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Other Announcements
HELLENIC BANK PUBLIC COMPANY LTD
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Pillar III Disclosures for the six-month period ended 30th June 2022

Announcement dated 28th September 2022 is attached.

Attachments:

1. **Pillar III Disclosures for the six-month period ended 30th June 2022**
2. **Disclosures**

Non Regulated

Publication Date: 28/09/2022

HELLENIC BANK

28th September 2022

ANNOUNCEMENT

Subject: **Pillar III Disclosures for the six-month period ended 30th June 2022**

Hellenic Bank Public Company Limited (the "Bank") announces today the publication of Pillar III Disclosures for the six-month period ended 30th June 2022.

These Disclosures are posted on Bank's website www.hellenicbank.com (Investor Relations).

Please find attached the Pillar III Disclosures for the six-month period ended 30th June 2022.

HELLENIC BANK PUBLIC COMPANY LTD

Hellenic Bank Group

PILLAR III DISCLOSURES

for the six-month period ended 30 June 2022

September 2022

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1 INTRODUCTION

1.1 Corporate Information

Hellenic Bank Public Company Limited (the "Bank") was incorporated and is domiciled in the Republic of Cyprus in 1976 and is a public company in accordance with the provisions of the Companies Law (Cap. 113), the Cyprus Stock Exchange Laws and Regulations and the Income Tax Laws. The Bank's registered office is at 200, Corner of Limassol and Athalassa Avenues, 2025 Strovolos, P.O. Box 24747, 1394 Nicosia.

The Bank is the holding company of Hellenic Bank Group (the "Group"). The Group comprises of the Bank and its subsidiaries entities.

The principal activity of the Group is the provision of a wide range of banking and financial services, which include financial, investment and insurance services, custodian and factoring services as well as management and disposal of properties. The Bank provides banking and financial services mainly through its branch network. As at 30 June 2022 the branch network included 58 branches, 6 cash offices in Cyprus, as well as 3 representative offices. These representative offices are not licenced to offer any banking services and their sole role is for administrative support.

The Bank is a significant credit institution and has been designated by the Central Bank of Cyprus (CBC) as an "Other Systemically Important Institution" ("O-SII"). The Group is subject to joint supervision by the European Central Bank (ECB) and the CBC for the purposes of its prudential requirements.

1.2 Pillar III Regulatory Framework

1.2.1 Regulatory framework overview

The Pillar III disclosures for the six-month period ended 30 June 2022 of the Group (hereinafter "the Report" or "the Disclosures") have been prepared in accordance with the Capital Requirements Regulation No. 575/2013 (the "CRR") and the Capital Requirements Directive 2013/36/EU (the "CRD IV"), as amended by Regulation (EU) 2019/876 (the "CRR II") and Directive (EU) 2019/878 (the "CRD V"), respectively. For the preparation of these Disclosures, the Group has adopted the European Banking Authority (EBA) Guidelines on Pillar III disclosures requirements (EBA/ITS/2020/04), where applicable.

Effective from 1 January 2014, the CRD IV and the CRR, as in force, form the European regulatory package designed to transpose the new capital, liquidity and leverage standards of Basel III into the European Union's legal framework.

The CRR establishes the prudential requirements for capital, liquidity and leverage that credit institutions and investment firms need to abide by and is immediately binding on all European Union member states. The CRD IV governs access to deposit-taking activities and internal governance arrangements including remuneration, board composition and transparency, while it also sets out additional capital buffer requirements. Unlike the CRR, the CRD IV was transposed into national law by EU member states, and national regulators were allowed to impose additional capital buffer requirements. The CRR permits a transitional period for certain of the enhanced capital requirements and certain other measures, such as the leverage ratio, which are largely fully effective from 1 January 2018, and some other transitional provisions with phase-in until 2024 (the latest).

In March 2018, ECB published an NPE addendum which supplements the NPL Guidance by specifying the ECB's supervisory expectations when assessing a bank's levels of prudential provisions for non-performing exposures. The ECB will, in this context, assess, among other things, the length of time an exposure has been classified as non-performing (vintage) as well as the collateral held. In April 2019, Regulation (EU) 2019/630 was issued, as regards to the minimum loss coverage for non-performing exposures, with an immediate effective date, prescribing the minimum provision coverages based on vintage and collateral held, for loans that originated after 26 April 2019.

On 27 June 2019, the revised rules on capital and liquidity (CRR II and CRD V) came into force, with CRR II being directly applicable in each EU member state, while CRD V should have been transposed into national law by each EU member state. Accordingly, CRD V has been transposed into the Cyprus national law. The CRR II is an amending regulation, therefore the existing provisions of CRR apply, unless they are specifically amended by CRR II. Certain CRR II provisions took immediate effect while most amendments were applicable from 28 June 2021.

The CRR II amended significantly the CRR in a several aspects such as the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, counterparty credit risk, market risk, exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, among others, and introduces some clarifications regarding disclosures on remunerations. It also includes new disclosure requirements on performing, non-performing and forborne exposures, and on collateral and financial guarantees received. The CRD V amended the CRD IV as regards to exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers and capital conservation measures.

The current regulatory framework comprises of three Pillars:

- **Pillar I** sets out the guidelines for calculating the minimum regulatory capital requirements, including calculation of RWAs for credit risk, counterparty risk, market risk and operational risk.

- **Pillar II** covers the Supervisory Review and Evaluation Process (SREP) which assesses the Group's internal capital adequacy, and whether additional capital is required over and above the Pillar I and provides for the monitoring and self-assessment of a bank's capital adequacy and internal processes.

- **Pillar III** covers external quantitative and qualitative disclosure requirements designed to provide transparent information on regulatory capital adequacy and internal liquidity adequacy, risk exposures and risk management and internal control processes in order to enhance market discipline.

1.2.2 COVID-19 pandemic implications on capital

The amendments that came into force on 28 June 2021 are additional to those amendments introduced in June 2020 as per Regulation (EU) 2020/873 (also known as the "CRR quick-fix"), which implements certain CRR II provisions in response to the COVID-19 pandemic.

The main amendments of the CRR "quick-fix", which affected the Group's capital adequacy ratio included the acceleration of the implementation of the new SME discount factor, extending the IFRS 9 transitional arrangements by two years until the end of 2024, and introducing further relief measures to CET 1 by allowing:

- to fully add-back to CET 1 any increase in ECL recognised in 2020 and 2021 for non-credit impaired financial assets in a phased-out period of five years started from 2022, and also
- advancing the implementation of the application of prudential treatment of software assets which came into force in the last quarter of 2020
- a temporary treatment of unrealised gains or losses on exposures to central governments, to regional governments or to local authorities and to public sector entities, excluding those financial assets that are credit-impaired, and measured at fair value through other comprehensive income. The Group has elected not to adopt this temporary relief, for the six-month period ended 30 June 2022 and for the year ended 31 December 2021.

As part of the ECB's capital measures for COVID-19 pandemic, the Bank received an amendment to Supervisory Review and Evaluation Process (SREP) 2019, effective from March 2020, regarding the composition of the Pillar II additional own funds requirements. Pillar II requirement should be met with 56,25% of CET 1 Capital, 18,75% of Additional Tier 1 Capital, and 25% of Tier 2 Capital.

In addition, as per Central Bank of Cyprus (CBC) circular dated 7 May 2020, the phasing-in of the O-SII buffer of the Bank is deferred by 12 months, from the original 4 years, as a relief measure aiming to further assist corporations and households to deal with the economic consequences of the COVID-19 pandemic. Therefore, the O-SII buffer will be fully phased-in on 1 January 2023, instead of 1 January 2022 as originally set.

1.2.3 Regulatory developments

1.2.3.1 Banking Package 2021

On 27 October 2021, the European Commission ("EC") adopted a review of EU banking rules and released legislative proposals for additional amendments to CRR, CRD IV and the Bank Recovery and Resolution Directive (BRRD) (the "2021 Banking Package"). The 2021 Banking Package will implement, amongst other things, the final Basel III reforms due for implementation on 1 January 2025, with some exceptions, which have not yet been transposed into EU law. The 2021 Banking package aims to ensure stronger resilience of EU banks while contributing to Europe's recovery from the COVID-19 pandemic and the transition to climate neutrality.

