	**68**	**430**	**6**	**9,188**
Mortgages	4,647	1,803	366	38	336	6	**7,195**
Consumer, Personal and Other	837	352	191	30	91	-	**1,503**
Credit Cards	322	115	50	-	4	-	**491**
Corporate and Public Sector Lending	**22,134**	**2,852**	**447**	**3,219**	**283**	**297**	**29,232**
Large Corporate	15,312	1,171	15	1,415	63	50	**18,025**
SMEs	5,277	1,681	432	1,799	217	247	**9,654**
Public Sector	1,545	-	1	5	2	-	**1,553**
Debt securities measured at FVTOCI	2,260	22	-	-	-	-	**2,282**
Debt securities at amortised cost	9,201	-	-	-	-	-	**9,201**
Other assets - Financial assets	929	31	2	212	-	-	**1,174**
Total on balance sheet credit exposures	**41,661**	**5,176**	**1,057**	**3,499**	**714**	**303**	**52,410**
Financial guarantees	3,443	96	224	-	-	-	**3,763**
Letters of credit	41	1	-	-	-	-	**42**
Irrevocable undrawn credit commitments	936	107	-	-	7	-	**1,050**
Total off balance sheet credit exposures	**4,419**	**204**	**224**	**-**	**7**	**-**	**4,855**

Bank	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2022			Collective	Individual	Collective	Individual	
Due from banks	674	-	-	-	-	-	**674**
Loans and advances to customers at amortised cost	32,552	3,560	789	1,624	588	171	**39,284**
Retail Lending	**5,753**	**2,040**	**526**	**47**	**393**	**6**	**8,764**
Mortgages	4,551	1,677	306	20	319	5	**6,879**
Consumer, Personal and Other	866	263	172	27	71	-	**1,400**
Credit Cards	336	99	48	-	3	-	**485**
Corporate and Public Sector Lending	**26,799**	**1,520**	**263**	**1,578**	**195**	**165**	**30,520**
Large Corporate	19,190	456	6	998	67	34	**20,750**
SMEs	5,996	1,064	258	575	126	131	**8,150**
Public Sector	1,613	-	-	4	2	-	**1,620**
Debt securities measured at FVTOCI	1,383	3	-	-	-	-	**1,386**
Debt securities at amortised cost	10,196	-	-	-	-	-	**10,196**
Other assets - Financial assets	1,092	24	-	146	-	-	**1,262**
Total on balance sheet credit exposures	**45,898**	**3,587**	**789**	**1,771**	**588**	**171**	**52,803**
Financial guarantees	4,766	37	202	-	-	-	**5,005**
Letters of credit	114	-	-	-	-	-	**114**
Irrevocable undrawn credit commitments	1,614	78	3	-	6	-	**1,702**
Total off balance sheet credit exposures	**6,494**	**115**	**205**	**-**	**6**	**-**	**6,821**

Bank	Stage 1	Stage 2	Stage 3		POCI		Total
31/12/2021			Collective	Individual	Collective	Individual	
Due from banks	1,297	-	-	-	-	-	**1,297**
Loans and advances to customers at amortised cost	28,709	5,020	1,045	3,473	695	290	**39,232**
Retail Lending	**5,795**	**2,271**	**608**	**68**	**430**	**6**	**9,178**
Mortgages	4,647	1,803	366	38	336	6	**7,195**
Consumer, Personal and Other	827	352	191	30	91	-	**1,492**
Credit Cards	322	115	50	-	4	-	**491**
Corporate and Public Sector Lending	**22,913**	**2,749**	**438**	**3,405**	**265**	**284**	**30,054**
Large Corporate	16,617	1,257	14	1,874	59	46	**19,866**
SMEs	4,755	1,493	423	1,526	204	238	**8,639**
Public Sector	1,542	-	-	4	2	-	**1,549**
Debt securities measured at FVTOCI	2,260	22	-	-	-	-	**2,282**
Debt securities at amortised cost	9,201	-	-	-	-	-	**9,201**
Other assets - Financial assets	1,035	17	-	159	-	-	**1,212**
Total on balance sheet credit exposures	**42,502**	**5,059**	**1,045**	**3,632**	**695**	**290**	**53,224**
Financial guarantees	3,645	96	224	-	-	-	**3,965**
Letters of credit	41	1	-	-	-	-	**42**
Irrevocable undrawn credit commitments	936	107	-	-	7	-	**1,050**
Total off balance sheet credit exposures	**4,621**	**204**	**224**	**-**	**7**	**-**	**5,057**

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 as of the reporting date (the “PPA adjustment”).

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.

Loans and advances to customers at amortised cost for the Group and the Bank as at 31 December 2022 and 31 December 2021 are summarised as follows:

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)	(205)	(31)	(300)
Total Retail Lending	**5,752**	**1,987**	**367**	**368**	8,475
Large Corporate Lending					
Gross carrying amount	17,791	531	660	102	19,085
Less: ECL Allowance for impairment losses	(12)	(4)	(325)	(20)	(362)
Total Large Corporate Lending	**17,779**	**527**	**335**	**81**	18,722
SMEs Lending					
Gross carrying amount	6,739	1,203	1,036	279	9,257
Less: ECL Allowance for impairment losses	(13)	(59)	(579)	(97)	(747)
Total SMEs Lending	**6,726**	**1,145**	**458**	**182**	8,510
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	26,145	1,734	1,702	383	29,964
Less: ECL Allowance for impairment losses	(25)	(63)	(907)	(117)	(1,113)
Total Corporate and Public Sector Lending	**26,120**	**1,672**	**794**	**265**	28,851
Loans and advances to customers at amortised cost					
Gross carrying amount	31,908	3,774	2,274	782	38,738
Less: ECL Allowance for impairment losses	(36)	(115)	(1,113)	(148)	(1,413)
Total Loans and advances to customers at amortised cost	**31,872**	**3,659**	**1,162**	**633**	37,326

Group 31/12/2021	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	4,647	1,803	404	341	**7,195**
Less: ECL Allowance for impairment losses	(3)	(21)	(36)	(12)	**(72)**
Total Mortgages	**4,643**	**1,782**	**368**	**329**	**7,122**
Consumer, Personal and Other loans					
Gross carrying amount	837	352	222	92	**1,503**
Less: ECL Allowance for impairment losses	(17)	(35)	(101)	(22)	**(174)**
Total Consumer, Personal and Other loans	**820**	**317**	**120**	**70**	**1,328**
Credit Cards					
Gross carrying amount	322	115	50	4	**491**
Less: ECL Allowance for impairment losses	(1)	(5)	(40)	(3)	**(48)**
Total Credit Cards	**321**	**111**	**10**	**1**	**442**
Retail Lending					
Gross carrying amount	5,805	2,271	676	436	**9,188**
Less: ECL Allowance for impairment losses	(21)	(60)	(177)	(36)	**(295)**
Total Retail Lending	**5,784**	**2,210**	**498**	**400**	**8,893**
Large Corporate Lending					
Gross carrying amount	15,312	1,171	1,430	113	**18,025**
Less: ECL Allowance for impairment losses	(38)	(22)	(439)	(13)	**(512)**
Total Large Corporate Lending	**15,274**	**1,148**	**990**	**100**	**17,513**
SMEs Lending					
Gross carrying amount	5,277	1,681	2,231	465	**9,654**
Less: ECL Allowance for impairment losses	(30)	(92)	(846)	(147)	**(1,115)**
Total SMEs Lending	**5,247**	**1,589**	**1,386**	**317**	**8,540**
Public Sector Lending					
Gross carrying amount	1,545	-	5	2	**1,553**
Less: ECL Allowance for impairment losses	(1)	-	-	-	**(2)**
Total Public Sector Lending	**1,544**	**-**	**5**	**2**	**1,551**
Corporate and Public Sector Lending					
Gross carrying amount	22,134	2,852	3,666	580	**29,232**
Less: ECL Allowance for impairment losses	(69)	(114)	(1,285)	(160)	**(1,628)**
Total Corporate and Public Sector Lending	**22,065**	**2,738**	**2,381**	**420**	**27,604**
Loans and advances to customers at amortised cost					
Gross carrying amount	27,939	5,123	4,342	1,016	**38,420**
Less: ECL Allowance for impairment losses	(90)	(174)	(1,463)	(197)	**(1,924)**
Total Loans and advances to customers at amortised cost	**27,849**	**4,948**	**2,879**	**820**	**36,497**

Bank 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	866	263	199	71	1,400
Less: ECL Allowance for impairment losses	(6)	(28)	(116)	(13)	(163)
Total Consumer, Personal and Other loans	**860**	**236**	**83**	**58**	**1,237**
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	5,753	2,040	573	399	8,764
Less: ECL Allowance for impairment losses	(11)	(53)	(205)	(31)	(300)
Total Retail Lending	**5,742**	**1,987**	**367**	**368**	**8,465**
Large Corporate Lending					
Gross carrying amount	19,190	456	1,004	101	20,750
Less: ECL Allowance for impairment losses	(20)	(4)	(582)	(20)	(626)
Total Large Corporate Lending	**19,170**	**452**	**422**	**81**	**20,124**
SMEs Lending					
Gross carrying amount	5,996	1,064	833	257	8,150
Less: ECL Allowance for impairment losses	(11)	(56)	(442)	(93)	(603)
Total SMEs Lending	**5,985**	**1,008**	**391**	**164**	**7,547**
Public Sector Lending					
Gross carrying amount	1,613	-	4	2	1,620
Less: ECL Allowance for impairment losses	-	-	(3)	-	(3)
Total Public Sector Lending	**1,613**	**-**	**1**	**2**	**1,617**
Corporate and Public Sector Lending					
Gross carrying amount	26,799	1,520	1,841	360	30,520
Less: ECL Allowance for impairment losses	(32)	(61)	(1,027)	(113)	(1,232)
Total Corporate and Public Sector Lending	**26,768**	**1,459**	**814**	**247**	**29,288**
Loans and advances to customers at amortised cost					
Gross carrying amount	32,552	3,560	2,414	759	39,284
Less: ECL Allowance for impairment losses	(42)	(113)	(1,232)	(144)	(1,532)
Total Loans and advances to customers at amortised cost	**32,510**	**3,447**	**1,181**	**615**	**37,753**

Bank 31/12/2021	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	4,647	1,803	404	341	**7,195**
Less: ECL Allowance for impairment losses	(3)	(21)	(36)	(12)	**(72)**
Total Mortgages	**4,643**	**1,782**	**368**	**329**	**7,122**
Consumer, Personal and Other loans					
Gross carrying amount	827	352	222	92	**1,492**
Less: ECL Allowance for impairment losses	(17)	(35)	(101)	(22)	**(174)**
Total Consumer, Personal and Other loans	**810**	**317**	**120**	**70**	**1,318**
Credit Cards					
Gross carrying amount	322	115	50	4	**491**
Less: ECL Allowance for impairment losses	(1)	(5)	(40)	(3)	**(48)**
Total Credit Cards	**321**	**111**	**10**	**1**	**442**
Retail Lending					
Gross carrying amount	5,795	2,271	676	436	**9,178**
Less: ECL Allowance for impairment losses	(21)	(60)	(177)	(36)	**(295)**
Total Retail Lending	**5,774**	**2,210**	**498**	**400**	**8,883**
Large Corporate Lending					
Gross carrying amount	16,617	1,257	1,888	104	**19,866**
Less: ECL Allowance for impairment losses	(40)	(22)	(751)	(12)	**(825)**
Total Large Corporate Lending	**16,577**	**1,234**	**1,138**	**92**	**19,041**
SMEs Lending					
Gross carrying amount	4,755	1,493	1,949	442	**8,639**
Less: ECL Allowance for impairment losses	(27)	(89)	(701)	(144)	**(962)**
Total SMEs Lending	**4,728**	**1,403**	**1,248**	**298**	**7,677**
Public Sector Lending					
Gross carrying amount	1,542	-	5	2	**1,549**
Less: ECL Allowance for impairment losses	(1)	-	-	-	**(1)**
Total Public Sector Lending	**1,541**	**-**	**5**	**2**	**1,548**
Corporate and Public Sector Lending					
Gross carrying amount	22,913	2,749	3,842	549	**30,054**
Less: ECL Allowance for impairment losses	(67)	(112)	(1,452)	(157)	**(1,788)**
Total Corporate and Public Sector Lending	**22,846**	**2,638**	**2,391**	**392**	**28,266**
Loans and advances to customers					
Gross carrying amount	28,709	5,020	4,518	985	**39,232**
Less: ECL Allowance for impairment losses	(89)	(172)	(1,629)	(193)	**(2,083)**
Total Loans and advances to customers at amortised cost	**28,620**	**4,848**	**2,889**	**792**	**37,149**

Stage 1 exposures presented under note line “Large corporate lending”, both for the Group and the Bank, include CLOs with a gross carrying amount of € 502 million as of 31 December 2022 (31 December 2021: € 93 million). The corresponding ECL, for both years is immaterial. 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 and the Bank’s gross carrying amount of loan and advances to customers at amortised cost as at 31 December 2022 and 2021.

31/12/2022	Group					Bank				
	Strong	Recommended	Substandard	Default	Value of collateral	Strong	Recommended	Substandard	Default	Value of collateral
Retail Lending	**5,704**	**59**	**2,356**	**655**	**7,133**	**5,694**	**59**	**2,356**	**655**	**7,123**
Mortgages	4,517	34	1,939	389	6,551	4,517	34	1,939	389	6,551
Consumer, Personal and Other	858	18	317	216	581	848	18	317	216	571
Credit Cards	329	7	100	50	1	329	7	100	50	1
Corporate Lending	**22,607**	**1,952**	**1,926**	**1,858**	**12,970**	**21,711**	**3,474**	**1,686**	**2,028**	**11,650**
Large Corporate	16,954	839	606	685	6,934	16,684	2,506	522	1,038	6,555
SMEs	5,652	1,113	1,320	1,172	6,036	5,027	969	1,164	990	5,095
Public Sector	**1,609**	**6**	**2**	**5**	**1,566**	**1,609**	**4**	**2**	**4**	**1,564**
Greece	1,609	6	2	5	1,566	1,609	4	2	4	1,564
Total	**29,920**	**2,017**	**4,284**	**2,518**	**21,669**	**29,015**	**3,538**	**4,045**	**2,688**	**20,338**

31/12/2021	Group					Bank				
	Strong	Recommended	Substandard	Default	Value of collateral	Strong	Recommended	Substandard	Default	Value of collateral
Retail Lending	**5,725**	**80**	**2,589**	**794**	**7,396**	**5,725**	**70**	**2,589**	**793**	**7,386**
Mortgages	4,601	46	2,055	493	6,774	4,601	46	2,055	493	6,774
Consumer, Personal and Other	810	27	419	247	622	810	17	419	247	612
Credit Cards	314	7	116	53	1	314	7	116	53	1
Corporate Lending	**19,254**	**1,381**	**2,997**	**4,047**	**11,760**	**19,054**	**2,318**	**2,916**	**4,217**	**10,631**
Large Corporate	14,702	610	1,253	1,460	6,106	14,955	1,662	1,331	1,918	5,766
SMEs	4,553	771	1,744	2,587	5,654	4,099	656	1,585	2,299	4,864
Public Sector	**1,537**	**8**	**2**	**5**	**1,484**	**1,537**	**5**	**2**	**5**	**1,481**
Greece	1,537	8	2	5	1,484	1,537	5	2	5	1,481
Total	**26,516**	**1,469**	**5,589**	**4,846**	**20,640**	**26,316**	**2,393**	**5,508**	**5,016**	**19,497**

The tables below show the Group's and the Bank'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												
31/12/2022	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	**8,079**	**174**	**79**	**69**	**86**	**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	**25,222**	**1,607**	**178**	**32**	**82**	**441**	**780**	**28,342**	**24,530**	**1,734**	**1,697**	**381**	**28,342**
Large Corporate	17,897	809	43	0	58	207	71	**19,085**	17,791	531	660	102	**19,085**
SMEs	7,325	798	134	32	25	234	709	**9,257**	6,739	1,203	1,036	279	**9,257**
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	**34,918**	**1,781**	**257**	**102**	**169**	**573**	**939**	**38,738**	**31,908**	**3,774**	**2,274**	**782**	**38,738**
Value of collateral	**19,411**	**1,107**	**199**	**85**	**117**	**296**	**453**	**21,669**	**16,875**	**2,956**	**1,271**	**567**	**21,669**

Group	Gross loans and advances to customers at amortised cost												
31/12/2021	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	**8,497**	**210**	**67**	**61**	**96**	**128**	**130**	**9,188**	**5,805**	**2,271**	**676**	**436**	**9,188**
Mortgages	6,829	130	40	40	61	41	54	**7,195**	4,647	1,803	404	341	**7,195**
Consumer, Personal and Other	1,248	62	22	18	30	63	60	**1,503**	837	352	222	92	**1,503**
Credit Cards	420	18	5	4	4	24	16	**491**	322	115	50	4	**491**
Corporate Lending	**23,280**	**1,323**	**217**	**83**	**285**	**934**	**1,558**	**27,679**	**20,589**	**2,852**	**3,661**	**578**	**27,679**
Large Corporate	16,696	616	59	5	140	382	128	**18,025**	15,312	1,171	1,430	113	**18,025**
SMEs	6,584	706	158	77	146	553	1,430	**9,654**	5,277	1,681	2,231	465	**9,654**
Public Sector	**1,547**	**-**	**-**	**-**	**-**	**-**	**5**	**1,553**	**1,545**	**-**	**5**	**2**	**1,553**
Greece	1,547	-	-	-	-	-	5	**1,553**	1,545	-	5	2	**1,553**
Total	**33,324**	**1,533**	**284**	**143**	**381**	**1,063**	**1,692**	**38,420**	**27,939**	**5,123**	**4,342**	**1,016**	**38,420**
Value of collateral	**17,583**	**992**	**197**	**113**	**284**	**599**	**873**	**20,640**	**13,929**	**3,592**	**2,380**	**740**	**20,640**

Bank	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	**8,070**	**174**	**79**	**69**	**86**	**132**	**155**	**8,764**	**5,753**	**2,040**	**573**	**399**	**8,764**
Mortgages	6,501	98	53	48	56	45	78	6,879	4,551	1,677	327	324	6,879
Consumer, Personal and Other	1,149	59	22	17	26	61	66	1,400	866	263	199	71	1,400
Credit Cards	420	16	5	3	5	25	11	485	336	99	48	3	485
Corporate Lending	**26,129**	**1,357**	**122**	**21**	**74**	**511**	**685**	**28,900**	**25,186**	**1,520**	**1,837**	**358**	**28,900**
Large Corporate	19,484	751	33	-	58	357	68	20,750	19,190	456	1,004	101	20,750
SMEs	6,645	606	90	21	16	155	617	8,150	5,996	1,064	833	257	8,150
Public Sector	**1,616**	**-**	**-**	**-**	**-**	**-**	**4**	**1,620**	**1,613**	**-**	**4**	**2**	**1,620**
Greece	1,616	-	-	-	-	-	4	1,620	1,613	-	4	2	1,620
Total	**35,815**	**1,531**	**201**	**90**	**160**	**643**	**844**	**39,284**	**32,552**	**3,560**	**2,414**	**759**	**39,284**
Value of collateral	**18,333**	**979**	**146**	**61**	**109**	**265**	**444**	**20,338**	**15,804**	**2,768**	**1,209**	**558**	**20,338**

Bank	Gross loans and advances to customers at amortised cost												
31/12/2021	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	**8,487**	**210**	**67**	**61**	**96**	**128**	**130**	**9,178**	**5,795**	**2,271**	**676**	**436**	**9,178**
Mortgages	6,829	130	40	40	61	41	54	**7,195**	4,647	1,803	404	341	**7,195**
Consumer, Personal and Other	1,238	62	22	18	30	63	60	**1,492**	827	352	222	92	**1,492**
Credit Cards	420	18	5	4	4	24	16	**491**	322	115	50	4	**491**
Corporate Lending	**24,526**	**1,055**	**142**	**59**	**254**	**1,029**	**1,441**	**28,505**	**21,372**	**2,749**	**3,838**	**546**	**28,505**
Large Corporate	18,491	537	46	5	131	536	120	**19,866**	16,617	1,257	1,888	104	**19,866**
SMEs	6,035	517	96	53	123	493	1,321	**8,639**	4,755	1,493	1,949	442	**8,639**
Public Sector	**1,544**	**-**	**-**	**-**	**-**	**-**	**5**	**1,549**	**1,542**	**-**	**5**	**2**	**1,549**
Greece	1,544	-	-	-	-	-	5	**1,549**	1,542	-	5	2	**1,549**
Total	**34,557**	**1,265**	**209**	**119**	**350**	**1,157**	**1,575**	**39,232**	**28,709**	**5,020**	**4,518**	**985**	**39,232**
Value of collateral	16,870	731	133	83	256	585	840	**19,497**	13,075	3,427	2,282	714	**19,497**

The tables below show the Group's and the Bank'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												
31/12/2022	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**	**205**	**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	**247**	**16**	**5**	**8**	**50**	**248**	**536**	**1,109**	**25**	**63**	**904**	**117**	**1,109**
Large Corporate	152	1	-	-	44	118	47	**362**	12	4	325	20	**362**
SMEs	95	15	5	8	6	130	488	**747**	13	59	579	97	**747**
Public Sector	**-**	**-**	**-**	**-**	**-**	**-**	**3**	**4**	**-**	**-**	**4**	**-**	**4**
Greece	-	-	-	-	-	-	3	**4**	-	-	4	-	**4**
Total	**335**	**29**	**14**	**20**	**69**	**325**	**620**	**1,413**	**36**	**115**	**1,113**	**148**	**1,413**

Group	ECL allowance for impairments on loans and advances to customers at amortised cost												
31/12/2021	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	**127**	**11**	**6**	**9**	**19**	**64**	**59**	**295**	**21**	**60**	**177**	**36**	**295**
Mortgages	45	2	1	2	5	5	13	**72**	3	21	36	12	**72**
Consumer, Personal and Other	75	8	4	6	11	39	32	**174**	17	35	101	22	**174**
Credit Cards	7	1	1	2	2	21	14	**48**	1	5	40	3	**48**
Corporate Lending	**433**	**36**	**11**	**14**	**57**	**277**	**800**	**1,627**	**68**	**114**	**1,285**	**160**	**1,627**
Large Corporate	298	10	1	5	46	102	51	**512**	38	22	439	13	**512**
SMEs	135	26	10	8	11	175	750	**1,115**	30	92	846	147	**1,115**
Public Sector	**1**	**-**	**-**	**-**	**-**	**-**	**-**	**2**	**1**	**-**	**-**	**-**	**2**
Greece	1	-	-	-	-	-	-	**2**	1	-	-	-	**2**
Total	**561**	**47**	**17**	**23**	**75**	**342**	**859**	**1,924**	**90**	**174**	**1,463**	**197**	**1,924**

Bank	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**	**205**	**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	**390**	**16**	**4**	**4**	**49**	**321**	**445**	**1,229**	**31**	**61**	**1,024**	**113**	**1,229**
Large Corporate	298	4	-	-	44	234	45	**626**	20	4	582	20	**626**
SMEs	91	12	4	4	5	87	400	**603**	11	56	442	93	**603**
Public Sector	**-**	**-**	**-**	**-**	**-**	**-**	**3**	**3**	**-**	**-**	**3**	**-**	**3**
Greece	-	-	-	-	-	-	3	**3**	-	-	3	-	**3**
Total	**478**	**29**	**13**	**17**	**69**	**397**	**529**	**1,532**	**42**	**113**	**1,232**	**144**	**1,532**

Bank	ECL allowance for impairments on loans and advances to customers at amortised												
31/12/2021	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	**127**	**11**	**6**	**9**	**19**	**64**	**59**	**295**	**21**	**60**	**177**	**36**	**295**
Mortgages	45	2	1	2	5	5	13	**72**	3	21	36	12	**72**
Consumer, Personal and Other	75	8	4	6	11	39	32	**174**	17	35	101	22	**174**
Credit Cards	7	1	1	2	2	21	14	**48**	1	5	40	3	**48**
Corporate Lending	**625**	**32**	**9**	**13**	**56**	**385**	**667**	**1,787**	**67**	**112**	**1,452**	**157**	**1,787**
Large Corporate	497	10	1	5	46	217	49	**825**	40	22	751	12	**825**
SMEs	128	22	9	8	10	168	617	**962**	27	89	701	144	**962**
Public Sector	**1**	**-**	**-**	**-**	**-**	**-**	**-**	**1**	**1**	**-**	**-**	**-**	**1**
Greece	1	-	-	-	-	-	-	**1**	1	-	-	-	**1**
Total	**753**	**42**	**15**	**22**	**75**	**449**	**725**	**2,083**	**89**	**172**	**1,629**	**193**	**2,083**

The tables below present the credit quality per loan portfolio and industry:

Group 31/12/2022	Gross loans and advances to customers at amortised cost						
	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	**26,145**	**1,734**	**273**	**1,429**	**202**	**181**	**29,964**
Financial corporations	7,293	39	2	11	7	3	**7,357**
Manufacturing/ Handicraft	3,380	318	45	231	21	22	**4,016**
Construction	539	224	25	99	12	13	**913**
Real Estate Companies	766	35	3	247	15	22	**1,088**
Project Finance	2,182	5	1	9	-	-	**2,198**
Wholesale and retail trade	2,542	348	84	223	25	27	**3,248**
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	490	26	23	18	7	-	**564**
Energy	854	25	2	30	15	12	**938**
Transports and Logistics	456	97	13	142	2	-	**709**
Other industries	1,990	258	63	140	29	55	**2,536**
Public sector	1,615	-	-	5	2	-	**1,623**
Total	**31,908**	**3,774**	**799**	**1,475**	**595**	**187**	**38,738**

Group	Gross loans and advances to customers at amortised cost						
31/12/2021	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,805**	**2,271**	**608**	**68**	**430**	**6**	**9,188**
Corporate and Public Sector Lending	**22,134**	**2,852**	**448**	**3,218**	**283**	**297**	**29,232**
Financial corporations	6,709	5	4	440	5	6	**7,169**
Manufacturing/ Handicraft	2,544	633	81	517	34	55	**3,864**
Construction	573	144	41	278	20	13	**1,070**
Real Estate Companies	706	105	4	425	14	57	**1,312**
Project Finance	1,852	5	1	72	2	3	**1,936**
Wholesale and retail trade	2,204	419	123	371	38	54	**3,209**
Shipping Companies	1,946	3	1	31	-	-	**1,980**
Coastline/ Ferries Companies	118	-	1	103	-	-	**222**
Hotels	963	782	24	404	72	47	**2,292**
Agriculture	349	62	37	86	16	1	**550**
Energy	640	48	7	40	1	-	**735**
Transports and Logistics	401	94	19	252	4	1	**772**
Other industries	1,584	553	106	193	75	58	**2,568**
Public sector	1,545	-	1	5	2	-	**1,553**
Total	**27,939**	**5,123**	**1,056**	**3,286**	**714**	**303**	**38,420**

Group 31/12/2022	ECL allowance for impairments on loans and advances to customers at amortised cost						
	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**11**	**53**	**177**	**28**	**30**	**1**	**300**
Corporate and Public Sector Lending	**25**	**63**	**120**	**787**	**24**	**94**	**1,113**
Financial corporations	2	-	2	11	-	2	**18**
Manufacturing/ Handicraft	3	12	19	102	5	11	**152**
Construction	1	7	13	61	2	8	**92**
Real Estate Companies	1	1	1	110	-	11	**124**
Project Finance	2	1	-	7	-	-	**11**
Wholesale and retail trade	4	21	39	156	6	14	**240**
Shipping Companies	1	-	1	1	-	-	**3**
Coastline/ Ferries Companies	-	-	-	67	-	-	**67**
Hotels	2	3	3	38	1	3	**48**
Agriculture	1	1	8	7	1	-	**19**
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	**36**	**115**	**298**	**815**	**54**	**95**	**1,413**

Group 31/12/2021	ECL allowance for impairments on loans and advances to customers at amortised cost						
	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**21**	**60**	**155**	**22**	**36**	**-**	**295**
Corporate and Public Sector Lending	**69**	**114**	**165**	**1,120**	**45**	**115**	**1,628**
Financial corporations	7	-	2	101	-	1	**112**
Manufacturing/ Handicraft	12	26	29	141	5	18	**231**
Construction	4	6	16	107	4	6	**143**
Real Estate Companies	2	3	3	159	1	14	**182**
Project Finance	1	-	-	52	-	-	**54**
Wholesale and retail trade	12	30	53	199	11	28	**333**
Shipping Companies	1	-	1	15	-	-	**16**
Coastline/ Ferries Companies	-	-	-	30	-	-	**31**
Hotels	3	6	4	9	1	3	**26**
Agriculture	2	4	10	32	4	-	**52**
Energy	11	7	3	8	-	-	**30**
Transports and Logistics	1	3	8	157	1	1	**172**
Other industries	10	29	37	109	17	44	**245**
Public sector	1	-	-	-	-	-	**2**
Total	**90**	**174**	**321**	**1,142**	**81**	**115**	**1,924**

Group 31/12/2022	Loans and advances to customers at amortised cost						
	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	**26,120**	**1,672**	**153**	**641**	**178**	**88**	**28,851**
Financial corporations	7,291	39	1	-	7	1	**7,339**
Manufacturing/ Handicraft	3,377	306	26	129	16	11	**3,864**
Construction	538	217	13	38	10	5	**821**
Real Estate Companies	765	34	2	137	14	11	**964**
Project Finance	2,180	4	1	2	-	-	**2,187**
Wholesale and retail trade	2,538	327	45	67	18	13	**3,008**
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	489	25	14	11	6	-	**545**
Energy	850	23	1	10	14	6	**904**
Transports and Logistics	455	94	7	33	1	-	**591**
Other industries	1,986	247	36	45	23	16	**2,353**
Public sector	1,615	-	-	1	2	-	**1,619**
Total	**31,872**	**3,659**	**501**	**660**	**541**	**92**	**37,326**

Group	Loans and advances to customers at amortised cost						
31/12/2021	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,784**	**2,210**	**452**	**46**	**394**	**5**	**8,893**
Corporate and Public Sector Lending	**22,065**	**2,738**	**283**	**2,098**	**238**	**182**	**27,604**
Financial corporations	6,702	4	1	339	5	6	**7,058**
Manufacturing/ Handicraft	2,531	607	52	376	28	37	**3,632**
Construction	569	138	25	171	16	8	**927**
Real Estate Companies	703	102	2	267	13	43	**1,130**
Project Finance	1,850	5	1	20	2	3	**1,882**
Wholesale and retail trade	2,192	389	70	172	27	26	**2,876**
Shipping Companies	1,945	3	-	16	-	-	**1,964**
Coastline/ Ferries Companies	118	-	1	73	-	-	**191**
Hotels	959	776	20	395	71	44	**2,265**
Agriculture	347	58	26	54	12	1	**498**
Energy	629	41	4	31	1	-	**706**
Transports and Logistics	400	91	11	95	3	-	**600**
Other industries	1,574	524	69	84	58	14	**2,323**
Public sector	1,544	-	-	5	2	-	**1,551**
Total	**27,849**	**4,948**	**735**	**2,144**	**632**	**188**	**36,497**

Bank	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	**5,753**	**2,040**	**526**	**47**	**393**	**6**	**8,764**
Corporate and Public Sector Lending	**26,799**	**1,520**	**263**	**1,578**	**195**	**165**	**30,520**
Financial corporations	8,751	39	2	170	7	3	**8,972**
Manufacturing/ Handicraft	3,014	303	45	209	21	22	**3,614**
Construction	472	206	25	103	12	13	**831**
Real Estate Companies	1,061	30	3	380	12	21	**1,507**
Project Finance	2,182	5	1	26	-	-	**2,215**
Wholesale and retail trade	2,240	335	81	136	22	27	**2,841**
Shipping Companies	2,141	62	2	2	-	-	**2,206**
Coastline/ Ferries Companies	124	-	-	99	-	-	**223**
Hotels	1,696	256	10	165	67	25	**2,219**
Agriculture	485	26	23	18	7	-	**558**
Energy	844	21	2	30	15	12	**923**
Transports and Logistics	374	33	11	141	2	-	**561**
Other industries	1,801	204	60	94	28	42	**2,230**
Public sector	1,613	-	-	4	2	-	**1,620**
Total	**32,552**	**3,560**	**789**	**1,624**	**588**	**171**	**39,284**

Bank	Gross loans and advances to customers at amortised cost						
31/12/2021	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,795**	**2,271**	**608**	**68**	**430**	**6**	**9,178**
Corporate and Public Sector Lending	**22,913**	**2,749**	**438**	**3,405**	**265**	**284**	**30,054**
Financial corporations	8,308	17	4	598	5	6	**8,938**
Manufacturing/ Handicraft	2,271	607	81	492	30	55	**3,536**
Construction	507	137	40	267	20	13	**983**
Real Estate Companies	815	158	4	514	14	53	**1,560**
Project Finance	1,852	5	1	89	2	3	**1,953**
Wholesale and retail trade	1,981	381	122	283	38	54	**2,859**
Shipping Companies	1,946	3	1	31	-	-	**1,980**
Coastline/ Ferries Companies	118	-	1	103	-	-	**222**
Hotels	877	740	24	340	72	44	**2,096**
Agriculture	344	62	36	86	16	1	**545**
Energy	627	42	7	40	1	-	**717**
Transports and Logistics	280	82	18	250	4	1	**635**
Other industries	1,445	516	100	308	60	53	**2,481**
Public sector	1,542	-	-	4	2	-	**1,549**
Total	**28,709**	**5,020**	**1,045**	**3,473**	**695**	**290**	**39,232**

Bank 31/12/2022	ECL allowance for impairments on loans and advances to customers at amortised cost						
	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**11**	**53**	**177**	**28**	**30**	**1**	**300**
Corporate and Public Sector Lending	**32**	**61**	**116**	**911**	**24**	**89**	**1,232**
Financial corporations	6	-	2	131	-	2	**141**
Manufacturing/ Handicraft	2	12	19	93	5	11	**142**
Construction	1	6	13	65	2	8	**95**
Real Estate Companies	1	1	1	215	-	11	**230**
Project Finance	2	1	-	24	-	-	**28**
Wholesale and retail trade	3	21	37	84	6	14	**166**
Shipping Companies	1	-	1	1	-	-	**3**
Coastline/ Ferries Companies	-	-	-	67	-	-	**67**
Hotels	2	3	3	36	1	2	**46**
Agriculture	1	1	8	7	1	-	**19**
Energy	4	2	1	20	1	5	**34**
Transports and Logistics	-	2	6	109	1	-	**118**
Other industries	8	10	26	54	6	37	**141**
Public sector	-	-	-	3	-	-	**3**
Total	**42**	**113**	**294**	**939**	**53**	**90**	**1,532**

Bank 31/12/2021	ECL allowance for impairments on loans and advances to customers at amortised cost						
	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**21**	**60**	**155**	**22**	**36**	**-**	**295**
Corporate and Public Sector Lending	**67**	**112**	**165**	**1,287**	**45**	**112**	**1,788**
Financial corporations	9	-	2	212	-	1	**225**
Manufacturing/ Handicraft	11	25	29	131	5	18	**219**
Construction	4	6	16	108	4	5	**142**
Real Estate Companies	3	3	3	240	1	14	**264**
Project Finance	1	-	-	66	-	-	**68**
Wholesale and retail trade	11	28	53	123	11	29	**254**
Shipping Companies	1	-	1	15	-	-	**16**
Coastline/ Ferries Companies	-	-	-	30	-	-	**31**
Hotels	3	6	4	7	1	3	**25**
Agriculture	2	4	10	32	4	-	**52**
Energy	11	7	3	8	-	-	**30**
Transports and Logistics	1	3	8	158	1	1	**172**
Other industries	9	28	37	156	17	42	**289**
Public sector	1	-	-	-	-	-	**1**
Total	**89**	**172**	**320**	**1,309**	**81**	**112**	**2,083**

Bank 31/12/2022	Loans and advances to customers at amortised cost						
	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,742**	**1,987**	**349**	**19**	**363**	**4**	**8,465**
Corporate and Public Sector Lending	**26,768**	**1,459**	**147**	**667**	**171**	**76**	**29,288**
Financial corporations	8,746	38	1	38	7	1	**8,831**
Manufacturing/ Handicraft	3,012	291	26	117	16	11	**3,472**
Construction	471	200	12	38	10	5	**736**
Real Estate Companies	1,060	29	2	165	12	11	**1,278**
Project Finance	2,180	4	1	2	-	-	**2,187**
Wholesale and retail trade	2,237	314	44	52	15	13	**2,675**
Shipping Companies	2,140	62	-	1	-	-	**2,204**
Coastline/ Ferries Companies	124	-	-	32	-	-	**156**
Hotels	1,695	253	7	129	66	23	**2,173**
Agriculture	484	24	14	11	6	-	**539**
Energy	840	18	1	10	14	6	**889**
Transports and Logistics	374	30	5	33	1	-	**443**
Other industries	1,793	195	35	40	23	5	**2,089**
Public sector	1,613	-	-	1	2	-	**1,617**
Total	**32,510**	**3,447**	**496**	**686**	**535**	**80**	**37,753**

Bank	Loans and advances to customers at amortised cost						
31/12/2021	Stage 1	Stage 2	Stage 3		POCI		Total
			Collective	Individual	Collective	Individual	
Retail Lending	**5,774**	**2,210**	**452**	**46**	**394**	**5**	**8,883**
Corporate and Public Sector Lending	**22,846**	**2,638**	**273**	**2,118**	**220**	**172**	**28,266**
Financial corporations	8,298	17	1	386	5	6	**8,713**
Manufacturing/ Handicraft	2,260	581	52	361	25	37	**3,317**
Construction	503	131	23	159	16	8	**841**
Real Estate Companies	813	155	2	273	13	40	**1,296**
Project Finance	1,850	5	1	23	2	3	**1,884**
Wholesale and retail trade	1,970	353	70	160	27	26	**2,605**
Shipping Companies	1,945	3	-	16	-	-	**1,964**
Coastline/ Ferries Companies	118	-	1	73	-	-	**191**
Hotels	874	733	20	332	70	41	**2,072**
Agriculture	342	58	26	54	12	1	**493**
Energy	616	35	4	31	1	-	**687**
Transports and Logistics	278	79	10	92	3	-	**463**
Other industries	1,436	487	63	151	43	11	**2,192**
Public sector	1,541	-	-	4	2	-	**1,548**
Total	**28,620**	**4,848**	**725**	**2,164**	**614**	**178**	**37,149**

The tables that follow show the credit quality, per staging, of each loan category, for the Group and the Bank as at 31 December 2022 and 2021, inclusive of value of collateral:

Mortgages

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

Group	Mortgages - Internal rating grade				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	4,601	-	-	-	**4,601**
Recommended	46	-	-	-	**46**
Substandard	-	1,803	-	252	**2,055**
Default	-	-	404	90	**493**
Total Gross Balance	**4,647**	**1,803**	**404**	**341**	**7,195**
Strong	3	-	-	-	**3**
Recommended	-	-	-	-	**-**
Substandard	-	21	-	4	**25**
Default	-	-	36	8	**44**
Total ECL Allowance	**3**	**21**	**36**	**12**	**72**
Total Balance	**4,643**	**1,782**	**368**	**329**	**7,122**
Value of collateral	4,436	1,671	354	313	6,774

Bank	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

Bank	Mortgages - Internal rating grade				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	4,601	-	-	-	**4,601**
Recommended	46	-	-	-	**46**
Substandard	-	1,803	-	252	**2,055**
Default	-	-	404	90	**493**
Total Gross Balance	**4,647**	**1,803**	**404**	**341**	**7,195**
Strong	3	-	-	-	**3**
Recommended	-	-	-	-	**-**
Substandard	-	21	-	4	**25**
Default	-	-	36	8	**44**
Total ECL Allowance	**3**	**21**	**36**	**12**	**72**
Total Balance	**4,643**	**1,782**	**368**	**329**	**7,122**
Value of collateral	4,436	1,671	354	313	6,774

Consumer, Personal and Other Lending

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**

Group	Consumer, Personal and Other Lending - Internal rating grade				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	810	-	-	-	**810**
Recommended	27	-	-	-	**27**
Substandard	-	352	-	67	**419**
Default	-	-	222	25	**247**
Total Gross Balance	**837**	**352**	**222**	**92**	**1,503**
Strong	16	-	-	-	**16**
Recommended	-	-	-	-	**-**
Substandard	-	35	-	13	**48**
Default	-	-	101	9	**110**
Total ECL Allowance	**17**	**35**	**101**	**22**	**174**
Total Balance	**820**	**317**	**120**	**70**	**1,328**
Value of collateral	393	133	60	35	**622**

Bank	Consumer, Personal and Other Lending - Internal rating grade				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	848	-	-	-	**848**
Recommended	18	-	-	-	**18**
Substandard	-	263	-	54	**317**
Default	-	-	199	18	**216**
Total Gross Balance	**866**	**263**	**199**	**71**	**1,400**
Strong	6	-	-	-	**6**
Recommended	-	-	-	-	**-**
Substandard	-	28	-	5	**33**
Default	-	-	116	8	**124**
Total ECL Allowance	**6**	**28**	**116**	**13**	**163**
Total Balance	**860**	**236**	**83**	**58**	**1,237**
Value of collateral	393	95	50	33	**571**

Bank	Consumer, Personal and Other Lending - Internal rating grade				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	810	-	-	-	**810**
Recommended	17	-	-	-	**17**
Substandard	-	352	-	67	**419**
Default	-	-	222	25	**247**
Total Gross Balance	**827**	**352**	**222**	**92**	**1,492**
Strong	16	-	-	-	**16**
Recommended	-	-	-	-	**-**
Substandard	-	35	-	13	**48**
Default	-	-	101	9	**110**
Total ECL Allowance	**17**	**35**	**101**	**22**	**174**
Total Balance	**810**	**317**	**120**	**70**	**1,318**
Value of collateral	383	133	59	35	**612**

Credit Cards

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**

Group	Credit Cards - Internal rating grade				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	314	-	-	-	**314**
Recommended	7	-	-	-	**7**
Substandard	-	115	-	-	**116**
Default	-	-	50	3	**53**
Total Gross Balance	**322**	**115**	**50**	**4**	**491**
Strong	1	-	-	-	**1**
Recommended	-	-	-	-	**-**
Substandard	-	5	-	-	**5**
Default	-	-	40	3	**43**
Total ECL Allowance	**1**	**5**	**40**	**3**	**48**
Total Balance	**321**	**111**	**10**	**1**	**442**
Value of Collateral	1	-	-	-	**1**