The 2021 Banking Package consists of the following legislative proposals:

- a proposed Regulation (known as "CRR III") amending the CRR with regard to, amongst other things, requirements on credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor. This proposal reflects the EU's implementation of the Basel III reforms.
- a proposed Directive (known as "CRD VI") amending the CRD IV with regard to, amongst other things, supervisory powers, sanctions, third-country branches and ESG risks. This proposal introduces a regulatory framework for branches of third-country undertakings providing banking activities in EU member states and a requirement for environmental, social and governance (ESG) risks to be embedded in a credit institution's strategies, policies and processes.
- a proposed Regulation (the so-called "daisy chain" proposal) amending the CRR and the BRRD with regard to, amongst other things, the prudential treatment of G-SII groups with a multiple point of entry resolution strategy and a methodology for the indirect subscription of instruments eligible for meeting the minimum requirement for own funds and eligible liabilities (MREL).

The 2021 Banking Package will be discussed by the European Parliament and Council, and it will take some time until it is implemented (currently expected in 2025) while certain reforms are expected to be subject to transitional arrangements or to be phased-in over time.

The Bank is currently in the process of examining the revised framework, so as to be prepared for the effects of these legislative amendments. The final standards must be transposed into local law before coming into effect.

1.2.3.2 Disclosures of Environmental, Social and Governance (ESG) risks

On 24 January 2022, EBA published the final draft implementing technical standards (ITS) on prudential disclosures on ESG risks in accordance with Article 449a of the CRR (EBA/ITS/2022/01). Disclosure of information on ESG risks is a vital tool to promote market discipline and assess the banks' ESG related risks.

The EBA ESG Pillar III package, which is addressed to large institutions with securities traded on a regulated market of any Member State, includes disclosures on climate-change related transition and physical risks, including information on exposures towards carbon related assets and assets subject to chronic and acute climate change events, as well as disclosures on the institutions' mitigating actions supporting their counterparties in the transition to a carbon neutral economy and in the adaptation to climate change. Additionally, the ITS include KPIs on institutions' assets financing activities that are environmentally sustainable according to the EU taxonomy.

Finally, the purpose of these disclosures is to publicly disclose how institutions are embedding ESG considerations in their governance, business model, strategy and risk management framework and overall business model. These ITS aim to support institutions in the public disclosure of meaningful and comparable information on how ESG-related risks and vulnerabilities, and in particular climate change, may exacerbate other risks in their balance sheet and at the same time allow investors and stakeholders to compare the sustainability performance of institutions and of their financial activities. It will also support transparency in regard to how institutions are mitigating those risks, including information on how they are supporting their customers and counterparties in the adaptation process to e.g., climate change and in the transition towards a more sustainable economy.

These disclosure requirements are applicable from June 2022 on an annual basis during the first year and biannually thereinafter. The Bank is currently in the process of examining the prudential disclosures on ESG risks, so as to set the road map for the implementation of these disclosure requirements.

Please refer to the 2021 ESG Impact Report issued in June 2022 which outlines the Bank's ESG initiatives, targets and actions for 2021 in four strategic pillars: People, Society, Environment and Marketplace, which is available on the Bank's website www.hellenicbank.com (ESG & Sustainability).

1.2.4 Capital requirements

The minimum regulatory capital requirements (phase-in) of the Group are presented in the table set out below.

In addition to the capital requirements disclosed in the following table, the Bank notes that the ECB has provided on a consolidated basis, a non-public Pillar II capital guidance (P2G) to be made up entirely of CET 1 capital.

Minimum Capital Requirement

	Notes	2022[1] (%)	2021 (%)
Pillar I			
CET 1		4,50	4,50
AT 1		1,50	1,50
Tier 1		6,00	6,00
Tier 2		2,00	2,00
Capital adequacy – Pillar I		**8,00**	**8,00**
Pillar II			
CET 1		1,94	1,80
AT 1		0,65	0,60
Tier 1		2,59	2,40
Tier 2		0,86	0,80
Capital adequacy – Pillar II		**3,45**	**3,20**
Combined buffer requirement	1		
Capital conservation buffer (CCB)	2	2,50	2,50
Countercyclical capital buffer (CCyB)	3	--	--
Other systematically important institutions buffer (O-SII)	4	0,875	0,75
Minimum CET 1 requirement		**9,815**	**9,55**
Minimum capital adequacy requirement		**14,825**	**14,45**

Notes:

1 Based on the provisions of the Macroprudential Oversight of Institutions Law of 2015 to (No. 2) 2021 (L. 6(I)/2015), effective from 1 January 2016, and taking into account the recommendations of the Recommendation ESRB/2014/1 of the European Systemic Risk Board (ESRB), the Central Bank of Cyprus (CBC) is the designated authority responsible for setting the macroprudential buffers that are derived from the provisions of the CRD IV.

2 The capital conservation buffer (CCB) was phased-in over a period of four years at 0,625% in 2016, 1,25% in 2017, and 1,875% in 2018 and was fully implemented on 1 January 2019 at 2,50%.

3 In accordance with the provisions of the above law (Note 1), the countercyclical capital buffer rate (CCyB) is reassessed on a quarterly basis, adjusted if necessary and published in the macroprudential policy decisions by the CBC. The CCyB is effective from 1 January 2016 and is determined by the national macroprudential authority of the countries in the European Economic Area (EEA) at the beginning of each quarter. The CCyB rate for Cyprus, where most of the Bank's exposures are located, was set at 0%, by CBC for the nine-month period of 2022 and for 2021. For the remaining exposures, the CCyB rate for the six-month period ended 30 June 2022 was also 0%.

4 In accordance with the provisions of the above law (Note 1), the CBC is also the responsible national authority for the designation of Other Systemically Important Institutions (O-SII institutions) and the methodology for the determination of the O-SII buffer requirement. The Bank has been designated as an O-SII institution and the CBC set the O-SII capital buffer rate at 0,875% for the year 2022 (2021: 0,75%). As per CBC circular received in November 2021, the fully loaded O-SII buffer for the Bank is reduced from 1,5% to 1%. Effective from 1 January 2022, the O-SII buffer for the Bank is 0,875% and from 2023 the O-SII buffer is set at 1%.

[1] As per 2021 final SREP letter, the new capital requirements are effective from 1 March 2022.

1.2.5 Supervisory Review and Evaluation Process

The 2021 SREP was based on the final decision received, on 2 February 2022, of ECB's intention to adopt a decision establishing prudential requirements pursuant to Regulation (EU) No 1024/2013 (Article 16(2)(a)). The SREP was conducted pursuant to Regulation (EU) No 1024/2013 (Article 4(1)(f)) and took into account the EBA SREP Guidelines, as well as the findings stemming from the supervisory stress test conducted in 2021. The 2021 SREP requirements are effective from 1 March 2022.

The ECB did not issue a SREP decision for the 2020 SREP cycle and the requirements established by the 2019 SREP decision continued to apply for 2021, including in particular the decisions on the capital requirements.

Effective from 1 March 2022, the Group is required to maintain, on a consolidated basis, a phased-in Capital Adequacy Ratio of 14,825% (2021: 14,45%), which includes:

- the minimum Pillar I own funds requirements of 8%, of which up to 1,5% can be met with Additional Tier 1 Capital and up to 2% with Tier 2 Capital,
- an own funds Pillar II requirement of 3,45% (2021: 3,2%) required to be held in excess of the minimum own fund requirement (P2R to be held in the form of 56,25% of CET 1 capital and 75% of Tier 1 capital), and
- a phased-in combined buffer requirement which for 2022 and 2021 includes the fully loaded capital conservation buffer of 2,5%, which has to be made up with CET 1 capital and the O-SII buffer of 0,875% (2021: 0,75%), with application starting from 1 January 2019 which is phased-in over a period of five years.

Based on the final 2021 SREP letter, the Pillar II requirement, effective from 1 March 2022, has increased to 3,45%. Based on the 2020 SREP communication, the Pillar II requirement applicable for 2021 stood at 3,2%.

As per CBC circular dated 7 May 2020, the fully loaded O-SII buffer for the Bank remained at 1,5% for 2021 but with the phasing-in being deferred by 12 months, from the original 4 years. Therefore, the O-SII buffer will be fully phased-in on 1 January 2023, instead of 1 January 2022, as was originally set. In November 2021, the Bank received notification from the CBC that the fully loaded O-SII buffer for the Bank is reduced from 1,5% to 1%. Effective from 1 January 2022, the O-SII buffer for the Bank is 0,875% and from 2023 the O-SII buffer is set at 1%.

Additionally, the combined buffer requirement applicable for the Bank, includes an institution specific CCyB calculated as a weighted average of the countercyclical buffer rates that apply in the countries where an institution's credit exposures are located. The CCyB rate for Cyprus, where most of the Bank's exposures are located, was set at 0% by CBC for the nine-month period of 2022 and for 2021. For the remaining exposures, the CCyB rate for the six-month period ended 30 June 2022 was also 0%.

In addition to the above, the ECB has provided on a consolidated basis, a non-public Pillar II capital guidance (P2G) ratio to be made up entirely of CET 1 capital. The P2G, effective from 1 March 2022, has increased compared to its previous level which is applicable for 2021.

Furthermore, the Bank should continue to refrain from making distributions to its shareholders, as the 2019 SREP decision continues to apply.

Taking the above into consideration, the Group's phased-in minimum Capital Adequacy Ratio, CET 1 and Tier 1 ratios, effective from 1 March 2022, were set at 14,825% (2021: 14,45%), 9,815% (2021: 9,55%) and 11,965% (2021: 11,65%) respectively, excluding P2G. The Group's capital ratios remain above the new SREP requirements.

In the context of the NPE addendum (refer to the previous section), the Bank received a letter from the ECB in 2019, as part of normal supervisory activities, containing qualitative and quantitative elements, with a focus on the management and addressing of NPEs in line with supervisory expectations with regards to the legacy NPE stock (i.e., loans that have defaulted prior to April 2018). The supervisory expectations with regards to legacy NPE coverages are re-assessed by the Regulator and communicated to the Bank as part of the annual SREP cycle (latest coverages for end of 2021 has been included in 2021 SREP letter). Taking into account the specificities of the supervisory expectations, the Bank has estimated the prudential provision shortfalls subject to Pillar 1 and Pillar 2 treatment and has subtracted them directly from own funds and risk weighted assets for the six-month period ended 30 June 2022 and for the year ended 31 December 2021.

1.3 Scope of Pillar III Disclosures

Pillar III Disclosure policy

The Group adopts a formal disclosure policy to comply with the disclosure requirements of Part Eight of the CRR, as amended by CRR II, and the respective EBA Guidelines and technical standards. The below provide the key elements of the disclosure policy such as basis of preparation, frequency of disclosures, means and approval.

In line with the Group's Pillar 3 Disclosure Policy, a dedicated process has to be followed in case the Group considers omitting certain disclosures due to these disclosures being immaterial, proprietary or confidential. In the rare cases where the Group classifies information as non-material in this report this has been stated accordingly in the related disclosures.

Basis of preparation

These Pillar III disclosures (hereinafter the "Report" or the "Disclosures") of the Group consists of both quantitative and qualitative disclosures, as required by Article 433a of Part Eight of the CRR, since the Group meets the conditions for being "large institution" as per Article 4 (146), which specify the frequency of the disclosure requirements on a semi-annual basis, and EBA Guidelines (EBA/ITS/2020/04) on Pillar III disclosures effective from 30 June 2021. The Group adheres to the frequency of disclosure requirements as provided within the latest EBA Guidelines on public disclosures under Part Eight of the CRR.

The disclosures have also been prepared in accordance with the EBA Guidelines (EBA/2014/14) on materiality, proprietary and confidentiality under Article 432. Therefore, the principles of materiality, proprietary and confidentiality have been applied throughout the report.

In the light of COVID-19 crisis, EBA published Guidelines (EBA/GL/2020/07) on legislative and non-legislative moratoria on loan repayments that are applicable as from 2 June 2020. The disclosure requirements are expected to be time-limited, as EBA Guidelines were strictly issued in the context of COVID-19 pandemic (refer to Section 4.4). As per EBA communication, following the uncertainty over COVID-19 developments, the Guidelines on the reporting and disclosure of exposures subject to measures applied in response to the COVID-19 crisis continue to apply until further notice.

The Pillar III disclosures for the six-month period ended 30 June 2022 should be read in conjunction with Interim Condensed Consolidated Financial Statements for the six-month period ended 30 June 2022, which are available on the Bank's official website: www.hellenicbank.com (Investor Relations).

The Pillar III disclosures of the Group for the six-month period ended 30 June 2022 have not been audited by the external auditors of the Group.

Due to rounding, numbers presented throughout this document may not precisely add-up to the totals provided and percentages may not precisely reflect the absolute figures. Additionally, the applicable EBA disclosure templates may include only rows that are applicable to the Group, in accordance with the respective guidelines.

The information presented in Pillar III disclosures is in Euro (€ million), unless otherwise stated within the Report.

Frequency of disclosures

The Group publishes the Pillar III disclosures in accordance with Articles 433 and 433a of the CRR, since the Group meets the conditions for being "large institution" as per Article 4 (146).

Article 433a specifies the frequency of the disclosure requirements on a quarterly, semi-annual and annual basis. The Group adheres to the frequency of disclosure requirements as provided within the latest EBA Guidelines on public disclosures under Part Eight of the CRR.

As per Article 433 the annual disclosures shall be published on the same date as the date on which institutions publish their financial statements or as soon as possible thereafter while quarterly and semi-annual disclosures shall be published on the same date as the date on which the institutions publish their financial reports for the corresponding period where applicable or as soon as possible thereafter. Such a delay cannot exceed any deadline for Pillar 3 disclosures publication set by the national competent authority.

As per the Business of Credit Institutions Law of 1997 to N.61(I)/2022 (the "Banking Law"), the audited financial statements of the Bank are submitted to the CBC within four months from the end of each financial year, unless otherwise permitted by the CBC or the ECB. Therefore, in accordance with Article 433 and the Group's Pillar III Disclosure policy, the Group's Pillar III disclosures are published within one month following the date of publication of the Group's financial statements or financial reports for the reference period, the latest.

Means of disclosures

The Pillar III disclosures for the six-month period ended 30 June 2022 are published in electronic format and are available on a designated location on the Bank's official website: www.hellenicbank.com under "Investor Relations" as per Article 434 of the CRR. Also, the disclosures are published as a standalone document that provides a readily accessible source of prudential information for the users.

Comparatives

Comparatives presented in the report are restated, where considered necessary, to conform with changes in the presentation of the current year. Where such restatement takes place, this is indicated in the respective table.

Approval & Management Attestation

The Group adopts formal policies to comply with the disclosure requirements laid down in Part Eight of the CRR, as amended by CRR II, and puts in place and maintains internal processes, systems and controls to verify that the disclosures are appropriate and in compliance with the requirements.

A framework of disclosure controls and procedures is in place to support the approval of the Group's disclosures prior to their publication on the Bank's website. Governance committees are responsible for reviewing the Group's disclosures so that they are subject to adequate verification and comply with applicable regulation and guidelines. Refer to Appendix C and Appendix D for the references to the Group's compliance with the Pillar III disclosure requirements.

The Pillar III disclosures for the six-month period ended 30 June 2022, as per the formal disclosure policy, are reviewed and approved by the Board of Directors (BoD), following the review by the Management Board (MB), the review of the Board Risk Management Committee (BRMC) and the Board Audit Committee (BAC), prior to their publication on the Bank's website.

The established governance process ensures that both the Group's Management and the Board are given sufficient opportunity to debate and challenge the Disclosures before their publication, hence, to examine that the Disclosures have been subject to adequate verification and comply with applicable standards and legislation.

1.4 Economic Environment

Despite uncertainties, the overarching narrative for Cyprus remains positive, although growth is expected to be more moderate compared to 2021. The year 2021 closed much stronger than expected (GDP +5.5%). Our forecast for the year 2022 is revised down to 2,8% (from +3.8%) due to the expected effect of the Ukraine/Russia crisis (refer further below in this section) in sectors like accommodation and restaurants, administrative and related services and a slowdown in consumption by local residents due to higher inflation rates. Although the Bank maintained the credit quality of the loan portfolio, as the various Cyprus government and EU support measures in regard to COVID-19 are being lifted and geopolitical uncertainties remain high, these could negatively impact specific lending portfolios. The ability of certain borrowers to repay their obligations may be adversely affected and, consequently, the amount of expected credit risk losses.

The Bank is closely monitoring the affected loan portfolio and applies an effective, efficient and comprehensive arrears management of incremental credit risk of the exposures, with the use of early warning triggers and behavioural scoring models, in order to mitigate the risk of potential new defaults. With a sizable part of the loan portfolio already assessed through lifetime provisioning, a portion of performing loans covered by the Asset Protection Scheme ("APS") and a sale of a non-performing exposures portfolio ("Project Starlight"), the Bank will be able to normalize its cost of risk going forward.