Bank	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**

Bank	Credit Cards - Internal rating grade				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	314	-	-	-	**314**
Recommended	7	-	-	-	**7**
Substandard	-	115	-	-	**116**
Default	-	-	50	3	**53**
Total Gross Balance	**322**	**115**	**50**	**4**	**491**
Strong	1	-	-	-	**1**
Recommended	-	-	-	-	**-**
Substandard	-	5	-	-	**5**
Default	-	-	40	3	**43**
Total ECL Allowance	**1**	**5**	**40**	**3**	**48**
Total Balance	**321**	**111**	**10**	**1**	**442**
Value of collateral	1	-	-	-	**1**

Large Corporate

Group	Large Corporate - Internal rating grade				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	16,954	-	-	-	**16,954**
Recommended	837	2	-	-	**839**
Substandard	-	529	10	67	**606**
Default	-	-	650	35	**685**
Total Gross Balance	**17,791**	**531**	**660**	**102**	**19,085**
Strong	9	-	-	-	**9**
Recommended	3	0	-	-	**3**
Substandard	-	4	0	2	**6**
Default	-	-	325	19	**344**
Total ECL Allowance	**12**	**4**	**325**	**20**	**362**
Total Balance	**17,779**	**527**	**335**	**81**	**18,722**
Value of collateral	6,135	385	355	60	**6,934**

Group	Large Corporate - Internal rating grade				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	14,702	-	-	-	**14,702**
Recommended	610	-	-	-	**610**
Substandard	-	1,171	8	75	**1,253**
Default	-	-	1,422	38	**1,460**
Total Gross Balance	**15,312**	**1,171**	**1,430**	**113**	**18,025**
Strong	33	-	-	-	**33**
Recommended	5	-	-	-	**5**
Substandard	-	22	-	2	**24**
Default	-	-	439	11	**450**
Total ECL Allowance	**38**	**22**	**439**	**13**	**512**
Total Balance	**15,274**	**1,148**	**990**	**100**	**17,513**
Value of collateral	4,736	610	677	83	**6,106**

Bank	Large Corporate - Internal rating grade				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	16,684	-	-	-	**16,684**
Recommended	2,506	-	-	-	**2,506**
Substandard	-	456	-	66	**522**
Default	-	-	1,004	35	**1,038**
Total Gross Balance	**19,190**	**456**	**1,004**	**101**	**20,750**
Strong	13	-	-	-	**13**
Recommended	7	-	-	-	**7**
Substandard	-	4	-	2	**6**
Default	-	-	582	18	**600**
Total ECL Allowance	**20**	**4**	**582**	**20**	**626**
Total Balance	**19,170**	**452**	**422**	**81**	**20,124**
Value of collateral	5,816	318	362	60	**6,555**

Bank	Large Corporate - Internal rating grade				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	14,955	-	-	-	**14,955**
Recommended	1,662	-	-	-	**1,662**
Substandard	-	1,257	-	75	**1,331**
Default	-	-	1,888	30	**1,918**
Total Gross Balance	**16,617**	**1,257**	**1,888**	**104**	**19,866**
Strong	32	-	-	-	**32**
Recommended	7	-	-	-	**7**
Substandard	-	22	-	2	**24**
Default	-	-	751	11	**761**
Total ECL Allowance	**40**	**22**	**751**	**12**	**825**
Total Balance	**16,577**	**1,234**	**1,138**	**92**	**19,041**
Value of collateral	4,355	606	731	75	**5,766**

SME

Group	SME - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	5,652	-	-	-	**5,652**
Recommended	1,086	27	-	-	**1,113**
Substandard	-	1,177	37	106	**1,320**
Default	-	-	1,000	173	**1,172**
Total Gross Balance	**6,739**	**1,203**	**1,036**	**279**	**9,257**
Strong	9	-	-	-	**9**
Recommended	4	-	-	-	**4**
Substandard	-	58	33	2	**94**
Default	-	-	545	95	**640**
Total ECL Allowance	**13**	**59**	**579**	**97**	**747**
Total Balance	**6,726**	**1,145**	**458**	**182**	**8,510**
Value of Collateral	4,397	890	572	177	**6,036**

Group	SME - Internal rating grade				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	4,553	-	-	-	**4,553**
Recommended	725	47	-	-	**771**
Substandard	-	1,635	17	92	**1,744**
Default	-	-	2,214	373	**2,587**
Total Gross Balance	**5,277**	**1,681**	**2,231**	**465**	**9,654**
Strong	23	-	-	-	**23**
Recommended	7	1	-	-	**8**
Substandard	-	91	8	3	**101**
Default	-	-	838	145	**982**
Total ECL Allowance	**30**	**92**	**846**	**147**	**1,115**
Total Balance	**5,247**	**1,589**	**1,386**	**317**	**8,540**
Value of collateral	2,883	1,177	1,284	310	**5,654**

Bank	SME - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	5,027	-	-	-	**5,027**
Recommended	969	-	-	-	**969**
Substandard	-	1,064	-	100	**1,164**
Default	-	-	833	157	**990**
Total Gross Balance	**5,996**	**1,064**	**833**	**257**	**8,150**
Strong	8	-	-	-	**8**
Recommended	3	-	-	-	**3**
Substandard	-	56	-	2	**58**
Default	-	-	442	91	**533**
Total ECL Allowance	**11**	**56**	**442**	**93**	**603**
Total Balance	**5,985**	**1,008**	**391**	**164**	**7,547**
Value of collateral	3,656	769	503	167	**5,095**

Bank	SME - Internal rating grade				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
Strong	4,099	-	-	-	**4,099**
Recommended	656	-	-	-	**656**
Substandard	-	1,493	-	92	**1,585**
Default	-	-	1,949	350	**2,299**
Total Gross Balance	**4,755**	**1,493**	**1,949**	**442**	**8,639**
Strong	21	-	-	-	**21**
Recommended	6	-	-	-	**6**
Substandard	-	89	-	3	**92**
Default	-	-	701	142	**843**
Total ECL Allowance	**27**	**89**	**701**	**144**	**962**
Total Balance	**4,728**	**1,403**	**1,248**	**298**	**7,677**
Value of collateral	2,423	1,017	1,134	291	**4,864**

Public Sector

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**

Group	Public Sector - Internal rating grade				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	1,537	-	-	-	**1,537**
Recommended	8	-	-	-	**8**
Substandard	-	-	-	2	**2**
Default	-	-	5	-	**5**
Total Gross Balance	**1,545**	**-**	**5**	**2**	**1,553**
Strong	1	-	-	-	**1**
Recommended	-	-	-	-	**-**
Substandard	-	-	-	-	**-**
Default	-	-	-	-	**-**
Total ECL Allowance	**1**	**-**	**-**	**-**	**2**
Total Balance	**1,544**	**-**	**5**	**2**	**1,551**
Value of collateral	1,479	-	5	-	**1,484**

Bank	Public Sector - Internal rating grade				
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	1,609	-	-	-	**1,609**
Recommended	4	-	-	-	**4**
Substandard	-	-	-	2	**2**
Default	-	-	4	-	**4**
Total Gross Balance	**1,613**	**-**	**4**	**2**	**1,620**
Strong	-	-	-	-	**-**
Recommended	-	-	-	-	**-**
Substandard	-	-	-	-	**-**
Default	-	-	3	-	**3**
Total ECL Allowance	**-**	**-**	**3**	**-**	**3**
Total Balance	**1,613**	**-**	**1**	**2**	**1,617**
Vaue of collateral	1,560	-	4	-	**1,564**

Bank	Public Sector - Internal rating grade				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Strong	1,537	-	-	-	**1,537**
Recommended	5	-	-	-	**5**
Substandard	-	-	-	2	**2**
Default	-	-	5	-	**5**
Total Gross Balance	**1,542**	**-**	**5**	**2**	**1,549**
Strong	1	-	-	-	**1**
Recommended	-	-	-	-	**-**
Substandard	-	-	-	-	**-**
Default	-	-	-	-	**-**
Total ECL Allowance	**1**	**-**	**-**	**-**	**1**
Total Balance	**1,541**	**-**	**5**	**2**	**1,548**
Value of collateral	1,476	-	4	-	**1,481**

As at 31 December 2022 and 2021 the Group and the Bank have not granted any Public Sector lending outside Greece. Refer also to Note 4.7.

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	**5,805**	**2,271**	**676**	**436**	**9,188**
Transfer (to)/ from Held for Sale	(1)	(2)	(120)	(23)	**(146)**
New assets originated or purchased	608	37	-	4	**649**
Other debits to the Gross Balance / (Repayments)	(902)	(258)	(42)	(22)	**(1,224)**
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 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**	**8,774**

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	-	-	(34)	(6)	**(40)**
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 2	-	27	(27)	-	**-**
ECL impairment charge/ (release) for the year (P&L)	(26)	-	72	(1)	**46**
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)**
FX differences and other movements	5	6	-	9	**20**
ECL allowance as at 31/12/2022	**11**	**53**	**205**	**31**	**300**

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Bank's Retail lending portfolio for 2022 is as follows:

Bank	Retail Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2022	**5,795**	**2,271**	**676**	**436**	**9,178**
Transfer (to)/ from Held for Sale	(1)	(2)	(120)	(23)	**(146)**
New assets originated or purchased	608	37	-	4	**649**
Other debits to the Gross Balance / (Repayments)	(901)	(258)	(42)	(22)	**(1,223)**
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 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	**5,753**	**2,040**	**573**	**399**	**8,764**

Bank	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	-	-	(34)	(6)	**(40)**
Transferred from Stage 1 to Stage 2	(3)	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 2	-	27	(27)	-	-
ECL impairment charge/ (release) for the year (P&L)	(26)	-	72	(1)	**46**
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)**
FX differences and other movements	5	6	-	9	**20**
ECL allowance as at 31/12/2022	**11**	**53**	**205**	**31**	**300**

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 2021 is as follows:

Group	Retail Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2021	**6,484**	**2,307**	**2,978**	**2,426**	**14,196**
Transfer (to)/ from Held for Sale/ Distribution[1]	(32)	(147)	(2,324)	(1,946)	**(4,449)**
New assets originated or purchased	526	19	-	-	**545**
Other debits to the Gross Balance / (Repayments)	(884)	(212)	(57)	(55)	**(1,208)**
Transferred from Stage 1 to Stage 2	(1,405)	1,405	-	-	-
Transferred from Stage 1 to Stage 3	(29)	-	29	-	-
Transferred from Stage 2 to Stage 1	952	(952)	-	-	-
Transferred from Stage 2 to Stage 3	-	(478)	478	-	-
Transferred from Stage 3 to Stage 1	-	-	-	-	-
Transferred from Stage 3 to Stage 2	-	257	(257)	-	-
Change in the present value of the allowance	178	65	48	38	**329**
Write-off of interest recognised from change in the present value of the allowance	-	-	(23)	(16)	**(40)**
Write-offs	(6)	(3)	(194)	(9)	**(212)**
FX differences and other movements	21	9	(2)	(1)	**27**
Gross carrying amount as at 31/12/2021	**5,805**	**2,271**	**676**	**436**	**9,188**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

Group	Retail Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2021	**24**	**76**	**1,225**	**940**	**2,265**
Transfer (to)/ from Held for Sale/ Distribution[1]	(1)	(8)	(913)	(901)	**(1,823)**
Transferred from Stage 1 to Stage 2	(5)	5	-	-	-
Transferred from Stage 1 to Stage 3	-	-	-	-	-
Transferred from Stage 2 to Stage 1	23	(23)	-	-	-
Transferred from Stage 2 to Stage 3	-	(34)	34	-	-
Transferred from Stage 3 to Stage 2	-	31	(31)	-	-
ECL impairment charge/ (release) for the year (P&L)	(11)	14	62	16	**82**
Change in the present value of the allowance	-	-	23	16	**39**
Write-off of interest recognised from change in the present value of the allowance	-	-	(23)	(16)	**(40)**
Write-offs	(6)	(3)	(194)	(9)	**(212)**
FX differences and other movements	(4)	2	(5)	(9)	**(16)**
ECL allowance as at 31/12/2021	**21**	**60**	**177**	**36**	**295**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Bank's Retail lending portfolio for 2021 is as follows:

Bank	Retail Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2021	**6,475**	**2,307**	**2,978**	**2,426**	**14,186**
Transfer (to)/ from Held for Sale/ Distribution[1]	(32)	(147)	(2,324)	(1,946)	**(4,449)**
New assets originated or purchased	526	19	-	-	**545**
Other debits to the Gross Balance / (Repayments)	(884)	(212)	(57)	(55)	**(1,208)**
Assets sold	-	-	-	-	-
Assets derecognised (excluding write offs)	-	-	-	-	-
Transferred from Stage 1 to Stage 2	(1,405)	1,405	-	-	-
Transferred from Stage 1 to Stage 3	(29)	-	29	-	-
Transferred from Stage 2 to Stage 1	952	(952)	-	-	-
Transferred from Stage 2 to Stage 3		(478)	478	-	-
Transferred from Stage 3 to Stage 1	-	-	-	-	-
Transferred from Stage 3 to Stage 2	-	257	(257)	-	-
Change in the present value of the allowance	178	65	48	38	**329**
Write-off of interest recognised from change in the present value of the allowance	-	-	(23)	(16)	**(40)**
Write-offs	(6)	(3)	(194)	(9)	**(212)**
FX differences and other movements	21	9	(2)	(1)	**27**
Gross carrying amount as at 31/12/2021	**5,795**	**2,271**	**676**	**436**	**9,178**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

Bank	Retail Lending -Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2021	**24**	**76**	**1,225**	**940**	**2,265**
Transfer (to)/ from Held for Sale/ Distribution[1]	-	(8)	(913)	(901)	**(1,823)**
Transferred from Stage 1 to Stage 2	(5)	5	-	-	**-**
Transferred from Stage 1 to Stage 3	-	-	-	-	**-**
Transferred from Stage 2 to Stage 1	23	(23)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	(34)	34	-	**-**
Transferred from Stage 3 to Stage 2	-	31	(31)	-	**-**
ECL impairment charge/ (release) for the year (P&L)	(11)	14	62	16	**82**
Change in the present value of the allowance	-	-	23	16	**39**
Write-off of interest recognised from change in the present value of the allowance	-	-	(23)	(16)	**(40)**
Write-offs	(6)	(3)	(194)	(9)	**(212)**
FX differences and other movements	(4)	2	(5)	(9)	**(16)**
ECL allowance as at 31/12/2021	**21**	**60**	**177**	**36**	**295**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

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	**22,134**	**2,852**	**3,666**	**580**	**29,232**
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	6,829	162	35	5	**7,031**
Other debits to the Gross Balance / (Repayments)	(3,541)	(574)	(314)	(72)	**(4,501)**
Assets sold	-	-	(62)	(2)	**(64)**
Assets derecognised (excluding write offs)	(830)	-	(4)	-	**(834)**
Transferred from Stage 1 to Stage 2	(1,681)	1,681	-	-	-
Transferred from Stage 1 to Stage 3	(32)	-	32	-	-
Transferred from Stage 2 to Stage 1	2,713	(2,713)	-	-	-
Transferred from Stage 2 to Stage 3	-	(114)	114	-	-
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	3	(2)	36	1	**38**
Gross carrying amount as at 31/12/2022	**26,145**	**1,734**	**1,702**	**383**	**29,964**

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**	**114**	**1,285**	**160**	**1,628**
Transfer (to)/ from Held for Sale	-	17	(216)	(56)	**(255)**
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	62	(62)		-	**-**
Transferred from Stage 2 to Stage 3	-	(11)	11	-	**-**
Transferred from Stage 3 to Stage 1	-	-	(0)	-	**-**
Transferred from Stage 3 to Stage 2	-	30	(30)	-	**-**
ECL impairment charge/ (release) for the year (P&L)	(135)	(37)	620	41	**489**
Recoveries of amounts previously written-off (P&L)	-	-	(11)	-	**(11)**
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 derecognised	(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	43	3	(244)	(3)	**(201)**
ECL allowance as at 31/12/2022	**25**	**63**	**907**	**117**	**1,113**

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Bank's Corporate and Public sector lending portfolio for 2022 is as follows:

Bank	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	**22,913**	**2,749**	**3,842**	**549**	**30,054**
Transfer (to)/ from Held for Sale	(2)	30	(610)	(121)	**(704)**
Contribution to Associates	-	-	(421)	-	**(421)**
New assets originated or purchased	6,785	160	-	4	**6,948**
Other debits to the Gross Balance / (Repayments)	(3,826)	(529)	(228)	(63)	**(4,646)**
Assets sold	-	-	(62)	(2)	**(64)**
Assets derecognised (excluding write offs)	(830)	-	(4)	-	**(834)**
Transferred from Stage 1 to Stage 2	(1,584)	1,584	-	-	-
Transferred from Stage 1 to Stage 3	(23)	-	23	-	-
Transferred from Stage 2 to Stage 1	2,714	(2,714)	-	-	-
Transferred from Stage 2 to Stage 3	-	(95)	95	-	-
Transferred from Stage 3 to Stage 1	49	-	(49)	-	-
Transferred from Stage 3 to Stage 2	-	247	(247)	-	-
Debt for equity exchange	-	-	(181)	-	**(181)**
Change in the present value of the allowance	614	85	91	21	**811**
Write-off of interest recognised from change in the present value of the allowance	-	(1)	(51)	(11)	**(63)**
Write-offs	-	-	(368)	(19)	**(387)**
FX differences and other movements	(10)	5	11	1	**7**
Gross carrying amount as at 31/12/2022	**26,799**	**1,520**	**1,841**	**360**	**30,520**

Bank	Corporate and Public Sector Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2022	**67**	**112**	**1,452**	**157**	**1,788**
Transfer (to)/ from Held for Sale	-	17	(216)	(56)	**(255)**
Contribution to associates	-	-	(92)	-	**(92)**
Transferred from Stage 1 to Stage 2	(10)	10	-	-	-
Transferred from Stage 1 to Stage 3	-	-	-	-	-
Transferred from Stage 2 to Stage 1	61	(61)	-	-	-
Transferred from Stage 2 to Stage 3	-	(10)	10	-	-
Transferred from Stage 3 to Stage 1	-	-	(0)	-	-
Transferred from Stage 3 to Stage 2	-	28	(28)	-	-
ECL impairment charge/ (release) for the year (P&L)	(100)	(37)	593	38	**494**
Recoveries of amounts previously written-off (P&L)	-	-	(11)	-	**(11)**
Change in the present value of the allowance	-	-	29	7	**36**
Write-off of interest recognised from change in the present value of the allowance	-	(1)	(51)	(11)	**(63)**
Write-offs	-	-	(368)	(19)	**(387)**
Financial assets derecognised	(2)	-	-	-	**(2)**
Disposals of loans and advances	-	-	-	(1)	**(1)**
Debt for equity exchange	-	-	(77)	-	**(77)**
FX differences and other movements	16	2	(213)	(3)	**(198)**
ECL allowance as at 31/12/2022	**32**	**61**	**1,027**	**113**	**1,232**

In November 2022, the Bank contributed into Strix Holdings LP, two (2) bond loans of total gross carrying amount and ECL of € 421 million and € 92 million, respectively, in exchange for additional limited partnership interests. Refer to Note 26B for further information.

Regarding the movement in gross carrying amounts the “transfer to/from assets held for sale” of € 850 million mainly refers to the portfolios Sunrise III and Solar.

Regarding the movement in ECL allowance, line item “transfer (to)/from assets held for sale” of € 295 million mainly refers to portfolios Sunrise III and Solar. Amount of € 283 million in line item “ECL impairment charge/ (release) for the year (P&L)” relates to the ECL recognised during the year upon classification of the aforementioned portfolios as held for sale. Accordingly, the respective ECL related to the said HFS portfolios is deducted from line item “FX differences and other movements”. Refer to Note 30 for further information of the aforementioned portfolios.

For the purposes of this disclosure (both for movement in gross carrying amounts and ECL allowance), transfers are deemed to have occurred at the end of the previous reporting period prior to the “held for sale” classification, therefore the balances quoted in the aforementioned paragraphs reflect the gross carrying amounts and ECL allowance of Sunrise III and Solar held for sale portfolio as of 31 March 2022.

During the year ended 31 December 2022 a loss of € 19 million has been recognised in Group’s Income Statement (31 December 2021: gain € 3 million) due to derecognition of loans and advances to customers at amortised cost, in the context of either sale transactions or debt to equity exchanges.

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 2021 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 1/1/2021	**16,881**	**2,734**	**9,088**	**2,271**	**30,974**
Transfer (to)/ from Held for Sale/ Distribution[1]	-	(34)	(4,821)	(1,493)	**(6,349)**
Intercompany loans (recognized)/ derecognized due to change in Group's perimeter	59	-	-	-	**59**
New assets originated or purchased	4,957	120	11	-	**5,087**
Other debits to the Gross Balance / (Repayments)	176	(600)	(345)	(70)	**(839)**
Assets sold	(1)	-	(30)	-	**(31)**
Assets derecognised (excluding write offs)	-	-	(148)	(23)	**(172)**
Transferred from Stage 1 to Stage 2	(2,104)	2,104	-	-	**-**
Transferred from Stage 1 to Stage 3	(60)	-	60	-	**-**
Transferred from Stage 2 to Stage 1	1,484	(1,484)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	(486)	486	-	**-**
Transferred from Stage 3 to Stage 1	7	-	(7)	-	**-**
Transferred from Stage 3 to Stage 2	-	412	(412)	-	**-**
Debt for equity exchange	-	-	(21)	-	**(21)**
Change in the present value of the allowance	448	92	222	67	**829**
Write-off of interest recognised from change in the present value of the allowance	-	(1)	(151)	(46)	**(198)**
Write-offs	-	-	(309)	(139)	**(448)**
FX differences and other movements	288	(5)	45	13	**340**
Gross carrying amount as at 31/12/2021	**22,134**	**2,852**	**3,666**	**580**	**29,232**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

Group	Corporate and Public Sector Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2021	**88**	**173**	**3,407**	**1,123**	**4,790**
Transfer (to)/ from Held for Sale/ Distribution[1]	-	(11)	(1,951)	(826)	**(2,788)**
Transferred from Stage 1 to Stage 2	(11)	11	-	-	**-**
Transferred from Stage 1 to Stage 3	(1)	-	1	-	**-**
Transferred from Stage 2 to Stage 1	33	(33)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	(46)	46	-	**-**
Transferred from Stage 3 to Stage 1	1	-	(1)	-	**-**
Transferred from Stage 3 to Stage 2	-	47	(47)	-	**-**
ECL impairment charge/ (release) for the year (P&L) (as reclassified)	(84)	(6)	477	25	**411**
Recoveries of amounts previously written-off (P&L)	-	-	(7)	-	**(7)**
Change in the present value of the allowance	-	1	81	35	**117**
Write-off of interest recognised from change in the present value of the allowance	-	(2)	(154)	(46)	**(202)**
Write-offs	-	-	(309)	(139)	**(448)**
Financial assets derecognised	-	-	(9)	(1)	**(10)**
Disposals of loans and advances	-	-	(20)	-	**(20)**
Debt for equity exchange	-	-	(18)	-	**(18)**
FX differences and other movements (as reclassified)	43	(18)	(211)	(11)	**(196)**
ECL allowance as at 31/12/2021	**69**	**114**	**1,285**	**160**	**1,628**

[1] Line item “Transfer (to)/from assets Held for sale/Distribution” includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

An analysis of changes in the gross carrying amount and the corresponding ECL allowance for impairment losses in relation to the Bank's Corporate and Public sector Lending portfolio for 2021 is as follows:

Bank	Corporate and Public Sector Lending - Movement in gross carrying amounts				
	Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2021	**18,016**	**2,558**	**8,892**	**2,110**	**31,575**
Transfer (to)/ from Held for Sale/ Distribution[1]	(176)	(13)	(4,526)	(1,348)	**(6,063)**
New assets originated or purchased	4,702	107	-	-	**4,809**
Other debits to the Gross Balance / (Repayments)	244	(484)	(289)	(70)	**(600)**
Assets sold	-	-	(30)	(0)	**(30)**
Assets derecognised (excluding write offs)	-	-	(148)	(23)	**(172)**
Transferred from Stage 1 to Stage 2	(2,209)	2,209	-	-	**-**
Transferred from Stage 1 to Stage 3	(48)	-	48	-	**-**
Transferred from Stage 2 to Stage 1	1,613	(1,613)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	(456)	456	-	**-**
Transferred from Stage 3 to Stage 1	7	-	(7)	-	**-**
Transferred from Stage 3 to Stage 2	-	342	(342)	-	**-**
Debt for equity exchange	-	-	(21)	-	**(21)**
Change in the present value of the allowance	486	94	223	60	**863**
Write-off of interest recognised from change in the present value of the allowance	-	-	(144)	(38)	**(182)**
Write-offs	-	-	(309)	(143)	**(453)**
FX differences and other movements	280	5	39	1	**326**
Gross carrying amount as at 31/12/2021	**22,913**	**2,749**	**3,842**	**549**	**30,054**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

Bank	Corporate and Public Sector Lending - Movement in ECL allowance				
	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2021	**84**	**161**	**3,388**	**1,019**	**4,652**
Transfer (to)/ from Held for Sale/ Distribution[1]	-	3	(1,752)	(710)	**(2,460)**
Transferred from Stage 1 to Stage 2	(11)	11	-	-	**-**
Transferred from Stage 1 to Stage 3	(1)	-	1	-	**-**
Transferred from Stage 2 to Stage 1	35	(35)	-	-	**-**
Transferred from Stage 2 to Stage 3	-	(42)	42	-	**-**
Transferred from Stage 3 to Stage 1	1	-	(1)	-	**-**
Transferred from Stage 3 to Stage 2	-	37	(37)	-	**-**
ECL impairment charge/ (release) for the year (P&L) (as reclassified)	(26)	(7)	453	14	**434**
Recoveries of amounts previously written-off (P&L)	-	-	(7)	-	**(7)**
Change in the present value of the allowance	-	-	74	28	**102**
Write-off of interest recognised from change in the present value of the allowance	-	-	(144)	(38)	**(182)**
Write-offs	-	-	(309)	(143)	**(453)**
Financial assets derecognised	-	-	(9)	(1)	**(10)**
Disposals of loans and advances	-	-	(20)	-	**(20)**
Debt for equity exchange	-	-	(18)	-	**(18)**
FX differences and other movements (as reclassified)	(15)	(16)	(209)	(11)	**(251)**
ECL allowance as at 31/12/2021	**67**	**112**	**1,452**	**157**	**1,788**

[1] Line item "Transfer (to)/from assets Held for sale/Distribution" includes mainly the held for distribution loans related to the securitizations of Sunrise I and Sunrise II and the Held for sale loans related to Sunshine portfolio.

The gross modification impact recognized by the Group and the Bank, during the period ended 31 December 2022, for loans with ECL allowance measured at an amount equal to lifetime ECL was gain € 3 million and € 1.7 million, respectively (31 December 2021: loss € 60 million for both the Group and the Bank). The said impact represents the changes in the gross carrying amount (before ECL allowance) of the loans from immediately before, to immediately after modification. The impact of modification for the Group and the Bank on the ECL allowance associated with these loans was a release of ECL allowance of € 16 million and € 14 million, respectively (31 December 2021: € 38 million and € 36 million, respectively). The net impact for the Group and the Bank on the income statement for the period ended 31 December 2022 was therefore, gain € 19 million and € 16 million, respectively (31 December 2021: loss € 22 million and € 24 million, respectively). The gross carrying amount (before modification) of the loans whose cash flows were modified during the period ended 31 December 2022 amounted to € 1,249 million for the Group (31 December 2021: € 4,057 million) and € 1,059 million for the Bank (31 December 2021: € 3,844 million). The gross carrying amount for the Group and the Bank as at 31 December 2022 of loans and advances to customers at amortised cost that have been modified since initial recognition at a time when their ECL allowance was measured at an amount equal to lifetime ECL (Stage 3 and Stage 2) and for which their respective ECL allowance as at 31 December 2022 is measured at an amount equal to 12-month ECL (Stage 1), is € 208 million (31 December 2021: € 473 million for both the Group and the Bank).

4.3.3 Collateral and other credit enhancements

Along with the evaluation of the creditworthiness of counterparties, the Group and the Bank estimate 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 and the Bank have defined categories of acceptable collateral and have 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 is initially evaluated during the credit approval process, based on their current or fair value and 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 and the Bank accept 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 Bank 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 properties 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 and the Bank according to Credit Policy Manual are 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 determining the market value of a real estate property. More volatile real estate market conditions may lead to a higher evaluation frequency.

The Group and the Bank may also obtain guarantees from parent companies for loans and advances granted to their subsidiaries.

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	14,862	1,424	5,383	21,669	3,441
Mortgages	6,425	70	56	6,551	-
Consumer, Personal and Other	350	78	153	581	-
Credit Cards	-	1	-	1	-
Large Corporate	5,018	851	1,064	6,934	1,453
SMEs	3,068	424	2,544	6,036	1,988
Public Sector	1	1	1,565	1,566	-
Total financial assets at amortised cost	**14,862**	**1,424**	**5,383**	**21,669**	**3,441**
Derivative financial instruments	-	635	-	635	-
Total financial instruments at FVTPL	**-**	**635**	**-**	**635**	**-**
Financial guarantees	126	120	86	332	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**

Group 31/12/2021	Fair value of collateral and credit enhancements held under the base scenario				
	Type of collateral or credit enhancement				
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received
Loans and advances to customers at amortised cost	14,882	1,416	4,342	20,640	3,079
Mortgages	6,642	61	70	6,774	-
Consumer, Personal and Other	387	73	162	622	-
Credit Cards	-	1	-	1	-
Large Corporate	4,273	884	950	6,106	928
SMEs	3,579	397	1,679	5,654	2,151
Public Sector	1	1	1,482	1,484	-
Total financial assets at amortised cost	**14,882**	**1,416**	**4,342**	**20,640**	**3,079**
Derivative financial instruments	-	500	-	500	-
Total financial instruments at FVTPL	**-**	**500**	**-**	**500**	**-**
Financial guarantees	122	100	81	302	839
Letters of credit	1	-	1	2	1
Irrevocable undrawn credit commitments	411	21	54	486	1,092
Total	**534**	**121**	**136**	**790**	**1,932**

Bank 31/12/2022	Fair value of collateral and credit enhancements held under the base scenario				
	Type of collateral or credit enhancement				
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received
Loans and advances to customers at amortised cost	14,461	1,415	4,462	20,338	3,450
Mortgages	6,425	70	56	6,551	-
Consumer, Personal and Other	350	68	153	571	-
Credit Cards	-	1	-	1	-
Large Corporate	4,958	853	744	6,555	1,462
SMEs	2,726	423	1,946	5,095	1,988
Public Sector	1	1	1,562	1,564	-
Total financial assets at amortised cost	**14,461**	**1,415**	**4,462**	**20,338**	**3,450**
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**	**997**	**2,512**

Bank	Fair value of collateral and credit enhancements held under the base scenario				
	Type of collateral or credit enhancement				
31/12/2021	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received
Loans and advances to customers at amortised cost	14,366	1,399	3,732	19,497	3,081
Mortgages	6,642	61	70	6,774	-
Consumer, Personal and Other	387	63	162	612	-
Credit Cards	-	1	-	1	-
Large Corporate	4,159	879	729	5,766	937
SMEs	3,176	395	1,293	4,864	2,144
Public Sector	1	1	1,479	1,481	-
Total financial assets at amortised cost	**14,366**	**1,399**	**3,732**	**19,497**	**3,081**
Derivative financial instruments	-	500	-	500	-
Total financial instruments at FVTPL	**-**	**500**	**-**	**500**	**-**
Financial guarantees	122	100	81	302	839
Letters of credit	1	-	1	2	1
Irrevocable undrawn credit commitments	411	21	54	486	1,092
Total	**535**	**121**	**136**	**790**	**1,932**

The below tables provide the fair value of collaterals held and credit enhancements 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 ECLs 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					
31/12/2022	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received	Associated ECL
Loans and advances to customers at amortised cost	1,065	17	189	1,271	322	1,113
Mortgages	285	1	4	290	-	48
Consumer, Personal and Other	46	1	3	50	-	116
Credit Cards	-	-	-	-	-	41
Large Corporate	331	3	21	355	147	325
SMEs	403	12	157	572	175	579
Public Sector	-	-	4	4	-	4
Total loans and advances to customers at amortised cost	**1,065**	**17**	**189**	**1,271**	**322**	**1,113**
Financial guarantees	13	1	8	22	137	80
Letters of credit	-	-	-	-	-	-
Total	**13**	**1**	**8**	**22**	**137**	**80**

Group 31/12/2021	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					
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received	Associated ECL
Loans and advances to customers at amortised cost	2,014	97	268	2,380	532	1,463
Mortgages	346	2	6	354	-	36
Consumer, Personal and Other	55	3	2	60	-	101
Credit Cards	-	-	-	-	-	40
Large Corporate	578	77	29	684	163	439
SMEs	1,035	15	227	1,277	369	846
Public Sector	-	-	4	5	-	-
Total loans and advances to customers at amortised cost	**2,014**	**97**	**268**	**2,380**	**532**	**1,463**
Financial guarantees	16	2	8	26	155	77
Letters of credit	-	-	-	-	-	-
Total	**16**	**2**	**8**	**26**	**155**	**77**

Bank 31/12/2022	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					
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received	Associated ECL
Loans and advances to customers at amortised cost	1,023	16	169	1,209	331	1,232
Mortgages	285	1	4	290	-	48
Consumer, Personal and Other	46	1	3	50	-	116
Credit Cards	-	-	-	-	-	41
Large Corporate	345	3	14	362	156	582
SMEs	347	11	144	503	175	442
Public Sector	-	-	4	4	-	3
Total loans and advances to customers at amortised cost	**1,023**	**16**	**169**	**1,209**	**331**	**1,232**
Financial guarantees	13	1	8	23	137	80
Letters of credit	-	-	-	-	-	-
Total	**13**	**1**	**8**	**23**	**137**	**80**

Bank 31/12/2021	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					
	Real estate collateral	Financial collateral	Other collateral	Total value of collateral	Guarantees received	Associated ECL
Loans and advances to customers at amortised cost	1,946	93	242	2,282	534	1,629
Mortgages	346	2	6	354	-	36
Consumer, Personal and Other	55	3	2	59	-	101
Credit Cards	-	-	-	-	-	40
Large Corporate	637	74	20	731	165	751
SMEs	909	15	210	1,134	369	701
Public Sector	-	-	4	4	-	-
Total loans and advances to customers at amortised cost	**1,946**	**93**	**242**	**2,282**	**534**	**1,629**
Financial guarantees	16	2	8	26	155	77
Letters of credit	-	-	-	-	-	-
Total	**16**	**2**	**8**	**26**	**155**	**77**

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:

31/12/2022	Group		Bank	
	Mortgages (gross amounts)	Commercial real estate loans (gross amounts)	Mortgages (gross amounts)	Commercial real estate loans (gross amounts)
Less than 50%	3,082	50	3,082	50
50%-70%	1,568	53	1,568	67
71%-80%	555	19	555	19
81%-90%	415	35	415	35
91%-100%	311	8	311	8
101%-120%	356	37	356	37
121%-150%	254	3	254	3
Greater than 150%	338	17	338	17
Total exposure	**6,879**	**223**	**6,879**	**237**
Weighted Average LTV	**63.1%**	**92.5%**	**63.1%**	**91.0%**

31/12/2021	Group		Bank	
	Mortgages (gross amount)	Commercial real estate loans (gross amounts)	Mortgages (gross amount)	Commercial real estate loans (gross amounts)
Less than 50%	2,811	42	2,811	42
50%-70%	1,620	72	1,620	74
71%-80%	645	33	645	44
81%-90%	499	49	499	49
91%-100%	418	19	418	19
101%-120%	504	27	504	27
121%-150%	331	43	331	43
Greater than 150%	368	52	368	52
Total exposure	**7,195**	**337**	**7,195**	**351**
Weighted Average LTV	**66.1%**	**104.2%**	**66.1%**	**102.9%**

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 of the Group and the Bank.

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	Net gain / losses on sale
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**	**-**

Group 31/12/2021	Gross amount	Of which: added this year	Accumulated impairment or fair value adjustment	Of which: on newly added	Net amount	Net Sale Price	Net gain / losses on sale
Real estate	**2,033**	**112**	**(158)**	**(28)**	**1,875**	**61**	**6**
-Residential	431	46	(32)	3	399	32	5
-Commercial	1,602	66	(126)	(31)	1,476	29	2
Other collateral	**9**	**-**	**(7)**	**(1)**	**2**	**-**	**-**

Bank 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	Net gain / losses on sale
Real estate	**1,784**	**389**	**(100)**	**(15)**	**1,684**	**35**	**4**
-Residential	439	45	(21)	(3)	418	17	2
-Commercial	1,345	344	(79)	(12)	1,266	18	2
Other collateral	-	-	-	-	-	-	-

Bank 31/12/2021	Gross amount	Of which: added this year	Accumulated impairment or fair value adjustment	Of which: on newly added	Net amount	Net Sale Price	Net gain / losses on sale
Real estate	**1,404**	**93**	**(97)**	**(3)**	**1,306**	**34**	**4**
-Residential	406	46	(22)	4	384	25	4
-Commercial	998	47	(76)	(6)	922	9	-
Other collateral	-	-	-	-	-	-	-

The Group and the Bank grant loans and advances to customers at amortised cost, which are collateralised by property. In case these loans become defaulted, the Group and the Bank proceed to the repossession of the relevant property, if this is assessed as the best solution by the responsible, authorized for this purpose, units / committees of the Bank and its subsidiaries. In this context, Management assesses 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, taking into account the potential value of subsequent sale or the potential benefit of the own use of the asset. In this context, as at 31 December 2022 the carrying amount of the repossessed property classified as investment property, which is also been rented, amounted to € 471 million.

The aforementioned assessment is part of the Group 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 property acquired from auctions and / or via voluntary surrenders is performed by the Property Committee of the Group, which is responsible for deciding in which auctions the Bank will participate in the acquisition of the collateral in cooperation with Intrum Debt Servicer. Furthermore, the management of the above mentioned property as well as the supervision of the cooperating REO servicers is performed by the Group Real Estate ("GRE").

Regarding the property 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 or direct sales, while e-bidding procedures (www.properties4sale.gr) are being performed, as well as public tenders through the press. Relevant sale procedures are executed through the channels of the cooperating servicers (i. Intrum REO Solutions and ii. REM Real Estate Management). Furthermore, rental agreements for many acquired properties, managed by GRE, are signed in collaboration with the corresponding servicers, when it is presumed that the rental income offered by the potential lessee is favorable for the Group and the Bank compared to the rental assessment of the asset. Those rental agreements for the perimeter of assets under the exclusive management of GRE are being monitored by the responsible cooperating servicers, who are responsible for the monitoring and collection of rental agreements of the assets included in the perimeter under their management respectively. Additionally, the Real Estate portfolio includes property to be used by the Bank or to be rented to other subsidiaries or associates of the Group. This portfolio is managed by GRE, in cooperation with the Technical Division Department of the Bank. In addition, special property that can be utilized through further investments, is 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 cooperation with external advisors, in an attempt for the improvement of total assets' return.

4.4 Forbearance

Overview of modified and 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 EBA ITS Guidelines, 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). 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 Group is providing 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 Group Risk Management for the achievement of a common understanding and the development of appropriate methodologies to assess the risk of the portfolio managed by Intrum. Group Risk Management 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.

Credit quality of forborne loans and advances to customers measured at amortised cost

31/12/2022	Group			Bank		
	Loans measured at amortised cost	Forborne Loans measured at amortised cost	% of Forborne Loans measured at amortised cost	Loans measured at amortised cost	Forborne Loans measured at amortised cost	% of Forborne Loans measured at amortised cost
Stage 1	31,908	-	-	32,552	-	-
Stage 2	3,774	1,216	32.2%	3,560	1,113	31.3%
Stage 3	2,274	934	41.1%	2,414	925	38.3%
POCI	782	206	26.4%	759	189	24.9%
Total Gross exposure	**38,738**	**2,356**	**6.1%**	**39,284**	**2,227**	**5.7%**
Stage 1 ECL allowance	(36)	-	-	(42)	-	-
Stage 2 ECL allowance	(115)	(42)	36.7%	(113)	(40)	35.7%
Stage 3 ECL allowance	(1,113)	(349)	31.3%	(1,232)	(363)	29.4%
POCI ECL allowance	(148)	(24)	16.4%	(144)	(23)	16.0%
Total ECL allowance	**(1,413)**	**(415)**	**29.4%**	**(1,532)**	**(426)**	**27.8%**
Stage 1	31,872	-	-	32,510	-	-
Stage 2	3,659	1,174	32.1%	3,447	1,073	31.1%
Stage 3	1,162	585	50.4%	1,181	562	47.6%
POCI	633	182	28.7%	615	166	27.0%
Loans measured at amortised cost	**37,326**	**1,940**	**5.2%**	**37,753**	**1,801**	**4.8%**
Value of collateral	21,669	1,727	8.0%	20,338	1,593	7.8%

31/12/2021	Group			Bank		
	Loans measured at amortised cost	Forborne Loans measured at amortised cost	% of Forborne Loans measured at amortised cost	Loans measured at amortised cost	Forborne Loans measured at amortised cost	% of Forborne Loans measured at amortised cost
Stage 1	27,939	-	-	28,709	-	-
Stage 2	5,123	1,387	27.1%	5,020	1,294	25.8%
Stage 3	4,342	1,777	40.9%	4,518	1,714	37.9%
POCI	1,016	308	30.3%	985	285	28.9%
Total Gross exposure	**38,420**	**3,472**	**9.0%**	**39,232**	**3,294**	**8.4%**
Stage 1 ECL allowance	(90)	-	-	(89)	-	0.0%
Stage 2 ECL allowance	(174)	(59)	34.0%	(172)	(58)	33.6%
Stage 3 ECL allowance	(1,463)	(442)	30.2%	(1,629)	(460)	28.3%
POCI ECL allowance	(197)	(21)	10.5%	(193)	(20)	10.6%
Total ECL allowance	**(1,924)**	**(522)**	**27.1%**	**(2,083)**	**(539)**	**25.9%**
Stage 1	27,849	-	-	28,620	-	-
Stage 2	4,948	1,328	26.8%	4,848	1,236	25.5%
Stage 3	2,879	1,335	46.4%	2,889	1,254	43.4%
POCI	820	287	35.0%	792	265	33.4%
Loans measured at amortised cost	**36,497**	**2,950**	**8.1%**	**37,149**	**2,755**	**7.4%**
Value of collateral	20,640	2,216	10.7%	19,497	2,033	10.4%

Forborne loans and advances to customers measured at amortised cost by type of forbearance measure

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Reduced payment schedule	395	556	372	533
Payment moratorium/ Holidays	21	71	21	71
Term extension	172	149	101	135
Arrears capitalization	113	91	78	94
Hybrid (i.e. combination of forbearance measures)	1,036	1,826	1,025	1,664
Other	202	258	202	258
Total net amount	**1,940**	**2,950**	**1,801**	**2,755**

For presentation purposes and due to amendment performed during this year, as regards to mapping of types of forbearance measures, the respective comparative amounts per type have been amended accordingly.