In these challenging times, the Bank aims to remain in a robust position and will continue focusing on strengthening and improving its market position by supporting the real economy.

Russia/Ukraine crisis

The Bank is closely monitoring the latest developments in Ukraine and Russia and provides regular updates to the Executive Committees and Board Committees on contingency risk management actions and risk mitigation. The Bank is also taking all necessary and appropriate measures to manage all related risks and to comply with the applicable sanctions imposed on Russia. A Crisis Management Action Plan was developed by the Bank focusing on six key initiatives relating to the areas of: i) Compliance ii) Payments iii) Foreign exchange and Market Risk iv) Credit Risk v) Russian Banks monitoring & reporting vi) Information Security and Fraud.

The monitoring of customers has also intensified, while transactions are strictly monitored and vetted accordingly. The Bank expects limited impact from its direct exposure, while any indirect impact will depend on the longevity and severity of crisis and its impact on the Cypriot economy, which remains uncertain at this stage. The Bank will continue to monitor the situation, taking all necessary measures to mitigate the impact on its operations and financial performance.

The Russia/Ukraine crisis has moderated the growth expectations for the Cypriot economy and there is increased uncertainty regarding the potential economic impact of the crisis. Furthermore, elevated inflation rates have resulted in a significant positive shift in interest rate curves. The higher interest rates will have a positive impact on the Bank's revenues going forward. However, the Bank's financial performance could be impacted by, among others, (a) the ongoing negotiations with the Union for a new collective agreement and a staff exit scheme, (b) the completion of the Starlight project, and (c) increased cost of risk related to the higher costs of servicing loans and the weakening economy.

For more information on the Economic Environment refer to Note 39 of the Interim Condensed Consolidated Financial Statements for the six-month period ended 30 June 2022.

2 KEY METRICS

The table below, namely EU KM1, provides the key prudential and regulatory metrics and ratios covered by the CRR and CRD, including own funds, RWAs, capital ratios, capital buffers requirements, requirements based on SREP, leverage rate, liquidity coverage ratio and net stable funding ratio.

The table covers the first two quarters of 2022 and the last three quarters of 2021, in accordance with the Group's regulatory reporting submissions for each relevant quarter. The relevant capital ratios and leverage ratio that have been calculated on an IFRS 9 fully loaded basis are presented in Section 3.4.

For all periods presented below, except for 31 December 2021, capital ratios and leverage ratio disclosed are as per the Group's quarterly regulatory/supervisory reporting submissions, which unaudited profits are excluded, in accordance with Article 26(2) of the CRR.

Template 1: EU KM1 – Key metrics template

		a	b	c	d	e
		30-Jun-22[2]	**31-Mar-22**[3]	**31-Dec-21**[4]	**30-Sep-21**[3]	**30-Jun-21**[3]
	Available own funds (amounts € million)[5]					
1	Common Equity Tier 1 (CET1) capital	1.069	1.016	1.058	1.095	1.076
2	Tier 1 capital	1.198	1.145	1.187	1.224	1.206
3	Total capital	1.198	1.145	1.187	1.224	1.206
	Risk-weighted exposure amounts (€ million)[5]					
4	Total risk exposure amount	5.722	5.693	5.479	5.586	5.582
	Capital ratios (as a percentage of risk-weighted exposure amount)					
5	Common Equity Tier 1 ratio (%)	18,68%	17,84%	19,30%	19,59%	19,28%
6	Tier 1 ratio (%)	20,95%	20,12%	21,67%	21,92%	21,61%
7	Total capital ratio (%)	20,95%	20,12%	21,67%	21,92%	21,61%
	Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)					
EU 7a	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	3,45%	3,45%	3,20%	3,20%	3,20%
EU 7b	of which: to be made up of CET1 capital (%)	1,94%	1,94%	1,80%	1,80%	1,80%
EU 7c	of which: to be made up of Tier 1 capital (%)	2,59%	2,59%	2,40%	2,40%	2,40%
EU 7d	Total SREP own funds requirements (%)	11,45%	11,45%	11,20%	11,20%	11,20%
	Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)					
8	Capital conservation buffer (%)	2,50%	2,50%	2,50%	2,50%	2,50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	0,00%	0,00%	0,00%	0,00%	0,00%
9	Institution specific countercyclical capital buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 9a	Systemic risk buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
10	Global Systemically Important Institution buffer (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 10a	Other Systemically Important Institution buffer (%)	0,88%	0,88%	0,75%	0,75%	0,75%
11	Combined buffer requirement (%)	3,38%	3,38%	3,25%	3,25%	3,25%
EU 11a	Overall capital requirements (%)	14,83%	14,83%	14,45%	14,45%	14,45%
12	CET1 available after meeting the total SREP own funds requirements (%)	9,50%	8,67%	10,47%	10,72%	10,41%
	Leverage ratio[5]					
13	Total exposure measure	20.099	19.634	19.332	19.194	19.023
14	Leverage ratio (%)	5,96%	5,83%	6,14%	6,38%	6,34%
	Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)					
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14b	of which: to be made up of CET1 capital (%)	0,00%	0,00%	0,00%	0,00%	0,00%

[2] Figures and ratios presented are as per the final regulatory reporting submissions, for which interim profits for the six-month period ended 30 June 2022 are included, following permission granted by the Supervisory Authorities.
[3] Figures and ratios presented are as per the final regulatory reporting submissions, for which unaudited profits are excluded.
[4] Figures and ratios presented are as per the final regulatory reporting submissions, for which audited profits are included.
[5] On IFRS 9 transitional basis. Refer to Section 3.4 for metrices on an IFRS 9 fully loaded basis.

		a	b	c	d	e
		30-Jun-22[2]	31-Mar-22[3]	31-Dec-21[4]	30-Sep-21[3]	30-Jun-21[3]
EU 14c	Total SREP leverage ratio requirements (%)	3,00%	3,00%	3,00%	3,00%	3,00%
	Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)					
EU 14d	Leverage ratio buffer requirement (%)	0,00%	0,00%	0,00%	0,00%	0,00%
EU 14e	Overall leverage ratio requirement (%)	3,00%	3,00%	3,00%	3,00%	3,00%
	Liquidity Coverage Ratio[6]					
15	Total high-quality liquid assets (HQLA) (Weighted value -average) (€ million)	7.909	7.703	7.431	7.195	7.034
EU 16a	Cash outflows - Total weighted value (€ million)	2.092	1.992	1.904	1.865	1.854
EU 16b	Cash inflows - Total weighted value (€ million)	412	391	374	374	375
16	Total net cash outflows (adjusted value) (€ million)	1.680	1.601	1.530	1.491	1.478
17	Liquidity coverage ratio (%)	471%	481%	486%	483%	476%
	Net Stable Funding Ratio					
18	Total available stable funding (€ million)	16.565	14.016	13.848	14.942	14.936
19	Total required stable funding (€ million)	9.319	7.243	7.036	7.977	7.979
20	NSFR ratio (%)	178%	194%	197%	187%	187%

[6] As per EBA Guidelines on LCR disclosures (EBA/GL/2017/01), each quarterly observation is the average of the previous 12 months preceding the end of each quarter.

3 OWN FUNDS

3.1 Regulatory Capital

The Group's regulatory capital under Pillar I is calculated in accordance with the provisions of the CRR, as amended by CRR II where applicable, and is analysed in this section of the Disclosures. The capital base of the Group for regulatory purposes is divided into two main categories, namely the Common Equity Tier 1 (CET 1) capital and the Additional Tier 1 (AT 1) capital.

(I) Common Equity Tier 1 capital

Common Equity Tier 1 capital includes the Bank's share capital, share premium, retained earnings including the loss/profit for the year, accumulated other comprehensive income (i.e., revaluation reserve of investments in debt securities, revaluation reserve of investments in equity securities and property revaluation reserve) and other reserves such as reduction of share capital reserve. As per Article 26(1) of the CRR and EBA Guidelines on prudent valuations, a part of property revaluation reserve is not allowed to be included in CET 1 capital.

Prudential Filters and deductions from CET 1 capital

The following items which are deductible from CET1 capital in accordance with the CRR are as follows:

- The carrying amount of goodwill and other intangible assets, with the exception of software assets for which the provisions of Regulation (EU) 2020/873 apply and deferred tax assets that rely on future profitability and do not arise from temporary differences.

- The prudent valuation requirements of Article 105 of the CRR, and pursuant to Article 34 of the CRR, additional value adjustments (AVA) are applied to all assets and liabilities measured at fair value which relate to financial instruments and are deducted from CET 1 capital, as well as the amount of any additional prudential value adjustments as per Article 3 of the CRR.

- As per Regulation (EU) 2019/630 amending the CRR as regards to minimum loss coverage for non-performing exposures (Pillar 1 treatment) and as per ECB Addendum to NPL Guidance (2018) and minimum provision coverages for legacy defaulters communicated via SREP assessment (Pillar 2 treatment), the prudential provisioning of non-performing exposures is deducted from CET 1 capital.

- As per Article 16(2)(d) of the Regulation (EU) No 1024/2013, the net book value of immovable properties acquired in the course of satisfaction of debt, applicable for the six-month period ended 30 June 2022.

It is noted that the prudential filters of Article 32, regarding Securitised Assets, and Article 33, regarding cash flow hedges and changes in the value of own liabilities, of the CRR are not applicable to the Group.

IFRS 9 transitional arrangements

As per Regulation (EU) 2017/2395 issued amending the CRR, as regards transitional arrangements for mitigating the impact of the introduction of IFRS 9, a portion of the impact of expected credit losses provisions is added back to CET 1 capital allowing for a transitional period of five years until full impact on 2023. For the years 2022 and 2021 the portion added back is set at 25% and 50% respectively, with 2022 being the final year of the transitional period.

In June 2020, Regulation (EU) 2020/873 came into force, as regards certain adjustments in response to the COVID-19 pandemic, which extends the IFRS 9 transitional arrangements by introducing further relief measures to CET 1. IFRS 9 transitional arrangements have been extended by 2 years (i.e. up until 31 December 2024). Post 1 January 2020 expected credit losses on Stages 1 and 2 exposures are added back in CET 1 in a phased-out period of five years. For the years 2022 and 2021 the portion added back is 75% and 100% respectively, reducing to 50% for 2023 and to 25% for 2024, with 2024 being the final year of the transitional period.

Additionally, Regulation (EU) 2020/873 permits institutions to temporarily add back unrealised gains or losses on exposures to central governments, to regional governments or to local authorities and to public sector entities, excluding those financial assets that are credit-impaired, and measured at fair value through other comprehensive income, during the period from 1 January 2020 to 31 of December 2022. The Group has elected not to adopt this temporary relief, neither for the six-month period ended 30 June 2022 or the year ended 31 December 2021.

Disclosures of IFRS 9 transitional arrangements impact on capital ratios are presented in Section 3.4.

Items not deducted from CET 1 capital

The following items which are not deductible from CET1 capital in accordance with the CRR are as follows:

- The Group's significant investments in financial sector entities, including its investments in subsidiary companies which operate in the insurance sector, the Group applied the provisions of Article 48 of the CRR, where these items are less than 10% of CET 1 capital and therefore are risk weighted at 250%.

- The Group's deferred tax assets that rely on future profitability and arise from temporary differences, the Group applied the provisions of Article 48 of the CRR, where these items are less than 10% of CET 1 capital and therefore is risk weighted at 250%.

- The Group's significant investments in financial sector entities, as per the provisions of Article 48 of the CRR, including its investments in subsidiary companies which operate in the insurance sector and deferred tax assets that rely on future profitability and arise from temporary differences are subject to a combined threshold of 17,65% of CET 1 capital.

- As per Regulation (EU) No 2019/876 regarding the prudential treatment of software assets, the Group's portion of software assets not deducted from CET 1 is risk weighted at 100%.

(II) Additional Tier 1 capital

Additional Tier 1 capital includes hybrid instruments, composed by Convertible Capital Securities 1 (CCS1) and Convertible Capital Securities 2 (CCS2). The CCS1 and CCS2 are perpetual securities with no maturity date and are listed on the Cyprus Stock Exchange (CSE). In accordance with the terms and characteristics of CCS 1 and 2, their appropriate classification and measurement is that of a financial liability.

Full details/terms of issue of the Bonds and Securities of the Bank are included in the Prospectus and the Supplementary Prospectuses of each issue available on the Bank's official website: www.hellenicbank.com (Investor Relations). For more information in relation to the CCS1 and CCS2 securities, refer to Note 37 of the Financial Statements for the year ended 31 December 2021 and Section 4.1.2 of the Pillar III Disclosures for the year ended 31 December 2021.

The Group's Capital policy aims to ensure the viability of the Group through the maintenance of an appropriate level of capital, to meet regulatory and legal requirements and internal buffers set, safeguard the best interests of shareholders and support its business strategy. As per Article 437 (1) (e) of the CRR no restrictions apply to the calculation of own funds.

Additionally, the Bank should continue to refrain from making distributions to its shareholders, as the 2019 SREP decision continues to apply.

3.2 Composition of regulatory own funds

The tables below disclose the components of regulatory capital as at 30 June 2022 and 31 December 2021. The disclosures have been prepared using the format set out in Annex VII of the Commission Implementing Regulation (EU) 2021/637 laying down implementing technical standards (ITS) with regards to the disclosure of own funds requirements for institutions, as per Article 437 of the CRR.

Template 2: EU CC1 – Composition of regulatory own funds

(€ million)		(a)	(b)	(c)
		30 June 2022	**31 December 2021**	**Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation[7]**
Common Equity Tier 1 (CET 1) capital: instruments and reserves				
1	Capital instruments and the related share premium accounts	760	760	F
2	Retained earnings	11	31	G
3	Accumulated other comprehensive income (and other reserves) Note: i	288	296	H
EU-3a	Funds for general banking risk	--	--	
4	Amount of qualifying items referred to in Article 484 (3) CRR and the related share premium accounts subject to phase out from CET1	--	--	
5	Minority interests (amount allowed in consolidated CET 1)	--	--	
EU-5a	Independently reviewed interim profits net of any foreseeable charge or dividend	57	--	G
6	**Common Equity Tier 1 (CET 1) capital before regulatory adjustments**	**1.116**	**1.087**	
Common Equity Tier 1 (CET 1) capital: regulatory adjustments				
7	Additional value adjustments (negative amount)	--	--	
8	Intangible assets (net of related tax liability) (negative amount) Note: ii	(34)	(32)	C
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	--	(1)	D
11	Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	--	--	
12	Negative amounts resulting from the calculation of expected loss amounts	--	--	
13	Any increase in equity that results from securitised assets (negative amount)	--	--	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	--	--	
15	Defined-benefit pension fund assets (negative amount)	--	--	
16	Direct and indirect holdings by an institution of own CET 1 instruments (negative amount)	--	--	
17	Direct, indirect and synthetic holdings of the CET 1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	--	--	
18	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	--	--	
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	--	--	
EU-20a	Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	--	--	
EU-20b	of which: qualifying holdings outside the financial sector (negative amount)	--	--	
EU-20c	of which: securitisation positions (negative amount)	--	--	
EU-20d	of which: free deliveries (negative amount)	--	--	

[7] References provide the mapping of items of the statement of financial position prepared under the regulatory scope of consolidation used to calculate regulatory capital as reflected in the column "References" in Section 4.3 "EU CC2 - Reconciliation of regulatory own funds to statement of financial position in the audited financial statements".

(€ million)		(a)	(b)	(c)
		30 June 2022	31 December 2021	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation[7]
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	--	--	
22	Amount exceeding the 17,65% threshold (negative amount)	--	--	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	--	--	
25	of which: deferred tax assets arising from temporary differences	--	--	
EU-25a	Losses for the current financial year (negative amount)	--	(21)	G
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	--	--	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	--	--	
27a	Other regulatory adjustments Note: iii	(14)	25	
28	**Total regulatory adjustments to Common Equity Tier 1 (CET 1)**	**(47)**	**(29)**	
29	**Common Equity Tier 1 (CET 1) capital**	**1.069**	**1.058**	
Additional Tier 1 (AT1) capital: instruments				
30	Capital instruments and the related share premium accounts	130	130	E
31	of which: classified as equity under applicable accounting standards	--	--	
32	of which: classified as liabilities under applicable accounting standards	130	130	E
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	--	--	
EU-33a	Amount of qualifying items referred to in Article 494a (1) CRR subject to phase out from AT1	--	--	
EU-33b	Amount of qualifying items referred to in Article 494b (1) CRR subject to phase out from AT1	--	--	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	--	--	
35	of which: instruments issued by subsidiaries subject to phase out	--	--	
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**130**	**130**	
Additional Tier 1 (AT1) capital: regulatory adjustments				
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	--	--	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	--	--	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	--	--	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	--	--	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	--	--	
42a	Other regulatory adjustments to AT1 capital	--	--	
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**--**	**--**	
44	**Additional Tier 1 (AT1) capital**	**130**	**130**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**1.198**	**1.187**	
Tier 2 (T2) capital: instruments				
46	Capital instruments and the related share premium accounts	--	--	
47	Amount of qualifying items referred to in Article 484(5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	--	--	