Reconciliation of forborne loans and advances to customers measured at amortised cost

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Opening balance as at 1/1 (net)	**2,950**	**5,828**	**2,755**	**5,529**
Forbearance measures during the year	429	1,009	421	988
Repayment of loans (partial or total)	(281)	(422)	(258)	(411)
Loans that exited forbearance status during the year	(989)	(1,891)	(948)	(1,868)
Transfer (to)/ from Held for sale	(152)	(1,566)	(152)	(1,475)
ECL impairment charge for the year	(30)	(51)	(32)	(51)
FX differences and other movements	14	43	14	43
Closing balance (net)	**1,940**	**2,950**	**1,801**	**2,755**

Forborne loans and advances to customers measured at amortised cost by product line

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Retail lending	**869**	**1,141**	**869**	**1,141**
Mortgage	761	980	761	980
Consumer, Personal and Other	107	160	107	160
Credit cards	-	-	-	-
Corporate lending	**1,072**	**1,810**	**932**	**1,615**
Large Corporate	513	805	504	772
SME's	559	1,004	428	842
Public sector	-	-	-	-
Greece	-	-	-	-
Other Countries	-	-	-	-
Total net amount	**1,940**	**2,950**	**1,801**	**2,755**

Forborne loans and advances to customers measured at amortised cost by geographical region

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Greece	1,921	2,916	1,793	2,733
Rest of Europe	19	34	8	23
Total net amount	**1,940**	**2,950**	**1,801**	**2,755**

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 Bank's debt to equity transactions that occurred in 2022 and 2021 are presented in the following tables:

	2022			
S/N	Company	% Holding obtained	Date of acquisition	Cost of acquisition
1	Proinvestment International Balkan	29.6%	21/6/2022	-
2	Imithea Single Member S.A.	n/a (former wholly owned subsidiary)	25/2/2022	75
3	Sinoris Single Member S.A.	100.0%	11/8/2022	-
4	Neoris Single Member S.A.	100.0%	1/9/2022	2
5	Notos Com Holdings S.A.	6.9%	26/10/2022	-
6	Aleva Single Member S.A.	100.0%	30/12/2022	8
7	Arpis Single Member S.A.	100.0%	30/12/2022	4

	2021			
S/N	Company	% Holding	Date of acquisition	Cost of acquisition
1	EUROMEDICA SOCIETE ANONYME FOR PROVISION OF MEDICAL SERVICES	29.4%	17/11/2021	11

4.6 Debt securities at amortised cost and debt securities measured at FVTOCI

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 and Bank	External rating grade of debt securities measured at FVTOCI				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
AAA	-	-	-	-	-
A- to A+	17	-	-	-	17
BBB- to BBB+	38	-	-	-	38
BB- to BB+	1,148	-	-	-	1,148
Lower than BB-	180	3	-	-	183
Unrated	-	-	-	-	-
Total	**1,383**	**3**	**-**	**-**	**1,386**

Group and Bank	External rating grade of debt securities measured at FVTOCI				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
AAA	106	-	-	-	**106**
A- to A+	18	-	-	-	**18**
BBB- to BBB+	177	-	-	-	**177**
BB- to BB+	1,568	3	-	-	**1,571**
Lower than BB-	391	19	-	-	**410**
Unrated	-	-	-	-	-
Total	**2,260**	**22**	**-**	**-**	**2,282**

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						
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Total
AAA	10	-	-	-	**10**	-	**10**
BBB- to BBB+	2,421	-	-	-	**2,421**	-	**2,421**
BB- to BB+	7,728	-	-	-	**7,728**	22	**7,706**
Lower than BB-	40	-	-	-	**40**	1	**39**
Total	**10,199**	**-**	**-**	**-**	**10,199**	23	**10,176**

Bank	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**
BBB- to BBB+	2,418	-	-	-	**2,418**	-	**2,418**
BB- to BB+	7,728	-	-	-	**7,728**	22	**7,706**
Lower than BB-	40	-	-	-	**40**	1	**39**
Total	**10,196**	**-**	**-**	**-**	**10,196**	23	**10,173**

Group and Bank	External rating grade of debt securities at amortised cost						
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Total
BBB- to BBB+	2,429	-	-	-	**2,429**	-	**2,429**
BB- to BB+	6,772	-	-	-	**6,772**	18	**6,754**
Total	**9,201**	**-**	**-**	**-**	**9,201**	19	**9,183**

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 31/12/2022	Gross carrying amounts										
	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**	652	-	-	-	**652**	729
Loans and advances to customers at amortised cost	22,526	3,612	1,735	766	**28,638**	9,383	163	540	15	**10,100**	38,738
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**	9,293	117	476	6	**9,892**	29,964
Large Corporate	8,572	424	439	100	**9,535**	9,219	107	221	2	**9,549**	19,085
SMEs	6,665	1,193	782	275	**8,915**	74	10	255	4	**343**	9,257
Public Sector	1,615	-	5	2	**1,623**	-	-	-	-	**-**	1,623
Financial assets at FVTOCI	1,236	-	-	-	**1,236**	147	3	-	-	**150**	1,386
Debt securities at amortised cost	7,674	-	-	-	**7,674**	2,525	-	-	-	**2,525**	10,199
Other assets - Financial Instruments	997	31	166	-	**1,193**	137	-	46	-	**183**	1,376
Total	**32,509**	**3,642**	**1,901**	**766**	**38,818**	**12,844**	**166**	**585**	**15**	**13,610**	**52,428**

Group	Gross carrying amounts										
31/12/2021	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**	1,287	-	-	-	**1,287**	**1,332**
Loans and advances to customers at amortised cost	19,382	5,059	3,327	1,007	**28,775**	8,557	64	1,015	10	**9,645**	**38,420**
Retail Lending	5,708	2,219	613	430	**8,970**	97	52	63	7	**218**	**9,188**
Mortgages	4,564	1,774	391	335	**7,064**	83	29	13	6	**131**	**7,195**
Consumer, Personal and Other	823	330	173	91	**1,417**	14	23	49	-	**86**	**1,503**
Credit cards	321	115	50	4	**490**	1	-	-	-	**1**	**491**
Corporate and Public Sector Lending	13,674	2,840	2,714	577	**19,805**	8,460	12	952	3	**9,427**	**29,232**
Large Corporate	6,869	1,165	1,093	111	**9,237**	8,443	6	337	2	**8,788**	**18,025**
SMEs	5,260	1,675	1,616	464	**9,015**	17	6	615	-	**639**	**9,654**
Public Sector	1,545	-	5	2	**1,553**	-	-	-	-	**-**	**1,553**
Financial assets at FVTOCI	1,879	8	-	-	**1,887**	381	14	-	-	**395**	**2,282**
Debt securities at amortised cost	6,716	-	-	-	**6,716**	2,485	-	-	-	**2,485**	**9,201**
Other assets - Financial Instruments	810	31	171	-	**1,012**	119	-	43	-	**162**	**1,174**
Total	**28,833**	**5,099**	**3,498**	**1,007**	**38,436**	**12,828**	**78**	**1,058**	**10**	**13,974**	**52,410**

Bank 31/12/2022	Gross carrying amounts										
	Greece					Other Countries					Grand Total
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total	
Due from banks	56	-	-	-	**56**	619	-	-	-	**619**	674
Loans and advances to customers at amortised cost	23,150	3,397	1,694	744	**28,985**	9,402	163	720	15	**10,300**	39,284
Retail Lending	5,673	1,994	509	390	**8,566**	80	46	64	9	**198**	8,764
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**	6	17	53	-	**76**	1,400
Credit cards	335	99	47	3	**484**	1	-	-	-	**1**	485
Corporate and Public Sector Lending	17,477	1,403	1,185	354	**20,419**	9,322	117	656	6	**10,101**	30,520
Large Corporate	9,931	349	569	99	**10,948**	9,259	107	434	2	**9,802**	20,750
SMEs	5,933	1,054	611	253	**7,851**	63	10	222	4	**299**	8,150
Public Sector	1,613	-	4	2	**1,620**	-	-	-	-	**-**	1,620
Financial assets at FVTOCI	1,236	-	-	-	**1,236**	147	3	-	-	**150**	1,386
Debt securities at amortised cost	7,671	-	-	-	**7,671**	2,525	-	-	-	**2,525**	10,196
Other assets - Financial Instruments	920	24	141	-	**1,086**	172	-	5	-	**176**	1,262
Total	**33,033**	**3,421**	**1,835**	**744**	**39,033**	**12,864**	**165**	**725**	**15**	**13,770**	**52,803**

Bank 31/12/2021	Gross carrying amounts										
	Greece					Other Countries					Grand Total
	Stage 1	Stage 2	Stage 3	POCI	Total	Stage 1	Stage 2	Stage 3	POCI	Total	
Due from banks	44	-	-	-	**44**	1,253	-	-	-	**1,253**	**1,297**
Loans and advances to customers at amortised cost	20,009	4,956	3,350	975	**29,290**	8,700	64	1,169	10	**9,942**	**39,232**
Retail Lending	5,698	2,219	613	430	**8,960**	97	52	63	7	**218**	**9,178**
Mortgages	4,564	1,774	391	335	**7,064**	83	29	13	6	**131**	**7,195**
Consumer, Personal and Other	813	330	173	91	**1,407**	14	23	49	-	**86**	**1,492**
Credit cards	321	115	50	4	**490**	1	-	-	-	**1**	**491**
Corporate and Public Sector Lending	14,311	2,738	2,737	546	**20,331**	8,603	12	1,106	3	**9,723**	**30,054**
Large Corporate	8,031	1,251	1,336	102	**10,719**	8,586	6	553	2	**9,147**	**19,866**
SMEs	4,738	1,487	1,396	442	**8,062**	17	6	553	-	**577**	**8,639**
Public Sector	1,542	-	5	2	**1,549**	-	-	-	-	**-**	**1,549**
Financial assets at FVTOCI	1,879	8	-	-	**1,887**	381	14	-	-	**395**	**2,282**
Debt securities at amortised cost	6,716	-	-	-	**6,716**	2,485	-	-	-	**2,485**	**9,201**
Other assets - Financial Instruments	885	17	157	-	**1,059**	151	-	2	-	**153**	**1,212**
Total	**29,533**	**4,982**	**3,507**	**975**	**38,997**	**12,969**	**78**	**1,171**	**10**	**14,227**	**53,224**

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 per industry. The allocation was performed according to the business sector of each counterparty.

Group	Gross carrying amounts - Industry sectors															
31/12/2022	Financial Corpora-tions	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	Indivi-duals	Total
Due from banks	729	-	-	-	-	-	-	-	-	-	-	-	-	-	-	729
Loans and advances to customers at amortised cost	7,357	4,016	913	1,088	2,198	3,248	1,623	2,206	223	2,345	564	938	709	2,536	8,774	38,738
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	7,357	4,016	913	1,088	2,198	3,248	1,623	2,206	223	2,345	564	938	709	2,536	-	29,964
Large Corporate	7,285	1,775	351	755	2,183	902	-	2,206	223	1,199	14	628	361	1,203	-	19,085
SMEs	72	2,241	562	333	15	2,346	-	-	-	1,146	550	311	348	1,333	-	9,257
Public Sector							1,623									1,623
Financial assets at FVOCI	305	71	-	8	-	-	795	-	-	-	-	23	10	174	-	1,386
Debt securities at amortised cost	164	5	-	-	-	-	10,009	-	-	-	-	-	17	3	-	10,199
Other assets - Financial Instruments	81	18	18	14	-	4	605	-	-	-	-	9	-	488	139	1,376
Total	**8,636**	**4,111**	**931**	**1,110**	**2,198**	**3,252**	**13,032**	**2,207**	**223**	**2,345**	**564**	**971**	**736**	**3,201**	**8,913**	**52,428**
Stage 1	8,572	3,473	545	786	2,182	2,542	12,966	2,141	124	1,772	490	887	482	2,535	5,856	45,353
Stage 2	39	318	224	36	5	350	16	62	-	296	26	26	97	273	2,040	3,808
Stage 3	14	277	137	251	10	309	48	3	99	183	41	32	154	309	619	2,486
POCI	10	43	26	37	-	52	2	-	-	94	7	27	2	84	399	781
Total	**8,636**	**4,111**	**931**	**1,110**	**2,198**	**3,252**	**13,032**	**2,207**	**223**	**2,345**	**564**	**971**	**736**	**3,201**	**8,913**	**52,428**

The Group's gross carrying amount of the Public sector's Loans and advances of € 1,623 million as at 31 December 2022 includes the funding facility to OPEKEPE of € 1,558 million (31 December 2021: € 1,474 million). This amount was repaid in the first quarter of 2023.

Group	Gross carrying amounts - Industry sectors															
31/12/2021	**Financial Corpora-tions**	**Manufacturing / Handicraft**	**Construction**	**Real Estate Companies**	**Project Finance**	**Wholesale and retail trade**	**Public sector**	**Shipping Companies**	**Coastline/ Ferries Companies**	**Hotels**	**Agricult ure**	**Energy**	**Transport & Logistics**	**Other industries**	**Indivi-duals**	**Total**
Due from banks	1,332	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**1,332**
Loans and advances to customers at amortised cost	7,169	3,864	1,070	1,312	1,936	3,209	1,553	1,980	222	2,292	550	735	772	2,568	9,188	**38,420**
Retail lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9,188	**9,188**
Mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,195	**7,195**
Consumer, Personal and Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,503	**1,503**
Credit cards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	491	**491**
Corporate and public sector lending	7,169	3,864	1,070	1,312	1,936	3,209	1,553	1,980	222	2,292	550	735	772	2,568	-	**29,232**
Large Corporate	7,128	1,521	383	808	1,870	750	-	1,980	222	1,107	10	509	397	1,339	-	**18,025**
SMEs	42	2,342	687	504	66	2,459	-	-	-	1,185	540	226	375	1,229	-	**9,654**
Public Sector							1,553									**1,553**
Financial assets at FVOCI	314	52	-	15	-	4	1,664	-	-	-	-	25	10	198	-	**2,282**
Debt securities at amortised cost	-	-	-	-	-	-	9,201	-	-	-	-	-	-	-	-	**9,201**
Other assets - Financial Instruments	79	19	23	8	-	6	518	-	-	-	-	5	-	372	146	**1,174**
Total	**8,894**	**3,935**	**1,093**	**1,334**	**1,936**	**3,219**	**12,936**	**1,981**	**222**	**2,292**	**550**	**765**	**782**	**3,139**	**9,334**	**52,410**
Stage 1	8,431	2,611	585	728	1,852	2,204	12,859	1,946	118	963	349	669	411	2,030	5,905	**41,661**
Stage 2	7	636	144	105	5	425	16	3	-	782	62	48	95	577	2,271	**5,176**
Stage 3	445	599	331	430	73	497	58	32	104	427	123	47	271	398	722	**4,556**
POCI	12	89	33	71	5	92	2	-	-	119	17	1	5	133	436	**1,016**
Total	**8,894**	**3,935**	**1,093**	**1,334**	**1,936**	**3,219**	**12,936**	**1,981**	**222**	**2,292**	**550**	**765**	**782**	**3,139**	**9,334**	**52,410**

The following tables break down the gross carrying amounts per industry sector of the Bank's financial assets that are exposed to credit risk, inclusive of staging classification per industry. The allocation was performed according to the business sector of each counterparty.

Bank	Gross carrying amounts - Industry sectors															
31/12/2022	Financial Corpora-tions	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	674	-	-	-	-	-	-	-	-	-	-	-	-	-	-	674
Loans and advances to customers at amortised cost	8,972	3,614	831	1,507	2,215	2,841	1,620	2,206	223	2,219	558	923	561	2,230	8,764	39,284
Retail lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8,764	8,764
Mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	6,879	6,879
Consumer, Personal and Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,400	1,400
Credit cards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	485	485
Corporate and Public Sector Lending	8,972	3,614	831	1,507	2,215	2,841	1,620	2,206	223	2,219	558	923	561	2,230	-	30,520
Large Corporate	8,901	1,619	328	1,235	2,200	765	-	2,206	223	1,183	13	628	299	1,152	-	20,750
SMEs	72	1,995	504	272	15	2,076	-	-	-	1,035	545	296	262	1,078	-	8,150
Public Sector							1,620									1,620
Financial assets at FVOCI	305	71	-	8	-	-	795	-	-	-	-	23	10	174	-	1,386
Debt secutities at amortised cost	164	5	-	-	-	-	10,006	-	-	-	-	-	17	3	-	10,196
Other assets – Financial Instruments	78	18	1	2	-	-	605	-	-	-	-	-	-	464	94	1,262
Total	**10,194**	**3,708**	**832**	**1,517**	**2,215**	**2,841**	**13,026**	**2,207**	**223**	**2,219**	**558**	**947**	**588**	**2,872**	**8,858**	**52,803**
Stage 1	9,973	3,108	472	1,069	2,182	2,240	12,961	2,141	124	1,696	485	868	401	2,338	5,839	45,898
Stage 2	39	303	206	30	5	335	16	62	-	256	26	21	33	216	2,040	3,587
Stage 3	172	255	128	384	27	217	47	3	99	175	40	32	152	247	581	2,560
POCI	10	42	25	34	-	49	2	-	-	92	7	27	2	71	399	759
Total	**10,194**	**3,708**	**832**	**1,517**	**2,215**	**2,841**	**13,026**	**2,207**	**223**	**2,219**	**558**	**947**	**588**	**2,872**	**8,858**	**52,803**

The Bank's gross carrying amount of the Public sector's Loans and advances of € 1,620 million as at 31 December 2022 includes the funding facility to OPEKEPE of € 1,558 million (31 December 2021: € 1,474 million). This amount was repaid in the first quarter of 2023.

Bank	Gross carrying amounts – Industry sectors															
31/12/2021	Financial Corpora-tions	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline/ Ferries Companies	Hotels	Agricult ure	Energy	Transport & Logistics	Other industries	Indivi-duals	Total
Due from banks	1,297	-	-	-	-	-	-	-	-	-	-	-	-	-	-	**1,297**
Loans and advances to customers at amortised cost	8,938	3,536	983	1,560	1,953	2,859	1,549	1,980	222	2,096	545	717	635	2,481	9,178	**39,232**
Retail lending	-	-	-	-	-	-	-	-	-	-	-	-	-	-	9,178	**9,178**
Mortgages	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7,195	**7,195**
Consumer, Personal and Other	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,492	**1,492**
Credit cards	-	-	-	-	-	-	-	-	-	-	-	-	-	-	491	**491**
Corporate and public sector lending	8,938	3,536	983	1,560	1,953	2,859	1,549	1,980	222	2,096	545	717	635	2,481	-	**30,054**
Large Corporate	8,896	1,388	348	1,175	1,887	631	-	1,980	222	1,058	10	507	338	1,424	-	**19,866**
SMEs	42	2,148	635	384	66	2,228	-	-	-	1,038	535	209	297	1,056	-	**8,639**
Public Sector							1,549									**1,549**
Financial assets at FVOCI	314	52	-	15	-	4	1,664	-	-	-	-	25	10	198	-	**2,282**
Debt securities at amortised cost	-	-	-	-	-	-	9,201	-	-	-	-	-	-	-	-	**9,201**
Other assets - Financial Instruments	73	18	6	10	-	-	514	-	-	-	-	1	-	494	96	**1,212**
Total	**10,621**	**3,607**	**989**	**1,584**	**1,953**	**2,863**	**12,929**	**1,981**	**222**	**2,096**	**545**	**742**	**645**	**3,173**	**9,274**	**53,224**
Stage 1	9,990	2,338	513	833	1,852	1,981	12,856	1,946	118	877	344	653	289	2,029	5,883	**42,502**
Stage 2	17	610	137	158	5	385	13	3	-	740	62	42	82	534	2,271	**5,059**
Stage 3	602	574	307	526	91	405	57	32	104	363	122	46	268	497	684	**4,677**
POCI	12	86	32	68	5	92	2	-	-	116	17	1	5	113	436	**985**
Total	**10,621**	**3,607**	**989**	**1,584**	**1,953**	**2,863**	**12,929**	**1,981**	**222**	**2,096**	**545**	**742**	**645**	**3,173**	**9,274**	**53,224**

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 per industry. The allocation was performed according to the business sector of each counterparty.

Group	Nominal Amounts of Off Balance Sheet Items - Industry sectors															
31/12/2022	**Financial Corpora-tions**	**Manufacturing / Handicraft**	**Construction**	**Real Estate Companies**	**Project Finance**	**Wholesale and retail trade**	**Public sector**	**Shipping Companies**	**Coastline/ Ferries Companies**	**Hotels**	**Agricult ure**	**Energy**	**Transport and Logistics**	**Other industries**	**Indivi-duals**	**Total**
Letters of Guarantee	2,180	536	987	28	-	245	-	-	-	46	13	466	57	230	-	4,788
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	1,623
Balance at 31/12/2022	**2,239**	**755**	**1,068**	**132**	**224**	**329**	**-**	**164**	**-**	**222**	**53**	**681**	**98**	**454**	**106**	**6,526**
Stage 1	2,238	717	920	126	224	274	-	164	-	207	49	680	95	433	70	6,199
Stage 2	1	8	15	-	-	38	-	-	-	4	2	1	2	12	34	115
Stage 3	-	30	132	6	-	17	-	-	-	11	-	-	1	6	-	204
POCI	-	-	-	-	-	-	-	-	-	-	2	-	-	3	1	6
Total	**2,239**	**755**	**1,068**	**132**	**224**	**329**	**-**	**164**	**-**	**222**	**53**	**681**	**98**	**454**	**106**	**6,526**

Group	Nominal Amounts of Off Balance Sheet Items – Industry sectors															
31/12/2021	**Financial Corpora-tions**	**Manufacturing / Handicraft**	**Construction**	**Real Estate Companies**	**Project Finance**	**Wholesale and retail trade**	**Public sector**	**Shipping Companies**	**Coastline/ Ferries Companies**	**Hotels**	**Agricult ure**	**Energy**	**Transport & Logistics**	**Other industri es**	**Indivi-duals**	**Total**
Letters of Guarantee	1,752	326	953	30	-	220	-	-	-	44	5	114	59	262	-	**3,763**
Letters of Credit	8	11	1	-	-	12	-	-	-	-	2	-	-	9	-	**42**
Irrevocable undrawn credit commitments	18	109	14	88	154	45	-	48	-	107	47	21	42	266	90	**1,050**
Balance at 31/12/2021	**1,777**	**446**	**967**	**118**	**154**	**277**	**-**	**48**	**0**	**151**	**54**	**134**	**101**	**538**	**90**	**4,855**
Stage 1	1,776	401	778	114	154	225	-	48	-	100	44	130	88	496	65	**4,419**
Stage 2	1	13	41	-	-	39	-	-	-	39	8	4	11	24	24	**204**
Stage 3	-	32	148	4	-	13	-	-	-	11	1	-	2	13	-	**224**
POCI	-	-	-	-	-	-	-	-	-	1	2	-	-	4	1	**7**
Total	**1,777**	**446**	**967**	**118**	**154**	**277**	**-**	**48**	**0**	**151**	**54**	**134**	**101**	**538**	**90**	**4,855**

The following tables break down the nominal amounts of off-balance items per industry sector of the Banks's financial assets that are exposed to credit risk inclusive of staging classification per industry. The allocation was performed according to the business sector of each counterparty.

Bank	Nominal Amounts of Off Balance Sheet Items - Industry sectors															
31/12/2022	Financial Corpora-tions	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	2,315	536	987	111	-	245	-	-	-	46	13	466	57	230	-	5,005
Letters of Credit	-	54	6	1	-	12	-	-	-	-	4	-	-	36	-	114
Irrevocable undrawn credit commitments	136	164	74	105	224	71	-	164	-	176	36	216	41	188	106	1,702
Balance at 31/12/2022	**2,451**	**755**	**1,068**	**216**	**224**	**329**	**-**	**164**	**-**	**222**	**53**	**681**	**98**	**454**	**106**	**6,821**
Stage 1	2,450	717	920	209	224	274	-	164	-	207	49	680	95	433	70	6,494
Stage 2	1	8	15	-	-	38	-	-	-	4	2	1	2	12	34	115
Stage 3	-	30	132	6	-	17	-	-	-	11	-	-	1	6	-	205
POCI	-	-	-	-	-	-	-	-	-	-	2	-	-	3	1	6
Total	**2,451**	**755**	**1,068**	**216**	**224**	**329**	**-**	**164**	**-**	**222**	**53**	**681**	**98**	**454**	**106**	**6,821**

Bank	Nominal Amounts of Off Balance Sheet Items - Industry sectors															
31/12/2021	Financial Corpora-tions	Manufacturing / Handicraft	Construction	Real Estate Companies	Project Finance	Wholesale and retail trade	Public sector	Shipping Companies	Coastline/ Ferries Companies	Hotels	Agriculture	Energy	Transport & Logistics	Other industries	Individuals	Total
Letters of Guarantee	1,871	326	953	112	-	220	-	-	-	44	5	114	59	262	-	**3,965**
Letters of Credit	8	11	1	-	-	12	-	-	-	-	2	-	-	9	-	**42**
Irrevocable undrawn credit commitments	18	109	14	88	154	45	-	48	-	107	47	21	42	266	90	**1,050**
Balance at 31/12/2021	**1,897**	**446**	**967**	**201**	**154**	**277**	**-**	**48**	**-**	**151**	**54**	**134**	**101**	**538**	**90**	**5,057**
Stage 1	1,896	401	778	196	154	225	-	48	-	100	44	130	88	496	65	**4,621**
Stage 2	1	13	41	-	-	39	-	-	-	39	8	4	11	24	24	**204**
Stage 3	-	32	148	4	-	13	-	-	-	11	1	-	2	13	-	**224**
POCI	-	-	-	-	-	-	-	-	-	1	2	-	-	4	1	**7**
Total	**1,897**	**446**	**967**	**201**	**154**	**277**	**-**	**48**	**-**	**151**	**54**	**134**	**101**	**538**	**90**	**5,057**

Receivables from the Greek Public Sector

The following table presents the carrying amount of the Group's and the Bank's receivables from the Greek Public Sector.

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Derivative financial instruments	31	296	31	296
Debt securities at FVTPL	154	445	154	445
Loans and advances at amortised cost	1,619	1,551	1,617	1,548
Debt securities at amortised cost	7,517	6,698	7,514	6,698
Debt securities at FVTOCI	795	1,450	795	1,450
Other assets	718	629	703	620
Total	**10,835**	**11,068**	**10,814**	**11,056**

During 2022, the Group purchased GGBs of nominal value € 2.2 billion, which were classified at amortised cost. Refer to Note 25 for further information on material debt securities transactions throughout the reporting year.

4.8 Offsetting of financial assets and liabilities

According to the provisions of IFRS 7 "Financial Instruments: Disclosures", the impact or the possible impact of enforceable master netting agreements or similar agreements for financial instruments on the Statement of Financial Position of the Group and the Bank should be disclosed. More specifically, the disclosures should include the following:

i. The financial assets and liabilities, which are offset in accordance with the criteria of IAS 32 and the net amount is presented in the Statement of Financial Position, when there is a legally enforceable right and the intention to settle the net amounts or simultaneously collect the receivable and settle the obligation.

ii. The transactions which fall under ISDA contracts and similar master netting agreements irrespectively of whether these are offset or not in the Statement of Financial Position.

The Group and the Bank have not offset any financial assets or liabilities on 31 December 2022 and 2021, given that the netting criteria mentioned in the first case (i) are not fulfilled.

The following tables, present for the Group and the Bank the gross amounts of the financial instruments recognised as at 31 December 2022 and 2021, as well as the net effect on the Statement of Financial Position from the exercise of netting rights ("net amount") arising from ISDA contracts and similar master netting agreements. Therefore, these tables include mainly the following financial instruments: a) interest rate swap contracts ("IRSs"), cross currency interest rate swap contracts, fx forwards, currency swaps and options, for which there are ISDA contracts and b) interbank repos covered by GMRA.

Group				Related amounts not offset in the Statement of Financial Position		
31/12/2022	Recognised financial assets (gross amounts)	Financial liabilities (offset amounts)	Net amount of financial assets	Recognized financial instruments and other non cash collateral received	Cash collateral received	Net amount
Financial Assets						
Derivative financial instruments	1,830	-	1,830	24	1,768	38
Reverse Repurchase agreements	52	-	52	52	-	-
Total	**1,883**	**-**	**1,883**	**76**	**1,768**	**38**

Group				Related amounts not offset in the Statement of Financial Position		
31/12/2022	Recognised financial liabilities (gross amounts)	Financial assets (offset amounts)	Net amount of financial liabilities	Recognized financial instruments and other non cash collateral pledged	Cash collateral pledged	Net amount
Financial Liabilities						
Derivative financial instruments	656	-	656	224	358	74
Repurchase agreements	298	-	298	298	-	-
Total	**954**	**-**	**954**	**522**	**359**	**74**

Group				Related amounts not offset in the Statement of Financial Position		
31/12/2021	Recognised financial assets (gross amounts)	Financial liabilities (offset amounts)	Net amount of financial assets	Recognized financial instruments and other non cash collateral received	Cash collateral received	Net amount
Financial Assets						
Derivative financial instruments	593	-	593	291	229	72
Reverse Repurchase agreements	51	-	51	51	-	-
Total	**644**	**-**	**644**	**343**	**229**	**72**

Group				Related amounts not offset in the Statement of Financial Position		
31/12/2021	Recognised financial liabilities (gross amounts)	Financial assets (offset amounts)	Net amount of financial liabilities	Recognized financial instruments and other non cash collateral pledged	Cash collateral pledged	Net amount
Financial Liabilities						
Derivative financial instruments	393	-	393	6	360	27
Repurchase agreements	286	-	286	286	-	-
Total	**679**	**-**	**679**	**292**	**360**	**27**

Bank				Related amounts not offset in the Statement of Financial Position		
31/12/2022	Recognised financial assets (gross amounts)	Financial liabilities (offset amounts)	Net amount of financial assets	Recognized financial instruments and other non cash collateral received	Cash collateral received	Net amount
Financial Assets						
Derivative financial instruments	1,830	-	1,830	24	1,768	38
Reverse Repurchase agreements	52	-	52	52	-	-
Total	**1,883**	**-**	**1,883**	**76**	**1,768**	**38**

Bank				Related amounts not offset in the Statement of Financial Position		
31/12/2022	Recognised financial liabilities (gross amounts)	Financial assets (offset amounts)	Net amount of financial liabilities	Recognized financial instruments and other non cash collateral pledged	Cash collateral pledged	Net amount
Financial Liabilities						
Derivative financial instruments	656	-	656	224	358	74
Repurchase agreements	298	-	298	298	-	-
Total	**954**	**-**	**954**	**522**	**359**	**74**

Bank				Related amounts not offset in the Statement of Financial Position		
31/12/2021	Recognised financial assets (gross amounts)	Financial liabilities (offset amounts)	Net amount of financial assets	Recognized financial instruments and other non cash collateral received	Cash collateral received	Net amount
Financial Assets						
Derivative financial instruments	593	-	593	291	229	72
Reverse Repurchase agreements	51	-	51	51	-	-
Total	**644**	**-**	**644**	**343**	**229**	**72**

Bank				Related amounts not offset in the Statement of Financial Position		
31/12/2021	Recognised financial liabilities (gross amounts)	Financial assets (offset amounts)	Net amount of financial liabilities	Recognized financial instruments and other non cash collateral pledged	Cash collateral pledged	Net amount
Financial Liabilities						
Derivative financial instruments	393	-	393	6	360	27
Repurchase agreements	286	-	286	286	-	-
Total	**679**	**-**	**679**	**292**	**360**	**27**

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 Bank 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 Bank 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 Bank 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 Bank. The most significant types of market risk for the Group and the Bank are interest rates, equity and foreign exchange risk.

The Group and the Bank 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", which incorporates all risk factors) are calculated.

For every activity that bears an inherent market risk, the Group and the Bank 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 as of 1st of July 2022, has enhanced its VaR model from Parametric approach to Historical Simulation ("HVaR"), as the latter, among others, does not assume that the portfolio follows a normal distribution and consequently the VaR is not a result of statistical parameters (volatility), whilst it is also applicable for fat tails, being more precise for all kinds of products, inclusive of non-linear products.

The HVaR is a scenario-based method based on historical data variations and it is more precise for non-linear products. 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. In the context of the above, the VaR results presented in the table below are not comparable with the ones calculated in 2021.

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 is the Expected Shortfall ("ES"), which 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 figures and are analyzed on a scenario basis to identify how the positions perform under the predefined scenarios.

The Group and the Bank evaluate the validity of the VaR estimates, by conducting a relevant back-testing program 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 and the Bank's Trading Book as at 31 December 2022 amounted to € 2.8 million. This estimate comprises € 1.0 million for interest rate risk, € 1.6 million for equity risk, nil for commodities risk and € 0.2 million for foreign exchange risk.

The table below summarizes the VaR calculations depicting both approaches as at 31 December 2022 and 2021.

Group - Amounts in € million	Total VaR	VaR Interest Rate Risk	VaR Equity Risk	VaR Foreign Exchange Risk	VaR Commodities Risk	Diversification Effect
2022– Historical Simulation	2.8	1.0	1.6	0.2	-	-
2021 – Parametric Approach	5.7	5.6	1.0	1.0	0.5	-2.5

4.10 Currency risk

The Group and the Bank are exposed to 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 Bank's exposure to foreign currency exchange risk as at 31 December 2022 and 2021.

The following tables include an analysis per currency of the Group's and the Bank'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 31/12/2022	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Cash and balances with Central Banks	9,534	25	13	-	4	14	9,591
Due from banks	634	20	6	2	35	32	729
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	34,300	2,327	4	1	680	13	37,326
Loans and advances to customers mandatorily measured at FVTPL	52	-	-	-	-	-	52
Financial assets measured at FVTOCI	1,470	15	-	-	-	-	1,485
Debt securities at amortised cost	10,153	-	23	-	-	-	10,176
Assets held for sale	386	-	-	-	20	-	406
Investment property	1,459	-	-	-	-	63	1,522
Investments in associated undertakings and joint ventures	1,023	-	-	-	-	-	1,023
Property and equipment	722	-	-	-	-	-	723
Intangible assets	301	-	-	-	-	-	301
Tax receivables	132	-	-	-	-	-	133
Deferred tax assets	5,957	-	-	-	-	1	5,958
Other assets	3,328	18	1	-	31	41	3,418
Assets from discontinued operations	-	-	-	-	-	-	-
Total assets	**71,665**	**3,515**	**274**	**23**	**772**	**391**	**76,639**
Liabilities							
Due to banks	6,816	63	42	-	-	1	6,922
Due to customers	55,380	2,569	127	3	25	227	58,331
Derivative financial instruments (notional amounts)	1,171	898	105	20	742	138	3,075
Debt securities in issue	849	-	-	-	-	-	849
Other borrowed funds	819	-	-	-	-	-	819
Current income tax liabilities	6	-	-	-	-	-	6
Deferred tax liabilities	8	-	-	-	-	1	10
Retirement and termination benefit obligations	55	-	-	-	-	-	55
Provisions	122	-	-	-	-	1	122
Liabilities held for sale	2	-	-	-	-	-	2
Other liabilities	1,104	-	-	-	-	15	1,120
Liabilities from discontinued operations	-	-	-	-	-	-	-
Total liabilities	**66,333**	**3,530**	**274**	**23**	**767**	**383**	**71,310**
Derivative financial instruments - fair value adjustment	**1,182**	**-**	**-**	**-**	**-**	**-**	**1,182**
Foreign currency exposure	**6,515**	**(16)**	**-**	**-**	**5**	**7**	**6,511**

Group 31/12/2021	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Cash and balances with Central Banks	15,432	21	9	-	4	18	15,484
Due from banks	1,232	26	3	3	32	35	1,332
Financial assets at FVTPL	908	-	-	-	-	-	908
Financial assets mandatorily measured at FVTPL	168	28	-	-	-	-	196
Derivative financial instruments (notional amounts)	1,708	452	101	1	4	264	2,529
Loans and advances to customers at amortised cost	33,600	2,131	3	2	730	29	36,497
Loans and advances to customers mandatorily measured at FVTPL	51	-	-	-	-	-	51
Financial assets measured at FVTOCI	2,331	18	-	-	-	-	2,349
Debt securities at amortised cost	9,183	-	-	-	-	-	9,183
Assets held for sale	208	206	-	-	22	-	435
Investment property	970	-	-	-	-	71	1,041
Investments in associated undertakings and joint ventures	630	-	-	-	-	-	630
Property and equipment	883	-	-	-	-	-	883
Intangible assets	265	-	-	-	-	-	266
Tax receivables	139	-	-	-	-	-	139
Deferred tax assets	6,022	-	-	-	-	1	6,022
Other assets	3,245	122	1	-	25	70	3,464
Assets from discontinued operations	114	-	-	-	-	-	114
Total assets	**77,088**	**3,006**	**117**	**6**	**817**	**489**	**81,522**
Liabilities							
Due to banks	14,794	50	1	-	4	-	14,850
Due to customers	52,855	2,145	118	1	19	248	55,385
Derivative financial instruments (notional amounts)	738	758	-	8	867	185	2,556
Debt securities in issue	971	-	-	-	-	-	971
Other borrowed funds	786	-	-	-	-	-	786
Current income tax liabilities	4	-	-	-	-	-	4
Deferred tax liabilities	8	-	-	-	-	1	9
Retirement and termination benefit obligations	75	-	-	-	-	-	75
Provisions	134	-	-	-	-	1	135
Liabilities held for sale	3	-	-	-	-	-	3
Other liabilities	1,091	-	-	-	-	2	1,092
Liabilities from discontinued operations	28	-	-	-	-	-	28
Total liabilities	**71,487**	**2,953**	**119**	**9**	**889**	**437**	**75,894**
Derivative financial instruments - fair value adjustment	**227**	**-**	**-**	**-**	**-**	**-**	**227**
Foreign currency exposure	**5,828**	**52**	**(2)**	**(3)**	**(72)**	**51**	**5,855**

Bank 31/12/2022	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Cash and balances with Central Bank	9,534	25	13	-	4	14	9,591
Due from banks	598	17	5	2	35	17	674
Financial assets at FVTPL	528	-	-	-	-	-	528
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	34,612	2,347	5	1	680	108	37,753
Loans and advances to customers mandatorily measured at FVTPL	52	-	-	-	-	-	52
Financial assets measured at FVTOCI	1,470	15	-	-	-	-	1,485
Debt securities at amortised cost	10,150	-	23	-	-	-	10,173
Assets held for sale	404	-	-	-	7	-	411
Investment property	823	-	-	-	-	-	823
Investments in subsidiaries	511	-	2	-	-	2	515
Investments in associated undertakings and joint ventures	981	-	-	-	-	-	981
Property and equipment	668	-	-	-	-	-	668
Intangible assets	278	-	-	-	-	-	278
Tax receivables	131	-	-	-	-	-	131
Deferred tax assets	5,934	-	-	-	-	-	5,934
Other assets	3,154	18	1	-	31	11	3,214
Total assets	**71,493**	**3,532**	**276**	**23**	**759**	**377**	**76,461**
Liabilities							
Due to banks	6,704	63	42	-	-	1	6,809
Due to customers	55,613	2,577	127	3	25	228	58,573
Derivative financial instruments (notional amounts)	1,171	898	105	20	742	138	3,075
Debt securities in issue	849	-	-	-	-	-	849
Other borrowed funds	819	-	-	-	-	-	819
Retirement and termination benefit obligations	54	-	-	-	-	-	54
Provisions	112	-	-	-	-	-	112
Liabilities held for sale	-	-	-	-	-	-	-
Other liabilities	920	-	-	-	-	12	932
Total liabilities	**66,242**	**3,538**	**274**	**23**	**767**	**378**	**71,223**
Derivative financial instruments - fair value adjustment	**1,182**	**-**	**-**	**-**	**-**	**-**	**1,182**
Foreign currency exposure	**6,434**	**(6)**	**2**	**-**	**(8)**	**(1)**	**6,420**

Bank 31/12/2021	EUR	USD	GBP	JPY	CHF	Other currencies	Total
Assets							
Cash and balances with Central Bank	15,432	21	9	-	4	18	15,484
Due from banks	1,219	20	3	3	32	20	1,297
Financial assets at FVTPL	886	-	-	-	-	-	886
Financial assets mandatorily measured at FVTPL	168	28	-	-	-	-	196
Derivative financial instruments (notional amounts)	1,708	452	101	1	4	264	2,529
Loans and advances to customers at amortised cost	34,116	2,151	4	2	738	139	37,149
Loans and advances to customers mandatorily measured at FVTPL	51	-	-	-	-	-	51
Financial assets measured at FVTOCI	2,331	18	-	-	-	-	2,349
Debt securities at amortised cost	9,183	-	-	-	-	-	9,183
Assets held for sale	203	206	-	-	10	-	419
Investment property	473	-	-	-	-	-	473
Investments in subsidiaries	394	-	2	-	-	3	399
Investments in associated undertakings and joint ventures	603	-	-	-	-	-	603
Property and equipment	877	-	-	-	-	-	877
Intangible assets	255	-	-	-	-	-	255
Tax receivables	138	-	-	-	-	-	138
Deferred tax assets	5,992	-	-	-	-	-	5,992
Other assets	3,090	122	1	-	25	18	3,257
Total assets	**77,117**	**3,019**	**119**	**6**	**813**	**462**	**81,536**
Liabilities							
Due to banks	14,781	50	1	-	4	-	14,837
Due to customers	53,110	2,153	118	1	19	250	55,651
Derivative financial instruments (notional amounts)	738	758	-	8	867	185	2,556
Debt securities in issue	971	-	-	-	-	-	971
Other borrowed funds	786	-	-	-	-	-	786
Retirement and termination benefit obligations	73	-	-	-	-	-	73
Provisions	129	-	-	-	-	-	129
Liabilities held for sale	3	-	-	-	-	-	3
Other liabilities	966	-	-	-	-	-	965
Total liabilities	**71,557**	**2,962**	**120**	**9**	**889**	**435**	**75,971**
Derivative financial instruments - fair value adjustment	**227**	**-**	**-**	**-**	**-**	**-**	**227**
Foreign currency exposure	**5,787**	**57**	**(1)**	**(3)**	**(76)**	**26**	**5,792**

4.11 Interest rate risk

Interest rate risk is the risk of a negative impact on the Group and the Bank’s financial position due to its exposure to interest rates fluctuations.