(€ million)		(a) 30 June 2022	(b) 31 December 2021	(c) Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation[7]
EU-47a	Amount of qualifying items referred to in Article 494a (2) CRR subject to phase out from T2	--	--	
EU-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	--	--	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	--	--	
49	of which: instruments issued by subsidiaries subject to phase out	--	--	
50	Credit risk adjustments	--	--	
51	**Tier 2 (T2) capital before regulatory adjustments**	**--**	**--**	
	Tier 2 (T2) capital: regulatory adjustments			
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	--	--	
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	--	--	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	--	--	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	--	--	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	--	--	
EU-56b	Other regulatory adjustments to T2 capital	--	--	
57	**Total regulatory adjustments to Tier 2 (T2) capital**	**--**	**--**	
58	**Tier 2 (T2) capital**	**--**	**--**	
59	**Total capital (TC = T1 + T2)**	**1.198**	**1.187**	
60	**Total risk exposure amount**	**5.722**	**5.479**	
	Capital ratios and buffers			
61	**Common Equity Tier 1 capital**	**18,68%**	**19,30%**	
62	**Tier 1 capital**	**20,95%**	**21,67%**	
63	**Total capital**	**20,95%**	**21,67%**	
64	**Institution CET 1 overall capital requirement** Note: iv	**9,82%**	**9,55%**	
65	*of which: capital conservation buffer requirement*	*2,50%*	*2,50%*	
66	*of which: countercyclical capital buffer requirement*	*0,00%*	*0,00%*	
67	*of which: systemic risk buffer requirement*	*0,00%*	*0,00%*	
EU-67a	*of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement*	*0,88%*	*0,75%*	
EU-67b	*of which: additional own funds requirements to address the risks other than the risk of excessive leverage*	*1,94%*	*1,80%*	
68	**Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements**	**9,50%**	**10,47%**	
	Amounts below the thresholds for deduction (before risk weighting)			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	--	--	
73	Direct and indirect holdings by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17,65% thresholds and net of eligible short positions) Note: v	--	--	A plus B
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	--	--	D
	Applicable caps on the inclusion of provisions in Tier 2			

(€ million)		(a)	(b)	(c)
		30 June 2022	31 December 2021	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation[7]
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	--	--	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	63	60	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	--	--	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	--	--	
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 and 1 Jan 2022)			
80	Current cap on CET1 instruments subject to phase out arrangements	--	--	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	--	--	
82	Current cap on AT1 instruments subject to phase out arrangements	--	--	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	--	--	
84	Current cap on T2 instruments subject to phase out arrangements	--	--	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	--	--	

Notes:

i. As at 30 June 2022, as per Article 26 (1) of the CRR and EBA Guidelines on prudent valuations, a part of property revaluation reserve amounting to €20,7 million is not allowed to be included in CET 1 capital (31 December 2021: €20,7 million).

ii. As at 30 June 2022, software assets amounting to €12,2 million (31 December 2021: €14,9 million) were not deducted from CET 1 capital as per the provisions of Regulation (EU) 2020/873. Additionally, Goodwill includes the excess of the cost of the acquisition over the Group's interest in the net fair value of the identifiable assets, liabilities and contingent liabilities of the acquired entities at the date of acquisition of Pancyprian Insurance Ltd (PIL) amounting to €14,1 million (31 December 2021: €14,1 million). Goodwill classified as held for sale as at 30 June 2022 amounting to €2,4 million is also included (31 December 2021: €2,4 million).

iii. Other regulatory adjustments include the following:

- IFRS 9 transitional arrangements added back of €14,1 million (31 December 2021: €48,6 million),
- Capital reduction for additional prudential value adjustments as per Article 3 of the CRR of €0,8 million (31 December 2021: €1,4 million),
- The capital deduction for the prudential provisioning of non-performing exposures of €26,1 million (31 December 2021: €22,5 million), and
- The deduction of net book value of immovable properties acquired in the course of satisfaction of debt, as per Article 16(2)(d) of Regulation (EU) No 1024/2013, of €0,7 million (31 December 2021: NIL).

iv. Row 64 in the table above includes CET 1 Pillar II requirement and combined buffer requirement.

v. The statement of financial position, referenced in the corresponding column (c) above, includes the Group's significant investments in financial sector entities, including its investments in subsidiary companies which operate in the insurance sector (amount below 10% threshold from CET 1 capital).

Composition of regulatory own funds – commentary

The decrease of 62 basis in CET 1 ratio[8] of the Group, as at 30 June 2022, compared to 31 December 2021, was the result of the following:

(i) increase in CET1 capital due to:
- current period profits (effect of 104 basis points increase),
- the change in IFRS 9 transitional arrangements added back to CET 1, reduced from 50% for 2021 to 25% for 2022 and the COVID-19 relief measures as per Regulation (EU) 2020/873 by which subsequently to 1 January 2020 expected credit losses on Stages 1 and 2 exposures are added back in CET 1 in a phased-out period of 5 years (reducing to 75% for 2022 from 100% for 2020 and 2021) (effect of 63 basis points decrease),
- the change in prudential provision for non-performing exposures[9] and the deduction of net book value of immovable properties acquired in the course of satisfaction of debt (total effect of 8 basis points decrease),
- the decrease in other comprehensive income mainly due to the decrease in revaluation reserve from bonds and the change in intangible assets deducted from own funds (total effect of 12 basis points decrease),

(ii) overall increase in RWAs (effect of 83 basis points decrease), mainly due to:
- the increase in credit RWAs mainly driven by the increase in net funded exposures due to the acquisition of part of the performing loan portfolio (Tranche A and Tranche B)[10] from RCB Bank, (refer to Section 4.1.1).

[8] The figures and ratios presented as at 30 June 2022 are as per the final regulatory reporting submissions, for which interim profits are included, following permission granted by the Supervisory Authorities.
[9] As per Regulation (EU) 2019/630, amending Regulation (EU) No 575/2013 as regards to minimum loss coverage for non-performing exposures (Pillar 1 treatment) and as per ECB Addendum to NPL Guidance (2018) and minimum provision coverages for legacy defaulters communicated via SREP assessment (Pillar 2 treatment).
[10] As per the Bank's announcement on 22 March 2022 "Agreement to acquire a performing loan portfolio".

3.3 Reconciliation of regulatory own funds (on IFRS 9 transitional basis) to statement of financial position in the audited financial statements

The below tables provide a comparison between the statement of financial position included in the financial statements and the statement of financial position prepared under the regulatory scope of consolidation, in accordance with the format set out in Annex VII of the Commission Implementing Regulation (EU) 2021/637. References in the last column of the tables provide the mapping of items of the statement of financial position under the regulatory scope of consolidation used to calculate regulatory capital.

Template 3: EU CC2 – Reconciliation of regulatory own funds to statement of financial position in the financial statements for the six-month period ended 30 June 2022

30 June 2022 (€ million)		**a**	**b**	**c**
		Statement of financial position as in published financial statements as at period ended 30 June 2022	**Statement of financial position under regulatory scope of consolidation as at period ended 30 June 2022**	**References[11]**
Assets				
1	Cash and balances with Central Banks	7.233	7.233	
2	Placements with other banks	499	481	
3	Loans and advances to customers	6.124	6.124	
4	Debt securities	4.758	4.758	
5	Equity securities and collective investment units	109	29	A
6	Investment in subsidiary companies	--	40	B
7	Property, plant and equipment	172	165	
8	Stock of property	152	151	
9	Intangible assets	46	29	C
10	Tax receivable	5	5	
11	Deferred tax asset	--	--	
12	Assets and disposal group held for sale	226	226	
13	Other assets	148	94	
14	**Total assets**	**19.472**	**19.335**	
Liabilities				
15	Deposits by banks	124	124	
16	Funding by Central Banks	2.277	2.277	
17	Customer deposits and other customer accounts	15.458	15.458	
18	Amounts due to subsidiary companies	--	6	
19	Tax payable	5	4	
20	Deferred tax liability	10	10	D
21	Liabilities and disposal group held for sale	2	2	
22	Other liabilities	310	187	
23	Loan capital	130	130	E
24	**Total liabilities**	**18.316**	**18.198**	
Shareholders' Equity				
25	Share capital and share premium	760	760	F
26	Retained earnings	84	68	G
27	Accumulated other comprehensive income and other reserves	312	309	H
28	**Equity attributable to owners of the parent company**	**1.156**	**1.137**	
29	Non-controlling interests	--	--	
30	**Total equity**	**1.156**	**1.137**	I/J
31	**Total liabilities and equity**	**19.472**	**19.335**	

[11] References provide the mapping of items of the statement of financial position prepared under the regulatory scope of consolidation used to calculate regulatory capital as reflected in column "References" in Section 3.2 "EU CC1 - Composition of regulatory own funds".

Template 4: EU CC2 – Reconciliation of regulatory own funds to statement of financial position in the audited financial statements for the year ended 31 December 2021

31 December 2021 (€ million)		a	b	c
		Statement of financial position as in published financial statements as at year ended 31 December 2021	**Statement of financial position under regulatory scope of consolidation as at year ended 31 December 2021**	**References[11]**
Assets				
1	Cash and balances with Central Banks	7.346	7.346	
2	Placements with other banks[12]	414	397	
3	Loans and advances to customers	5.732	5.732	
4	Debt securities[12]	4.463	4.463	
5	Equity securities and collective investment units[12]	94	29	A
6	Investment in subsidiary companies	--	40	B
7	Property, plant and equipment	180	173	
8	Stock of property	169	168	
9	Intangible assets	47	30	C
10	Tax receivable	3	3	
11	Deferred tax asset	--	--	
12	Assets and disposal group held for sale	254	254	
13	Other assets[12]	134	87	
14	**Total assets**	**18.836**	**18.722**	
Liabilities				
15	Deposits by banks	122	122	
16	Funding by Central Banks	2.294	2.294	
17	Customer deposits and other customer accounts	14.942	14.942	
18	Amounts due to subsidiary companies	--	6	
19	Tax payable	3	2	
20	Deferred tax liability	10	10	D
21	Liabilities and disposal group held for sale	3	3	
22	Other liabilities	226	127	
23	Loan capital	130	130	E
24	**Total liabilities**	**17.730**	**17.636**	
Shareholders' Equity				
25	Share capital and share premium	760	760	F
26	Retained earnings	28	10	G
27	Accumulated other comprehensive income and other reserves	318	317	H
28	**Equity attributable to owners of the parent company**	**1.106**	**1.086**	
29	Non-controlling interests	--	--	
30	**Total equity**	**1.106**	**1.086**	I/J
31	**Total liabilities and equity**	**18.836**	**18.722**	

[12] Comparative figures on placements with other banks, investments in debt securities and investments in equity securities and collective investments, have been reclassified to conform with changes in the presentation of the statement of financial position in the published financial statements of the current period which reflects the reclassification of the assets held to cover liabilities of unit linked funds included in "Other assets" to each of these categories. For further information, refer to Note 4.3 of the Interim Condensed Consolidated Financial Statements for the six-month period ended 30 June 2022.

The following table provides reconciliation between regulatory capital, on an IFRS 9 transitional basis, with equity in the statement of financial position presented in the published financial statements for the six-month period ended 30 June 2022 and year ended 31 December 2021.

€ million	References[13]	30 June 2022	31 December 2021
Total equity per published financial statements	I	1.156	1.106
Regulatory deductions:			
Deconsolidation of insurance entities	I - J	(19)	(20)
Intangible assets	C	(34)	(32)
Deferred tax assets that rely on future profitability and do not arise from temporary differences	D	--	(1)
Reserves arising from revaluation of properties and other non CET1 eligible reserves[14]		(21)	(20)
Value adjustments due to the requirements for prudent valuation		(0)	(0)
Additional deductions of CET1 Capital due to Article 3 CRR[15]		(1)	(1)
IFRS 9 transitional arrangements		14	49
CET1 capital elements or deductions - other		(26)	(23)
Total Common Equity Tier 1 capital (CET 1)		**1.069**	**1.058**
Additional Tier 1 capital			
Loan Capital	E	130	130
Total Additional Tier 1 capital		**130**	**130**
Total Tier 1 capital		**1.198**	**1.187**
Tier 2 capital			
Loan Capital		--	--
Total Tier 2 capital		**--**	**--**
Total Own funds		**1.198**	**1.187**

[13] References provide the mapping of items of the statement of financial position prepared under the regulatory scope of consolidation used to calculate regulatory capital as reflected in the column "References" in Section 3.3 "EU CC2 - Reconciliation of regulatory own funds to statement of financial position in the audited financial statements".
[14] As per Article 26(1) of the CRR and EBA Guidelines on prudent valuations, a part of property revaluation reserve is not allowed to be included in CET 1 capital.
[15] Additionally, the amount of any additional prudential value adjustments as per Article 3 of the CRR are deducted from CET 1 capital.

3.4 Comparison of own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 CRR

The following table provides a comparison of the Group's own funds, Common Equity Tier 1 capital, Tier 1 capital, risk-weighted assets, Common Equity Tier 1 capital ratio, Tier 1 capital ratio, total capital ratio and leverage ratio with and without the application of transitional arrangements for IFRS 9 or analogous ECLs. Only the transitional arrangements arising from the implementation of the IFRS 9 and analogous ECLs are considered for the purposes of this template.

Template 5: IFRS 9 – FL

		30-Jun-22[16]	31-Mar-22[17]	31-Dec-21[18]	30-Sep-21[17]	30-Jun-21[17]
	Available capital (amounts € million)					
1	Common Equity Tier 1 (CET1) capital	1.069	1.016	1.058	1.095	1.076
2	Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1.055	1.002	1.009	1.043	1.031
2a	CET1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI (other comprehensive income) in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--
3	Tier 1 capital	1.198	1.145	1.187	1.224	1.206
4	Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1.184	1.131	1.139	1.172	1.161
4a	Tier 1 capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--
5	Total capital	1.198	1.145	1.187	1.224	1.206
6	Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	1.184	1.131	1.139	1.172	1.161
6a	Total capital as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--
	Risk-weighted assets (amounts € million)					
7	Total risk-weighted assets	5.722	5.693	5.479	5.586	5.582
8	Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5.708	5.679	5.431	5.536	5.517
	Capital ratios (%)					
9	Common Equity Tier 1 (as a percentage of risk exposure amount)	18,68%	17,84%	19,30%	19,59%	19,28%
10	Common Equity Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18,48%	17,64%	18,58%	18,83%	18,69%
10a	CET1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--
11	Tier 1 (as a percentage of risk exposure amount)	20,95%	20,12%	21,67%	21,92%	21,61%
12	Tier 1 (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	20,75%	19,92%	20,96%	21,18%	21,04%
12a	Tier 1 (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--
13	Total capital (as a percentage of risk exposure amount)	20,95%	20,12%	21,67%	21,92%	21,61%

[16] Figures and ratios presented are as per the final regulatory reporting submissions, for which interim profits are included, following permission granted by the Supervisory Authorities.
[17] Figures and ratios presented are as per the final regulatory reporting submissions, for which unaudited profits are excluded.
[18] Figures and ratios presented are as per the final regulatory reporting submissions.

		30-Jun-22[16]	31-Mar-22[17]	31-Dec-21[18]	30-Sep-21[17]	30-Jun-21[17]
14	Total capital (as a percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	20,75%	19,92%	20,96%	21,18%	21,04%
14a	Total capital (as a percentage of risk exposure amount) as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--
	Leverage ratio (%)					
15	Leverage ratio total exposure measure	20.099	19.634	19.332	19.194	19.023
16	Leverage ratio	5,96%	5,83%	6,14%	6,38%	6,34%
17	Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	5,88%	5,75%	5,90%	6,12%	6,11%
17a	Leverage ratio as if the temporary treatment of unrealised gains and losses measured at fair value through OCI in accordance with Article 468 of the CRR had not been applied	--	--	--	--	--

Since 2018, as per the notification to the regulator, the Group has been applying to the full extent the IFRS9 transitional arrangements for capital as set out under CRR Article 473a (including amendments via the CRR “quick-fix” revisions published in June 2020). Specifically, the Group has opted to apply both paragraphs 2 and 4 of CRR Article 473a (static and dynamic relief).