Changes in interest rates affect the Group and the Bank'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 Bank'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 EIR 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 and the Bank's financial performance.

The Group and the Bank apply an Interest Rate Risk Management Policy outlining various valuation techniques that mainly rely on maturity and repricing schedules, incorporating behavioral models, where necessary.

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 31/12/2022	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	9,591	-	-	-	-	-	9,591
Due from banks	624	71	8	3	-	23	729
Financial assets at FVTPL	73	145	212	46	53	20	548
Financial assets mandatorily measured at FVTPL	-	-	32	-	12	138	182
Loans and advances to customers	14,704	7,662	6,622	5,301	3,089	-	37,378
Financial assets measured at FVTOCI	79	311	450	254	292	99	1,485
Debt securities at amortised cost	1	503	91	894	8,685	-	10,176
Other assets	-	-	5	35	92	1,071	1,203
Total financial assets	**25,073**	**8,692**	**7,420**	**6,533**	**12,223**	**1,351**	**61,291**
Financial liabilities							
Due to banks	6,715	103	5	92	7	-	6,922
Due to customers	29,154	4,299	6,510	10,631	7,738	-	58,331
Debt securities in issue	-	-	-	849	-	-	849
Other borrowed funds	-	-	-	819	-	-	819
Other liabilities	1	1	2	1	-	1,114	1,120
Total financial liabilities	**35,870**	**4,403**	**6,517**	**12,392**	**7,745**	**1,114**	**68,041**
Net notional amount of derivative financial instruments	**842**	**(23)**	**88**	**2,618**	**(3,537)**		**(12)**
Total interest rate gap	**(9,955)**	**4,267**	**990**	**(3,241)**	**941**	**237**	**(6,761)**

Group 31/12/2021	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	15,484	-	-	-	-	-	15,484
Due from banks	1,248	66	8	-	-	10	1,332
Financial assets at FVTPL	58	16	159	89	564	22	908
Financial assets mandatorily measured at FVTPL	-	-	32	-	11	153	196
Loans and advances to customers	15,176	6,992	6,060	4,816	3,497	5	36,547
Financial assets measured at FVTOCI	59	106	178	561	1,379	67	2,349
Debt securities at amortised cost	-	-	15	159	9,008	-	9,183
Other assets	-	-	-	1	6	1,001	1,007
Total financial assets	**32,025**	**7,180**	**6,454**	**5,625**	**14,464**	**1,258**	**67,006**
Financial liabilities							
Due to banks	14,760	87	4	-	-	-	14,850
Due to customers	23,673	5,358	7,468	11,370	7,515	-	55,385
Debt securities in issue	470	-	-	500	-	-	971
Other borrowed funds	-	-	-	786	-	-	786
Other liabilities	7	2	3	-	-	1,079	1,092
Total financial liabilities	**38,910**	**5,447**	**7,475**	**12,657**	**7,515**	**1,079**	**73,084**
Net notional amount of derivative financial instruments	**983**	**4,068**	**1,673**	**76**	**(6,829)**		**(30)**
Total interest rate gap	**(5,903)**	**5,801**	**652**	**(6,956)**	**120**	**179**	**(6,108)**

Bank 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 Bank	9,591	-	-	-	-	-	9,591
Due from banks	602	71	2	-	-	-	674
Financial assets at FVTPL	73	145	212	46	52	-	528
Financial assets mandatorily measured at FVTPL	-	-	32	-	12	138	182
Loans and advances to customers	13,900	8,673	6,807	5,335	3,090	-	37,804
Financial assets measured at FVTOCI	79	311	450	254	292	99	1,485
Debt securities at amortised cost	-	502	91	894	8,685	-	10,173
Other assets	-	-	1	35	92	1,024	1,151
Total financial assets	**24,244**	**9,702**	**7,594**	**6,564**	**12,223**	**1,261**	**61,589**
Financial liabilities							
Due to banks	6,714	92	3	-	-	-	6,809
Due to customers	29,367	4,303	6,518	10,647	7,738	-	58,573
Debt securities in issue	-	-	-	849	-	-	849
Other borrowed funds	-	-	-	819	-	-	819
Other liabilities	-	-	-	-	-	932	932
Total financial liabilities	**36,080**	**4,395**	**6,522**	**12,315**	**7,738**	**932**	**67,983**
Net notional amount of derivative financial instruments	**842**	**(23)**	**88**	**2,618**	**(3,537)**		**(12)**
Total interest rate gap	**(10,994)**	**5,285**	**1,160**	**(3,133)**	**948**	**329**	**(6,406)**

Bank 31/12/2021	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 Bank	15,484	-	-	-	-	-	15,484
Due from banks	1,229	66	1	-	-	-	1,297
Financial assets at FVTPL	58	16	159	89	564	1	886
Financial assets mandatorily measured at FVTPL	-	-	32	-	11	153	196
Loans and advances to customers	14,817	7,836	6,197	4,852	3,497	-	37,200
Financial assets measured at FVTOCI	59	106	178	561	1,379	67	2,349
Debt securities at amortised cost	-	-	15	159	9,008	-	9,183
Other assets	-	-	-	-	-	1,099	1,099
Total financial assets	**31,646**	**8,024**	**6,583**	**5,661**	**14,458**	**1,320**	**67,693**
Financial liabilities							
Due to banks	14,758	75	4	-	-	-	14,837
Due to customers	23,821	5,374	7,502	11,438	7,515	-	55,651
Debt securities in issue	470	-	-	500	-	-	971
Other borrowed funds	-	-	-	786	-	-	786
Other liabilities	-	-	-	-	-	965	965
Total financial liabilities	**39,050**	**5,448**	**7,506**	**12,725**	**7,515**	**965**	**73,210**
Net notional amount of derivative financial instruments	**983**	**4,068**	**1,673**	**76**	**(6,829)**		**(30)**
Total interest rate gap	**(6,421)**	**6,644**	**751**	**(6,988)**	**113**	**354**	**(5,547)**

The Group and the Bank 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”).

The interest rate gap analysis enables the evaluation of interest rate risk using the changes in Net Interest Income (“ΔNII”) measure, which denotes 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 and the Bank’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 and the Bank’s inability to meet its cash flow obligations when they come due, without incurring unacceptable costs or losses at all times, including under stress.

The Group and the Bank apply a uniform Liquidity Risk Management Policy for the effective management of liquidity risk, approved by the Board’s Risk Management Committee. This policy complies with the supervisory regulations and is consistent with best practices applied internationally.

The policy specifies the principal liquidity risk assessment definitions and methodologies, defines the roles and responsibilities of the Bank's Units, Group subsidiaries and staff involved and sets out the guidelines for liquidity crisis management. In order to manage liquidity risk effectively, Management monitors, 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 Bank 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 Bank and the Group LCR and NSFR are calculated on a monthly and quarterly basis, respectively, as per regulation (EU) No. 575/2013. As at 31 December 2022, both the Bank LCR and NSFR exceeded the minimum regulatory threshold of 100%, standing at 197% and 138%, respectively. Liquidity Risk disclosures under Pillar III are available at Piraeus Financial Holdings S.A website.

Under Directive 2013/36/EU [known as Capital Requirements Directive ("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 Bank submitted in 2022 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 Bank and the Group. In addition, within the ICAAP and ILAAP framework, Management examined stress test scenarios and assessed their impact on the Bank'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.

Group 31/12/2022	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Due to banks	1,261	3	2,071	3,848	43	7,225
Due to customers	52,965	2,859	2,505	18	-	58,347
Debt securities in issue	5	-	19	1,061	-	1,085
Other borrowed funds	-	28	39	994	-	1,061
Other liabilities	186	78	43	85	181	574
Total	**54,417**	**2,967**	**4,677**	**6,006**	**224**	**68,292**
Irrevocable undrawn credit commitments	-	8	71	990	554	**1,623**

Group 31/12/2021	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Due to banks	379	4	14,309	79	47	14,818
Due to customers	48,640	3,630	3,069	51	-	55,389
Debt securities in issue	2	-	493	78	521	1,094
Other borrowed funds	-	28	39	1,061	-	1,127
Other liabilities	99	62	166	75	26	429
Total	**49,120**	**3,723**	**18,076**	**1,343**	**595**	**72,857**
Irrevocable undrawn credit commitments	1	2	28	638	380	**1,050**

Bank 31/12/2022	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Due to banks	1,260	2	2,059	3,756	36	7,113
Due to customers	53,207	2,859	2,505	18	-	58,589
Debt securities in issue	5	-	19	1,061	-	1,085
Other borrowed funds	-	28	39	994	-	1,061
Other liabilities	58	59	28	79	176	401
Total	**54,530**	**2,948**	**4,651**	**5,908**	**213**	**68,249**
Irrevocable undrawn credit commitments	-	8	146	992	555	**1,702**

Bank 31/12/2021	Up to 1 month	1 - 3 months	3 - 12 months	1 - 5 years	Over 5 years	Total
Due to banks	378	4	14,309	67	47	14,805
Due to customers	48,906	3,630	3,069	51	-	55,655
Debt securities in issue	2	-	493	78	521	1,094
Other borrowed funds	-	28	39	1,061	-	1,127
Other liabilities	101	63	156	63	30	413
Total	**49,387**	**3,724**	**18,065**	**1,319**	**599**	**73,094**
Irrevocable undrawn credit commitments	1	2	28	638	380	**1,050**

4.13 Transfers of financial assets

As of 31 December 2022 and 2021, the carrying amount of transferred financial assets, which continue to be recognized in their entirety on the Group's and the Bank's Statement of Financial Position, inclusive of the associated liabilities are presented in the following tables:

31/12/2022	Transferred assets		Associated liabilities	
	Carrying amount		Carrying amount	
	Group	Bank	Group	Bank
Financial assets at FVTPL	55	55	54	54
Loans and advances to customers	10,833	10,833	6,489	6,489
Financial assets at FVTOCI	8	8	7	7
Debt securities at amortised cost	419	419	331	331
Total	**11,315**	**11,315**	**6,881**	**6,881**

31/12/2021	Transferred assets		Associated liabilities	
	Carrying amount		Carrying amount	
	Group	Bank	Group	Bank
Financial assets at FVTPL	863	863	759	759
Loans and advances to customers	9,478	9,478	5,691	5,691
Financial assets at FVTOCI	1,630	1,630	1,315	1,315
Debt securities at amortised cost	9,045	9,045	7,409	7,409
Total	**21,016**	**21,016**	**15,173**	**15,173**

Transactions whereby financial assets are transferred, but continue to be recognized in their entirety on the Group's and the Bank'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 and the Bank are unable to use, sell or pledge the aforementioned assets during the term of the transaction and remain exposed to interest rate risk and credit risk on these assets. The counterparty's recourse is not limited to the transferred assets.

The Group and the Bank have 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.

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 31/12/2022	Fair Value 31/12/2022	Level 1	Level 2	Level 3
Financial assets					
Loans and advances to customers at amortised cost	37,326	36,966	-	-	36,966
Debt securities at amortised cost	10,176	8,547	8,496	51	-
Financial liabilities					
Debt securities in issue	849	774	774	-	-
Other borrowed funds	819	760	-	760	-

Group	Carrying Amount 31/12/2021	Fair Value 31/12/2021	Level 1	Level 2	Level 3
Financial assets					
Loans and advances to customers	36,497	36,531	-	-	36,531
Debt securities at amortised cost	9,183	8,964	8,964	-	-
Financial liabilities					
Debt securities in Issue	971	964	488	476	-
Other borrowed funds	786	782	-	782	-

Bank	Carrying Amount 31/12/2022	Fair Value 31/12/2022	Level 1	Level 2	Level 3
Financial assets					
Loans and advances to customers at amortised cost	37,753	37,409	-	-	37,409
Debt securities at amortised cost	10,173	8,544	8,493	51	-
Financial liabilities					
Debt securities in issue	849	774	774	-	-
Other borrowed funds	819	760	-	760	-

Bank	Carrying Amount 31/12/2021	Fair Value 31/12/2021	Level 1	Level 2	Level 3
Financial assets					
Loans and advances to customers	37,149	37,212	-	-	37,212
Debt securities at amortised cost	9,183	8,964	8,964	-	-
Financial liabilities					
Debt Securities in Issue	971	964	488	476	-
Other borrowed funds	786	782	-	782	-

The following methods and assumptions were used to estimate the fair values of the aforementioned financial instruments at 31 December 2022 and 2021.

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.

Debt 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 instruments 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 (3) levels based on the inputs used in valuation techniques, 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.

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 in its entirety. 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 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 the Bank's Statement of Financial Position at the end of the reporting period, by fair value hierarchy level:

Financial instruments measured at fair value and bases of valuation								
Group	31/12/2022				31/12/2021			
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets								
Derivative financial instruments	-	1,830	-	1,830	-	591	2	**593**
Financial assets at FVTPL	434	114	-	548	851	57	-	**908**
Financial assets mandatorily measured at FVTPL	104	-	78	182	112	-	83	**196**
Loans and advances to customers mandatorily measured at FVTPL	-	-	52	52	-	-	51	**51**
Financial assets at FVTOCI	1,216	246	23	1,485	2,115	212	22	**2,349**
Financial liabilities								
Derivative financial instruments	-	656	-	656	-	393	-	**393**

Financial instruments measured at fair value and bases of valuation								
Bank	31/12/2022				31/12/2021			
	Level 1	Level 2	Level 3	Total	Level 1	Level 2	Level 3	Total
Financial assets								
Derivative financial instruments	-	1,830	-	1,830	-	591	2	593
Financial assets at FVTPL	414	114	-	528	829	57	-	886
Financial assets mandatorily measured at FVTPL	104	-	78	182	112	-	83	196
Loans and advances to customers mandatorily measured at FVTPL	-	-	52	52	-	-	51	51
Financial assets at FVTOCI	1,216	246	23	1,485	2,115	212	22	2,349
Financial liabilities								
Derivative financial instruments	-	656	-	656	-	393	-	393

Transfers between Level 1 and Level 2

Within the year ended 31 December 2022, € 134 million of bonds issued by corporations and financial institutions were transferred from Level 1 to Level 2, while € 22 million of corporate bonds were transferred from Level 2 to Level 1, due to change in their trading activity. There were no transfers of financial liabilities between Level 1 and Level 2 during the years ended 31 December 2022 and 31 December 2021. 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 a) contingent consideration in the form of a performance note payable to the Bank based on the EBITDA of: (i) Intrum Hellas Credit Servicing S.A.; (ii) Intrum Hellas REO Solutions S.A.; and (iii) any of their affiliates for a specified period of time, with par value and fair value of € 32 million, issued by Intrum Holding Spain S.A.U., b) contingent and variable consideration asset recognized following the disposal of loans and corporate receivables, the fair value of which was estimated at € 10 million, 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 such as earnings forecasts, comparable multiples of income economic value, 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. (e.g. balance sheet or regulatory capital).

f) Subordinated notes of the Sunrise I and II, Phoenix and Vega I,II,III securitizations retained by the Group and the Bank as of 31 December 2022 classified within “Loans and advances mandatorily measured at FVTPL”, which have been valued using multiple valuation techniques incorporating significant unobservable inputs.

g) Bifurcated embedded derivatives related to Back-to-back Tier II Notes, issued from the Bank on 31 December 2020 (refer to Note 35 for further information).

During the year ended 31 December 2022 and 2021, 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 at FVTPL	Loans and advances to customers mandatorily at FVTPL	Financial assets at FVTOCI	Derivative financial instruments - assets
Opening balance as at 1/1/2021	**60**	**57**	**35**	**-**
Gain/ (loss) recognized in the income statement	19	(2)	-	2
Purchases / Additions	11	-	-	-
Recognition of Sunrise I and II subordinated notes	-	59	-	-
Disposals/ Contributions	(9)	(63)	(13)	-
FX differences	2	-	-	-
Closing Balance as at 31/12/2021	**83**	**51**	**22**	**2**
Gain/ (loss) recognized in the income statement	(26)	1	-	(2)
Purchases / Additions	29	-	1	-
Disposals/ Contributions	(13)	-	-	-
FX differences	5	-	-	-
Closing Balance as at 31/12/2022	**78**	**52**	**23**	**-**

Bank	Movement of Level 3 Instruments			
	Financial assets mandatorily at FVTPL	Loans and advances to customers mandatorily at FVTPL	Financial assets at FVTOCI	Derivative financial instruments - assets
Opening Balance as at 1/1/2021	**59**	**57**	**35**	**-**
Gain/ (loss) recognized in the income statement	20	(2)	-	2
Purchases	11	-	-	-
Recognition of Sunrise I and II subordinated notes	-	59	-	-
Disposals/ Settlements	(9)	(63)	(13)	-
FX differences	2	-	-	-
Closing Balance as at 31/12/2021	**83**	**51**	**22**	**2**
Gain/ (loss) recognized in the income statement	(26)	1	-	(2)
Purchases / additions	29	-	1	-
Disposals/ Settlements	(13)	-	-	-
FX differences	5	-	-	-
Closing Balance as at 31/12/2022	**78**	**52**	**23**	**-**

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-taking 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. All 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 Group Risk Management ("GRM") on a systematic basis.

The Group mainly engages in 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 31 December 2022 and 2021, 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 2022 and 2021

Financial instruments[4]	Fair Value 2022	Fair Value 2021	Valuation Technique	Significant Unobservable Input	Range of Inputs 2022 Low	Range of Inputs 2022 High	Range of Inputs 2021 Low	Range of Inputs 2021 High
Financial assets mandatorily at FVTPL – Contingent & variable considerations	42	43	Monte Carlo simulation	Revenue volatility Discount rate Expected EBITDA/CFs	15% 14% n/a[2]	15% 14% n/a[2]	15% 14% n/a[2]	15% 14% n/a[2]
Financial assets mandatorily at FVTPL and FVTOCI – equity securities, mutual funds	56	63	Income, market approach	n/a[1]	n/a[1]	n/a[1]	n/a[1]	n/a[1]
Loans and advances to customers mandatorily measured at FVTPL – Phoenix, Vega I,II,II and Sunrise I and II subordinated notes	6	8	Market approach	Binding quotes from third parties	10%[5]	23%[5]	15%[5]	36%[5]
Loans and advances to customers mandatorily measured at FVTPL – Other	46	43	Discounted Cash Flows	Credit risk adjusted expected cash flows	0%[3]	100%[3]	0%[3]	100%[3]

[1]*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.*

[2] *The performance targets and forecasted EBITDA or Cash Flows (CFs) of the underlying associates or debtors of the Group, throughout the earnout 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] *Represented as percentage of the loan's gross carrying amount*

[4] *Includes financial instruments with an individual fair value higher than € 5 million at the end of the reporting period.*

[5] *Represented as percentage of the subordinated notes' nominal value.*

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 CRR against risks undertaken, according to the regulatory framework,
- To preserve the Bank's ability to continue its operations unhindered, thus to continue providing returns and benefits to its shareholders and ensure the confidence of their customers,
- To retain a sound and stable capital base in order to support the Bank'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 Bank 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 currently stands.

The aforementioned regulatory framework requires financial institutions to maintain for the Bank a minimum level of regulatory capital related to the undertaken risks. After the Hive-Down of the banking activity of former Piraeus Bank, the capital adequacy ratios are calculated, quarterly, under the provision of Regulation (EU) 575/2013, on a standalone base for the Bank and on a Group base, solely, for the upper consolidation level namely Piraeus Financial Holdings Group.

The minimum thresholds for the capital adequacy ratios, as per article 92 of the CRR2, are as follows:

	Bank
Common Equity Tier 1 Ratio (CET1)	4.5%
Tier 1 Ratio (T1)	6.0%
Total Capital Ratio (CAD Ratio)	8.0%

The ECB, through the SREP decision on 2 February 2022, informed the Management on the revised OCR levels, effective since 1 March 2022. The Bank has to maintain on an individual basis a Total SREP Capital Requirement ("TSCR") of 8.0% and an OCR of 11.25%, which includes:

a) the minimum Pillar I total capital requirements of 8.0% as per article 92(1) of Regulation 575/2013/EU;

b) the fully loaded capital conservation buffer of 2.5% under Greek Law 4261/2014;

c) the transitional Other Systemic Important Institutions ("O-SII") capital buffer of 0.75% for 2022 under Greek Law 4261/2014.

The capital adequacy ratios as at 31 December 2022 for the Bank, as calculated under the existing regulatory framework, taking into account the relevant transitional period provisions applicable under Regulation (EU) No. 575/2013 and the transitional arrangements applicable under Regulation (EU) 2395/2017 for mitigating the impact of the introduction of IFRS 9 on own funds, were as follows:

	Bank	
	31/12/2022	31/12/2021
Ordinary shares	5,345	5,345
Share premium	1,715	1,715
Other reserves and retained earnings	(1,240)	(1,869)
Less: Intangible assets	(188)	(188)
Total regulatory adjustments on CET1 capital	(1,612)	(1,302)
Common Equity Tier 1 Capital (CET1)	**4,021**	**3,702**
Additional Tier 1 instruments	600	600
Total Additional Tier 1 Capital	**600**	**600**
Tier 1 Capital (A)	**4,621**	**4,302**
Subordinated debt	775	742
Total Tier II Capital (B)	**775**	**742**
Total regulatory capital (A) + (B)	**5,396**	**5,044**
Total risk weighted assets (on and off- balance sheet items)	**29,651**	**30,853**
CET1 Capital ratio	**13.56%**	**12.00%**
T1 Capital ratio	**15.58%**	**13.94%**
Total Capital ratio	**18.20%**	**16.35%**

As of 31 December 2022, the Total Capital ratio for the Bank stood at 18.20% and the CET1 ratio stood at 13.56% covering the minimum TSCR levels.

During the period ended 31 December of 2022, the Bank received SRT approval for Ermis Triton, Ermis Mortgage, Ermis EIF and Ermis VI, four (4) synthetic securitization transactions of performing business/mortgage loans that led to a RWA relief of € 1.6 billion.

The Bank has adopted the provisions of Article 473[a] of Regulation (EU) No 2017/2395, amending Regulation (EU) No 575/2013 relating to the CRR in regards with “transitional arrangements for mitigating the impact of the introduction of IFRS 9 on own funds”. These transitional arrangements allowed the Group to add back to its capital base a proportion of the IFRS 9 impact due to ECL allowance during the first five (5) years of use.

In addition, according to paragraph 7[a] that has been added to the said article, the Bank replaced the rescaling of all exposure values that are reduced by ECL allowance with a standard risk weight of 100% to be assigned to the amounts added back to CET1 capital. In addition, the Bank, following the amendment of the article 468 CRR 575/2013 has made use of the temporary regulatory treatment of unrealized gains and losses of sovereign bonds measured at FVTOCI. Based on the said amendment of article 468, institutions may remove from the calculation of their CET1, the unrealized gains and losses accumulated since 31 December 2019 accounted for as “fair value changes” of sovereign debt securities, multiplied with a prudential factor of 0.7 for the year 2021 and of 0.4 for the year 2022.

In addition, Commission Delegated Regulation (EU) 2020/2176 of 12 November 2020 was applied from the end of December 2020 and onwards, allowing financial institutions to measure software assets on a prudential accumulated amortisation basis and risk weight a regulatory defined part instead of fully deducting them from CET1.

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 Bank, takes into account the DTAs which have been recognised on the basis of the relevant provisions of the IFRSs. As at 31 December 2022 the DTA of the Group and the Bank amounted to € 5,958 million (31 December 2021: € 6,022 million) and € 5,934 million (31 December 2021: € 5,992 million), respectively. At each reporting date, the Group and the Bank 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"), DTAs 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, DTAs of Greek financial institutions, as well as DTAs 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 Deferred Tax Credit ("DTC") status during all this period, while it disconnects the accounting write-offs from final debt write-offs.

As at 31 December 2022, the DTA of the Group and the Bank that meets the provisions of article 27 of Law 4172/2013, as currently in force i.e. is eligible for DTC, amounted to € 3,541 million (31 December 2021: € 3,617 million), of which € 1,050 million relates to unamortised PSI losses (31 December 2021: € 1,105 million) and € 2,491 million relates to temporary differences between the IFRS carrying amount and tax base of loans and advances to customers (31 December 2021: € 2,512 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 DTAs may be adversely affected by: a) the future reduction of income tax rates, b) the adverse change of the regulations governing the treatment of deferred tax assets 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 Bank's regulatory capital ratios.

4.18 IBOR Reform

During 2021, the Group has 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, the Group launched all necessary actions relating to the new USD risk-free reference rate definition (USD Secured Overnight Financing Rate, “USD SOFR”) in order to replace the USD LIBOR Benchmark, which is expected to cease being representative and published on 30 June 2023. More specifically, the Bank proceeded to the USD LIBOR contracts’ amendments with the insertion of new RFR SOFR definition and necessary fallback language provisions.

Financial instruments impacted by the reform

Changes made to a financial instrument measured at other than FVTPL, that are economically equivalent and required by interest rate benchmark reform, do not result in derecognition or a change in their carrying amount. Instead, they require the EIR to be updated to reflect the change in the interest rate benchmark. In addition, hedge accounting relationships should not be discontinued solely as a result of benchmark interest rate replacement, while any difference in hedge effectiveness assessment arising from the reform should be treated as an additional source of ineffectiveness provided that the hedge accounting relationship meets all other criteria.

The table below represents the non-derivative financial assets, non-derivative financial liabilities and derivative financial instruments that have not yet completed the transition to an alternative benchmark rate:

Financial Instruments yet to transition to alternative benchmarks, by main benchmark	
31/12/2022	**USD LIBOR**
Non derivative financial assets	2,306
Non derivative financial liabilities	-
Notional Amounts of Derivatives	
Interest Rate Swaps	49
Options-Interest rate	84
Total	**2,439**

The amounts depicted in the table here above, reflect the 31 December 2022 carrying amount of non-derivative financial assets, in specific loans and advances to customers at amortised cost, as well as the notional amounts of derivatives yet to transition to alternative benchmarks.

As far as USD Libor benchmark loan accounts are concerned, these have not been reformed to the new RFR, since the respective USD Libor benchmark is expected to cease being representative and published on 30 June 2023.

As far as derivatives are concerned, following the announcement by ICE Benchmark Administration Limited (“IBA”), in March 2021, that the publication of the USD Libor would be extended on 30 June 2023, the Group’s transition program focused mainly on client engagement for Sterling (GBP), Swiss franc (CHF) and Japanese yen (JPY) Libor interest rates, as well as EONIA.

Regarding EURIBOR, this 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, to the extent that these exist, as well as on expert judgement as 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, the EMMI issued a press release to start publishing the forward-looking term rate EFTERM (Euro Forward Looking Term Rate) 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 (EU BMR). The Group, assessing the future possibility of EURIBOR reform, has initiated preparatory work for the adjustment of the respective contracts, by introducing fallbacks provisions in the contracts, so as 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 fair value hedge accounting relationships of the Group as of 31 December 2022, considering that the hedging instruments used are referenced to Euribor rates which are not subject to the contemplated reform.

4.19 Climate Related Matters

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 (4) pillars:

1. Reach net zero in own operations: the Group' climate action starts by managing its own environmental footprint through its operations. The Group 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.
2. Steer portfolio towards net zero by 2050 or sooner: The Bank makes the most positive impact on climate action also through its financing to companies and individuals. The Bank focuses on the sectors that are responsible for the higher greenhouse gas emissions, and measures whether the Bank's lending in each sector is aligning with the Group's climate ambition.
3. Support and advise clients in line with a carbon neutral economy: to support Bank's clients in their climate transition it 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 SME, and retail customers in Greece.
4. Manage climate and environmental risks: The Bank is progressively integrating the risks associated with climate change in the Group's RMF. The Bank approach continues to develop as methodologies advance and regulatory guidance and requirements evolve. The Group also aims to help its clients protect their business from climate risks by advising them and financing their transition.

The Group participates in the ECB supervisory dialogue with the aim of incorporating strategies and practices for managing climate-related and environmental risks under the current prudential framework. The Group has embarked on a project named "Proteus" to meet all ECB expectations by end of 2023. The project has an internal governance structure that facilitates effectively, and timely decision-making related to C&E risks.

The Group participated in the 2022 supervisory Climate Stress Test that assessed how prepared European banks are for dealing with financial and economic shocks stemming from climate risk. The test was a learning exercise both for banks and supervisors. It aimed to identify shortcomings, best practices and challenges banks face when managing climate-related risk. Importantly, this is not a pass or fail exercise, nor does it have direct implications for banks' capital levels.

Overall, the Bank scored at par with the average of the European participating banks. The results indicated an adequate climate risk stress testing framework and a good performance in data quality. On the other hand, income reliance on carbon intensive activities was higher than the EU average, also reflecting country-specific characteristics.

The Bank is using the results of the Climate Stress Test to deeper investigate how to further engage with its clients to steer them on a low-carbon path and hence manage potential sensitivities to long-term transition risk, high concentration of corporate exposures into carbon intensive counterparties, as well as short-term transition and physical risks.

Assessing Climate Risk deriving from the Bank's business borrowers

The Group is exposed to climate-related and environmental risks through its financial activities and its operations. Thus, it recognizes that both rapidly changing regulation, as well as stakeholder demands, may materially affect its business, operations and strategic plans. In this context, the Group assesses its exposure to material climate risks through its borrowers, customers, and counterparties. As already mentioned above, climate related risks can affect several important aspects of the Group's financial position, both in the short-term but more likely in the medium and long-term and can also pose new challenges for the Group's Risk Management.

The Group has developed the propriety tool "Climabiz" which is used for the annual assessment of the business borrower's climate risk. The tool estimates, in monetary terms, the risks deriving from climate change for economic sectors and businesses that are deemed vulnerable to climate change and in which the Bank has material exposures.

Climabiz uses three (3) Intergovernmental Panel on Climate Change (the "IPCC") climate scenarios (Representative Concentration Pathways, "RCPs") simulated for different regions of the country, both for the historical (period 1971-2020) and for the future (period 2021-2050) climate. The climate scenarios include the adoption of ambitious emission reduction policies (RCP2.6), the evolution of climate change without the implementation of additional policies for the emissions reduction (RCP8.5) and the intermediate scenario (RCP4.5). The tool estimates physical risk (acute and chronic) and transition risk.

The Group will continue to upgrade the Climabiz tool, monitor on an annual basis the climate risk of its business portfolios and gradually use the results to inform its decisions in supporting energy transition plans of its clients.

This approach will enable the Group to leverage on the climate risk quantification and achieve a comprehensive C&E risk classification. Namely:

- create a qualitative classification of portfolios and their potential exposure to C&E risks and their transmission channels;
- summarise the identification, measurement, monitoring and reporting of C&E risks and outline the process for establishing Climate Risk Appetite;
- outline roles and responsibilities applicable to Climate Risk Framework;
- utilise enhancements in scenarios analysis and methodology capabilities to effectively manage collaterals;
- incorporate C&E Risks in Credit Risk parameters;
- further integrate C&E risks into Operational Risk Framework and conduct trainings to raise awareness on C&E drivers for strengthening the identification and measurement of Operational Risks (including reputation and litigation risks).

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.

Corporate Banking – Includes Large Corporates, Shipping, Small and Medium Entities ("SME") and Agricultural Core customer segments.

Piraeus Financial Markets ("PFM") – This segment 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 and Sunrise II 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, Strix Holdings LP and Strix Holdings NC 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. Refer to Note 2.4.39.

An analysis of the results and other financial figures per business segment of the Group is presented below.

1/1 - 31/12/2022	"Core" Segments (1), (2)					NPE MU	Group
	Retail Banking	Corporate Banking	PFM	Other	Total		
Net interest income	567	452	263	57	1,339	(35)	**1,304**
Net fee and commission income	195	164	8	1	367	5	**372**
Income from non-banking activities	-	-	-	59	59	6	**64**
Net gains/ (losses) from derecognition of financial instruments measured at amortised cost	-	-	(17)	1	(16)	(20)	**(36)**
Net other income/ (expenses)	282	-	507	(6)	783	28	**812**
Total Net Income	**1,044**	**615**	**762**	**111**	**2,532**	**(15)**	**2,516**
Total operating expenses	(480)	(188)	(59)	(88)	(814)	(53)	**(867)**
Profit/ (loss) before provisions, impairment and other credit-risk related expenses	**564**	**428**	**702**	**24**	**1,717**	**(68)**	**1,649**
ECL Impairment (losses)/ releases on loans and advances to customers at amortised cost	11	89	1	(3)	99	(622)	**(523)**
Other credit-risk related expenses on loans and advances to customers at amortised cost	(28)	(33)	-	(1)	(63)	(80)	**(142)**
Impairment (losses)/ releases on other assets	-	-	-	(47)	(47)	-	**(47)**
ECL impairment (losses) / releases on debt securities measured at FVTOCI	-	-	1	-	1	-	**1**
Impairment on subsidiaries and associates	-	-	-	(2)	(2)	-	**(2)**
Impairment of property and equipment and intangible assets	-	-	-	(4)	(4)	-	**(4)**
Impairment on debt securities at amortised cost	-	-	(5)	-	(5)	-	**(5)**
Other provision (charges)/ releases	2	4	-	(17)	(12)	(1)	**(12)**
Share of profit/ (loss) of associates and joint ventures	-	-	-	6	6	23	**29**
Profit/ (loss) before income tax	**548**	**488**	**700**	**(45)**	**1,691**	**(748)**	**943**
Income tax benefit/ (expense)							(130)
Profit/ (loss) for the year from continuing operations							**813**
Profit/ (loss) after income tax from discontinued operations	-	-	-	51	51	-	**51**
Profit/ (loss) for the year							**864**
As at 31/12/2022							
Total assets from continuing operations (excluding assets held for sale)	9,604	20,214	24,271	11,747	65,836	9,161	**74,997**
Assets held for sale	4	12	-	17	33	373	**406**
Total assets	9,608	20,226	24,271	11,764	65,869	9,534	**75,403**
Total liabilities	42,798	14,278	8,344	3,011	68,432	460	**68,891**

(1) In the second quarter of 2022, the Group changed the presentation of: i) selected equity participations from reporting segment "other" to "NPE MU", in order to align the respective segmental presentation with the organizational structure and responsibilities of NPE MU and ii) selected expenses, included in certain line items (i.e. net interest income, net other income/ (expenses), ECL impairment losses) from reporting segment "other" into the other four (4) "core" segments of the Group. The comparative information has been adjusted accordingly.

(2) In the third quarter of 2022, the Group reclassified Private Banking from reporting segment "Retail" into "Other". This was in line with the establishment of the new WAM division, which is included within reporting segment "Other". This segment is engaged in developing clients' wealth and capital management operations. The comparative information has been adjusted accordingly.

1/1 - 31/12/2021 As reclassified	"Core" Segments					NPE MU	Group
	Retail Banking	Corporate Banking	PFM	Other	Total		
Net interest income	425	445	151	141	1,163	144	**1,307**
Net fee and commission income	188	146	6	(7)	333	12	**345**
Income from non-banking activities	-	-	-	24	24	16	**40**
Net gains/ (losses) from derecognition of financial instruments measured at amortised cost	-	8	323	2	334	(7)	**327**
Net other income/ (expenses)	6	4	161	189	359	33	**392**
Total Net Income	**618**	**603**	**641**	**350**	**2,213**	**197**	**2,410**
Total operating expenses	(443)	(168)	(46)	(124)	(782)	(90)	**(872)**
Profit/ (loss) before provisions, impairment and other credit-risk related expenses	**175**	**435**	**595**	**226**	**1,431**	**107**	**1,538**
ECL Impairment (losses) / releases on loans and advances to customers at amortised cost	(89)	1	(1)	(4)	(93)	(393)	**(486)**
Other credit-risk related expenses on loans and advances to customers at amortised cost	(40)	(8)	-	(5)	(53)	(89)	**(141)**
Impairment (losses) / releases on other assets	-	-	-	6	6	6	**12**
ECL impairment (losses) / releases on debt securities measured at FVTOCI	-	-	(11)	-	(11)	-	**(11)**
Impairment on subsidiaries and associates	-	-	-	(23)	(23)	-	**(23)**
Impairment of property and equipment and intangible assets	-	-	-	(13)	(13)	-	**(13)**
Impairment on debt securities at amortised cost	-	-	(19)	-	(19)	-	**(19)**
Other provision (charges)/ releases	(3)	(1)	-	13	9	-	**9**
Share of profit/ (loss) of associates and joint ventures	-	-	-	18	18	-	**18**
Profit/ (loss) before income tax	**43**	**427**	**565**	**219**	**1,252**	**(369)**	**884**
Income tax benefit/ (expense)							(485)
Profit/ (loss) for the year from continuing operations							**399**
Profit/ (loss) after income tax from discontinued operations	-	-	-	(7)	(7)	-	**(7)**
Profit/ (loss) for the year							**392**
As at 31/12/2021							
Total assets from continuing operations (excluding assets held for sale)	9,584	17,628	29,146	13,175	69,533	9,503	**79,036**
Total assets from discontinued operations	-	-	-	114	114	-	**114**
Assets held for sale	7	7	-	33	47	388	**435**
Total assets	9,591	17,635	29,146	13,322	69,695	9,891	**79,586**
Total liabilities	40,057	12,743	16,199	4,356	73,355	376	**73,731**

Interest income is presented for each reporting segment net of interest expense, as the performance of each segment is evaluated on a net interest income basis. The amount of € 783 million presented under line item "net other income/(expenses)" mainly includes a gain upon loss of control over subsidiaries of € 282 million relating to the disposal of the merchant acquiring business (refer to Note 26), presented within reporting segment "Retail Banking", as well as net gain from financial instruments of € 507 million (refer to Notes 9 and 10), presented within reporting segment "PFM".

b) Geographical segment

The Group operates in the following geographical areas: a) Greece, the Bank's country of domicile; b) Rest of Europe, which includes Albania, Bulgaria, Romania, Serbia, Ukraine, Cyprus, United Kingdom, Germany and Ireland; and c) Other Countries, which include Egypt. To this end, Greece generated 99% of the Group's net income.

The following table summarises the Group's net income and non-current assets, across all geographical areas. The breakdown is based on the location of the respective legal entity.

Group	Net Income		Non-current assets	
	1/1 - 31/12/2022	1/1 - 31/12/2021 As reclassified	31/12/2022	31/12/2021
Greece	2,496	2,406	2,419	2,055
Rest of Europe	20	4	123	129
Other countries	-	-	4	5
Continuing Operations	**2,516**	**2,410**	**2,546**	**2,189**
Discontinued Operations	**84**	**39**	**-**	**80**

For information regarding the entities of the Group classified as discontinued operations in 2022 and 2021, refer to Note 14.

6 Net interest income

Continuing operations	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Interest and similar income				
Debt securities measured at FVTOCI	35	46	35	46
Debt securities at amortised cost	181	86	181	86
Loans and advances to customers at amortised cost & Reverse repos	1,192	1,263	1,193	1,266
Due from banks	7	3	7	3
Negative interest from liabilities due to ECB	70	146	70	146
Negative interest from other interest-bearing liabilities	4	2	4	2
Other	69	10	64	5
Total interest income for financial instruments not measured at FVTPL	**1,558**	**1,555**	**1,554**	**1,554**
Financial instruments measured at FVTPL	11	8	11	7
Derivative financial instruments	98	133	98	133
Total interest and similar income	**1,667**	**1,696**	**1,662**	**1,694**
Interest expense and similar charges				
Due to customers and repurchase agreements	(45)	(38)	(45)	(38)
Debt securities in issue and other borrowed funds	(127)	(96)	(127)	(96)
Due to banks	(14)	(2)	(12)	(2)
Contribution of Law 128/75	(54)	(58)	(54)	(58)
Negative interest from interest-bearing assets	(38)	(43)	(38)	(42)
Other	(2)	(2)	(2)	(2)
Total interest expense from financial instruments not measured at FVTPL	**(281)**	**(239)**	**(277)**	**(238)**
Derivative financial instruments	(82)	(150)	(82)	(150)
Total interest expense	**(363)**	**(389)**	**(360)**	**(389)**
Net interest income	**1,304**	**1,307**	**1,302**	**1,305**

Line item “negative interest from liabilities due to ECB” both for the Group and the Bank comprises the interest income recognised from the funding liabilities of the Bank due to ECB, in the context of the TLTRO III program. Specifically, the revenue recognised during the year ended 31 December 2022 amounting to € 70 million (31 December 2021: € 146 million), which includes the program’s extra benefit (50 bps lower than the average DFR of the respective period) up to 23 June 2022 (the end of additional special interest period), given that the Bank met the related lending performance requirements between 1 October 2020 and 31 December 2021.

Line item “Other” of interest and similar income both for the Group and the Bank comprises € 54 million, generated from the use of Eurosystem’s deposit facility (overnight deposits with the Central Bank remunerated at the applicable DFR). During the second semester of 2022, the ECB proceeded with a rapid tightening of its monetary policy in order to tame the very high and persistent inflation. As a result, ECB announced four (4) consecutive increases of its key interest rates by a total of 250 bps.

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.

Group - Continuing operations	1/1 - 31/12/2022				1/1 - 31/12/2021			
	Not credit impaired	Credit impaired			Not credit impaired	Credit impaired		
	Stage 1 & 2	Stage 3	POCI	Total	Stage 1 & 2	Stage 3	POCI	Total
Retail Lending	293	17	12	322	276	45	35	**355**
Corporate Lending	751	97	19	867	631	225	50	**906**
Public Sector Lending	4	-	-	4	2	-	-	**2**
Total Interest income	**1,048**	**114**	**31**	**1,192**	**908**	**270**	**84**	**1,263**

Bank	1/1 - 31/12/2022				1/1 - 31/12/2021			
	Not credit impaired	Credit impaired			Not credit impaired	Credit impaired		
	Stage 1 & 2	Stage 3	POCI	Total	Stage 1 & 2	Stage 3	POCI	Total
Retail Lending	293	17	12	322	276	45	35	**355**
Corporate Lending	756	94	18	868	638	224	47	**909**
Public Sector Lending	3	-	-	4	1	-	-	**1**
Total Interest income	**1,053**	**111**	**29**	**1,193**	**915**	**269**	**82**	**1,266**

7 Net fee and commission income

Continuing operations	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021 As reclassified	1/1 - 31/12/2022	1/1 - 31/12/2021 As reclassified
Fee and commission income				
Commercial banking	394	379	386	375
Investment banking	26	37	14	24
Asset management	33	29	14	16
Total fee and commission income	**453**	**445**	**414**	**415**
Fee and commission expense				
Commercial banking	(73)	(93)	(71)	(90)
Investment banking	(6)	(6)	-	-
Asset management	(1)	(1)	(1)	(1)
Total fee and commission expense	**(80)**	**(100)**	**(72)**	**(91)**
Net fee and commission income	**372**	**345**	**342**	**324**

a. Fee and commission income

The Group and the Bank 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 Bank'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 Bank, for the years ended 31 December 2022 and 2021, per product type and business segment.

The Group and the Bank reclassified the amounts of the reporting segment "Retail" into "Other". Refer to Note 5 for further information.

Group	Fee and Commission income					
1/1 - 31/12/2022	Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Acquiring	9	5	-	-	-	14
Asset management/Brokerage	31	3	9	8	-	51
Cards [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	1	93
Payments	22	5	1	-	-	28
FX fees	27	6	1	-	-	34
Other	20	12	-	-	-	32
Total	**251**	**172**	**11**	**13**	**6**	**453**

Group	Fee and Commission income					
1/1 - 31/12/2021 As reclassified	Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Acquiring	53	24	1	-	1	**79**
Asset management/Brokerage	30	2	7	9	-	**48**
Cards [1]	41	6	-	-	2	**49**
Deposits Commissions [1]	8	1	-	-	-	**9**
Funds Transfer	48	13	-	3	2	**66**
Letters of Guarantee	3	29	-	-	3	**35**
Loans and advances to customers[1]	9	60	-		1	**70**
Payments	20	5	1	1	-	**27**
FX fees	18	3	-	1	-	**22**
Other	18	22	-	-	-	**40**
Total	**248**	**164**	**9**	**14**	**9**	**445**

Bank	Fee and Commission income					
1/1 - 31/12/2022	Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Acquiring	9	5	-	-	-	14
Asset management/Brokerage	8	1	6	4	-	19
Cards [(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	73	-	-	1	84
Payments	22	6	1	-	-	29
FX fees	27	6	1	-	-	34
Other	20	12	-	-	-	33
Total	**228**	**163**	**8**	**9**	**6**	**414**

Bank	Fee and Commission income					
1/1 - 31/12/2021 As reclassified	Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Acquiring	53	24	1	-	1	79
Asset management/Brokerage	4	1	4	12	-	21
Cards [(1)]	41	6	-	-	2	49
Deposits Commissions [(1)]	8	1	-	-	-	9
Funds Transfer	48	13	-	3	2	66
Letters of Guarantee	3	29	-	-	3	35
Loans and advances to customers [(1)]	9	55	-	1	1	66
Payments	20	5	1	1	-	27
FX fees	18	3	-	1	-	22
Other	18	23	-	-	-	41
Total	**221**	**160**	**7**	**18**	**9**	**415**

(1) Refers to financial assets and financial liabilities carried at amortised cost.

Fee and commission expense figures have been restated in order to better reflect the nature of the expenses recognised, in respect of the services provided in processing of cards transactions, and due to the amendment of the presentation of assets under management and success fees (refer to Note 15 for further information).

b. Other income

The tables below present other income from contracts with customers of the Group and the Bank, for the years ended 31 December 2022 and 2021 which fall within the scope of IFRS 15.

Group 1/1 - 31/12/2022	Other Income Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Other operating income	-	-	13	22	26	61
Gain from sale of investment property	-	-	-	2	-	2
Gain from sale of other assets	-	-	-	5	-	5
Total	**-**	**-**	**13**	**29**	**26**	**68**

Group 1/1 - 31/12/2021 As reclassified	Other Income Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Other operating income	-	-	-	40	33	**73**
Gain from sale of investment property	-	-	-	1	-	**1**
Gain from sale of other assets	-	-	-	3	3	**6**
Total	**-**	**-**	**-**	**44**	**36**	**80**

Bank 1/1 - 31/12/2022	Other Income Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Other operating income	-	-	13	6	26	45
Gain from sale of other assets	-	-	-	3	-	3
Total	**-**	**-**	**13**	**9**	**26**	**48**

Bank 1/1 - 31/12/2021 As reclassified	Other Income Retail Banking	Corporate Banking	Piraeus Financial Markets	Other	NPE MU	Total
Other operating income	-	-	-	10	33	**43**
Gain from sale of investment property	-	-	-	1	-	**1**
Gain from sale of other assets	-	-	-	1	3	**4**
Total	**-**	**-**	**-**	**12**	**36**	**48**

8 Income from non-banking activities

During the year ended 31 December 2022, the Group and the Bank amended the presentation of income from non-banking activities, mainly comprising rental income from investment property, previously reported in line item “Net Other income/(expenses)” into line item “Income from non-banking activities”. Rental income from investment property for the current year stood at € 59 million for the Group and € 18 million for the Bank (31 December 2021: € 34 million for the Group and € 10 million for the Bank). Refer to Note 50 for the said change in presentation of the comparatives.

9 Net gains/ (losses) from financial instruments measured at FVTPL

Continuing operations	Group 1/1 - 31/12/2022	Group 1/1 - 31/12/2021	Bank 1/1 - 31/12/2022	Bank 1/1 - 31/12/2021
Gains / (losses) from debt securities	(73)	(1)	(73)	(1)
Gains / (losses) from other financial instruments	437	89	435	89
Net income from financial instruments measured at FVTPL	**364**	**88**	**362**	**88**

The Group's and Bank's net gains from financial instruments measured at FVTPL for the year ended 31 December 2022 mainly comprise gains of € 405 million from derivatives (31 December 2021: gains of € 73 million for the Group and € 72 million for the Bank). The Group's and Bank's losses from debt securities for the year ended 31 December 2022 are mainly attributable to disposal of GGBs and Greek treasury bills amounting to € 54 million.

10 Net gains/ (losses) from financial instruments measured at FVTOCI

The Group's and the Bank's net gains from derecognition of financial instruments measured at FVTOCI for the year ended 31 December 2022 amounted to € 112 million (31 December 2021: € 87 million) and relate to disposal of debt securities, of total nominal value € 1,621 million. An amount of € 106 million pertains to realized gains and reversal of ECL allowance upon disposal of GGBs and Greek treasury bills, of total nominal value € 1,363 million.

11 Net other income/ (expenses)

Continuing operations	Group 1/1 - 31/12/2022	Group 1/1 - 31/12/2021 As reclassified	Bank 1/1 - 31/12/2022	Bank 1/1 - 31/12/2021 As reclassified
Gains/ (losses) from fair value remeasurement of investment property (Note 29)	38	4	23	17
Other net income / (loss)	18	26	13	7
Total Net other income / (expense)	**55**	**30**	**36**	**24**

Refer to Note 50 for the change in presentation of comparatives.

12 Staff costs

Continuing operations	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Wages and salaries	(291)	(284)	(274)	(270)
Social insurance contributions	(60)	(55)	(57)	(52)
Other staff costs	(22)	(28)	(21)	(28)
Voluntary redundancy costs	(57)	(24)	(57)	(22)
Retirement benefit charges	(5)	(4)	(4)	(4)
Total	**(435)**	**(395)**	**(413)**	**(376)**

In accordance with its strategic objectives and transformation priorities, the Group initiated in 2022 a new Voluntary Exit Scheme ("VES") for certain group of employees. As a result, a corresponding provision of € 57 million was booked for Group and Bank in 2022, increasing equally the staff cost. The Group's and the Bank's full-time equivalents ("FTE") from continuing operations as of 31 December 2022 was 8,292 and 7,950 respectively (31 December 2021: 9,120 and 8,773, respectively). The number of Group's and Bank's FTE who exited voluntarily in 2022, making use of the 2022 and 2021 VES, stood at 633 and 628, respectively.

13 Administrative expenses

Continuing operations	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021 As reclassified	1/1 - 31/12/2022	1/1 - 31/12/2021 As reclassified
Taxes and duties	(74)	(78)	(64)	(68)
Promotion and advertising expenses	(24)	(28)	(37)	(42)
Fees and similar expenses	(65)	(101)	(53)	(89)
Contributions payable to Deposit Insurance and Resolution Funds	(59)	(48)	(59)	(48)
Other administrative expenses	(106)	(113)	(96)	(101)
Total	**(328)**	**(368)**	**(309)**	**(349)**

The contributions payable to Deposit Insurance and Resolution Funds mainly comprise: a) € 33 million under the Resolution leg of the Hellenic Deposit and Investment Guarantee Fund ("HDIGF") (31 December 2021: € 31 million); and b) € 25 million ex-ante contributions to the Single Resolution Fund ("SRF") (31 December 2021: € 17 million).

14 Discontinued operations

On 23 March 2022, the Bank signed a share transfer agreement for the contribution of its entire shareholding in subsidiary Imithea Single Member S.A. into Strix Holdings LP. The transaction was completed in the third quarter of 2022, after having obtained the required regulatory approval by the Hellenic Competition Commission ("HCC"). Following the loss of control over its former subsidiary, the Group recognised a gain of € 55 million (Refer also to Note 48).

The profit from discontinued operations for the period ended 31 December 2022 comprises mainly Imithea Single Member S.A.

A) Profit / (loss) after income tax from discontinued operations

	1/1 - 31/12/2022	1/1 - 31/12/2021
Gain from loss of control over subsidiaries	55	-
Net other income	29	39
Total net income	**84**	**39**
Staff costs	(19)	(27)
Administrative expenses	(11)	(13)
Depreciation and amortisation	(3)	(4)
Total operating expenses	**(33)**	**(44)**
Profit/(loss) before provisions, impairment and other credit-risk related expenses	**52**	**(5)**
Provisions and impairment losses	(1)	(1)
Profit/(loss) before income tax	**51**	**(6)**
Income tax expense	-	(1)
Profit/(loss) after income tax from discontinued operations	**51**	**(7)**

B) Assets and liabilities from discontinued operations

	31/12/2022	31/12/2021
ASSETS		
Property and equipment	-	80
Deferred tax assets	-	9
Other assets	-	25
Total Assets	**-**	**114**

	31/12/2022	31/12/2021
LIABILITIES		
Retirement and termination benefit obligations	-	2
Provisions	-	4
Other liabilities	-	22
Total Liabilities	**-**	**28**

15 Other credit risk related expenses on loans and advances to customers at amortised cost

During the year ended 31 December 2022, the Group and the Bank amended the presentation of fees payable for having its

NPE portfolio managed, such as assets under management ("AUM") fees and success fees, previously included in line items "Administrative expenses", "ECL Impairment losses on loans and advances to customers at amortised cost" and "Fee and commission expense", into line item "Other credit-risk related charges on loans and advances to customers at amortised cost". For the year ended 31 December 2022 AUM fees amounted to € 28 million for the Group and € 27 million for the Bank (31 December 2021: € 32 million for the Group and the Bank), while success fees amounted to € 81 million for the Group and € 80 million for the Bank (31 December 2021: € 96 million for the Group and the Bank). Refer to Note 50 for the said change in presentation of the comparatives.

Additionally, for the year ended 31 December 2022, credit protection fees payable by the Group and the Bank in the context of synthetic securitizations, amounted to € 33 million (31 December 2021: € 13 million for the Group and the Bank).

16 Income tax benefit / (expense)

Continuing operations	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Current tax expense	(12)	(7)	(4)	(2)
Deferred tax benefit / (expense) (Note 39)	(118)	(479)	(111)	(475)
Income tax benefit / (expense)	**(130)**	**(485)**	**(115)**	**(477)**

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 2022 and 2021, provided that the specific provisions of art. 27A of the Greek Income Tax Code ("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		Bank	
	2022	2021	2022	2021
Profit / (loss) before income tax / (expense)	943	884	940	854
Tax calculated based on current tax rate (29%)	(273)	(256)	(273)	(248)
Non taxable income	246	66	237	72
Non tax deductible expenses and other permanent differences	(120)	(299)	(79)	(302)
Effect of different tax rates applied	8	2	-	-
Deferred tax impact due to change in tax rate	-	(2)	-	-
Effect of results of investments in associates	8	5	-	-
Income tax benefit / (expense)	**(130)**	**(485)**	**(115)**	**(477)**
Effective tax rate for the year	**13.8%**	**54.9%**	**12.2%**	**55.9%**

As at 31 December 2022, the Group and the Bank recognized a DTA of € 5,958 million and € 5,934 million, respectively (31 December 2021: € 6,022 million for the Group and € 5,992 million for the Bank), and a deferred tax liability of € 10 million (31 December 2021: € 9 million) that was recognised at a Group level. For further information, refer to Note 39.

Effective from tax year 2021 onwards, par. 3A of article 27 of the ITC 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 (5) 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 2022 and 2021 (Bulgaria: 10%, Romania: 16%, Egypt: 22.5%, Serbia: 15%, Ukraine: 18%, Cyprus: 12.5%, Albania: 15% and United Kingdom: 19%).

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 deferred tax assets 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 and the Bank for the years ended 31 December 2022 and 2021 amounted to € 6 million and € 6 million, respectively and has been charged within line item "net other income/ (expenses)" of the Income Statement.

17 Earnings/(losses) per share

Basic earnings/(losses) per share ("EPS") are calculated by dividing the profit/(loss) after tax attributable to the ordinary shareholders of the Bank 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 - 31/12/2022	1/1 - 31/12/2021
Profit/(loss) for the year attributable to ordinary shareholders of the Bank from continuing operations	814	399
Profit/(loss) for the year attributable to ordinary shareholders of the Bank from discontinued operations	51	(7)
Profit/(loss) for the year attributable to ordinary shareholders of the Bank from continuing and discontinued operations	**864**	**392**
Weighted average number of ordinary shares in issue (basic & diluted earnings/losses)	5,345,329,653	5,375,353,048
Basic & diluted earnings/(losses) per share in € from continuing operations	0.15	0.07
Basic & diluted earnings/(losses) per share in € from discontinued operations	0.01	0.00
Basic & diluted earnings/(losses) per share in € from continuing and discontinued operations	**0.16**	**0.07**

18 Tax effects relating to other comprehensive income / (expense) for the period

Group - Continuing operations	1/1 - 31/12/2022			1/1 - 31/12/2021		
	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	(250)	68	(183)	(150)	46	(104)
Change in currency translation reserve	(4)	-	(4)	2	-	2
Items that will not be reclassified subsequently to profit or loss						
Change in reserve from equity instruments measured at FVTOCI	32	(9)	23	(45)	13	(32)
Change in property revaluation reserve	10	(3)	7	-	-	-
Change in reserve of actuarial gains/ (losses)	10	(3)	7	-	-	-
Other comprehensive income/ (expense) from continuing operations	**(203)**	**53**	**(150)**	**(194)**	**59**	**(135)**

Bank	1/1 - 31/12/2022			1/1 - 31/12/2021		
	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	(250)	68	(183)	(150)	46	(104)
Items that will not be reclassified subsequently to profit or loss						
Change in reserve from equity instruments measured at FVTOCI	32	(9)	23	(45)	13	(32)
Change in property revaluation reserve	10	(3)	7	-	-	-
Change in reserve of actuarial gains/ (losses)	9	(3)	6	(1)	-	(1)
Other comprehensive income/ (expense) from the year	**(200)**	**53**	**(147)**	**(196)**	**59**	**(137)**

19 Cash and balances with central banks

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Cash in hand	691	719	691	718
Deposits in central banks	8,309	14,699	8,309	14,699
Cheques clearing system – central banks	25	66	25	66
Cash and balances with Central Banks (Note 46)	**9,026**	**15,484**	**9,026**	**15,484**
Mandatory reserves with central banks	565	-	565	-
Total Cash and balances with central banks	**9,591**	**15,484**	**9,591**	**15,484**

The variance in line "Deposits in central banks" is mainly due to partial repayment of the ECB funding through TLTRO III. Refer to Note 32 for further details.

The 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. The Bank's mandatory deposits at BoG bear interest set equal to the ECB deposit facility rate (2.0% as of 31 December 2022), while the interest on any excess average balance of the relevant account is zero.

20 Due from banks

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Sight and time deposits with banks	207	158	159	125
Securities purchased under agreements to resell	52	51	52	51
Placements with banks	80	80	80	78
Collateral posted in margin accounts	389	1,042	383	1,042
Total due from banks	**729**	**1,332**	**674**	**1,297**
of which:				
Current	728	1,265	673	1,229
Non-current	1	67	1	67

The decrease of € 653 million for the Group and € 659 million for the Bank in cash posted as collateral margin is mainly attributable to unrealized gains of derivative transactions engaged under ISDA and CSA agreements. Refer to Notes 21 and 32 for further information.

21 Derivative financial instruments

31/12/2022	Group			Bank		
	Notional amount	Fair value		Notional amount	Fair value	
Derivatives held for trading		**Assets**	**Liabilities**		**Assets**	**Liabilities**
IRSs	9,259	616	528	9,259	616	528
Currency swaps	1,454	5	11	1,454	5	11
FX forwards	923	11	18	923	11	18
Options and other derivative instruments	6,805	104	82	6,805	104	82
Cross Currency Interest Rate Swaps	540	17	16	540	17	16
	18,981	**753**	**656**	**18,981**	**753**	**656**
Embedded derivatives	**900**	**-**	**-**	**900**	**-**	**-**
Derivatives held for hedging (fair value hedge)						
IRSs	3,496	1,077	-	3,496	1,077	-
Total	**23,377**	**1,830**	**656**	**23,377**	**1,830**	**656**

31/12/2021	Group			Bank		
	Notional amount	Fair value		Notional amount	Fair value	
Derivatives held for trading		**Assets**	**Liabilities**		**Assets**	**Liabilities**
IRSs	9,414	359	341	9,414	359	341
Currency swaps	1,366	1	20	1,366	1	20
FX forwards	555	3	9	555	3	9
Options and other derivative instruments	5,106	8	11	5,106	8	11
Cross Currency Interest Rate Swaps	379	6	12	379	6	12
	16,820	**377**	**393**	**16,820**	**377**	**393**
Embedded equity derivatives	**900**	**2**	**-**	**900**	**2**	**-**
Derivatives held for hedging (fair value hedge)						
IRSs	6,649	214	-	6,649	214	-
Total	**24,370**	**593**	**393**	**24,370**	**593**	**393**

IRSs mainly include transactions held with the Group's and Bank's clientele and their offsetting positions engaged by the Group and the Bank with other counterparties in order to economically hedge its interest rate risk exposure.

HEDGE ACCOUNTING

Fair Value Hedge accounting

The Group and the Bank enter into IRSs to mitigate the risk of changes in interest rates on the fair value of fixed rate debt securities. Specifically, the Group and the Bank hedge the benchmark interest rate risk component by entering into IRSs with critical terms that match those of the debt instrument hedged. This hedging objective is consistent with the Group's and the Bank's overall interest rate risk management strategy (refer to Note 4.11).

The Group and the Bank assess 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 IRS used to hedge the exposure.

The Group and the Bank have identified the following sources of ineffectiveness:

- Credit risk of the counterparty, which is not offset by the hedged item. The Group and the Bank minimize counterparty credit risk 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 IBOR reform does not have any impact on the active fair value hedge accounting relationships of the Group and the Bank as at 31 December 2022 (refer to Note 4.18).

The maturity profile of IRSs designated by both the Group and the Bank as hedging instruments in fair value hedge accounting relationships, which were effective as of the end of the reporting period, is illustrated below:

31/12/2022	Group and Bank		
	Due between 1 to 5 years	Due after 5 years	Total
Notional amount of IRSs	5	3,491	3,496

31/12/2021	Group and Bank		
	Due between 1 to 5 years	Due after 5 years	Total
Notional amount of IRSs	5	6,644	6,649

The table below summarizes the balance sheet and income statement figures related to IRSs and fixed rate sovereign bonds designated as hedging instruments and hedged items, respectively, in fair value hedge accounting relationships.

31/12/2022	Group and Bank				
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	1,144

31/12/2021	Group and Bank				
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	6,649	214	-	Derivative financial instruments	208

31/12/2022	Group and Bank				
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)	Debt securities at amortised cost	(1,373)
Debt securities at FVTOCI	202	200	n/a	Financial assets at FVTOCI	(52)

31/12/2021	Group and Bank				
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	6,189	7,293	(190)	Debt securities at amortised cost	(190)
Debt securities at FVTOCI	460	612	n/a	Financial assets at FVTOCI	(15)

"Changes in fair value used for calculating hedge ineffectiveness" include also fair value hedge adjustments recognised in Group's and Bank's Income Statement related to discontinued hedges until their de-designation date.

The cumulative amount of fair value hedge adjustments remaining in the statement of financial position of the Group and Bank by reducing the carrying amount of hedged items regarding the discontinued hedge relationships, not included in the figures of the table above, was € 533 million as at 31 December 2022.

The hedge ineffectiveness, determined as the difference between the hedging gains or losses of the hedging instrument and the hedged item, recognised in profit or loss of the Group and the Bank for the period ended 31 December 2022, amounts to gain of € 19 million (31 December 2021: gain of € 3 million).

22 Financial assets at fair value through profit or loss

a) Financial assets at FVTPL

	Group		Bank	
	31/12/2022	**31/12/2021**	**31/12/2022**	**31/12/2021**
Greek government bonds and T-bills	154	445	154	445
Foreign government bonds and T-bills	370	437	370	437
Corporate bonds	4	4	4	4
Equity securities	20	22	-	1
Total	**548**	**908**	**528**	**886**

b) Financial assets mandatorily at FVTPL

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Contingent consideration assets	42	43	42	43
Bonds issued by financial institutions	2	-	2	-
Unlisted shares	33	40	33	40
Mutual Funds	105	113	105	113
Total	**182**	**196**	**182**	**196**

Line item "contingent consideration assets" comprises: i) a performance note issued by Intrum Holding Spain S.A.U. in 2019 with a fair value of € 32 million; and ii) a contingent claim initially recognized in 2021 following the disposal of certain corporate loans included in the Pivot transaction, the fair value of which stood at € 10 million as at 31 December 2022.

23 Loans and advances to customers at amortised cost

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Mortgages	6,877	7,191	6,877	7,191
Consumer/ personal and other loans	1,403	1,486	1,393	1,476
Credit cards	485	490	485	490
Retail Lending	**8,765**	**9,168**	**8,756**	**9,157**
Corporate and Public Sector Lending	**29,435**	**29,054**	**29,990**	**29,876**
Collateralised loan obligations (CLOs)	**502**	**93**	**502**	**93**
Total gross loans and advances to customers at amortised cost	**38,702**	**38,314**	**39,248**	**39,126**
Less: ECL allowance	(1,377)	(1,818)	(1,496)	(1,977)
Total	**37,326**	**36,497**	**37,753**	**37,149**
of which:				
Current	6,136	5,075	7,225	4,958
Non current	31,190	31,421	30,528	32,192

For both the Group and the Bank, the senior notes of the securitizations Phoenix, Vega I, II and III, Sunrise I and II, with a gross carrying amount of € 6,088 million as at 31 December 2022 (31 December 2021: 6,250 million), are included within line item "Corporate and Public Sector Lending" (refer to Note 2.4.18). The ECL allowance on the aforementioned notes is immaterial 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		Bank	
	31/12/2022	**31/12/2021**	**31/12/2022**	**31/12/2021**
Mortgages (grossed up with PPA adjustment)	6,879	7,195	6,879	7,195
Less PPA adjustment	(2)	(4)	(2)	(4)
Mortgages	**6,877**	**7,191**	**6,877**	**7,191**
Consumer/ personal and other loans (grossed up with PPA adjustment)	1,410	1,503	1,400	1,492
Less PPA adjustment	(6)	(17)	(6)	(17)
Consumer/ personal and other loans	**1,403**	**1,486**	**1,393**	**1,476**
Credit cards (grossed up with PPA adjustment)	485	491	485	491
Less PPA adjustment	-	(1)	-	(1)
Credit cards	**485**	**490**	**485**	**490**
Retail Lending (grossed up with PPA adjustment)	8,774	9,188	8,764	9,178
Less PPA adjustment	(9)	(21)	(9)	(21)
Retail Lending	**8,765**	**9,168**	**8,756**	**9,157**
Corporate and Public Sector Lending (grossed up with PPA adjustment)	29,964	29,232	30,520	30,054
Less PPA adjustment	(27)	(85)	(27)	(85)
Corporate and Public Sector Lending	**29,937**	**29,147**	**30,493**	**29,969**
Total gross loans and advances to customers at amortised cost (grossed up with PPA adjustment)	38,738	38,420	39,284	39,232
Less PPA adjustment	(36)	(106)	(36)	(106)
Total gross loans and advances to customers at amortised cost (A)	**38,702**	**38,314**	**39,248**	**39,126**
Less: ECL allowance (grossed up with PPA adjustment)	(1,413)	(1,924)	(1,532)	(2,083)
Less PPA adjustment	36	106	36	106
Less: ECL allowance (B)	**(1,377)**	**(1,818)**	**(1,496)**	**(1,977)**
Net loans and advances to customers at amortised cost (A) + (B)	**37,326**	**36,497**	**37,753**	**37,149**
of which:				
Current	6,136	5,075	7,225	4,958
Non current	31,190	31,421	30,528	32,192

Loans and advances to customers at amortized cost include finance lease receivables, broken down as follows:

Group - Finance lease receivables	**31/12/2022**	**31/12/2021**
No later than one year	231	203
One to five years	436	407
Later than five years	435	467
Gross investment in finance leases	**1,102**	**1,077**
Unearned finance income	(211)	(148)
Net investment in finance leases	**891**	**929**
of which:		
No later than one year	193	179
One to five years	339	341
Later than five years	358	409

As at 31 December 2022, the ECL allowance for finance lease receivables amounted to € 76 million and € 5 million for the Group and the Bank respectively (31 December 2021: € 65 million for the Group and € 5 million for the Bank).

24 Financial assets at FVTOCI

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Greek Government Bonds	237	1,118	237	1,118
Corporate Bonds	286	304	286	304
Bonds issued by financial institutions and foreign governments	305	528	305	528
Greek treasury bills	558	332	558	332
Debt securities at FVTOCI	**1,386**	**2,282**	**1,386**	**2,282**
Equity securities at FVTOCI	**99**	**67**	**99**	**67**
Total financial instruments at FVTOCI	**1,485**	**2,349**	**1,485**	**2,349**
Current debt securities at FVTOCI	560	343	560	343
Non-current debt securities at FVTOCI	826	1,939	826	1,939
Total debt securities at FVTOCI	**1,386**	**2,282**	**1,386**	**2,282**

Refer to Note 4.6 for information on the credit rating and stage allocation of the debt securities classified at FVTOCI.

The Group and the Bank hold certain equity securities designated at FVTOCI, the fair value of which is presented in the following table:

Group and Bank - Fair value of equity securities designated at FVTOCI	31/12/2022	31/12/2021
Attica Holdings S.A.	59	27
Ideal Group	9	9
Atlantic Insurance Public Limited Company	6	7
Other	27	24
Total	**101**	**67**

The equity investment in Attica Holdings S.A. refers to a non-controlling shareholding of 11.8%, previously held by the Bank. In July 2022, the Bank contributed all such shares into Strix Holdings LP in exchange for additional limited partnership interests. Following this transfer, as of 31 December 2022, Strix Holdings LP is the legal owner of the said shares. The transaction did not meet the IFRS 9 derecognition requirements, therefore, the said equity securities are recognized by the Group and the Bank as financial assets measured at FVTOCI. Refer to Note 53 for further information on the corollary mandatory tender offer launched by the Bank on 22 February 2023 to the shareholders of Attica Holdings S.A. holding a total stake of 20.62%.

The movement of debt securities at FVTOCI is summarized below:

	Group			Bank		
	Stage 1	Stage 2	Total	Stage 1	Stage 2	Total
Opening balance at 1/1/2021	**2,681**	**19**	**2,700**	**2,681**	**19**	**2,700**
Additions	4,503	3	4,506	4,503	3	4,506
Coupon collections	(54)	(1)	(55)	(54)	(1)	(55)
Disposals/ maturities	(4,829)	-	(4,829)	(4,829)	-	(4,829)
Interest Income	44	2	46	44	2	46
Foreign exchange differences	1	-	1	1	-	1
Gain/ (loss) from changes in fair value	(87)	-	(88)	(87)	-	(88)
Closing balance 31/12/2021	**2,260**	**22**	**2,282**	**2,260**	**22**	**2,282**
Additions	2,024	-	2,024	2,024	-	2,024
Coupon collections	(37)	(2)	(39)	(37)	(2)	(39)
Disposals/ maturities	(2,710)	(19)	(2,729)	(2,710)	(19)	(2,729)
Transferred from Stage 1 to Stage 2	(9)	9	_	(9)	9	-
Transferred from Stage 2 to Stage 1	4	(4)	-	4	(4)	-
Interest Income	33	2	35	33	2	35
Foreign exchange differences	1	-	1	1	-	1
Gain/ (loss) from changes in fair value	(183)	(5)	(189)	(183)	(5)	(189)
Closing balance 31/12/2022	**1,383**	**3**	**1,386**	**1,383**	**3**	**1,386**

The Group and the Bank recognised in the income statement and OCI an ECL allowance on debt securities measured at FVTOCI of € 1 million and € 11 million for the period ended 31 December 2022 and 2021, respectively. As at 31 December 2022, the ECL allowance on debt securities classified in Stage 1 and Stage 2 amounted to € 8 million and € 4 million, respectively (31 December 2021: € 15 million and € 2 million, respectively).

25 Debt securities at amortised cost

The Group's and the Bank's portfolio mainly consists of foreign and domestic sovereign bonds, the vast majority of which have a residual maturity higher than 12 months as of the reporting date.

During the year, the Group purchased debt securities measured at amortised cost of total nominal value € 2,679 million, of which € 2,175 million relates to GGBs and € 301 million to foreign sovereign bonds. The impact of fair value hedge accounting on the debt securities measured at amortised cost was a loss of € 1,373 million, which was offset by the valuation gain of the hedging derivatives (refer to Note 21).

The Group and the Bank recognised during the year ended 31 December 2022 loss of € 16 million related to the derecognition of debt securities measured at amortised cost, mainly attributable to disposal of GGBs of nominal value € 80 million. The aforementioned disposals are in consistency with HTC business model based on Group's authorized thresholds.

As at 31 December 2022, the entire population of securities is classified in Stage 1 and the resulting ECL allowance amounted to € 23 million for the Group and the Bank (31 December 2021 amounted to € 19 million for the Group and the Bank). For more information on the credit rating of the portfolio, refer to Note 4.6.

During the third quarter of 2022, the Executive Committee approved the termination of the business line of acquiring debt securities issued by corporations and financial institutions for the purposes of trading, due to the significant operational restructuring triggered by the acquisition of Iolcus. Specifically, on 18 July 2022, the Bank publicly announced the formation of the new WAM Division, with the business objective of offering specialized asset management services to its clientele. The Bank's former "Economics & Investment Strategy" Unit comprising the "Investment Strategy", "Portfolios", "Global Economics" and "Greek & Sectoral Economics" functions, was transferred from PFM to WAM and renamed to "Economic Research and Analysis Unit" ("ERAU"). The change was significant to the Group's operations, given that the FTE transferred approximate 40% of PFM's total headcount. To this effect, a more passive investment approach mainly focusing on the credit quality of the issuers and specifically their ability to pay coupons and repay capital at maturity, i.e. a hold-to-collect business model, applies. Such change in the objective of the business model required reclassification of all affected financial assets from FVTOCI to amortised cost, in accordance with IFRS 9.

The nominal value and carrying amount of the debt securities affected by the aforementioned change of business model is € 672 million and € 667 million as of the reclassification date, respectively. The reclassification date for the Group and the Bank is 1 January 2023. Refer to Note 53 for further information.

As disclosed in Note 2.4.15, henceforth, debt securities issued by corporations and financial institutions will be acquired by the Group solely for HTC purposes and classified at amortised cost, unless they fail the SPPI test.

26 Investments in consolidated companies

The Group's and the Bank's investments in consolidated companies as at 31 December 2022, are provided below:

A. Subsidiaries (full consolidation method)

a/a	Name of Company	Activity	Country	Unaudited tax years [1]	Group	Bank
					% holding	% holding
1.	Piraeus Leasing Single Member S.A.	Financial leasing	Greece	-	100.00%	100.00%
2.	Sunshine Leases Single Member S.A.	Financial leasing	Greece	-	100.00%	100.00%
3.	Piraeus Property Real Estate Management Single Member S.A.	Property management	Greece	-	100.00%	100.00%
4.	Dynamic Asset Operating Leasing S.A.	Operating leasing	Greece	2017-2022	100.00%	-
5.	Geniki Single Member S.A. Financial & Consulting Services	Financial & consulting services	Greece	2017-2022	100.00%	100.00%
6.	Piraeus Securities S.A.	Stock exchange services	Greece	2017-2022	100.00%	100.00%
7.	Piraeus Factoring Single Member S.A.	Corporate factoring	Greece	2017-2022	100.00%	100.00%
8.	Piraeus Capital Management Single Member S.A.	Management of venture capital fund	Greece	2017-2022	100.00%	100.00%

a/a	Name of Company	Activity	Country	Unaudited tax years [1]	Group	Bank
					% holding	% holding
9.	Piraeus Jeremie Technology Catalyst Management Single Member S.A.	Management of venture capital fund	Greece	2017-2022	100.00%	100.00%
10.	Piraeus Asset Management Single Member M.F.M.C. S.A.	Mutual funds management	Greece	2017-2022	100.00%	100.00%
11.	Geniki Information Single Member S.A.	Assessment and collection of commercial debts	Greece	2017-2022	100.00%	100.00%
12.	Achaia Clauss Estate S.A.	Property management	Greece	2017-2022	75.76%	75.76%
13.	Kosmopolis A' Shopping Centers Single Member S.A.	Shopping center's management	Greece	2017-2022	100.00%	100.00%
14.	ND Development Single Member S.A.	Property management	Greece	2017-2022	100.00%	100.00%
15.	New Up Dating Development Real Estate and Tourism Single Member S.A.	Property, tourism & development company	Greece	2017-2022	100.00%	100.00%
16.	Picar Single Member S.A.	City Link areas management	Greece	2017-2022	100.00%	100.00%
17.	P.H. Development	Property management	Greece	2017-2022	100.00%	100.00%
18.	General Construction and Development Co. S.A.	Property development/ holding company	Greece	2017-2022	66.66%	66.66%
19.	Entropia Ktimatiki S.A.	Property management	Greece	2017-2022	66.70%	-
20.	Komotini Real Estate Development Single Member S.A.	Property management	Greece	2017-2022	100.00%	100.00%
21.	Piraeus Development Single Member S.A.	Property management	Greece	2017-2022	100.00%	100.00%
22.	Piraeus Real Estate Single Member S.A.	Construction company	Greece	2017-2022	100.00%	100.00%
23.	Pleiades Estate Single Member S.A.	Property management	Greece	2017-2022	100.00%	100.00%
24.	Mille Fin S.A.	Trading of boat vehicles, cars and equipment	Greece	2017-2022	100.00%	100.00%
25.	Multicollection S.A.	Assessment and collection of commercial debts	Greece	2009-2022	51.00%	51.00%
26.	Piraeus Direct Solutions Single Member S.A.	Financial - telecommunication & IT services	Greece	2017-2022	100.00%	100.00%
27.	Centre of Sustainable Entrepreneurship Excelixi Single Member S.A.	Consulting Services - Hotel - Training & Seminars	Greece	2017-2022	100.00%	100.00%
28.	PROSPECT M.C.P.Y.	Yachting management	Greece	2017-2022	100.00%	-
29.	Ianos Properties Single Member S.A.	Property management	Greece	2017-2022	100.00%	100.00%
30.	Lykourgos Properties Single Member S.A.	Property management	Greece	2017-2022	100.00%	100.00%
31.	Thesis Hermes Single Member S.A.	Property management	Greece	2022	100.00%	100.00%
32.	Thesis Agra Single Member S.A.	Property management	Greece	2022	100.00%	100.00%
33.	Thesis Cargo Single Member S.A.	Property management	Greece	2022	100.00%	100.00%
34.	Thesis Schisto Single Member S.A.	Property management	Greece	2022	100.00%	100.00%
35.	Thesis Stone Single Member S.A.	Property management	Greece	2022	100.00%	100.00%

a/a	Name of Company	Activity	Country	Unaudited tax years (1)	Group % holding	Bank % holding
36.	Trastor Real Estate Investment Company	Real estate investment property	Greece	2017-2022	98.32%	98.32%
37.	Sinoris Single Member S.A.	Property management	Greece	-	100.00%	100.00%
38.	Iolcus Investments Alternative Investments Funds Managers S.A.	Alternative investments funds management	Greece	2017-2022	100.00%	100.00%
39.	Neoris Single Member S.A.	Property management	Greece	-	100.00%	100.00%
40.	Aleva Single Member S.A.	Property management	Greece	-	100.00%	100.00%
41.	Arpis Single Member S.A.	Property management	Greece	-	100.00%	100.00%
42.	Tirana Leasing Sh.A.	Finance leases	Albania	2018-2022	100.00%	100.00%
43.	Cielo Consultancy Sh.P.K.	Property management	Albania	2014-2022	99.09%	-
44.	Beta Asset Management EOOD	Rent and management of real estate	Bulgaria	2013-2022	100.00%	-
45.	Bulfina E.A.D.	Property management	Bulgaria	2008-2022	100.00%	100.00%
46.	Bulfinace E.A.D.	Property management	Bulgaria	2008-2022	100.00%	-
47.	Delta Asset Management EOOD	Real estate development	Bulgaria	-	100.00%	-
48.	Varna Asset Management EOOD	Real estate development	Bulgaria	2014-2022	100.00%	-
49.	Asset Management Bulgaria EOOD	Travel - rental services and property management	Bulgaria	2012-2022	100.00%	-
50.	Besticar Bulgaria EOOD	Receivable's collection	Bulgaria	2012-2022	100.00%	-
51.	Besticar EOOD	Receivable's collection	Bulgaria	2012-2022	100.00%	-
52.	Emerald Investments EOOD	Property management	Bulgaria	2018-2022	100.00%	-
53.	Piraeus Nedvizhimi Imoti EOOD	Property management	Bulgaria	-	100.00%	-
54.	Ekaterina Project EOOD	Property management	Bulgaria	-	100.00%	-
55.	Botstile EOOD	Property management	Bulgaria	-	100.00%	-
56.	Euroinvestment & Finance Public Ltd	Asset management, real estate operations	Cyprus	2018-2022	88.69%	88.69%
57.	R.E. Anodus Two Ltd	Holding and investment company	Cyprus	2013-2022	99.09%	99.09%
58.	Tellurion Ltd	Holding company	Cyprus	2013-2022	100.00%	100.00%
59.	Tellurion Two Ltd	Holding company	Cyprus	2015-2022	99.09%	-
60.	Trieris Two Real Estate LTD	Holding, Investment and Real Estate Portfolio Management	Cyprus	2011-2022	100.00%	100.00%
61.	R.E. Anodus Ltd	Consultancy services for real estate development and investments	Cyprus	2014-2022	100.00%	100.00%
62.	Lakkos Mikelli Real Estate Ltd	Property management	Cyprus	2018-2022	50.44%	40.00%
63.	Philoktimatiki Public Ltd	Land and property development	Cyprus	2018-2022	52.18%	6.39%
64.	Sunholdings Properties Company Ltd	Land and property development	Cyprus	2018-2022	26.09%	-
65.	Philoktimatiki Ergoliptiki Ltd	Construction company	Cyprus	2018-2022	52.18%	-
66.	Akinita Ukraine LLC	Real estate development	Ukraine	2014-2022	100.00%	-
67.	Sinitem LLC	Sale and purchase of real estate	Ukraine	2013-2022	99.94%	-
68.	Solum Enterprise LLC	Property management	Ukraine	2012-2022	99.94%	-
69.	Solum Limited Liability Company	Property management	Ukraine	2018-2022	99.94%	-

a/a	Name of Company	Activity	Country	Unaudited tax years (1)	Group % holding	Bank % holding
70.	Piraeus Leasing Romania S.A.	Monitoring and collection services for loans disbursed by the company	Romania	2003-2022	100.00%	100.00%
71.	Daphne Real Estate Consultancy SRL	Real estate development	Romania	2014-2022	99.09%	-
72.	Proiect Season Residence SRL	Real estate development	Romania	2018-2022	100.00%	-
73.	R.E. Anodus SRL	Real estate development	Romania	2013-2022	99.09%	-
74.	Piraeus Rent Doo Beograd	Operating leases	Serbia	2007-2022	100.00%	100.00%
75.	Piraeus Real Estate Egypt LLC	Property management	Egypt	2011-2022	100.00%	99.90%
76.	Trieris Real Estate Management Ltd	Management of real estate companies	British Virgin Islands	-	100.00%	100.00%
77.	Piraeus Group Finance PLC	Debt securities' issuance	United Kingdom	-	100.00%	100.00%
78.	Praxis I Finance PLC	SPV for securitization of consumer loans	United Kingdom	-	-	-
79.	Piraeus SNF DAC	SPV for securitization of corporate, mortgage and consumer loans	Ireland	-	-	-
80.	Sunrise III NPL Finance DAC	SPV for securitization of corporate loans	Ireland	-	-	-
81.	Magnus NPL Finance DAC	SPV for securitization of corporate loans	Ireland	-	-	-

Note [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 78 - 81 are SPVs for securitization of loans and advances to customers and issuance of debt securities. The investment numbered 64 is a subsidiary due to majority representation in the Bank's Board of Directors.

Furthermore, as at 31 December 2022 the subsidiaries duly numbered 5, 11, 24, 25, 42 and 78 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 Bank's investments in subsidiaries during the year is provided below:

	Bank	
	31/12/2022	31/12/2021
Opening balance	399	591
Additions	166	3
Participation in share capital increases/ decreases of subsidiaries	3	3
Disposals and derecognitions	(227)	(194)
Impairment charge	(2)	(2)
Transfers to associates	-	(2)
Transfers from associates	176	-
Closing balance	**515**	**399**

Disposal of the merchant acquiring business unit

On 15 March 2022, the Bank completed the sale of its merchant acquiring business to Euronet Worldwide that was demerged by way of hive-down and contributed into a newly established legal entity, after obtaining the required regulatory approvals, for a total consideration of € 300 million. The Group's gain from the transaction amounted to € 282 million and was recognized in line item "Net gains/ (losses) from loss of control over subsidiaries/ disposal of associates and joint ventures" of the Income Statement.

Acquisition of Trastor Real Estate Investment Company S.A.

On 21 January 2022, the Bank reached an agreement with WRED LLC ("WRED"), a company affiliated with Värde Partners, for the acquisition of WRED's approximately 52% stake in Trastor Real Estate Investment Company S.A. ("Trastor"). The transaction was completed on 28 February 2022, after receiving the required regulatory approvals, as well as the consent of the HFSF. The cash consideration of the transaction amounted to € 98 million (€ 1.25 per share).

The acquisition of Trastor underpins the Group's strategy for accretive return-on-capital actions and entails the following key benefits: i) immediate enhancement of the fee generating pools of the Group; ii) capture of the dynamics of the Greek real estate market, especially in the segments of prime office and logistic spaces where Trastor is mainly focused; and iii) strengthening of the Group's capabilities in real estate platforms in Greece.

The fair value of each major class of assets acquired and liabilities assumed as at the acquisition date is provided below:

	Trastor Real Estate Investment Company
ASSETS	
Due from banks	10
Investment property	327
Other assets	6
Total Assets	**343**
LIABILITIES	
Due to banks	72
Other liabilities	23
Total Liabilities	**95**
Shareholders' equity	248
Total liabilities and shareholders' equity	**343**
Goodwill recognized	
Cash consideration	98
Effective settlement of pre-existing relationships	66
Non controlling interest	6
Previously held interest	81
	251
Fair value of identifiable net assets	248
Goodwill	**3**

The Group recognized the resulting goodwill within line item "Intangible Assets" in the Statement of Financial Position. The remeasurement at fair value of the previously held interest in Trastor resulted to a gain of approximately € 2 million.

The table below presents: (a) Trastor's post-acquisition total net income and profit before tax that is included in the consolidated income statement for the year ended 31 December 2022 and (b) the total net income and profit before tax which would have been included in the consolidated income statement had the acquisition occurred on 1 January 2022.

	Post acquisition results up to 31 December 2022 (a)	Results of Trastor for the year ended 31 December 2022 (b)
Total net income	39	42
Profit before income tax	31	32

For the period from 1 January 2022 up to the acquisition date, the Group's share (44.75%) in Trastor's total net income and profit before income tax was € 1 million and € 1 million, respectively.

Piraeus Bank acquired an additional 1.6% stake in Trastor in the context of a mandatory tender offer that was completed in June 2022.

Annual financial statements of subsidiaries

The annual financial statements of the Bank and its subsidiaries for the year ended 31 December 2022, which have been issued prior to approval of the Annual Financial Statements, are available on the web site of Piraeus Financial Holdings S.A. 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 web site of Piraeus Financial Holdings S.A. 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 2022, the Group controlled, thus, consolidated two (2) SPVs, namely Sunrise III NPL Finance DAC and Magnus NPL Finance DAC, which were established for the securitization of the respective NPE portfolios. As at 31 December 2022, the underlying loans of Sunrise III NPL Finance DAC are recognized on the Group's statement of financial position, whilst Magnus NPL Finance DAC consists of legal claims that had already been written off from the Group's Statement of Financial Position at the date of their securitization.

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:

Company name	Outstanding amount of debt securities held	
	31/12/2022	31/12/2021
Sunrise III NPL Finance DAC	174	-
Magnus NPL Finance DAC	11	-
Total	**185**	**-**

Interests in unconsolidated structured entities

As at 31 December 2022, 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 € 2 billion, while the clientele includes 59,852 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 2022, the Bank's assets in open-ended mutual funds are valued at € 104 million according to the table below:

Mutual funds	Total Assets	
	31/12/2022	31/12/2021
Domestic Mutual Funds	58	28
Abroad Mutual Funds	46	84

The following table presents the carrying amount of the mutual funds' assets that the Group manages, per asset class, as at 31 December 2022 and 2021:

Mutual funds	Total Assets	
	31/12/2022	31/12/2021
Equity funds	393	368
Balanced funds	156	198
Bonds funds	778	685
Money Market funds	198	215
Fund of Funds	518	602
Total	**2,043**	**2,068**

Within 2021, the Group completed the securitization of Phoenix, Vega, Sunrise I and Sunrise II NPE portfolios, through six (6) SPVs, namely "Phoenix NPL Finance DAC", "Vega I NPL Finance DAC", "Vega II NPL Finance DAC", "Vega III NPL Finance DAC", "Sunrise I NPL Finance DAC" and "Sunrise II NPL Finance DAC". The establishment of the SPVs was in the context of the Group's NPE de-risking plan which utilized the HAPS scheme pursuant to law 4649/2019.

The NPE portfolios were transferred to the SPVs, on or after their establishment, and the SPVs issued three (3) tranches 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 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	
	31/12/2022	31/12/2021
Loans and advances to customers at amortised cost		
Senior Notes	6,075	6,236
Loans and advances to customers mandatorily measured at FVTPL		
Mezzanine and Junior Notes [1]	6	34

[1] As at 31 December 2021 the Group held 49% of the Mezzanine and Junior Notes issued by Sunrise I NPL Finance DAC and Sunrise II NPL Finance DAC.

B. Associates and joint ventures (equity accounting method)

B.1 Associates

The Group's and the Bank's associates as at 31 December 2022 are the following:

s/n	Name of Company	Activity	Country	Unaudited tax years [1]	Group	Bank
					% Holding	% Holding
1	Piraeus - TANEO Capital Fund	Close end venture capital fund	Greece	-	50.01%	50.01%
2	PJ Tech Catalyst Fund	Close end venture capital fund	Greece	-	30.00%	30.00%
3	APE Commercial Property Real Estate Tourist and Development S.A.	Holding company	Greece	2017-2022	27.80%	27.80%
4	Marfin Investment Group Holdings S.A.	Holding company	Greece	2017-2022	31.19%	31.19%
5	Omicron Cyclos Ena Symmetohiki S.A. [2]	Holding company	Greece	2017-2022	28.10%	28.10%
6	APE Fixed Assets Real Estate Tourist and Development S.A.	Real estate, development/ tourist services	Greece	2017-2022	27.80%	27.80%
7	APE Investment Property S.A.	Real estate, development/ tourist services	Greece	2017-2022	28.92%	28.92%
8	Olganos Real Estate S.A.	Property management/electricity production from renewable energy resources	Greece	2017-2022	32.27%	32.27%
9	Pyrrichos S.A.	Property management	Greece	2017-2022	55.95%	55.95%
10	Exodus S.A.	Information technology & software	Greece	2017-2022	49.90%	49.90%
11	Evros Development Company S.A.	European community programs management	Greece	2017-2022	30.00%	30.00%
12	Gaia S.A.	Software services	Greece	2017-2022	24.92%	-
13	Crete Scient & Tech. Park Manag. & Dev. Co. S.A.	Scientific and technology park management	Greece	2017-2022	30.45%	30.45%
14	Intrum Hellas REO Solutions S.A.	Real estate	Greece	2019-2022	19.96%	19.96%
15	Intrum Hellas Credit Servicing S.A.	Credit and loan servicing	Greece	2019-2022	20.00%	20.00%

s/n	Name of Company	Activity	Country	Unaudited tax years [1]	Group	Bank
					% Holding	% Holding
16	Teiresias S.A.	Interbanking company of development, operation and management of information systems	Greece	2017-2022	23.53%	23.53%
17	Piraeus Direct Services S.A.	Support & e-commerce services, trade of time renewal cards	Greece	2017-2022	49.90%	49.90%
18	ANEK Lines S.A.	Maritime transport - Coastal shipping	Greece	2019-2022	27.68%	27.68%
19	Perigenis Business Properties S.A.	Property management	Greece	2020-2022	20.61%	20.61%
20	Neuropublic S.A.	Development and management of information systems	Greece	2021-2022	5.00%	5.00%
21	Abies S.A. [2]	Property management	Greece	2017-2022	40.14%	40.14%
22	ETVA Industrial Parks S.A.	Development/ management of industrial areas	Greece	2017-2022	1.00%	1.00%
23	Euromedica Societe Anonyme for provision of Medical Services	Hospital and health services	Greece	2021-2022	29.35%	29.35%
24	Trieris Real Estate Ltd	Property management	British Virgin Islands	2018-2022	26.35%	26.35%
25	Strix Holdings LP	Holdings limited partnership	Ireland	-	100.00%	100.00%
26	Strix Asset Management Ltd	Asset management	Ireland	-	25.00%	25.00%
27	Strix Holdings NC LP [3]	Holdings limited partnership	Ireland	-	100.00%	100.00%

Note [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.

Note [2]: Placed under liquidation as of 31 December 2022.

Note [3]: Renamed to Strix Holdings LP II effective from 20 February 2023.

The Group's associate NGP Plastic S.A., is immaterial to the Group's financial position and results of operations, therefore, is not accounted for under the equity method but recognised at cost. The contribution of this non-significant associate is approximately 0.2%, 0.03% and 0.03% of the Group's total net income, total equity and total assets, respectively, based on the most recent financial statements obtained.

The Group exercises significant influence but does not control any of the companies listed above as at 31 December 2022. This holds even for the entities duly numbered 1, 9, 25 and 27, where the Group's shareholding exceeds 50%. Significant influence also exists in the companies duly numbered 14, 20 and 22, where the Group's shareholding does not exceed 20%.

In June 2022, Strix Holdings (GP) Limited ("Strix GP"), an entity controlled by Blantyre Capital Limited ("Blantyre"), established a limited partnership in Ireland under the name Strix Holdings NC LP. In December 2022, the Bank became the sole limited partner of Strix Holdings NC LP and executed an agreement, under which certain equity investments (i.e. Piraeus Equity Partners Limited, Euroterra Real Estate Company, Rebicat Real Estate Company, Euroak Real Estate Company and Imithea Single Member S.A.) will be transferred from Strix Holdings LP to Strix Holdings NC LP. The transfer of the said investments was reflected as a reclassification of € 246 million between the carrying amount of the Bank's investment in Strix Holdings LP and Strix Holdings NC LP as of 31 December 2022. No gain or loss was recognized by the Group as a result of this reclassification. Strix Holdings LP and Strix Holdings NC LP are material associates of the Group.

As of 31 December 2022, Piraeus Bank had committed to Strix GP that certain non-core assets with a total carrying value of € 157 million in Piraeus Bank's standalone financial statements shall be placed under professional management by 15 June 2023.

B.2 Joint ventures

The Group's and the Bank's joint ventures as at 31 December 2022 are the following:

s/n	Name of Company	Activity	Country	Unaudited tax years [1]	Group	Bank
					% Holding	% Holding
1	AEP Elaiona S.A.	Property management	Greece	2017-2022	50.00%	-
2	Peirga Kythnou P.C.	Real estate	Greece	2019-2022	50.00%	50.00%
3	Sunrise III Real Estate Single Member S.A.	Property management	Greece	-	100.00%	100.00%

Note [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 interests in non-significant associates and joint ventures as at 31 December 2022 and 2021, amounted to € 191 million and € 278 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 2022 and 2021. 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	2022	2021
Share of profit/ (loss) of associates and joint ventures, after tax	29	18
Total comprehensive income	**29**	**18**

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 2022 amounted to € 49 million (31 December 2021: € 38 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 recognized.

There are no significant contingent liabilities relating to the Group's participation in associates and joint ventures.

There are no unrecognised commitments of the Group related to its participation in joint ventures and associates that could result in future outflow of cash or other resources.

There are no significant restrictions in the ability of associates or joint ventures to transfer resources to the Bank in the form of dividends or to repay lending facilities granted by the Group, apart from the customary restrictions imposed on their framework of operation and the applicable legislation.

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		Bank	
	31/12/2022	31/12/2021 As reclassified	31/12/2022	31/12/2021 As reclassified
Opening balance	630	269	603	252
Contribution of equity interests	135	358	135	358
Disposals	(1)	-	-	-
Share of profit/ (loss) of associates and joint ventures, after tax	29	18	-	-
Contribution of debt assets	329	-	329	-
Acquisition of controlling interests	(79)	-	(78)	-
Impairment	(2)	(23)	(5)	(27)
Foreign exchange differences and other adjustments	(18)	8	(3)	20
Closing balance	**1,023**	**630**	**981**	**603**

In 2022, Piraeus Bank contributed its entire shareholding in subsidiary Imithea Single Member S.A. into Strix Holdings LP. Refer to Note 14 for further information. The carrying amount of the Bank's investment in Strix Holdings LP increased by € 135 million and the Group recognised a gain from loss of control over Imithea Single Member S.A. of € 55 million.

In November 2022, Piraeus Bank contributed into Strix Holdings LP, two (2) bond loans of total carrying value € 329 million due from Marfin Investment Group Holdings S.A. ("MIG"), in exchange for additional limited partnership interests in Strix Holdings LP. As a result of this contribution, Piraeus Bank's cost of investment in Strix Holdings LP increased by an equivalent amount and no gain or loss was recognized by the Group.

The decrease in the carrying amount of the Group's investments in associates and joint ventures of € 79 million refers to the previously held interest in Trastor that was accounted for as an associate and which increased to a controlling interest on 8 February 2022 through a business combination. Refer to Note 26A for further information.

Basic financial information of the associates and the joint ventures for 2022 and 2021

			31/12/2022				
s/n	Name of 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	Marfin Investment Group Holding S.A.	Greece	31.19%	*	*	*	*
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%	*	*	*	*
24	Perigenis Business Properties S.A.	Greece	20.61%	-	-	47	-
25	Strix Holdings LP	Ireland	100.00%	16	-	587	-
26	Strix Asset Management Limited	Ireland	25.00%	-	-	7	-
27	Strix Holdings NC LP	Ireland	100.00%	-	-	250	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%	-	-	-	-

(*) As of the date that the BoD approved the Annual Financial Statements, the listed associated companies Marfin Investment Group Holdings S.A. and ANEK Lines S.A., had not published their annual financial statements for 2022.

s/n	Name of Company	Country	31/12/2021				
			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%	-	-	1	1
3	APE Commercial Property Real Estate Tourist and Development S.A.	Greece	27.80%	-	-	6	-
4	APE Fixed Assets Real Estate Tourist and Development S.A.	Greece	27.80%	-	-	48	5
5	Trieris Real Estate LTD	British Virgin Islands	32.35%	-	-	5	1
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%	-	2	3	4
9	Piraeus - TANEO Capital Fund	Greece	50.01%	2	-	3	-
10	Teiresias S.A.	Greece	23.53%	-	15	14	12
11	PJ Tech Catalyst Fund	Greece	30.00%	3	-	15	-
12	Pyrrichos S.A.	Greece	55.95%	(2)	-	6	20
13	Piraeus Direct Services S.A.	Greece	49.90%	-	20	5	2
14	Gaia S.A.	Greece	26.00%	-	23	12	7
15	Olganos S.A.	Greece	32.27%	(1)	-	7	10
16	Abies S.A.	Greece	40.14%	-	-	-	-
17	ETVA Industrial Parks S.A.	Greece	1.00%	-	-	215	-
18	Euromedica Societe Anonyme for provision of medical services	Greece	29.35%	-	-	145	136
19	Neuropublic S.A.	Greece	5.00%	(1)	6	19	8
20	Exus Software Ltd	United Kingdom	49.90%	-	7	12	11
21	Marfin Investment Group Holding S.A.	Greece	31.24%	(26)	367	1,223	1,115
22	Intrum Hellas REO Solutions S.A.	Greece	19.96%	26	31	78	15
23	Intrum Hellas Credit Servicing S.A.	Greece	20.00%	51	183	654	264
24	Trastor Real Estate Investment Company	Greece	44.75%	23	37	355	174
25	ANEK Lines S.A.	Greece	27.68%	(40)	126	281	321
26	Perigenis Business Properties S.A.	Greece	20.61%	-	-	48	-
27	Strix Holdings LP	Ireland	100.00%	-	-	350	-
28	Strix Asset Management Limited	Ireland	25.00%	-	-	32	-
29	AEP ELAIONA S.A.	Greece	50.00%	(2)	-	111	110
30	Peirga Kythnou P.C.	Greece	50.00%	-	-	4	-
31	Sunrise I Real Estate Single Member S.A.	Greece	100.00%	-	-	33	33
32	Sunrise II Real Estate Single Member S.A.	Greece	100.00%	-	-	-	-
33	Sunrise I NPL Finance DAC	Ireland	-	-	-	2,539	2,539
34	Sunrise II NPL Finance DAC	Ireland	-	-	-	1,279	1,279

27 Intangible assets

	Group				Bank			
	Goodwill	Software	Other intangible	Total	Goodwill	Software	Other intangible	Total
Cost								
At 1 January 2021	38	676	39	753	-	666	36	702
Additions	-	47	-	47	-	47	-	47
Transfers	-	20	-	20	-	19	-	19
Derecognitions	(29)	(1)	(1)	(31)	-	-	-	-
At 31 December 2021	**9**	**742**	**38**	**789**	**-**	**732**	**36**	**768**
Opening balance of newly consolidated companies	9	-	-	9	-	-	-	-
Additions	-	71	-	71	-	70	-	70
Transfers	3	8	-	11	-	8	-	8
At 31 December 2022	**22**	**820**	**38**	**880**	**-**	**810**	**36**	**847**
Accumulated amortisation								
At 1 January 2021	-	**(440)**	**(34)**	(474)	-	**(430)**	**(32)**	(462)
Amortisation charge	-	(51)	(1)	(52)	-	(51)	(1)	(52)
Derecognitions	-	1	1	2	-	-	-	-
At 31 December 2021	**-**	**(490)**	**(34)**	**(524)**	**-**	**(481)**	**(33)**	**(513)**
Amortisation charge	-	(55)	(1)	(55)	-	(54)	(1)	(55)
At 31 December 2022	**-**	**(544)**	**(35)**	**(579)**	**-**	**(535)**	**(33)**	**(568)**
Net book value								
At 31 December 2021	**9**	**252**	**4**	**266**	**-**	**251**	**4**	**255**
At 31 December 2022	**22**	**276**	**3**	**301**	**-**	**275**	**3**	**278**

As of 31 December 2022 the Group's goodwill increased by € 13 million, mainly due to acquisition of controlling interests in Iolcus Investments AIFM S.A. (€ 9 million) and Trastor (€ 3 million). Refer to Note 48a for further information.

28 Property and equipment

Group	Land and buildings	Equipment and other tangible assets	Right of use assets	Assets under construction	Leasehold improvements	Total
Cost						
At 1 January 2021	682	382	177	47	191	1,480
Additions	5	21	12	11	4	52
Transfers	5	-	-	(21)	-	(15)
Disposals and write-offs	(1)	(13)	(11)	(1)	(10)	(36)
Derecognitions	(17)	(69)	(3)	(4)	-	(94)
Impairment	-	(1)	-	-	(11)	(13)
Transfer to held for sale	-	(41)	-	-	-	(41)
At 31 December 2021	**674**	**279**	**175**	**32**	**173**	**1,333**
Acquisition of subsidiaries	62	1	(24)	-	-	40
Additions	5	25	23	5	5	63
Transfers	(226)	-	(10)	(8)	-	(244)
Disposals and write-offs	(2)	(9)	(11)	-	(7)	(29)
Derecognitions	(1)	-	-	-	-	(1)
Revaluations	10	-	-	-	-	10
Impairment	(1)	-	-	-	(3)	(4)
At 31 December 2022	**522**	**295**	**153**	**29**	**169**	**1,168**
Accumulated depreciation						
At 1 January 2021	(76)	(252)	(76)	-	(86)	(490)
Depreciation charge for the year	(8)	(22)	(23)	-	(5)	(57)
Disposals and write-offs	-	12	5	-	10	27
Derecognitions	13	23	1	-	-	37
Transfer to held for sale	-	34	-	-	-	34
At 31 December 2021	**(71)**	**(205)**	**(92)**	**-**	**(82)**	**(450)**
Acquisition of subsidiaries	-	(1)	9	-	-	9
Depreciation charge for the year	(8)	(18)	(17)	-	(5)	(48)
Transfers	14	-	8	-	-	23
Disposals and write-offs	-	8	3	-	6	17
Derecognitions	-	-	-	-	-	-
Other movements	-	4	-	-	-	4
At 31 December 2022	**(65)**	**(211)**	**(89)**	**-**	**(81)**	**(445)**
Net book value						
At 31 December 2021	**603**	**74**	**82**	**32**	**92**	**883**
At 31 December 2022	**457**	**84**	**64**	**29**	**88**	**723**

Bank	Land and buildings	Equipment and other tangible assets	Right of use assets	Assets under construction	Leasehold improvements	Total
Cost						
At 1 January 2021	647	299	172	41	188	1,347
Additions	5	20	11	10	4	49
Transfers	2	-	-	(20)	-	(19)
Disposals and write-offs	(1)	(12)	(11)	(1)	(10)	(36)
Impairment	-	(1)	-	-	(11)	(13)
Transfer to held for sale	-	(41)	-	-	-	(41)
At 31 December 2021	**652**	**265**	**171**	**29**	**170**	**1,287**
Acquisition of subsidiaries	1	-	-	-	-	1
Additions	5	25	15	5	5	55
Transfers	(219)	-	-	(8)	-	(227)
Disposals and write-offs	(2)	(9)	(10)	-	(5)	(26)
Revaluations	10	-	-	-	-	10
Impairment	-	-	-	-	(3)	(3)
At 31 December 2022	**446**	**281**	**177**	**26**	**167**	**1,096**
Accumulated depreciation						
At 1 January 2021	(58)	(219)	(54)	-	(84)	(416)
Depreciation charge for the year	(7)	(18)	(24)	-	(5)	(54)
Disposals and write-offs	-	12	5	-	10	26
Transfer to held for sale	-	34	-	-	-	34
At 31 December 2021	**(65)**	**(192)**	**(74)**	**-**	**(79)**	**(410)**
Depreciation charge for the year	(7)	(18)	(22)	-	(4)	(51)
Transfers	14	-	-	-	-	14
Disposals and write-offs	-	8	2	-	4	15
Other movements	-	4	-	-	-	4
At 31 December 2022	**(58)**	**(198)**	**(93)**	**-**	**(79)**	**(428)**
Net book value						
At 31 December 2021	**587**	**73**	**98**	**29**	**91**	**877**
At 31 December 2022	**388**	**83**	**83**	**26**	**87**	**668**

Refer to Note 26A for information on the subsidiaries acquired in 2022.

At the end of the reporting period the “Right of use assets” includes an amount of € 59 million for the Group (31 December 2021: € 78 million) and € 79 million for the Bank (31 December 2021: 93 million) relating to leases of land and buildings. Line item ”Derecognitions” mainly refers to loss of control over subsidiaries that occurred in 2022. Refer to Note 48 for further information.

29 Investment property

	Group			Bank
	Owned property	Right-of-use assets	Total	Owned property
At 1 January 2021	1,047	71	1,119	440
Net gain/ (losses) from fair value measurement (Note 11)	11	(7)	4	17
Additions	36	-	36	16
Transfers	(1)	-	(1)	6
Disposals and write-offs	(10)	-	(10)	(6)
Other movements	2	-	2	-
Derecognitions	(108)	-	(108)	
At 31 December 2021	**976**	**65**	1,041	**473**
Acquisition of subsidiaries	250	27	278	204
Net gain/ (losses) from fair value measurement (Note 11)	43	(6)	38	23
Additions	66	-	66	4
Transfers	121	2	123	121
Disposals and write-offs	(17)	-	(17)	(2)
Other movements	(4)	-	(4)	-
Derecognitions	(2)	-	(2)	-
At 31 December 2022	**1,434**	**88**	**1,522**	**823**

For information on rental income recognised from investment property, refer to Note 8. Direct operating expenses arising from investment property generating rental income amounted to € 4 million for the Group for the years ended 31 December 2022 and 2021, and € 4 million for the Bank for the year ended 31 December 2022 (31 December 2021: € 3 million), whilst for those investment property that did not generate income the said expenses amounted to € 3 million and € 2 million for the Group and the Bank, respectively, for both 2022 and 2021.

The fair value measurements of investment property are categorized 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 26A for information on the subsidiaries acquired in 2022.

30 Assets held for sale

As at 31 December 2022, the carrying amount of the Group's assets held for sale amounted to € 406 million (31 December 2021: € 435 million), of which € 400 million comprises financial assets – mainly loans and advances to customers. The variance between the figures reported for the Group and the figures reported for the Bank is attributed to intercompany eliminations. Note 5 presents a breakdown of these assets held for sale per business segment, where € 373 million and € 33 million have been reported under "NPE MU" and "Core" reporting segments, respectively. The total loss recognized by the Group in 2022 from writing down the carrying amount of the assets held for sale to fair value less cost to sell, amounted to € 288 million, of which € 283 million and € 5 million charged in line items "ECL impairment losses on loans and advances to customers at amortized cost" and "Impairment (losses)/releases on other assets", respectively.

Held for sale classifications in the current year:

Sunrise III and Solar: Management assessed and concluded that these loan portfolios meet the held for sale classification criteria. For information on the basis and factors applied by Management in its assessment, refer to Note 3.1. As at 31 December 2022 the carrying amount of the Sunrise III and Solar portfolios was written down to € 169 million and € 102 million, respectively.

Other NPE portfolios: Certain NPEs comprising corporate loans were classified as held for sale during the current year, the carrying value of which was written down to € 9 million as at 31 December 2022.

Assets classified as held for sale in prior years:

As of the reporting date, Management reassessed the held for sale criteria of certain NPE portfolios, namely Sunshine, Chios, Trinity IX and Trinity XI (previously designated as Trinity IV) and concluded that they still continue to apply. Management expects that any factors that may have delayed the disposal process will be resolved throughout the next twelve months. As at 31 December 2022 the total carrying amount of the said NPEs amounted to € 127 million (31 December 2021 € 175 million).

Assets sold during the current year:

NPE portfolios: During 2022, the Group disposed certain NPE portfolios namely Dory, Wheel, Trinity IV-B and Trinity X. The profit and loss recognized upon disposal was immaterial. The aggregate carrying value of the aforementioned portfolios was € 234 million as at 31 December 2021.

Merchant acquiring business: On 15 March 2022 Piraeus Bank completed the sale of its merchant acquiring business. The carrying value of the assets disposed was € 27 million as at 31 December 2021. The gain recognized by the Group upon disposal amounted to € 282 million. Refer to Note 26A for further information.

31 Other assets

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Inventories - property	1,391	1,337	1,256	1,014
Accumulated impairment of inventories - property	(131)	(159)	(122)	(110)
Net amount of inventories - property (A)	**1,260**	**1,178**	**1,134**	**904**
Other inventories	70	78	68	74
Accumulated impairment of other inventories	(1)	(1)	-	-
Net amount of other inventories (B)	**69**	**77**	**68**	**74**
Total net amount of inventories (A) + (B)	**1,328**	**1,255**	**1,202**	**978**
Prepaid expenses	44	41	36	38
Accrued income	1	-	-	-
Claims from tax authorities and the Greek State	16	9	-	-
Credit Cards-settlement account	54	70	54	70
Deposit and Investment Guarantee Fund (HDIGF)	582	826	582	826
Other	231	282	217	259
Total other non financial assets	928	1,228	890	1,193
Accumulated impairment of other non financial assets	(40)	(25)	(29)	(14)
Net amount of other non financial assets (C)	**887**	**1,202**	**861**	**1,179**
Claims from the Greek State	596	507	596	506
Credit Cards	84	86	84	86
Accrued income	71	57	70	56
Receivables	101	103	48	205
Other	524	420	464	358
Total financial assets	1,376	1,174	1,262	1,212
ECL allowance of financial assets	(173)	(167)	(111)	(112)
Net amount of financial assets (D)	**1,203**	**1,007**	**1,151**	**1,100**
Other assets (A) + (B) + (C) + (D)	**3,418**	**3,464**	**3,214**	**3,257**
of which (excluding inventory):				
Current	829	763	754	841
Non-current	1,261	1,446	1,258	1,438

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 2022, the carrying amount of inventory property that was written down to its net realizable value amounted to € 650 million for the Group and € 547 million for the Bank (31 December 2021: € 455 million for the Group and € 382 million for the Bank).

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. Due to the increase to the aforementioned amount, the contributions paid by credit institutions to HDIGF increased from 2008 onwards.
- Greek Law 4370/2016 article 25 par. 8, 9 and 10 provides that the Supplementary Deposit Cover Fund ("SDCF"), is considered as a distinct group of assets comprising annual contributions made by the credit institutions, pursuant to paragraph 2 of art. 6 of Greek Law 3714/2008 (A '231). SDCF's assets are assets of the SDCF members credit institutions, based on their respective participation, managed by HDIGF. Each credit institution participating in SDCF has an individual share corresponding to its percentage of participation.
- Article 144 of Greek Law 4972/2022 specified that the SDCF assets will be gradually returned to the credit institutions in three (3) annual installments throughout 2022-2024. The Bank received in December 2022 the first installment, which amounted to € 247 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 ("RS") 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 accrued income.

The credit cards receivable 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 financial assets" for the Group and the Bank in 2022 and 2021.

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)**
ECL impairment charge for the year	-	-	10	**10**
Write-off of impairment losses	-	-	(1)	**(1)**
Other movements	-	-	1	**1**
At 31/12/2022	**1**	**1**	**171**	**173**

Group	Movement in ECL allowance			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1/1/2021	8	11	383	**402**
Transfer to held for sale	-	-	(207)	**(207)**
Reversal of unutilised impairment allowance	(1)	-	(2)	**(3)**
ECL impairment charge for the year	1	-	8	**8**
Financial assets derecognised	(6)	(10)	(16)	**(32)**
At 31/12/2021	**1**	**1**	**165**	**167**

Bank	Movement of ECL allowance			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1/1/2022	1	1	110	**112**
Reversal of unutilised impairment allowance	(1)	-	(11)	**(12)**
ECL impairment charge for the year	1	-	5	**6**
Other movements	-	-	5	**5**
At 31/12/2022	**1**	**1**	**109**	**111**

Bank	Movement in ECL allowance			
	Stage 1	Stage 2	Stage 3	Total
ECL allowance as at 1/1/2021	1	1	317	319
Transfer to held for sale	-	-	(207)	(207)
Reversal of unutilised impairment allowance	-	-	(2)	(2)
ECL impairment charge for the year	-	-	2	2
At 31/12/2021	**1**	**1**	**110**	**112**

Ageing analysis of selective financial assets by product line

Group	Days past due - Gross Carrying Amount											
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	Total
Claims from the Greek State	82	6	2	-	129	375	-	**596**	538	16	42	**596**
Credit cards	84	-	-	-	-	-	-	**84**	84	-	-	**84**
Receivables	291	144	55	34	2	169	-	**696**	514	24	158	**696**
Total	**457**	**151**	**57**	**34**	**131**	**544**	**-**	**1,376**	**1,136**	**40**	**200**	**1,376**

Group	Days past due - Gross Carrying Amount											
31/12/2021 As reclassified	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denounced	Total	Stage 1	Stage 2	Stage 3	Total
Claims from the Greek State	194	104	2	17	1	189	-	**507**	441	13	52	**507**
Credit cards	86	-	-	-	-	-	-	**86**	86	-	-	**86**
Receivables	210	104	13	72	17	162	-	**580**	400	18	162	**580**
Total	**492**	**208**	**15**	**89**	**18**	**351**	**-**	**1,174**	**927**	**30**	**214**	**1,174**

Bank	Days past due - Gross Carrying Amount											
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	Total
Claims from the Greek State	82	6	2	-	129	375	-	**596**	538	16	42	**596**
Credit cards	84	-	-	-	-	-	-	**84**	84	-	-	**84**
Receivables	253	144	55	28	2	99	-	**581**	470	8	103	**581**
Total	**420**	**150**	**58**	**28**	**131**	**475**	**-**	**1,262**	**1,092**	**24**	**145**	**1,262**

Bank	Days past due - Gross Carrying Amount											
31/12/2021 As reclassified	Current	1-30 days	31-90 days	91-180 days	181-365 days	365+ days	Denounced	Total	Stage 1	Stage 2	Stage 3	Total
Claims from the Greek State	194	104	2	17	1	189	-	**506**	441	13	52	**506**
Credit cards	86	-	-	-	-	-	-	**86**	86	-	-	**86**
Receivables	180	250	10	59	13	106	-	**619**	508	4	107	**619**
Total	**460**	**354**	**13**	**76**	**14**	**295**	**-**	**1,212**	**1,035**	**17**	**159**	**1,212**

32 Due to banks

	Group		Bank	
	31/12/2022	**31/12/2021**	**31/12/2022**	**31/12/2021**
Amounts due to ECB and central banks	5,443	14,332	5,443	14,332
Interbank deposits	159	90	159	90
Securities sold to credit institutions under agreements to repurchase	298	286	298	286
Other	1,021	142	909	129
	6,922	**14,850**	**6,809**	**14,837**
of which:				
Current	3,255	14,728	3,242	14,727
Non-current	3,667	122	3,567	110

During the fourth quarter of 2022, the Group made use of the early repayment option granted from ECB and therefore prepaid an amount of € 8.65 billion from the outstanding TLTRO III funds. Additionally, during the second semester of 2022 an amount of € 0.35 billion was also repaid to ECB, upon maturity of the respective transactions.

The increase of € 879 million for the Group and € 780 million for the Bank in category "Other", is mainly attributed to cash collateral received by the Bank in the context of derivative transactions engaged under ISDA and CSA agreements.

The revenue recognised in Net Interest Income, regarding the TLTRO III funding for the year ended 31 December 2022, both for the Group and the Bank, amounted to € 70 million (31 December 2021 € 146 million), including the additional bonus provided for the additional special interest period, given that the Bank met the lending performance requirements between 1 October 2020 and 31 December 2021 (refer to Note 6).

33 Due to customers

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Corporate				
Current and sight deposits	14,127	14,255	14,367	14,521
Term deposits	3,087	2,068	3,087	2,068
Blocked deposits, guarantee deposits and other accounts	324	283	325	283
Total (A)	**17,537**	**16,606**	**17,779**	**16,872**
Retail				
Current and sight deposits	7,650	6,213	7,650	6,213
Savings accounts	25,792	24,318	25,792	24,318
Term deposits	7,202	8,171	7,202	8,171
Blocked deposits, guarantee deposits and other accounts	39	44	39	44
Total (B)	**40,684**	**38,747**	**40,684**	**38,747**
Cheques payable and remittances (C)	**110**	**32**	**110**	**32**
Total Due to customers (A)+(B)+(C)	**58,331**	**55,385**	**58,573**	**55,651**
of which:				
Current	58,314	55,336	58,556	55,602
Non-current	17	49	17	49

As at 31 December 2022, "Due to customers" (excluding cheques payable and remittances) with floating interest rate amounted to € 47.9 billion and € 48.1 billion for the Group and the Bank, respectively, while with fixed rate amounted to € 10.3 billion, for both the Group and the Bank.

34 Debt securities in issue

		Group		Bank	
	Weighted Interest Rate (%)	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Covered Bonds - floating rate - Series 4	3m Euribor + 250bp	-	471	-	471
Senior Preferred Bond	3.875%	501	500	501	500
Senior Preferred Bond	8.250%	349	-	349	-
Total debt securities in issue		**849**	**971**	**849**	**971**

The financial terms of the debt securities held by third party 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 on third party
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%

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 on third party
31/12/2021													
Covered Bonds													
Piraeus Bank S.A.	Floating rate covered bond series 4	Mortgage loans	31-Oct-17	31-Oct-22	EUR	3m Euribor + 250bp/ Quarterly	500	500	-	30	470	471	3m Euribor + 250bp
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	3.875%

On 3 November 2021, Piraeus Bank S.A., issued Senior Preferred Notes of nominal value € 500 million, maturing in November 2027, bearing an annual fixed interest rate of 3.875% for the first five (5) years and reset once thereafter, at the prevailing mid swap rate plus 3.948%. The Senior Preferred Notes, having an embedded issuer call option after five (5) years, may be fully redeemed by the issuer on 3 November 2026 at par, in their entirety, subject to prior regulatory approval. The bond is listed in the Luxembourg Stock Exchange's Euro MTF market. The Senior Preferred Notes were issued under the Euro Medium Term Notes (EMTN) Programme, compliant with the Bank's "Green Bond Framework".

On 31 October 2022, Piraeus Bank S.A. repaid € 500 million of a 5-year Covered Bond Series bearing a floating coupon of 3M Euribor + 250bps (issued in October 2017). The bond was issued under the € 10 billion Covered Bond Programme, privately placed and mainly subscribed by the European Investment Bank, the European Investment Fund and the European Bank for Reconstruction and Development.

On 28 November 2022, Piraeus Bank S.A., issued Senior Preferred Notes of nominal value € 350 million, maturing in January 2027, bearing an annual fixed interest rate of 8.25% for the first 3.5 years and reset once thereafter, at the prevailing mid swap rate plus 5.715% per annum. The Senior Preferred Notes, having an embedded issuer call option after 3.5 years, may be fully redeemed by the issuer on 28 January 2026 at par in their entirety, subject to prior regulatory approval. The bond is listed in the Luxembourg Stock Exchange's Euro MTF market. The Senior Preferred Notes were issued under the Euro Medium Term Notes (EMTN) Programme.

The following table includes the financial terms of debt securities retained by the Group and the Bank at 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
31/12/2022										
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	-	-

Issuer	Description	Underlying Loan Type	Issue Date	Maturity Date	Currency	Weighted Interest Rate/ Coupon Frequency	Nominal value	Outstanding nominal amount	Redemptions	Accumulated Cancellations
31/12/2021										
Covered Bonds										
Piraeus Bank S.A.	Floating rate covered bond Series 3	Mortgage loans	16-Feb-17	16-Nov-23	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-Nov-22	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-23	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-24	EUR	3m Euribor + 150bp / Quarterly	1,000	1,000	-	-

On 10 November 2022, Piraeus Bank S.A. proceeded with amendments to its fully retained Covered Bond Series 3 (issued in February 2017), Series 6 (issued in January 2018) and Series 7 (issued in May 2018) with regards to their maturity dates by 36 months and to the Covered Bond Series 5 (issued in November 2017) by 18 months, respectively.

As at 31 December 2022 and 2021 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 € 3,779 million and € 4,160 million, respectively.

Pursuant to the provisions of Greek Law 4920/2022, which incorporates the Directive (EU) 2162/2019 of the European Parliament and of the Council of 27 November 2019 on the issue of covered bonds and covered bond public supervision, the minimum statutory level of overcollateralization is set to 5% of the nominal value of the Covered bonds' outstanding balances. 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).

35 Other borrowed funds

Group's and Bank's other borrowed funds comprise solely two (2) Tier 2 subordinated Notes of total nominal value € 900 million ("Back-to-Back Tier 2 Notes"), which mirror all material terms of the Tier 2 subordinated notes of nominal value € 400 million and € 500 million issued by Piraeus Financial Holdings in June 2019 and February 2020, respectively.The Back-to-Back Tier 2 Notes are fully subscribed by Piraeus Financial Holdings.

As at 31 December 2022 the carrying value of the said notes for the Group and Bank amounted to € 386 million and € 432 million (31 December 2021: € 378 million and € 409 million, respectively). The Back-to-Back Tier 2 Notes are both callable by Piraeus Bank on 31 December 2025 at par. As the call price of the options is not approximately equal to the amortised cost of the Back-to-Back Tier 2 Notes at the call date, the embedded derivatives are not closely related to their host debt contracts and have been bifurcated (refer to Note 21). Furthermore, the respective Notes bear annual fixed rates of 9.75% and 5.5% for the first five (5) years and reset once thereafter at the prevailing 5 year mid swap rate plus 9.952% and 5.774%, respectively.

36 Other liabilities

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Deferred income	29	23	21	22
Accrued expenses	137	166	133	165
Lease liabilities	103	105	88	102
Liabilities from transactions via DIAS	258	170	258	170
Non-income taxes payable and social security contributions	38	36	33	32
Creditors and suppliers	76	82	67	83
Collections for third parties	193	242	193	242
Liabilities to Parent Entity	1	1	1	1
Other	285	267	138	149
	1,120	**1,092**	**932**	**965**
of which:				
Current	872	705	670	582
Non-current	248	387	262	383

The following table summarises the lease liabilities:

Lease liabilities	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
No later than one year	23	24	22	20
One to five years	64	76	59	63
Later than five years	29	21	14	25
Gross lease liabilities	**115**	**120**	**95**	**107**
Discounting	(13)	(15)	(7)	(6)
Lease liabilities	**103**	**105**	**88**	**102**
of which:				
No later than one year	18	20	20	18
One to five years	56	65	55	59
Later than five years	29	20	14	24

37 Provisions

The movement of the Group's and the Bank's provisions during the year is summarized below:

	Group				Bank			
	Litigations	Other	ECL allowance on credit commitments	Total	Litigations	Other	ECL allowance on credit commitments	Total
At 1 January 2021	**30**	**54**	**117**	**201**	**23**	**53**	**117**	**194**
Provision charge/ (release)	3	21	(14)	11	3	21	(14)	10
Provision utilised	(2)	(73)	-	(75)	(2)	(73)	-	(75)
Other movements	(2)	-	-	(2)	-	-	-	-
At 31 December 2021	**29**	**3**	**103**	**135**	**24**	**2**	**103**	**129**
Provision charge/ (release)	20	27	(11)	36	14	27	(11)	30
Provision utilised	(21)	(26)	-	(47)	(21)	(26)	-	(47)
Other movements	(1)	-	-	(1)	(1)	-	-	(1)
At 31 December 2022	**26**	**4**	**92**	**122**	**16**	**3**	**92**	**112**

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.

Line item "Provision utilised" includes an amount of € 25 million relating to the provision established for VES, utilised during 2022 (refer to Note 40).

38 Tax receivables

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Tax receivables	184	191	183	189
Accumulated impairment of tax receivables	(51)	(51)	(51)	(51)
Net tax receivables	133	139	131	138

Net tax receivables for the Group as at 31 December 2022 amounted to € 133 million (31 December 2021: € 139 million), of which € 131 million are attributable to the Bank, comprising of the following:

a) Receivables from withholding taxes on interest of bonds and treasury bills of € 67 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 € 34 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 € 32 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 next 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 € 28 million arising from corporate bonds, which are refundable by the Greek State.

d) Various other tax claims for the Group and the Bank of € 6 million and € 4 million, respectively.

39 Deferred Taxes

Deferred taxes for the Group and the Bank 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 Bank (Note 16).

Deferred tax assets and liabilities are attributable to the following items:

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Deferred tax liabilities				
Investment property fair value adjustment	10	9	-	-
Other temporary differences	-	-	-	-
Total	10	**9**	-	**-**

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Deferred tax assets				
Pensions and other post retirement benefits	14	20	14	19
Loans and advances to customers	5,066	5,192	5,099	5,175
Derivative financial instruments valuation adjustment	98	(58)	98	(58)
Investment property fair value adjustment	41	7	37	5
Depreciation of property and equipment	(28)	(39)	(80)	(48)
Amortisation of Intangible assets	(16)	(30)	(16)	(30)
Impairment of Greek government bonds (PSI)	1,050	1,105	1,050	1,105
Investments	(103)	(120)	(103)	(120)
Other temporary differences	(190)	(3)	(190)	(4)
Reserve from financial assets at FVTOCI	25	(52)	25	(52)
Total	**5,958**	**6,022**	**5,934**	**5,992**
Net deferred tax asset	**5,948**	**6,013**	**5,934**	**5,992**

DTA on tax losses carried forward are recognised only when it is probable that taxable profits will be available, against which these carried forward tax losses can be utilised. On this base the Group has unused tax losses as at 31 December 2022 of € 151 million (31 December 2021: € 456 million). The Bank has no unused tax losses as at 31 December 2022 (31 December 2021: € 237 million). For the above mentioned unused tax losses, no DTA was recognized in the Statement of Financial Position.

The Group and the Bank have offset the deferred tax assets 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 deferred tax assets and deferred tax liabilities when such taxes relate to the same fiscal authority.

	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Net deferred tax asset at 1/1	**6,013**	**6,239**	**5,992**	**6,235**
Deferred tax benefit / (expense)	(118)	(479)	(111)	(475)
Financial assets at FVTOCI (Note 18)	58	59	58	59
Actuarial gains/ (losses) (Note 18)	(3)	-	(3)	-
Derecognition of subsidiaries	-	21	-	-
Deferred tax of derecognition of Sunrise II portfolio	-	174	-	174
Property revaluation reserve (Note 18)	(3)	-	(3)	-
Net deferred tax asset at 31/12	**5,948**	**6,013**	**5,934**	**5,992**

During 2022, deferred taxation directly recognized in equity for the Group amounts to € 53 million, relating to the valuation of financial assets at FVTOCI, actuarial gains and property revaluation reserve (Note 18).

The deferred tax recognized 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		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Pensions and other post retirement benefits	(3)	(4)	(3)	(4)
Loans and advances to customers	(126)	(298)	(76)	(296)
Derivative financial instruments valuation adjustment	101	9	101	9
Investment property fair value adjustment	34	(12)	32	(12)
Depreciation of property and equipment	14	25	(29)	26
Amortisation of Intangible assets	15	31	15	31
Impairment of Greek government bonds (PSI)	(55)	(55)	(55)	(55)
Investments	17	(69)	17	(69)
Other temporary differences	(133)	(106)	(131)	(105)
Reserve from financial assets at FVTOCI	19	-	19	-
Total	**(118)**	**(479)**	**(111)**	**(475)**

Net deferred tax asset analysis	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Current	250	77	249	74
Non-current	5,708	5,945	5,685	5,918
Total	**5,958**	**6,022**	**5,934**	**5,992**

Net deferred tax liability analysis	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Current	-	-	-	-
Non-current	9	9	-	-
Total	**10**	**9**	**-**	**-**

40 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 company operates and the employee's profession (e.g. Greek law provides for different retirement benefits to salaried employees, wages earners and lawyers). In some cases, certain subsidiaries' bylaws provide 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 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, the 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. In case of disability before the normal retirement age or in case of early retirement no indemnity is provided.

For lawyers based on Law 4194/2013 the benefit paid in case of retirement is 100%. In case of voluntary departure, the benefit paid is: 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 Piraeus Bank S.A. The lump sum benefit is payable when the member is eligible for full pension by the social security fund. The lump sum benefit based on 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 the normal retirement age.

3. Lump Sum Benefit according to employee contracts of Former Nat West Bank Employees

A lump sum benefit is granted to certain employees of former Nat West Bank who work in the Bank, hired prior to 31 December 1991. The lump sum benefit is payable when the employee is eligible for full pension by the social security fund or in case of death. The lump sum benefit is equal to 100% of the retirement benefit according to Greek Law 2112/1920 and Greek Law 4093/2012.

4. Lump Sum Benefit according to the Agreement of Former Macedonia Thrace Bank Employees

A lump sum benefit is granted to former employees of Macedonia Thrace Bank who work in the Bank based on a collective agreement. The lump sum benefit is payable when the member is eligible for full pension from the social security fund.

The lump sum benefit is equal to 100% of the retirement benefit according to the Macedonia Thrace Bank's collective agreement.

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 according to a preset calculation of the liability when the child reaches the age of 25 or earlier under specific prerequisites. In case of death of the child the amount is paid to the parent, in case of departure of the parent from the Bank the amount contributed by the employee and not by the Bank is refunded without interest. If the departure is due to retirement, the plan can be continued and funded by the ex-employee's pension salary, in which case the Bank also continues to pay contributions.

6. Lump Sum Benefit according to the Insurance Policy of certain Key Management Members

The Bank retains an insurance contract regarding the lump sum benefit to be paid to certain members of Management based on a preset calculation of the liability when the employment is terminated in all cases except for fraud.

Piraeus Bank S.A. and Piraeus Bank 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, which have terms to maturity approximating the terms of the related liability.

The employees of the Group and the Bank are entitled to compensation upon termination of service, based on their service, their salary and their classification group.

The benefits paid for the years 2022 and 2021, according to the voluntary redundancy schemes are included in the disclosures for the 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 Bank, broken down by funded and non-funded pension schemes.

Amounts recognised in the Statement of Financial Position	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Pension schemes - funded	4	5	4	5
Other post retirement benefits - non funded	51	70	50	68
Total	**55**	**75**	**54**	**73**

Amounts recognised in Equity	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Funded				
Liability gain /(loss) due to changes in assumptions	1	-	1	-
Total funded	**1**	**-**	**1**	**-**
Non-funded				
Liability gain /(loss) due to changes in assumptions	9	(1)	9	(1)
Liability experience gain/ (loss) arising during the year	(1)	-	(1)	-
Total non-funded	**8**	**(1)**	**8**	**(1)**
Total	**9**	**(1)**	**9**	**(1)**

The difference between the amount of € 58 million relating to Settlement/ Curtailment/ Termination loss/ (gain) for the Group and the Bank and the amount of € 57 million reported as VES cost in Staff Cost (Note 12) is due to provision utilization by € 25 and an additional charge of € 24 million.

Amounts recognised in the Income Statement	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Total pension schemes - funded	-	-	-	-
Other post retirement and termination benefits of non - funded				
Current service cost	4	4	4	4
Settlement/ Curtailment/ Termination loss/ (gain)	58	76	58	74
Total other post retirement and termination benefits of non - funded	**62**	**80**	**62**	**78**
Total	**62**	**80**	**62**	**78**

A) Pension schemes - funded

The net liability in the Statement of Financial Position is determined as follows:

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Present value of funded obligations	5	7	5	7
Fair value of plan assets	(1)	(2)	(1)	(2)
Total	**4**	**5**	**4**	**5**

In funded plans, the Bank follows the recommendations of the insurance company concerning the amount of contributions. The expected contributions to funded post-employment defined benefit plans for the year 2023, amount to € 0.2 million. There are no commitments arising from the law concerning the level of funding for post-employment defined benefit plans provided by the Bank.

The movement of the gross defined benefit obligation is analysed as follows:

	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Opening balance	7	8	7	8
Benefits paid from the fund	(1)	(1)	(1)	(1)
Actuarial (gains)/ losses	(1)	-	(1)	-
Closing balance	**5**	**7**	**5**	**7**

The movement of the fair value of plan assets for the Group and the Bank is analysed as follows:

	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Opening balance	2	2	2	2
Employer contributions	-	1	-	1
Benefits paid from the fund	(1)	(1)	(1)	(1)
Closing balance	**1**	**2**	**1**	**2**
Return on plan assets	-	-	-	-

The plan assets, which are not quoted, are invested as follows:

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Mutual funds	97.6%	88.2%	97.6%	88.2%
Bonds	-	4.6%	-	4.6%
Deposits	2.4%	7.2%	2.4%	7.2%

Below is presented the movement of the net liability of funded pension schemes for the Group and the Bank, broken down into expenses, contributions, benefits and amounts recognized in equity:

	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Opening balance	5	6	5	6
Employer contributions	-	(1)	-	(1)
Amount recognised in equity	(1)	-	(1)	-
Closing balance	**4**	**5**	**4**	**5**

B) Other non-funded post retirement and termination benefits

The amounts recognised in the Statement of Financial Position are analysed as follows:

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Present value of unfunded obligations	51	70	50	68
Liability in the Statement of Financial Position	**51**	**70**	**50**	**68**

An amount of € 4 million included in the balance of the liability as of 31 December 2022, refers to terminations benefits.

The movement in the defined benefit obligation is analysed as follows:

	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Opening balance	70	82	68	79
Current service cost	4	4	4	4
Settlement/ Curtailment/ Termination loss/ (gain)	58	76	58	74
Benefits paid directly by the employer	(72)	(93)	(72)	(90)
Actuarial (gains)/ losses	(8)	1	(8)	1
Other movements	-	-	(1)	-
Derecognition of subsidiaries	(1)	-	-	-
Closing balance	**51**	**70**	**50**	**68**

The movement in the liability recognised in the Statement Financial Position for the Group and the Bank, broken down into expenses, contributions, benefits and amounts recognized in equity is analysed as follows:

	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021	1/1 - 31/12/2022	1/1 - 31/12/2021
Opening balance	70	82	68	79
Total expense recognised in Income statement	62	80	62	78
Benefits paid by the employer	(72)	(93)	(72)	(90)
Amount recognised in equity	(8)	1	(8)	1
Other movements	-	-	(1)	-
Derecognition of subsidiaries	(1)	-	-	-
Closing balance	**51**	**70**	**50**	**68**

The expected weighted average duration of the defined benefit obligation is 5.3 years for the Group and the Bank.

The actuarial assumptions used are as follows:

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Discount rate	3.8%	0.7%	3.8%	0.7%
Price inflation	2.6%	2.1%	2.6%	2.1%
Expected return on plan assets	3.7%	0.4%	3.7%	0.4%
Future increase in salaries	2.0%	2.1%	2.0%	2.1%
Mortality table applied	EVK00, based on Swiss mortality table		EVK00, based on Swiss mortality table	

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 (Bank)		
	Change in the assumptions	Increase	Decrease	Change in the assumptions	Increase	Decrease
Discount rate	+/-0.50%	-2.4%	2.5%	+/-0.50%	-2.4%	2.5%
Future increase in salaries	+/-0.50%	2.2%	-2.1%	+/-0.50%	2.2%	-2.1%
Voluntary withdrawal rate	increase/ decrease by 50%	-0.3%	0.4%	increase/ decrease by 50%	-0.3%	0.4%

The aforementioned sensitivity analysis is based on changing each assumption, while keeping the other assumptions unchanged. However, in an economic environment assumptions do not change independently and are usually affected at the same time. 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 final 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, like the mobility of the employees and the recruitment.

Defined Contribution Plans

Total contributions to social security funds, state run plans and defined contribution plans for 2022 for the Group and the Bank amounted to € 61 million and € 58 respectively (31 December 2021: € 56 million for the Group and € 53 million for the Bank).

Below is a summary of the defined contribution plans of the Group:

1. **Piraeus Bank State Pension Plan**

The Bank’s main post retirement pension plan is a defined contribution plan that is run by the 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.

2. **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 their retirement, and to insured family members.

3. **Piraeus Bank S.A. Private Pension Plan**

In November 2020 the Bank established the Institution for Occupational Retirement, Life and Medical Provision (“IORP”), a Non-Profit Legal Entity of Private law jurisdiction, which aims to provide additional insurance protection to its members, in addition to the main ones provided by social security funds.

With the IORP's establishment, a single fund was created from which all employees will receive a supplementary lump sum, improving their retirement conditions. Employees' participation in the IORP is voluntary and their contribution is optional and it can range from zero up to 20% of the gross monthly salary. The Bank, as employer, contributes to the individual account of the employee an additional 2% of the monthly gross salary for 14 months on an annual basis, valid from the date of registration in the Fund and without obligation to contribute by the employee. Moreover, the Bank retains a defined contribution insurance plan for the payment of an amount at the end of the employment relationship, for certain members of Management, in all cases with the exception of fraud.

4. Piraeus Bank S.A. Child Savings Private Defined Contribution Plans

The Bank offers three (3) defined-contribution plans to its employees in respect of their children, which have the same terms and requirements.

The total amount raised during period of insurance (i.e. employee's and employer's contributions, as well as interest) is paid in the form of a lump sum either to the child in case certain prerequisites are fulfilled, such as child's marriage, employment, 25th year of age and death of employee-parent or to the employee-parent in cases such as departure from the employer due to retirement, participation in voluntary exit scheme, permanent or total disability and death of the insured child. In case of employee's resignation, the employee receives his/her contributions including interest.

5. Piraeus Bank S.A. Private Insurance Health Plan

In addition, the Bank offers to its employees and their families (spouse and children with specific age limits respectively), through IORP, a Life and Health Care Insurance Plan. It includes employee's life insurance, reimbursement in case of employee's permanent and total disability due to accident or serious illness, employee's and/or dependent's hospital care and outpatient care, surgery / hospitalisation allowance, maternity allowance and check-up. The Bank pays monthly premiums to the insurance company, which are fixed for the benefit of health of employee and relatives and a percentage of salary for the benefits of life and disability insurance. In case of insurance in the plan of a spouse or child that is not insured for social health insurance under the employee, the insurance covers the benefits of hospital and outpatient care and the employee pays a monthly fixed amount per insured person, which is deducted from the monthly salary.

6. Domestic Subsidiaries State Pension and State Health Plan

Domestic subsidiaries' main post retirement and health plan is a defined contribution plan that is run by the State sponsored social security fund EFKA. Contribution by the employer and employee to the 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.

7. Defined Contribution Pension Plans of Greek Subsidiaries

Piraeus Asset Management Single Member S.A., Piraeus Leasing Single Member S.A., Sunshine Leases Single Member S.A., Piraeus Direct Solutions Single Member S.A., Piraeus Factoring Single Member S.A. and Piraeus Securities S.A. offer their employees the possibility to participate in Group's IORP. Employee participation in the IORP is voluntary and their contribution is optional: it can range from zero up to 20% of the gross monthly salary. Employer's contribution is 2% of the monthly gross salary for 14 months on an annual basis.

8. Defined Contribution Pension Plans of Foreign Branches and Subsidiaries

For two (2) Cypriot subsidiaries, Philoktimatiki Public Ltd and Philoktimatiki Ergoliptiki Ltd, the employer and employees pay contributions to the State Social Insurance Fund calculated on the basis of the employees' salaries. Additionally, these subsidiaries operate a defined contribution plan, the assets of which are held in a separate fund managed by a Committee. The plan is funded by payments made by the employer and the employees.

9. Private Health Plans of Greek Subsidiaries

Piraeus Leasing Single Member S.A., Sunshine Leases Single Member S.A., Piraeus Real Estate Single Member S.A., Piraeus Direct Solutions Single Member S.A., Piraeus Factoring Single Member S.A., Piraeus Securities S.A., Piraeus Asset Management Single Member S.A., Piraeus Capital Management S.A., Piraeus Jeremy Technology Catalyst Management Single Member S.A. and Piraeus Bank Group Cultural Foundation, offer employees group health plans, which include employee's life insurance, reimbursement in case of employee's permanent and total disability due to accident or serious illness, employee's and/or dependent's hospital care and outpatient care, surgery/hospitalisation allowance and maternity allowance. The subsidiaries pay monthly or annual premiums to the insurance companies. For coverage for hospital and outpatient care of a spouse or child in the plan, in the cases of Piraeus Leasing Single Member S.A., Sunshine Leases Single Member S.A., Piraeus Factoring Single Member S.A., Piraeus Securities S.A., Piraeus Asset Management Single Member S.A. and Piraeus Bank Group Cultural Foundation the premiums are also paid by the subsidiaries.

In the case of Piraeus Real Estate Single Member S.A. the employee pays monthly premiums per insured person which are deducted from the monthly salary. For Piraeus Direct Solutions Single Member S.A., Piraeus Capital Management S.A. and Piraeus Jeremy Technology Catalyst Management Single Member S.A in case of insurance in the plan of a spouse or child that is not insured for social health insurance under the employee, the employee pays a monthly fixed amount per insured person which is deducted from the monthly salary.

10. Private Health Plans of Foreign Branches and Subsidiaries

Varna Asset Management EOOD offer employees group health plan for hospital and outpatient care. Premiums are paid monthly. The employee pays the premium for insuring family (children, spouse and parents).

Solum Enterprise LLC and Akinita Ukraine LLC in Ukraine offer employees group health plans for hospital and outpatient care. Premiums are paid per quarter.

Piraeus Leasing Romania S.A. offer a check-up (on an annual basis or more frequently under specific circumstances e.g. long-term leave of employee due to illness) only to employees, not provided on the basis of an insurance contract.

Philoktimatiki Public Ltd and Philoktimatiki Ergoliptiki Ltd in Cyprus offer employees group health plan, which includes employee's life insurance, reimbursement in case of employee's permanent and total disability due to accident or serious illness, employee's and/or dependent's hospital care and outpatient care. Premiums are paid monthly by both the employees and the subsidiaries.

41 Leases

The table below presents the contractual undiscounted cash flows of the gross lease liabilities. The Group and the Bank have elected to take a recognition exemption for short-term leases, hence the analysis below does not include any leases with a residual term lower than 12 months.

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Up to 1 year	23	24	22	20
From 1 to 5 years	64	76	59	63
More than 5 years	29	21	14	25
Total undiscounted gross liabilities	**116**	**120**	**95**	**107**

As at 31 December 2022, the present value of lease liabilities amounts to € 103 million for the Group (31 December 2021: € 105 million) and € 88 million for the Bank (31 December 2021: € 102 million).

Lease liabilities are included in line item "Other liabilities".

a. Lease liabilities

Amounts recognized in profit or loss- ROU own assets	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Interest on lease liabilities	2	2	2	2
Depreciation charge for the year	17	23	22	24
Expenses relating to short-term leases	14	19	14	19

b. Lease receivables

Gross investments in finance leases	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Up to 1 year	231	203	7	7
From 1 to 5 years	436	407	2	2
More than 5 years	435	467	-	-
Total undiscounted lease payments receivable	**1,102**	**1,077**	**9**	**9**
Less: Unearned finance income	211	148	-	-
Net investment in the lease	**891**	**929**	**9**	**9**

Future income from operating leases	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Up to 1 year	40	34	22	10
From 1 to 5 years	159	130	103	45
More than 5 years	24	24	23	13
Total undiscounted lease payments receivable	223	188	148	68

42 Contingent liabilities, assets pledged, transfers of financial assets and commitments

42.1 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 2022, the Group and the Bank provided for cases under litigation an amount of € 26 million and € 16 million, respectively (31 December 2021: € 29 million and € 24 for the Group and the Bank, 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 2022. 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 expected not to exceed € 231 million for both the Group and the Bank (31 December 2021: € 265 million for both the Group and the Bank), while the timing of the outflow is uncertain. It is noted that based on historical data, this category of legal cases has led to non-significant losses for the Group.

42.2 Pending tax audits

The tax audit for the fiscal years 2020, 2021 has been completed and the relevant tax audit certificate issued, was unqualified.

From 2016 onwards, the requirement to obtain a tax audit became optional, however Management has opted for the Bank and the Group's Greek subsidiaries to continue being tax audited by 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 regards with the Group's Greek subsidiaries, for which Management elected to conduct a tax audit in accordance with article 65a of Greek Law 4174/2013, the respective tax audits for fiscal year 2021 have been completed and the relevant tax audit certificates have been issued. The fiscal year 2022 of the Bank and its Greek subsidiaries is currently being tax audited by Deloitte Certified Public Accountants S.A. and the final outcome of the tax audits 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 26 and therefore their tax liabilities for these years have not been finalized. The tax authorities have not yet audited the Group's subsidiaries for all fiscal years and consequently their tax positions for those years may not be considered as final.

Additional taxes and penalties may be imposed, for the unaudited years, however it is not expected to have a material effect on the financial position of the Group and the Bank.

42.3 Commitments

In the normal course of business, the Group and the Bank enter into contractual credit commitments towards its customers to facilitate their financing needs or obligations. Due to their nature, the 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 Group and the Bank, in measuring the credit risk of these credit commitments, applies the same Credit Policy, approval process and monitoring procedures as those applied for the Loans and advances to customers at amortised cost.

As at 31 December 2022 and 2021 the Group and the Bank had undertaken the following commitments:

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Financial guarantees	4,788	3,763	5,005	3,965
Letters of credit	114	42	114	42
Irrevocable undrawn credit commitments	1,623	1,050	1,702	1,050
Total credit commitments	**6,526**	**4,855**	**6,821**	**5,057**
Other commitments	110	-	110	-
Total commitments	**6,636**	**4,855**	**6,931**	**5,057**

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						
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	4,233	-	-	-	4,233	5	4,227
Recommended	317	-	-	-	317	1	316
Substandard	-	37	-	-	37	-	37
Default	-	-	202	-	202	80	122
Total	**4,549**	**37**	**202**	**-**	**4,788**	**87**	**4,702**

Group	Financial guarantees - Internal rating grade						
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	3,252	-	-	-	**3,252**	10	3,242
Recommended	191	-	-	-	**191**	1	189
Substandard	-	96	-	-	**96**	1	95
Default	-	-	224	-	**224**	77	147
Total	**3,443**	**96**	**224**	**-**	**3,763**	**90**	**3,673**

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	**3,443**	**96**	**224**	**-**	**3,763**
New off balance sheet items originated or purchased	2,841	24	35	-	**2,899**
Off balance sheet items repaid / matured	(1,744)	(81)	(49)	-	**(1,874)**
Transferred from Stage 1 to Stage 2	(102)	102	-	-	**-**
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	**4,549**	**37**	**202**	**0**	**4,788**

Group	Financial guarantees - Movement in nominal amount				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Gross carrying amount as at 1/1/2021	**2,843**	**147**	**321**	**-**	**3,310**
New off balance sheet items originated or purchased	1,789	4	52	-	1,845
Off balance sheet items repaid / matured	(1,173)	(89)	(130)	-	(1,393)
Transferred from Stage 1 to Stage 2	(130)	130	-	-	-
Transferred from Stage 1 to Stage 3	(13)	-	13	-	-
Transferred from Stage 2 to Stage 1	126	(126)	-	-	-
Transferred from Stage 2 to Stage 3	-	(5)	5	-	-
Transferred from Stage 3 to Stage 2	-	37	(37)	-	-
At 31/12/2021	**3,443**	**96**	**224**	**-**	**3,763**

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**	**-**	**80**	**-**	**87**

Group	Financial guarantees - Movement in ECL allowance				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
ECL allowance as at 1/1/2021	**8**	**1**	**98**	**-**	**108**
Transferred from Stage 1 to Stage 2	(1)	1	-	-	-
Transferred from Stage 2 to Stage 1	3	(3)		-	-
Transferred from Stage 3 to Stage 2	-	9	(9)	-	-
ECL Impairment charge/ (release) for the year (P&L)	3	(8)	(12)	-	(17)
At 31/12/2021	**12**	**1**	**77**	**-**	**90**

Bank	Financial guarantees - Internal rating grade						
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	4,362	-	-	-	4,362	5	4,356
Recommended	404	-	-	-	404	1	403
Substandard	-	37	-	-	37	-	37
Default	-	-	202	-	202	80	122
Total	**4,766**	**37**	**202**	**-**	**5,005**	**87**	**4,918**

Bank	Financial guarantees - Internal rating grade						
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	3,454	-	-	-	3,454	10	3,444
Recommended	191	-	-	-	191	1	189
Substandard	-	96	-	-	96	1	95
Default	-	-	224	-	224	77	147
Total	**3,645**	**96**	**224**	**-**	**3,965**	**90**	**3,875**

Bank	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	**3,645**	**96**	**224**	**-**	**3,965**
New off balance sheet items originated or purchased	3,330	24	35	-	**3,388**
Off balance sheet items repaid / matured	(2,219)	(81)	(49)	-	**(2,349)**
Transferred from Stage 1 to Stage 2	(102)	102	-	-	-
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	**4,766**	**37**	**202**	**-**	**5,005**

Bank 31/12/2021	Financial guarantees - Movement in nominal amount Stage 1	Stage 2	Stage 3	POCI	Total
Gross carrying amount as at 1/1/2021	**2,977**	**229**	**321**	**-**	**3,527**
New off balance sheet items originated or purchased	1,887	4	95	-	1,987
Off balance sheet items repaid/ matured	(1,285)	(89)	(173)	-	(1,548)
Transferred from Stage 1 to Stage 3	(130)	130	-	-	-
Transferred from Stage 2 to Stage 1	(13)	-	13	-	-
Transferred from Stage 2 to Stage 3	208	(208)	-	-	-
Transferred from Stage 3 to Stage 1	-	(5)	5	-	-
Write-offs	-	37	(37)	-	-
At 31/12/2021	**3,645**	**96**	**224**	**-**	**3,965**

Bank 31/12/2022	Financial guarantees - Movement in ECL allowance 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**	**-**	**80**	**-**	**87**

Bank 31/12/2021	Financial Guarantees - Movement in ECL allowances Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2021	**8**	**1**	**98**	**-**	**108**
Transferred from Stage 1 to Stage 3	(1)	1	-	-	-
Transferred from Stage 2 to Stage 3	3	(3)	-	-	-
Charge for new off balance sheet items from derecognitions (P&L)	-	9	(9)	-	-
Recoveries of amounts previously written-off (P&L)	3	(8)	(12)	-	(17)
At 31/12/2021	**12**	**1**	**77**	**-**	**90**

Group & Bank 31/12/2022	Letter of credit - Internal rating grade Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	112	-	-	-	112	1	112
Recommended	2	-	-	-	2	-	2
Substandard	-	-	-	-	-	-	-
Default	-	-	-	-	-	-	-
Total	**114**	**-**	**-**	**-**	**114**	**1**	**113**

Group & Bank	Letter of credit - Internal rating grade						
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	37	-	-	-	37	-	37
Recommended	4	-	-	-	4	-	3
Substandard	-	1	-	-	1	-	1
Default	-	-	-	-	-	-	-
Total	**41**	**1**	**-**	**-**	**42**	**-**	**42**

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**	**-**	**-**	**42**
New off balance sheet items originated or purchased	228	-	-	-	**228**
Off balance sheet items repaid/ matured	(155)	(1)	-	-	**(156)**
Gross carrying amount as at 31/12/2022	**114**	**-**	**-**	**-**	**114**

Group	Letters of credit - Movement in nominal amount				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Gross carrying amount as at 1/1/2021	**37**	**1**	**2**	**-**	**40**
New off balance sheet items originated or purchased	66	2	3	-	71
Off balance sheet items repaid/ matured	(62)	(3)	(4)	-	(69)
Transferred from Stage 1 to Stage 2	(1)	1	-	-	-
At 31/12/2021	**41**	**1**	**-**	**-**	**42**

Bank	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**	**-**	**-**	**42**
New off balance sheet items originated or purchased	228	-	-	-	**228**
Off balance sheet items repaid/ matured	(155)	(1)	-	-	**(156)**
Gross carrying amount as at 31/12/2022	**114**	**-**	**-**	**-**	**114**

Bank	Letters of Credit - Movement in nominal amount				
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**
Gross carrying amount as at 1/1/2021	**37**	**1**	**2**	**-**	**40**
New off balance sheet items originated or purchased	87	2	3	-	93
Off balance sheet items sold	(83)	(3)	(4)	-	(90)
Transferred from Stage 1 to Stage 3	(1)	1			-
At 31/12/2021	**41**	**1**	**-**	**-**	**42**

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**	**1,623**	**5**	**1,618**

Group	Irrevocable Undrawn Credit Commitments - Internal rating grade						
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total	ECL Allowance	Balance
Strong	888	-	-	-	888	7	882
Recommended	47	-	-	-	47	1	46
Substandard	-	107	-	7	114	5	109
Default	-	-	-	-	-	-	-
Total	**936**	**107**	**-**	**7**	**1,050**	**12**	**1,037**

Group & Bank	Irrevocable Undrawn Credit Commitments - Movement in ECL allowance				
31/12/2022	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2022	**7**	**5**	**-**	**-**	**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	-	-	(7)
ECL allowance as at 31/12/2022	**3**	**2**	**-**	**-**	**5**

Group & Bank	Irrevocable Undrawn Credit Commitments - Movement in ECL allowances				
31/12/2021	Stage 1	Stage 2	Stage 3	POCI	Total
ECL allowance as at 1/1/2021	4	3	-	-	8
Transferred from Stage 1 to Stage 3	(1)	1	-	-	-
Transferred from Stage 2 to Stage 3	2	(2)	-	-	-
Transferred from Stage 3 to Stage 1	-	(1)	1	-	-
Recoveries of amounts previously written-off (P&L)	3	3	(1)	-	4
At 31/12/2021	**7**	**5**	**-**	**-**	**12**

Bank	Irrevocable Undrawn Credit Commitments - Internal rating grade						
31/12/2022	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	1,431	-	-	-	**1,431**	2	1,429
Recommended	184	-	-	-	**184**	1	183
Substandard	-	78	-	6	**85**	2	83
Default	-	-	3	-	**3**	-	3
Total	**1,614**	**78**	**3**	**6**	**1,702**	**5**	**1,697**

Bank	Irrevocable Undrawn Credit Commitments - Internal rating grade						
31/12/2021	**Stage 1**	**Stage 2**	**Stage 3**	**POCI**	**Total**	**ECL Allowance**	**Balance**
Strong	888	-	-	-	**888**	7	882
Recommended	47	-	-	-	**47**	1	46
Substandard	-	107	-	7	**114**	5	109
Default	-	-	-	-	**-**	-	-
Total	**936**	**107**	**-**	**7**	**1,050**	**12**	**1,037**

42.4 Assets pledged

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Due from banks	389	1,042	389	1,042
Financial assets at fair value through profit or loss	55	854	55	854
Loans and advances to customers at amortised cost	7,055	5,318	7,055	5,318
Financial assets at FVTOCI	-	1,545	-	1,545
Debt securities at amortised cost	41	8,811	41	8,811
Other assets	-	29	-	29
	7,541	**17,600**	**7,541**	**17,600**

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 with regards to a) derivative transactions engaged under ISDA master netting agreements and CSA contracts and b) repo transactions covered by Global Master Repurchase Agreement ("GMRA") contracts.

In the context of interbank repurchase agreement (repo) transactions, securities of a total nominal value of € 389 million (31 December 2021: € 227 million) are used for liquidity purposes. The said amount includes GGBs of nominal value € 162 million (31 December 2021: € 221 million).

In addition to the above, as at 31 December 2022 and 2021 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 decrease of line item "Due from banks" compared to 31 December 2021, is mainly attributable to decreased collateral postings to derivative counterparties.

Additionally, it is noted that during December 2022 the Bank proceeded with repayments of specific TLTRO III operations amounted to € 8.9 billion. The aforementioned reduction of Group's borrowings resulted to a corresponding decrease of the debt securities pledged for liquidity purposes from the Eurosystem.

Furthermore, it is noted that Bank's minimum reserve requirement, regarding the amount of funds held on average over the current maintenance period in its current accounts to BoG, amounts to € 573 million.

43 Share capital

	Number of shares
	Issued shares
Opening balance at 1/1/2021	**5,400,000,000**
Increase in the number of ordinary shares due to issuance of new shares	1,717,000
Decrease in the number of ordinary shares due to distribution in kind	(56,387,347)
Balance at 31/12/2021	**5,345,329,653**
Balance at 31/12/2022	**5,345,329,653**

The Bank's share capital as at 31 December 2022 and 2021 amounted to € 5,345 million, divided into 5,345,329,653 common voting shares, with a nominal value of € 1.00 each.

44 Other reserves and retained earnings

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Legal reserve	14	13	-	-
Reserve from financial assets measured at FVTOCI	(16)	144	(16)	144
Currency translation reserve	(19)	(15)	-	-
Property revaluation reserve	7	-	7	-
Other reserves	6	7	-	-
Total other reserves	**(8)**	**149**	**(9)**	**144**
Retained earnings	**(1,159)**	**(1,970)**	**(1,232)**	**(2,013)**
Other reserves and retained earnings	**(1,167)**	**(1,821)**	**(1,240)**	**(1,869)**

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		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Opening balance	**144**	**281**	**144**	**281**
Losses from the valuation of debt securities	(137)	(74)	(137)	(74)
Gains from the valuation of equity securities	31	17	31	17
ECL on debt securities	(1)	11	(1)	11
Recycling of valuation adjustments and accumulated impairments upon disposal	(111)	(87)	(111)	(87)
Transfer to retained earnings	-	(62)	-	(62)
Deferred taxation	58	59	58	59
Closing balance	**(16)**	**144**	**(16)**	**144**

Regarding the line item "Recycling of valuation adjustments and accumulated impairments upon disposal" for the year ended 31 December 2022 refer to Note 10.

45 Dividend per share

The distribution of dividend for the year 2022 is not permitted as the provisions of the article 159 of the Law 4548/2018 (Reform of the Law of Sociétés Anonymes) are not met and the restrictions of the same article of the Law exist.

Based on the article 149A of Law 4261/2014, by way of derogation from item c) of par. 2 of article 160 and par. 2 of article 161 of Law 4548/2018, credit institutions are no longer subject to obligation to distribute a minimum dividend. For the distribution of dividends in kind, pursuant to par. 4 and 5 of article 161 of Law 4548/2018, prior approval of the BoG is required. A corresponding approval is required for the distribution in kind for additional Tier 1 capital instruments and Tier 2 capital instruments.

In compliance with the above, the BoD of the Bank will propose the non – distribution of dividends for the fiscal year 2022 in the Annual GM of Shareholders of 2023.

46 Cash and cash equivalents

For the purpose of the Cash Flow Statement, cash and cash equivalents comprise the following outstanding balances as at 31 December 2022 and 2021 with less than 90 days maturity from the date of their initial recognition.

	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Cash and balances with Central Banks	9,026	15,484	9,026	15,484
Due from banks	259	210	211	177
Financial assets at fair value through profit or loss	3	61	2	61
Financial assets at fair value through other comprehensive income	28	60	28	60
	9,316	**15,816**	**9,267**	**15,782**

47 Related party transactions

Related parties are:

a) Members of the Bank's BoD and the 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 Bank, that are controlled or jointly controlled by the Key Management Personnel and their close family members,

d) Bank's parent entity, namely Piraeus Financial Holdings S.A.

e) Bank΄s subsidiaries,

f) Bank΄s associates and the subsidiaries of its associates,

g) Bank΄s Joint ventures and the subsidiaries of its joint ventures,

h) HFSF, which holds ordinary shares in the share capital of the Parent entity of the Bank and benefits from the special rights stated in article 10 of Greek Law 3864/2010, as amended and in force.

The Group enters into transactions with the aforementioned entities and individuals under usual market terms and within the normal course of business. Loans and advances granted to related party and letters of guarantee issued in favor of related party were made in accordance with the Group's approved credit policies and procedures in terms of interest rates, collateral and non-payment risk.

47.1 Key Management Personnel and other related party

The tables below present Group's and Bank΄s related party transactions with Key Management Personnel and the related party referred to in points (b) and (c) above, as well as with HFSF. No significant transactions occurred with the HFSF during the year ended 31 December 2022.

Group (amounts in thousand €)	31/12/2022 Key Management Personnel	31/12/2022 Other related party	31/12/2021 Key Management Personnel	31/12/2021 Other related party
Loans and advances to customers at amortised cost (Gross carrying amount)	2,874	37	3,319	31
Due to customers	4,177	2,009	3,095	469

Group (amounts in thousand €)	1/1 - 31/12/2022 Key Management Personnel	1/1 - 31/12/2022 Other related party	1/1 - 31/12/2021 Key Management Personnel	1/1 - 31/12/2021 Other related party
Income	46	19	26	19
Expense	87	-	-	1

Bank (amounts in thousand €)	31/12/2022 Key Management Personnel	31/12/2022 Other related party	31/12/2021 Key Management Personnel	31/12/2021 Other related party
Loans and advances to customers at amortised cost (Gross carrying amount)	2,117	34	2,450	28
Due to customers	3,283	1,978	2,197	459

Bank (amounts in thousand €)	1/1 - 31/12/2022 Key Management Personnel	1/1 - 31/12/2022 Other related party	1/1 - 31/12/2021 Key Management Personnel	1/1 - 31/12/2021 Other related party
Income	34	18	20	18
Expense	87	-	-	1

Members of the Key Management Personnel benefits (amounts in thousand €)	Group 1/1 - 31/12/2022	Group 1/1 - 31/12/2021	Bank 1/1 - 31/12/2022	Bank 1/1 - 31/12/2021
Short term benefits	6,977	5,861	6,253	5,206
Contributions to the Institution for Occupational Retirement, Life and Medical Provision	75	88	69	85
Post-employment benefits	85	76	64	58

Short-term benefits of Key Management Personnel include wages, salaries, employer’s share of social contributions and other charges, while the “Post-employment benefits” includes the cost of programmes for the post-employment benefits.

The total provision for post-employment benefits to Key Management Personnel as at 31 December 2022 and 2021 amounted to € 1 million for both the Group and the Bank and is recognised in line item “Retirement and termination benefit obligations” in the Statement of Financial Position.

The ECL allowance for impairment on loans and advances to customers at amortised cost granted from the Group and the Bank to Key Management Personnel and other related party as at 31 December 2022 and 2021 amounted to less than € 0.1 million.

47.2 Parent company Piraeus Financial Holdings S.A.

Bank´s related party transactions with the parent company Piraeus Financial Holdings S.A. are as follows:

(amounts in thousand €)	Bank	
	31/12/2022	31/12/2021
Assets		
Other assets	45,616	46,090
Total	**45,616**	**46,090**
Liabilities		
Due to customers	44,761	50,048
Other borrowed funds	818,819	786,468
Other liabilities	852	782
Total	**864,432**	**837,298**

(amounts in thousand €)	Bank	
	31/12/2022	31/12/2021
Income		
Interest and similar income	-	7,727
Fee and commission income	-	67
Other income	26,692	31,362
Total	**26,692**	**39,156**
Expenses		
Interest expense and similar charges	(98,851)	**(87,784)**
Net losses from financial instruments measured at FVTPL	-	**(720)**
Total	**(98,851)**	**(88,504)**

Line item “Other borrowed funds” relates to Back-to-Back Tier 2 Notes issued by the Bank and fully subscribed by the parent entity.

Income from the coupons of the internal AT 1 capital instrument issued by the Bank and fully subscribed by the parent entity amounted to € 53 million for the year ended 31 December 2022 (31 December 2021: € 26 million).

47.3 Subsidiaries

Bank´s related party transactions with subsidiaries are presented below:

(amounts in thousand €)	Bank	
	31/12/2022	31/12/2021
Assets		
Loans and advances to customers at amortised cost (Gross carrying amount)	2,257,964	2,361,247
Assets held for sale	165,907	174,371
Other assets	2,369	156,335
Total	**2,426,240**	**2,691,953**
Liabilities		
Due to customers	241,969	266,104
Other liabilities	29,636	32,900
Total	**271,605**	**299,004**

(amounts in thousand €)	Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021 As restated
Income		
Interest and similar income	62,819	57,945
Fee and commission income	11,433	14,549
Dividend Income	8,866	1,426
Net other income/ (expenses)	(367)	360
Total	**82,752**	**74,281**
Expenses		
Interest expense and similar charges	(456)	(524)
Fee and commission expense	(101)	(165)
Operating expenses	(23,936)	(21,631)
Total	**(24,492)**	**(22,320)**

The ECL allowance for impairment on loans and advances to customers at amortised cost granted from the Bank to the subsidiaries of the Group as at 31 December 2022 amounted to € 282 million (31 December 2021: € 327 million). The ECL measurement on loans and advances to customers at amortised cost for the year 2022 amounted to € 45 million (31 December 2021: € 73 million).

Letters of guarantee to subsidiaries of the Group as at 31 December 2022 amounted to € 217 million (31 December 2021: € 202 million).

Line item "Other liabilities" as at 31 December 2022 includes an amount of € 29 million (31 December 2021: € 28 million), which is related to lease liabilities of Bank's subsidiaries, according to IFRS 16.

47.4 Associates

Group's and Bank's related party transactions with associates are presented below:

(amounts in thousand €)	Group		Bank	
	31/12/2022	31/12/2021	31/12/2022	31/12/2021
Loans and advances to customers at amortised cost (Gross carrying amount)	433,444	910,320	423,443	906,542
Other assets	3,406	5,704	2,023	2,037
Due to customers	254,136	400,083	254,136	400,083
Other liabilities	15,790	29,885	8,017	29,344

(amounts in thousand €)	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021 As restated	1/1 - 31/12/2022	1/1 - 31/12/2021 As restated
Total expense and capital expenditure	(105,822)	(359,404)	(50,206)	(356,828)
Total income	47,489	62,486	45,066	59,126

The ECL allowance for impairment on loans and advances to customers at amortised cost granted from both the Group and the Bank to associate companies as at 31 December 2022 amounted to € 75 million (31 December 2021: € 124 million for both the Group and the Bank). The ECL measurement on loans and advances to customers at amortised cost for the year 2022 amounted to € 46 million for both the Group and the Bank (31 December 2021: € 9 million for both the Group and the Bank).

Letters of guarantee to associates of the Group as at 31 December 2022 amounted to € 14 million for both the Group and the Bank (31 December 2021: € 17 million for both the Group and the Bank).

The variance in line item "Loans and advances to customers at amortised cost (Gross carrying amount)" mainly relates to the contribution into Strix Holdings LP of two (2) bond loans of € 421 million due from MIG (refer to Note 26B for further information).

In addition, the Group contributed its former subsidiary IMITHEA Single Member S.A. to its associate Strix Holdings LP. The Group recognised from the said transaction a gain of € 55 million (Refer to Note 14 and 26B for further details).

47.5 Joint ventures

Group's and Bank's related party transactions with joint ventures are presented below:

(amounts in thousand €)	Group		Bank	
	31/12/2022	31/12/2021 As restated	31/12/2022	31/12/2021 As restated
Loans and advances to customers at amortised cost (Gross carrying amount)	53,635	103,880	53,635	103,880
Other assets	5	-	5	-
Due to customers	35	145,299	35	145,299

(amounts in thousand €)	Group		Bank	
	1/1 - 31/12/2022	1/1 - 31/12/2021 As restated	1/1 - 31/12/2022	1/1 - 31/12/2021 As restated
Total income	664	674	664	674

The ECL allowance for impairment on loans and advances to customers at amortised cost granted from both the Group and the Bank to joint ventures as at 31 December 2022 amounted to € 40 million (31 December 2021: € 42 million as restated for the Group and the Bank).

Letters of guarantee to joint ventures as at 31 December 2022 amounted to nil (31 December 2021: € 60 million).

48 Changes in the portfolio of consolidated companies

a) New subsidiaries, associates and joint ventures recognised during the period:

On 25 May 2022, within the context of the restructuring and rationalization of the leasing business of the Group through a corporate demerger, certain wholly owned subsidiaries of the Group were established, namely Piraeus Leasing Single Member S.A., Sunshine Leases Single Member S.A. and Piraeus Property Real Estate Management Single Member S.A. (the beneficiary entities), following the demerger of certain wholly owned subsidiaries of the Group, namely Piraeus Leasing Single Member S.A., Piraeus Financial Leasing Single Member S.A. and Piraeus Leases Single Member S.A. (the demerged entities), by transferring from each demerged entity certain assets and liabilities to a) each beneficiary entity (the net asset value, as at the transformation date, amounted to € 92 million, € 19 million and € 7 million, respectively) and b) to Piraeus Bank S.A. (a net asset value, as at the transformation date, of € 70 million). Hence, the aforementioned demerged entities were removed from the General Commercial Registry, while the subsidiary of Piraeus Financial Leasing Single Member S.A., namely Dynamic Asset Operating Leasing S.A., became a subsidiary of Piraeus Leasing Single Member S.A. Refer also to Note 30.

On 18 July 2022, Piraeus Bank S.A. acquired a 100% shareholding in Iolcus for a consideration of € 10 million, which became a subsidiary of the Group.

On 30 December 2022, Piraeus Bank S.A. established through contribution in kind the subsidiaries Aleva Single Member S.A. and Arpis Single Member S.A., by fully subscribing in their share capital of € 15 million. The aforementioned entities were founded in the context of the rehabilitation agreement of the Greek Sugar Industry.

Except for the above, during the period ended 31 December 2022 the Bank did not make any new investment through acquisition or establishment of new companies, in excess of € 10 million.

b) Significant changes in the Group's subsidiaries, associates and joint ventures during the period:

The changes incurred during the period ended 31 December 2022, in excess of € 10 million, were the following:

On 2 March 2022, Piraeus Bank S.A. acquired a 52% controlling interest in Trastor for a cash consideration of € 98 million. Refer to Note 26A for further information.

On 22 September 2022, the Group lost control over Imithea Single Member S.A. Refer to Note 14 for further information.

Refer to Note 26B for current year's movements in associates.

c) Liquidation, disposal and merging of subsidiaries:

On 3 February 2022, the SPVs Axia Finance III PLC, Axia Finance PLC, Axia III APC Limited, Estia Mortgage Finance PLC, Estia Mortgage Finance II PLC, Praxis II APC Limited, Praxis II Finance PLC, Axia III Holdings Ltd and Praxis II Holdings Ltd were dissolved, while the dissolution of the SPV Kion Mortgage Finance PLC was performed on 11 April 2022.

On 31 May 2022, the liquidation of the subsidiary of the Group, Rhesus Development Projects SRL, was completed and the subsidiaries of Piraeus Bank S.A. namely Geniki Single Member S.A. Financial & Consulting Services and Geniki Information Single Member S.A. were set under liquidation.

On 2 June 2022, Bulfina E.A.D. 100% subsidiary company of the Group disposed of its total participation in its subsidiary namely Office Project 2021 EOOD.

On 17 June 2022, the subsidiary of Piraeus Bank S.A. namely Trastor Real Estate Investment Company, absorbed its wholly owned subsidiaries namely Dorida S.A. and Syzefxis Ltd.

On 28 June 2022, Piraeus Nedvizhimi Imoti EOOD, 100% subsidiary company of the Group disposed of its total participation in its subsidiaries Lozenetz Construction EOOD and Mladost Home EOOD.

On 11 July 2022, the liquidation of the subsidiary of the Group, Priam Business Consultancy SRL, was completed.

On 11 August 2022, Bulfina E.A.D., 100% subsidiary company of the Group, disposed of its participation in its subsidiary namely Vitosha Invest 146 EOOD.

On 6 September 2022, Omicron Cyclos Ena Symmetohiki S.A., 28.10% associate company of the Group, was set under liquidation.

On 6 October 2022, Piraeus Bank S.A., in the context of its strategy for targeted assets utilization, disposed of its total participation in its subsidiary namely Piraeus Real Estate Management Single Member S.A.

On 16 December 2022, Piraeus Bank S.A. disposed of its total participation in its associate namely Exus Software Ltd.

On 16 December 2022, Piraeus Nedvizhimi Imoti EOOD, 100% subsidiary company of the Group, disposed of its total participation in its subsidiary namely Infinity Omnia 11 OOD.

On 20 December 2022, the liquidation of the subsidiary of the Group, Piraeus Buildings S.A., was completed.

On 30 December 2022, Piraeus Bank S.A. disposed of its total participation in its subsidiary namely Piraeus Support Services Single Member S.A.

49 Independent Auditors' fees

On 22 July 2022, the Ordinary General Meeting of the Shareholders appointed Deloitte Certified Public Accountant S.A. as the principal independent public accountant for the year ended 31 December 2022. The following table presents the aggregated fees for professional statutory audit fees, tax audit fees, other audit related fees and other non-audit related fees for the year 2022 and 2021, by the Group's principal accounting firm Deloitte, which is a member firm of the Deloitte Network, other member firms of the Network and their respective affiliates (collectively, "Deloitte").

	Group		Bank	
(amounts in thousand €)	**31/12/2022**	**31/12/2021**	**31/12/2022**	**31/12/2021**
Statutory audit fees	2,163	2,232	1,400	1,460
Other audit related fees (Including tax audit fees)	489	678	219	469
Other non-audit related fees	181	133	175	122
Total	**2,833**	**3,043**	**1,793**	**2,051**

50 Reclassifications of comparative year

The reclassifications reflected in the Income Statement of the year 2021 are presented below. Refer to Note 7 "Net fee and commission income", Note 8 "Income from Non-Banking activities" and Note 15 "Other credit-risk related expenses on loans and advances to customers at amortised cost" for further details.

€ Million	Group		
	Year ended 31/12/2021		
	As published	Reclassifications	As reclassified
CONTINUING OPERATIONS			
Interest and similar income	1,696	-	1,696
Interest expense and similar charges	(389)	-	(389)
NET INTEREST INCOME	**1,307**	**-**	**1,307**
Fee and commission income	445	-	445
Fee and commission expense	(97)	(2)	(100)
NET FEE AND COMMISSION INCOME	**347**	**(2)**	**345**
Income from non-banking activities	-	40	40
Dividend income	3	-	3
Net gains/ (losses) from financial instruments measured at fair value through profit or loss ("FVTPL")	88	-	88
Net gains/ (losses) from financial instruments measured at fair value through other comprehensive income ("FVTOCI")	87	-	87
Net gains/ (losses) from derecognition of financial instruments measured at amortised cost	327	-	327
Net gains/ (losses) from loss of control over subsidiaries/ disposal of associates and joint ventures	184	-	184
Net other income/ (expenses)	70	(40)	30
TOTAL NET INCOME	**2,413**	**(2)**	**2,410**
Staff costs	(395)	-	(395)
Administrative expenses	(403)	35	(368)
Depreciation and amortisation	(109)	-	(109)
TOTAL OPERATING EXPENSES	**(907)**	**35**	**(872)**
PROFIT/ (LOSS) BEFORE PROVISIONS, IMPAIRMENT AND OTHER CREDIT-RISK RELATED EXPENSES	**1,506**	**32**	**1,538**
ECL impairment (losses)/ releases on loans and advances to customers at amortised cost	(582)	96	(486)
Other credit-risk related expenses on loans and advances to customers at amortised cost	(13)	(128)	(141)
Impairment (losses)/ releases on other assets	12	-	12
ECL impairment (losses)/ releases on debt securities measured at FVTOCI	(11)	-	(11)
Impairment on subsidiaries and associates	(23)	-	(23)
Impairment of property and equipment and intangible assets	(13)	-	(13)
Impairment on debt securities at amortised cost	(19)	-	(19)
Other provision charges/ (releases)	9	-	9
Share of profit/ (loss) of associates and joint ventures	18	-	18
PROFIT/ (LOSS) BEFORE INCOME TAX	**884**	**-**	**884**
Income tax benefit/ (expense)	(485)	-	(485)
PROFIT/ (LOSS) FOR THE PERIOD FROM CONTINUING OPERATIONS	**399**	**-**	**399**
DISCONTINUED OPERATIONS			
Profit/ (loss) after income tax from discontinued operations	(7)	-	(7)
PROFIT/ (LOSS) FOR THE PERIOD	**392**	**-**	**392**
From continuing operations			
Profit/ (loss) attributable to the equity holders of the Bank	399	-	399
Non controlling interest	(1)	-	(1)
From discontinued operations			
Profit/ (loss) attributable to the equity holders of the Bank	(7)	-	(7)
Non controlling interest	-	-	-
Earnings/ (losses) per share attributable to the equity holders of the Bank (in €):			
From continuing operations			
- Basic & Diluted	0.07	-	0.07
From discontinued operations			
- Basic & Diluted	-	-	-
Total			
- Basic & Diluted	0.07	-	0.07

€ Million	Bank		
	Year ended 31/12/2021		
	As published	Reclassifications	As reclassified
CONTINUING OPERATIONS			
Interest and similar income	1,694	-	1,694
Interest expense and similar charges	(389)	-	(389)
NET INTEREST INCOME	**1,305**	**-**	**1,305**
Fee and commission income	415	-	415
Fee and commission expense	(89)	(2)	(91)
NET FEE AND COMMISSION INCOME	**326**	**(2)**	**324**
Income from non-banking activities	-	16	16
Dividend income	18	-	18
Net gains/ (losses) from financial instruments measured at fair value through profit or loss ("FVTPL")	88	-	88
Net gains/ (losses) from financial instruments measured at fair value through other comprehensive income ("FVTOCI")	87	-	87
Net gains/ (losses) from derecognition of financial instruments measured at amortised cost	327	-	327
Net gains/ (losses) from loss of control over subsidiaries/ disposal of associates and joint ventures	199	-	199
Net other income/ (expenses)	40	(16)	24
TOTAL NET INCOME	**2,390**	**(2)**	**2,387**
Staff costs	(376)	-	(376)
Administrative expenses	(384)	35	(349)
Depreciation and amortisation	(106)	-	(106)
Net gain/ (losses) from sale of property and equipment and intangible assets	-	-	0
TOTAL OPERATING EXPENSES	**(865)**	**35**	**(830)**
PROFIT/ (LOSS) BEFORE PROVISIONS, IMPAIRMENT AND OTHER CREDIT-RISK RELATED EXPENSES	**1,525**	**32**	**1,557**
ECL impairment (losses)/ releases on loans and advances to customers at amortised cost	(605)	96	(509)
Other credit-risk related expenses on loans and advances to customers at amortised cost	(13)	(128)	(141)
Impairment (losses)/ releases on other assets	11	-	11
ECL impairment (losses)/ releases on debt securities measured at FVTOCI	(11)	-	(11)
Impairment on subsidiaries and associates	(30)	-	(30)
Impairment of property and equipment and intangible assets	(13)	-	(13)
Impairment on debt securities at amortised cost	(19)	-	(19)
Other impairment (losses)/ releases	-	-	-
Other provision charges/ (releases)	9	-	9
Share of profit/ (loss) of associates and joint ventures	-	-	-
PROFIT/ (LOSS) BEFORE INCOME TAX	**854**	**-**	**854**
Income tax benefit/ (expense)	(477)	-	(477)
PROFIT/ (LOSS) FOR THE PERIOD FROM CONTINUING OPERATIONS	**377**	**-**	**377**
DISCONTINUED OPERATIONS			
Profit/ (loss) after income tax from discontinued operations	-	-	-
PROFIT/ (LOSS) FOR THE PERIOD	**377**	**-**	**377**
From continuing operations			
Profit/ (loss) attributable to the equity holders of the Bank	-	-	-
Non controlling interest	-	-	-
From discontinued operations			
Profit/ (loss) attributable to the equity holders of the Bank	-	-	-
Non controlling interest	-	-	-
Earnings/ (losses) per share attributable to the equity holders of the Bank (in €):			
From continuing operations			
- Basic & Diluted	-	-	-
From discontinued operations			
- Basic & Diluted	-	-	-
Total			
- Basic & Diluted	-	-	-

51 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 full-time equivalent 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 2022 and 2021, which are prepared in accordance with IFRS as issued by the IASB and endorsed by the European Union.

Public subsidies received by the Group during the year ended 31 December 2022 are immaterial. Information presented above is analyzed in the following tables:

A) Country specific information

Country	31/12/2022			
	Total net income[3]	Profit/ (loss) before tax	Income tax benefit/ (expense)	Number of staff
Greece[1]	2,599	983	(129)	8,258
Romania	-	-	-	4
Bulgaria	2	(5)	-	8
Egypt	-	-	-	1
Cyprus	(2)	(3)	-	4
Serbia	2	3	-	5
Albania	-	-	-	2
Ukraine	-	-	-	7
Other countries[2]	(1)	15	-	3
Group[4]	**2,600**	**993**	**(129)**	**8,292**

(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.

Country	31/12/2021 As reclassified			
	Total net income[3]	Profit/ (loss) before tax	Income tax benefit/ (expense)	Number of staff
Greece[1]	2,471	913	(486)	10,018
Romania	(1)	(1)	-	4
Bulgaria	2	(10)	-	8
Egypt	-	-	-	1
Cyprus	(24)	(24)	1	4
Serbia	-	-	-	5
Albania	-	-	-	2
Ukraine	1	-	-	7
Other countries[2]	-	-	-	3
Group[4]	**2,449**	**878**	**(486)**	**10,052**

(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. and British Virgin Islands.

(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 26A.

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 Group and the Bank for the year ended 31 December 2022 amounted to 1.05% and 1.07%, respectively (31 December 2021: 0.54% and 0.50%, respectively).

52 Disclosures of Greek Law 4151/2013

In accordance with the provisions of Greek Law 4151/2013, every credit institution operating in Greece has the obligation to remit to the Greek State the cash balances plus interest for all dormant accounts, for which a period of 20 years has passed until the end of April of each year. In this context, on 19 April 2022, Piraeus Bank remitted to the Greek State the amount of € 1,201,649.19.

53 Events Subsequent to the End of the Reporting Period

- As disclosed in Note 25, on 1 January 2023 the Bank reclassified debt securities issued by corporations and financial institutions of total nominal value € 672 million, from FVTOCI to amortised cost, following the change in business model for managing the said asset class. The Bank's impact before tax as a result of the reclassification was an increase in closing equity by € 76 million.

- Since 6 February 2023 and up to 27 March 2023, Piraeus Bank gradually increased through the Stock Exchange its shareholding in MIG from 31.2% to 59.5%. The shareholding acquired in excess of one third of MIG's outstanding shares is subject to regulatory approval by the HCC and as a result, pursuant to the relevant provisions of antitrust law, the voting rights arising from such shares are not currently exercisable. Therefore, on 30 March 2023, the date that the Annual Financial Statements were authorized for issue, the Group had not obtained control over MIG. The cash consideration paid by Piraeus Bank for the additional equity interest in MIG throughout the subsequent events period, amounted to € 47 million. In line with the requirements of Greek Law 3461/2006, Piraeus Bank launched a mandatory tender offer ("MTO") in order to purchase the remaining MIG shares held by third parties at a price of €0.217 per share. Assuming that all existing shareholders accept Piraeus Bank's offer to sell their shares, the additional consideration payable in the context of the MTO is € 83 million. The MTO is expected to be completed in April 2023.

  As disclosed in Note 26B, in November 2022, Piraeus 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 interests. 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 said two (2) bond loans for MIG's total direct and indirect stake in Attica Holdings S.A. (i.e. a total shareholding of 79.4%), the "Debt-to-Asset Swap". The proposed transaction was subject to two (2) 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 were met subsequent to the end of the reporting period. Specifically, on 23 February 2023 the HCC approved the acquisition of a controlling stake in Attica Holdings S.A. by Strix Holdings LP and on 3 March 2023, MIG's re-iterative extraordinary general meeting of shareholders held upon postponement, resolved on the approval of the Debt-to-Asset Swap. Assuming that the HCC grants approval to Piraeus Bank for acquiring a controlling stake in MIG, the latter will be accounted for as a subsidiary under the full consolidation method, effective from the HCC approval date (i.e. the acquisition date). Following satisfaction of the Debt-to-Asset Swap conditions precedent, the scope of MIG's identifiable net assets as of the acquisition date shall not include: a) Attica Holdings S.A. and its subsidiaries; and b) MIG's bond loan liabilities due to Strix Holdings LP. Based on MIG's public announcement dated 15 December 2022, MIG's total assets, total liabilities and net assets as of 30 September 2022 adjusted on a proforma basis for the Debt-to-Asset Swap, amounted to € 228 million, € 100 million and € 128 million, respectively, therefore, the impact of the aforementioned business combination on the Group's financial position is not expected to be material.

Following the increase of its shareholding in excess of one third of MIG's outstanding shares, Piraeus Bank launched on 22 February 2023 a corollary MTO to the shareholders of Attica Holdings S.A. holding a total stake of 20.62%, in order to purchase their shares at a price of € 1.855 per share. The MTO is subject to approval by the HCC. Assuming that all such shares are purchased by Piraeus Bank, the cost of the MTO is € 83 million.

Athens, 30 March 2023

CHAIRMAN OF THE BOARD OF DIRECTORS	MANAGING DIRECTOR	GROUP CHIEF FINANCIAL OFFICER	DEPUTY CHIEF FINANCIAL OFFICER
GEORGE P. HANDJINICOLAOU	CHRISTOS I. MEGALOU	THEODOROS CH. GNARDELLIS	GEORGE TH. MARINOPOULOS
ID No X 501829	ID No AE 011012	ID No AI 662109	ID No AP 154589
			License No Class A 0137758

Information on a consolidated basis for the year 2022 according to article 6 of Law 4374/2016

PIRAEUS BANK

I. Payments made on a consolidated basis for the year 2022 for promotion and advertising expenses to Media Companies (according to par. 1 article 6 of Law 4374/2016)

Name	Amounts in thousand €
1984 ANEXARTITI DIMOSIOGRAFIA	3.20
21 ADMEDIA MIKE	0.50
24 MEDIA PSIFIAKON EFARMOGON A.E.	54.35
3SIXTY.COM E.P.E.	3.90
A. MYKONIATHS A.E.	1.50
ACHAIKI RADIOFONIA EKDOTIKI A.E.	1.09
ADESMEYTH ENHMEROSH I.K.E.	8.80
ADJUSTMENT	4.00
ADWEB LTD ETAIREIA PERIORISMENHS EYTHYNHS	2.48
AFOI RIGA EKDOTIKI ANON. EMPOR. ETAIREIA	1.60
AGRO BROKERS LTD	2.90
AGROTYPOS A.E.	1.90
AKTH MIAOYLH PUBLICATIONS IKE	1.50
ALEXIOU AH. VASILEIOS	0.50
ALHTHINO RADIOPHONO A.E. - RADIOTHLEOPTIKES EPIXEIRHSEIS	103.36
ALPHA DORYFORIKI THLEORASH S.A.	361.09
ALPHA RADIOPHONIKH A.E.	32.55
ALTER EGKO MME A.E.	644.50
AMOS INTERNATIONAL IKE	1.50
ANASTASIA PSALTI & SINERGATES MIXANIKI A.E.	0.60
ANEKSARTHTA MESA MAZIKHS ENHMEROSHS A.E.	27.00
ANTENNA TV A.E.	292.59
APELA KOSTIANIS G. IOANNIS	0.70
ARETH - ANNA E. TZALLA & SIA E.E	0.50
ARISTEIDOU IOAN. LIDIA	0.70
ART SAVY MON/PI IKE	15.00
ASLANIDIS G. ANASTASIOS	4.50
ASM PUBLICATION P. STERGIOY	2.00
ATHANASIOS AL. ARAMPATZHS PANERRAIKH EBDOMAD. EPHHM.	0.50
ATHANASIOS STAYRIDIS & SIA O.E.	0.65
ATHANASIOY EYAGGELOS & SIA E.E.	0.60
ATHENS BOIS AN. EKD. & DIAPHHM. ETAIREIA	62.00
ATHINAIKO PRAKT. EIDHS. - MAKEDON. PRAKT. EIDHS. A.E.	29.05
ATTIKA POLYKATASTHMATA A.E.	5.00
AUTOFOCUS - ASTIKI MI KERDOSKOPIKI ETAIREIA	0.80
ABP EKDOTIKH IKE	18.75
AKOH A.E.	2.50
B. MORPHIADHS K SIA E.E.	25.00
B. SKOYTARAS A.E.	1.50

Name	Amounts in thousand €
BANKINGNEWS A.E.	77.50
BARDOLIN IKE	1.00
BAS. I. KARYDIS & SIA O.E. - EKDOTIKI TRIPOLEOS	0.40
BASILIS ZAMPOYNIS	3.36
BAV MEDIA - XRHSTOS NIK. MPELOGIANNHS	4.26
BETTERMEDIA IKE	7.00
BONOS V. ILIAS	0.25
BOREIA ENHMEROTIKH A.E.	2.00
BOULEVARD FREE PRESS IKE	0.50
BRAINBUZZ MEDIA CONSULTING EEA	7.00
CHOUTZOUMIS CHRISTOFOROS & SIA O.E.	0.13
CHRISOULA ORFANIDOU - CO GRAPHICS	0.20
CHRYSH EYKAIRIA A.E.	2.00
CITIZEN MEDIA E.E.	5.50
CRETAPOST.GR	1.00
CRISIS MONITOR VOULGARIDOU CHRYSA	14.10
D. MPOYRAS K SIA E.E.	32.00
D.O.V. I.K.E. (EKDOSI EFIMERIDAS PATRIS)	1.50
DANET E.P.E.	0.50
DAPHNOPOTAMOS MON. E.P.E.	4.00
DELTA TILEORASI A.E.	3.42
DESMH EKDOTIKH A.E.	30.00
DHM. ORGAN. O CHRONOS MONOPR. I.K.E.	0.65
DHMOTIKH EPIX/SHS ENHMEROSHS IOANNINON	0.25
DIMITRIOS ALEX. ARAMPATZIS SERRAIKON THARROS	0.50
DIMITRIS DELLIOS	0.40
DIMOSIOGR. ORGAN. KONDYLI A.E.	3.00
DIMOSIOGRAFIKI I.K.E	0.62
DIOGENHS M.K.O	3.40
DION TILEORASI MONOPROSOPI I.K.E.	3.00
DISTRATO - EVANGELOS SPYROU LTD	3.60
DITIONE LIMITED E.E.	1.00
DPG DIGITAL MEDIA A.E.	66.00
DYADIKI ENIMEROSI E.E.	27.40
DYO DEKA ANONYMH EKDOTIKH ETAIREIA	31.50
EIRHNH E. ANAGNOSTOY	0.67
EKDOSEIS EPENDYSH A.E.	13.05
EKDOSEIS MOTORI E.P.E.	1.50
EKDOSEIS NEO XRHMA A.E.	94.00
EKDOSEIS PROTO THEMA EKDOTIKH A.E.	559.07
EKDOSEIS STAMOULH A.E.	3.00
EKSEREYNHTHS - EKSPLORER A.E.	40.50
ELCPRODUCTIONS AMKE	0.80

Name	Amounts in thousand €
ELENI I. DIAFONIDOY	0.70
ELEYTHERIA A.E.	4.90
ELEYTHERIA TOY TYPOY EKDOTIKH A.E.	56.00
ENA A.E.	1.19
ENIKOS ANONYMH ETAIRIA	120.00
ENTYPOEKDOTIKH A.E.B.E.T.	12.50
EPHHMERIS ESTIA ANONYMH EKDOTIKH ETAIREIA	28.00
EPIKOINONIA AIGAIOY A.E.	4.40
ERINYA EIDISIS M. IKE	2.40
ESTIA EPENDYTIKH MME A.E.	4.00
ETHNIKI ENOSI AGROTIKON SYNETERISMON	3.50
ETHNIKOS KHRIX TIS NEAS YORKIS ELLAS E.P.E.	28.90
ETHOS MEDIA A.E. EKDOTIKH SYNEDRIAKH	1.50
EYRYTANIKA NEA	0.50
FAQ EKDOTIKI MONOPROSOPI I.K.E.	5.00
FAROSNET MONOPROSOPI A.E.	16.00
FAST RIVER DIMIOURGIKO KIMENO SENARIA EKDILOSIS E.P.E.	2.00
FILELEFTHEROS TYPOS A.E.	68.22
FILODASIKI ENOSIS PLATANOU	1.00
FORWARD MEDIA IKE	15.30
FRONTSTAGE PHSYCHAGOGIKI A.E.	5.80
GENIKES RADIOTHLEOPTIKES EPIX. A.E.	7.92
GEORGIOS STAVR. PERIVOLARIS	0.40
GIANNARAS KONSTANTINOS	1.00
GRAFIKES TECHNES STEFANOS KARIDAKIS A.E.	1.20
GRAPHOTEXNIKH KRHTHS A.E.E.	2.48
GREEN BOX EKDOTIKH A.E.	31.90
HAPPY PUBLICATIONS - IOANNHS ZOYNALHS MIKE	1.50
HAZLIS AND RIVAS COMMUNICATIONS LTD	5.00
HELLASPRODUCTS E.P.E.	4.00
HELLENIC COMPANY FOR ENDOCRINE GRAIN SURGERY	2.00
HELLINOGERMANIKO EMPOR. & VIOMIX. EPIMELITIRIO	1.50
HMATHIOTIKI GI	0.05
HT PRESS ONLINE MONOPROSOPH IKE	10.60
HTTPOOL HELLAS M. IKE	45.12
HXOS KAI RYTHMOS A.E.	1.80
I FONI TIS MANIS	0.84
I. & E. KOYTSOLIONTOY O.E.	3.00
I. DIONATOS & SIA E.E.	13.00
I. K. DRAGOUMIS EKDOSIS IKE	12.00
I. KOROMILIS A.E.	0.50
IDIKOS LOGARIASMOS KONDYLION TOU ETHNIKOU ASTEROSKOPIOU	7.00
IKAROS RADIOTHLEOPTIKES EPIX/SEIS A.E.	4.00

Name	Amounts in thousand €
ILIAS KANELLIS & SIA E.E.	6.00
INTELLIGENT MEDIA LTD	3.00
INTERBUS A.E.	443.92
INTERNATIONAL RADIO NETWORKS A.E.	1.62
INTERNET MEDIA SERVICES O.E.	0.30
IONIAN RADIOTHLEOPTIKES EPIXEIRISEIS A.E.	4.70
K. TSIGKA	10.00
K.E.D HEALTH O.E.	39.00
KAINOTOMIA & ANAPTYKSH IKE	4.20
KALAITZAKHS EKDOTIKES EPIXEIRHSEIS A.E.	0.50
KALES ISTORIES IKE	3.96
KAPITAL.GR A.E.	132.25
KARAGIANNOPOULOS KON/NOS	2.50
KARMES MONOPROSOPI IKE	9.00
KARTA A.E.	3.20
KATHIMERINES EKDOSEIS ANONYMH ETAIREIA	564.87
KATSATOU PHNELOPH KAI SIA E.E.	18.00
KDB IKE	2.00
KINESSO HELLAS EPIKINONIES MONOPROSOPI A.E.	47.81
KISS ANONYMI ETAIRIA MME	0.86
KONTRA IKE	68.50
KOYTSHS I. DHMHTRHS	0.55
KYKLOS A.E.	20.00
KYRTSOS GROUP E.E.	16.00
LEOTSAKOS - MPOYSMPOYRELIS O.E.	12.50
LEPANTO - R.TV	5.61
LIQUID MEDIA ETAIREIA PARAGOGHS ANTIPROSOPEION & EMPORIKHS EKMETALLEYSHS PSHPHIAKON MME PERIEXOMENOY	40.80
LOCAL NEWS DHMHTRIOS K. TOLHS MONOPROSOPH IKE	0.60
LYKAVITTOS EKDOSEIS MONOPROSOPI IKE	1.50
MAKAS KONSTANTINOS	1.50
MAKEDONIA ENHMEROSI A.E.	2.00
MAKEDONIA TV S.A.	3.56
MARIA BASILAKH EKDOTIKES EPIXEIRHSEIS	17.50
MARINA G. TOYLA & SIA O.E.	1.30
MARKETING AND MEDIA SERVICES MONOPROSOPH	1.00
MAXITIS TYPOEKDOTIKI TSAKNAKIS & SIA O.E.	0.70
MEDIA - EPIKOINONIA A.E./EKDOTIKI - TILEOPTIKI A.E.	1.20
MEDIA2DAY EKDOTIKH A.E.	145.00
METRON ARISTON	3.30
METRONTHL MON IKE	2.74
MINDSUPPORT MONOPROSOPI IKE	0.82
MINDTHEGAP MEDIA COMMUNICATIONS MON IKE	11.00

Name	Amounts in thousand €
MONOCLE MEDIA LAB - MONONEWS IKE	93.00
MONOTYPIA MONOPROSOPI IKE	2.20
MORAX MEDIA S.A.	4.00
MPAM MEDIA I.K.E.	4.75
MPEXLIBANOS I. XRHSTOS	3.00
MPOYSIAS EPIKOINONIES E.P.E.	1.17
MPOYTHAS KONSTANTINOS TOY PETROU - IMERISIA	0.44
NAFTEMPORIKI - ZOFRANK HOLDINGS CO. LIMITED	51.00
NEA PASEGES - SOMATEIO	2.00
NEA THLEORASH A.E.	293.45
NEO RADIOPHONO TON DIMOSIOGRAFON E.P.E.	1.13
NEW COMMUNICATION	1.20
NEW MC KAI SIA E.E.	2.00
NEW MEDIA NETWORK SYNAPSIS S.A.	99.00
NEW POST PRIVATE COMPANY - DIADIKTYAKES YPHRESIES	22.50
NEWSIT E.P.E.	96.00
NIKOLAOS KOSMOPOULOS	0.50
NK MEDIA GROUP E.P.E.	24.00
NOISIS IKE	5.00
NOTOS FORUM MON. ID. KEF. ETAIRIA	0.70
NOVA BROADCASTING A.E.	57.21
NTOKOY KON. GEORGIA/EPHHMER. EPATHLO	0.50
NIKOLAOS XR. ZARMPALAS	0.14
OKTAS MEDIA IKE	47.45
ONDEC GROUP E.E.	1.15
ONE DIGITAL SERVICES A.E.	4.00
ONE STEP MON. IKE	0.50
ONMEDIA DIGITAL MONOPROSOPI A.E.	3.20
OPINION POST ILEKTRONIKES EKDOSEIS A.E.	21.20
OTE S.A.	30.46
P.D. EKDOSEIS E.P.E. - DEAL NEWS	13.09
PANHPEIROTIKH THLEORASH TV A.E.	0.50
PAPADAKHS G. MIXALHS	3.00
PAPADOGIANNI MARIA XRISTOS	1.20
PAPAGIANNOPOULOU G. ELENI	0.40
PAPALEKSIS I. FOTIS	2.00
PAPALIOS KONSTANTINOS K SIA E.E.	2.50
PAPASTATHOPOULOS K. ALEXANDROS	1.20
PAPPAS DIMITRIOS	1.00
PARA ENA YPHRESIES DIADIKTYOY DIAPHHMISH E.P.E.	167.00
PATSIKAS EKDOTIKH VEROIAS E.E.	0.20
PELOPONNHSOS PATRON EKDOSEIS A.E.	3.68
PERFECT MEDIA ADVERTISING MIKE	55.45

Name	Amounts in thousand €
PHAISTOS A.E.	8.90
PHELNIKOS HLEKTRONIKON MESON ENHMEROSHS M.E.P.E.	18.80
PMS IKE	27.00
POLITICAL PUBLISHING IKE	2.50
POLITIS E.E. YPIR. EKTYPOSIS EFIMERIDON	0.50
PONTOS TILEORASI A.E.	0.93
POWERGAME MEDIA I.K.E.	32.00
POYGARIDIS K. ANTONIS	0.80
PREMIUM A.E. EPIKOIN. PAROXHS YP. & EREYNON	44.00
PRESSROOM MEDIA MONOPROSOPI IKE	4.50
PRIME APPLICATIONS A.E.	48.66
PRIME ONE IPOKATASTIMA ALLODAPIS E.P.E.	24.13
PROTAGKON A.E. P. YPHR. DIADIKT. & ENTYPON	65.00
PROTI TIS ILIAS A.E.	2.00
RADIO PLAN BEE IDIOTIKI KEFALAIOUCHIKI ETAIRIA	2.25
RADIO THESSALONIKH A.E.	1.60
RADIOPHONIKES EPIXEIRHSEIS RADIO NORTH 98FM E.P.E.	4.00
RADIOPHONIKES PARAGOGES A.E./OASIS 88 FM	5.54
RADIOPHONIKH EPIKOINONIA A.E.	1.97
RADIOTHLEOPTIKA HLEKTRONIKA EKDOTIKA MESA ELLADOS A.E. TO PARON THS KYRIAKHS	3.00
RADIOTHLEOPTIKH S.A.	77.65
RADIOTHLEOPTIKES EPIX/SEIS EASY FM A.E.	6.00
RD NEWSHUB IDISIOGRAFIKI	0.86
REAL MEDIA MESA MAZIKHS ENHMEROSHS A.E.	72.29
REPORT PRIVATE COMPANY	0.50
S. APOSTOLIDHS KAI SIA E.E	0.23
S. BAGOYRDHS A.B.E.E.	0.10
SABD EKDOTIKH A.E.	38.00
SATKO MEDIA TV D. TRAMPAS	3.50
SERRAIKES EKDOSEIS E.P.E.	0.85
SETTINI MEDIA IKE EKDOSEIS ENTYPON	1.00
SIMOPOULOS N. MILTIADIS	0.40
SIMOYSI E.E.	8.40
SKAI EIDHSEIS NTOT KOM	447.15
SKIPPER ONDECK IKE	1.15
SOFIANNA A.E.	2.00
SOLAR MEDIA A.E.	8.00
SOLUTIONS O.E.	2.40
SPACE FM STEREO RADIOT/KI A.E.	3.18
SPORTNEWS YPHRESIES DIADIKTYOY A.E.	4.00
SPOT O.E. - APOSTOLOS ELLHNAS	0.50
STAR A.E. RADIOTHLEOPTIKOS ORGAN. KENTRIKHS ELLADOS	6.35
STAR ELLHNIKH RADIOTHLEOPTIKH A.E.	1.00

Name	Amounts in thousand €
STARTCOM E.P.E.	2.70
SYGXRONH EPOXH EKDOTIKH A.E.B.E.	9.55
SYNEIDISI A.E.	2.70
SYRGKANH LAM. PARASKEYH	0.63
T K DIGITAL SERVICES I K E - TSONI KON/NA MON. IKE	1.00
TAZIDIS I. GEORGIOS	0.30
TECHNOEKDOTIKI - T. PRESS MON. E.P.E.	1.00
TEKMIRIOSI M. E.P.E.	0.70
TELIA COMMUNICATION A.E.	8.00
TELIA INTERNET IKE	4.00
TERZENIDIS AL. KON/NOS	0.70
TH. TSIROGKAS & SIA E.E.	4.80
THARROS EKDOTIKI E.P.E.	0.30
THE TOC DIGITAL MEDIA YPHR. ENHM. A.E.	29.00
THE WALT DISNEY COMPANY GREECE MONOPROSOPI E.P.E.	3.90
THEMA RADIO A.E.	3.01
THEOXARHS SPYR. GEORGIOS	1.00
THESSALIKI RADIOFONIA TILEORASI A.E.	4.00
THLEOPTIKH RETHYMNOY A.E.	6.00
TILEOPTIKES & EKDOTIKES EPIX/SEIS A.E. - START TV	9.00
TO MANIFESTO FRONT PAGE IKE	4.00
TO MANIFESTO IKE	26.50
TSAROYXAS M. & SIA A.B.E.E. - PROINOS LOGOS	0.15
TZEKAS P. XARALAMPOS	2.14
USAY S. PAVLOPOULOS - DIADIKT. & KOIN./DIKTIAKI ENIMER. MON. E.P.E.	13.50
VAGOURDIS MEDIA GROUP IKE	0.30
VASILIOS LIATSOS & SIA E.E.	0.50
VERGINA YVRIDIKI TILEORASI A.E.	2.39
VGENIS G. THEODOROS	3.50
VI.PA. MONOPROSOPI I.K.E.	1.00
W.S.F. STREET FINANCE I.K.E.	1.00
WAVE MEDIA OPERATIONS E.P.E.	16.20
WEBJAR IDIOTIKH KEFALAIOUCHIKH ETAIRIA	1.00
XARTIS MONOPROSWPI E.P.E.	0.56
XIOTI A. XRISTINA - ANNA "LAKONIKOS TYPOS"	1.50
XNARIS EMMANOUIL & SIA O.E.	0.49
YPAITHROS XORA A.E.	18.55
YIOI S. TSOPANAKH - H. KOTIADHS O.E.	0.20
ZOH LEYKOFRYDOY IKE	0.49
ZOYGLA G.R. A.E.	54.00
Total	**7,314.56**

II. Payments made on a consolidated basis for the year 2022 for Grants, Donations and Sponsorships (according to par. 2 article 6 of Law 4374/2016)

Beneficiary	Amounts in thousand €
AMERICAN - HELLENIC CHAMBER OF COMMERCE	20.00
ANTIMETOPISH PAIDIKOY TRAYMATOS	1.00
ARAB - HELLENIC CHAMBER OF COMMERCE AND DEVELOPMENT	2.00
ASSOCIATION OF CANCER PATIENTS AND FRIENDS OF ARGOLIDA	0.30
ASTRONAFTES MAKE	3.65
ASYLO ANIATON PATRON	0.20
BERTIKAL SOLOYSIONS	8.00
CAPITAL LINK HELLAS MONOPROSOPI E.P.E.	5.00
DHMOS PYLAIAS - XORTIATH	1.50
DIMOS THERMOU KENTRO POLITISMOU ATHLITISMOU	1.00
DIKIGORIKOS SYLLOGOS ATHINON	30.00
DIKIGORIKOS SYLLOGOS THESSALONIKIS	20.00
DIMOS THESSALONIKIS	30.00
E.K.E.F.E. DIMOKRITOS	5.00
ELCPRODUCTIONS AMKE	16.00
ELETAEN MAKE	1.50
ELKE ANOIXTOU OIKONOMIKOU PANEPISTHMIOU	1.00
ELL. ET. PROST. & APOKAT. ANAP. PAIDON ELEPAP	50.00
ELLHNOGERMANIKO EMPOR. & VIOMHX. EPIMELHTHRIO	6.00
ELLINIKOS ERYTHROS STAYROS	1.00
EN. TRAP. & CHRIM/KON STEL. ELLIN. NAYTILIAS	1.00
EPAGGELMATIKO EPIMELITIRIO ATHINON	12.00
ET. AX. DIACH. TIS PERIOUS. TOU PAN/MIOU IOANNINON A.E.	1.00
ETAIREIA AKSIOP. & DIAX/SEOS PERIOYSIAS TOY APTH S.A.	15.00
ETHNIKH LYRIKH SKHNH	90.00
ETHNIKO & KAPODISTRIAKO PANEPISTIMIO ATHINON	24.00
ETHOS MEDIA	14.00
EXCESS	0.30
GENERATION 2.0 FOR RIGHTS & DIVERSITY	3.00
GIATROI XORIS SYNORA	0.40
HELLENIC BASKETBALL FEDERATION	50.00
HOLARGOS GYMNASTICS SPORTS CLUB	1.00
I. PAPADIMITROPOULOS & CO G.P.	4.03
ICAP A.E.	6.00
IDIKOS LOGARIASMOS KONDYLION EREYNAS TOU ETHNIKOU ASTEROSKOPIOU	1.00
IDRYMA ANARGYREIOS KAI KORGIALENEIOS SCHOLH SPETSON	1.00
IERA MHTROPOLHS MONEMBASIAS & SPARTHS	4.50
INSTITOUTO POLISEON ELLADOS	1.00

Beneficiary	Amounts in thousand €
K.E.D HEALTH O.E.	15.00
KENTRO DIETHNOUS KAI EVROPAIKOU DIKAIOU	1.00
KENTRO GYNAIKEION MELETON KAI EREVNON	0.50
KIVOTOS TOU KOSMOU	0.31
MADE GROUP AMKE	2.00
MAKE GIA THN PROST. TON YDAT. OIKOSYST.	1.70
MAKE-A-WISH	0.20
MAZI GIA TO PAIDI SOMATEIO ENOSH NPID	24.22
MPOUSIAS EPIKOINONIES E.P.E.	10.00
OIKONOMIKO SYNEDRIO DELFON	40.00
PAN. OMOSP. SYL. ERGAZ. YP. GEORGIAS (POSEYG)	2.50
PANHELLENIC SOCIETY OF BLIND PEOPLE	0.40
PAIDIKA XORIA SOS ELLADOS	33.00
PERIFEREIA DYTIKHS MAKEDONIAS	7.00
PHARMAKEYTIKOS SYLLOGOS THES/NIKIS	1.50
POLITISTIKO IDRYMA OMILOY PEIRAIOS (P.I.O.P)	2,533.77
S.E.G.A.S.	40.00
SIMPLEFSI MAKE	5.00
SINDESMOS EXAGOGEON VORIOU ELLADOS	5.00
SYLLOGOS FILON ALEXANDROU FIGOS	1.00
SYLLOGOS GONION PAIDION NEOPLASMATIKH ASTHENEIA FLOGA	0.10
SYLLOGOS P.E. SAMOU MELISSA	2.00
TENT X PATRAS MKO	3.60
THYATERIA ASSOCIATION (INTERNATIONAL UNION OF FRIENDS OF THE ARCHDIOCESE OF THYATEIRA AND GREAT BRITAIN)	2.00
TO XAMOGELO TOY PAIDIOY	0.30
TSOMOKOS DHMOSIES SXESEIS A.E.	30.00
YPOURGEIO ETHNIKHS PAIDEIAS KAI THRISKEVMATON	1.00
YPOYRGEIO ETHNIKHS AMYNHS (YPETHA)	20.00
Total payments to entities other than individuals	**3,215.48**
Total payments to individuals (206 Beneficiaries)	**40.33**

In compliance with the provisions of article 6 of Law 4374/2016 for the transparency among credit institutions, media companies and subsidized persons, the above presented payments on a consolidated basis relate to payments made by Piraeus Bank S.A. and its subsidiaries for the year 2022.

PIRAEUS BANK

www.piraeusholdings.gr