The CRR allows for a phase-in of the CET 1 reduction due to the increase in credit loss allowance, as a result of the implementation of IFRS 9, over a five-year period until year end 2024. The transitional provisions are structured in such a way that there is a static component relating to increases of credit loss allowance observed as of January 2018 and as per the CRR amendment published in June 2020 a dynamic component relating to credit loss allowance increases observed between two periods. The first being a period from January 2018 to January 2020 with a phase-in period until 2022, whilst the second period covers January 2020 to the currenting reporting date allowing for an extended phased-in period until 2024.

As of 30 June 2022, static relief under the IFRS 9 transitional arrangements amounted to €9,6 million (31 December 2021: €19,3 million) and dynamic relief amounted to €4,4 million (31 December 2021: €29,4 million) through CET 1 capital.

3.5 Countercyclical capital buffer

As set out in Article 130(1) of CRD, Member States are obliged to require institutions to maintain an institution-specific countercyclical capital buffer.

With a view to ensuring transparency and comparability across institutions, the CRR requires institutions to disclose the key elements of the calculation of their countercyclical capital buffer, comprising the geographical distribution of their relevant credit exposures and the final amount of their institution-specific countercyclical capital buffer.

As set out in Article 130(1) of CRD, an institution-specific countercyclical buffer is calculated as the product of its total risk exposure amount in accordance with Article 92(3) of the CRR and the institution-specific countercyclical buffer rate. In accordance with CRD Article 140(1), an institution-specific countercyclical capital buffer rate consists of the weighted average of the countercyclical buffer rates that apply in the countries where the relevant credit exposures of the institution are located.

The distribution by country of relevant credit exposures is provided in the tables below for 30 June 2022 and 31 December 2021 respectively, in accordance with the provisions laid down in Commission Delegated Regulation (EU) No 1152/2014. It is noted that the scope of template EU CCyB1, set out below, is limited to credit exposures relevant for the calculation of CCyB, in accordance with Article 140(4) of CRD.

In accordance with Article 2(5)(b) of Commission Delegated Regulation (EU) No 1152/2014, foreign general credit risk exposures, whose aggregate does not exceed 2% of the aggregate of the general credit, trading book and securitisation exposures of that institution, may be allocated to the institutions' home member state. The Bank has applied this discretion and since the highest foreign exposure is less than the 2% threshold (except France, Netherlands, UK and US for both December 2021 and June 2022), all foreign exposures, excluding the ones aforementioned, have been allocated to Cyprus.

Template 6: EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer

30 June 2022 (€ million)		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		**Relevant credit exposures – Market risk**		**Securitisation exposures Exposure value for non-trading book**	**Total exposure value**	**Own fund requirements**				**Risk-weighted exposure amounts**	**Own fund requirements weights (%)**	**Counter cyclical buffer rate (%)**
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	**Total**			
010	**Breakdown by country:**													
0101	Cyprus	6.084	--	--	--	251	6.335	325	--	5	**329**	4.126	**90%**	**0%**
0102	France	169	--	--	--	224	393	5	--	4	**9**	107	**2%**	**0%**
0103	Netherlands	179	--	--	--	180	359	8	--	2	**10**	120	**3%**	**0%**
0104	United States of America	154	--	--	--	--	154	12	--	--	**12**	154	**3%**	**0%**
0107	United Kingdom	230	--	--	--	--	230	8	--	--	**8**	95	**2%**	**0%**
020	**Total**	**6.816**	**--**	**--**	**--**	**655**	**7.471**	**357**	**--**	**11**	**368**	**4.602**	**100%**	

31 December 2021 (€ million)		a	b	c	d	e	f	g	h	i	j	k	l	m
		General credit exposures		Relevant credit exposures – Market risk		Securitisation exposures Exposure value for non-trading book	Total exposure value	Own fund requirements				Risk-weighted exposure amounts	Own fund requirements weights (%)	Counter cyclical buffer rate (%)
		Exposure value under the standardised approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for SA	Value of trading book exposures for internal models			Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
010	**Breakdown by country:**													
0101	Cyprus	5.520	--	--	--	192	5.712	309	--	6	**315**	3.938	**90%**	**0%**
0102	France	148	--	--	--	210	358	4	--	3	**7**	88	**2%**	**0%**
0103	Netherlands	141	--	--	--	161	302	8	--	1	**9**	113	**3%**	**0%**
0104	United States of America	127	--	--	--	--	127	11	--	--	**11**	137	**3%**	**0%**
0107	United Kingdom	226	--	--	--	30	256	7	--	1	**8**	100	**2%**	**0%**
020	**Total**	**6.162**	**--**	**--**	**--**	**593**	**6.755**	**339**	**--**	**11**	**350**	**4.376**	**100%**	

The table below summarizes the institution-specific countercyclical buffer rate calculation for 30 June 2022 and 31 December 2021 respectively:

Template 7: EU CCyB2 – Amount of institution-specific countercyclical capital buffer

€ million		**30 June 2022**	**31 December 2021**
1	Total Risk Exposure Amount	5.722	5.479
2	Institution specific countercyclical buffer rate	0,0%	0,0%
3	Institution specific countercyclical buffer requirement	--	--

3.6 Minimum required own funds for credit, market and operational risk

3.6.1 Overview of total risk weighted exposure amounts (RWEA)

The Group follows the Standardised Approach for the calculation of the Pillar I capital requirement for credit risk and market risk and the Basic Indicator Approach (BIA) for operational risk. Pillar II requirement (P2R) is a bank-specific capital requirement which applies in addition to, and covers risks which are underestimated or not covered by Pillar I. P2R is determined on the basis of SREP.

The tables below provide a breakdown of the RWEAs by risk frameworks and model approaches and the corresponding Pillar I own funds requirements (defined on Pillar I total capital at 8%) for the periods disclosed.

Template 8: EU OV1 – Overview of total risk exposure amounts

(€ million)		**Total risk exposure amounts (TREA)[19]**		**Total own funds requirements**
		30 June 2022	**31 March 2022**	**30 June 2022**
1	Credit risk (excluding CCR)	4.872	4.843	390
2	*Of which the standardised approach*	4.872	4.843	390
3	*Of which the Foundation IRB (F-IRB) approach*	--	--	--
4	*Of which slotting approach*	--	--	--
EU 4a	*Of which equities under the simple risk weighted approach*	--	--	--
5	*Of which the Advanced IRB (A-IRB) approach*	--	--	--
6	Counterparty credit risk - CCR	14	10	1
7	*Of which the standardised approach*	--	--	--
8	*Of which internal model method (IMM)*	--	--	--
EU 8a	*Of which exposures to a CCP*	--	--	--
EU 8b	*Of which credit valuation adjustment - CVA*	7	4	--
9	*Of which other CCR*	7	6	1
15	Settlement risk	--	--	--
16	Securitisation exposures in the non-trading book (after the cap)	138	141	11
17	*Of which SEC-IRBA approach*	--	--	--
18	*Of which SEC-ERBA (including IAA)*	112	111	9
19	*Of which SEC-SA approach*	26	30	2
EU 19a	*Of which 1250% / deduction*	--	--	--
20	Position, foreign exchange and commodities risks (Market risk)	2	3	--
21	*Of which the standardised approach*	*2*	*3*	--
22	*Of which IMA*	--	--	--
EU 22a	Large exposures	--	--	--
23	Operational risk	696	696	56
EU 23a	*Of which basic indicator approach*	696	696	56
EU 23b	*Of which standardised approach*	--	--	--
EU 23c	*Of which advanced measurement approach*	--	--	--
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	134	132	11
29	**Total**	**5.722**	**5.693**	**458**

[19] Figures reported include exposures classified as held for sale as per IFRSs.

(€ million)		Total risk exposure amounts (TREA)[19]		Total own funds requirements
		30 June 2021	31 March 2021	30 June 2021
1	Credit risk (excluding CCR)	4.697	4.683	376
2	*Of which the standardised approach*	4.697	4.683	376
3	*Of which the Foundation IRB (F-IRB) approach*	--	--	--
4	*Of which slotting approach*	--	--	--
EU 4a	*Of which equities under the simple risk weighted approach*	--	--	--
5	*Of which the Advanced IRB (A-IRB) approach*	--	--	--
6	Counterparty credit risk - CCR	14	5	1
7	*Of which the standardised approach*	--	--	--
8	*Of which internal model method (IMM)*	--	--	--
EU 8a	*Of which exposures to a CCP*	--	--	--
EU 8b	*Of which credit valuation adjustment - CVA*	5	2	--
9	*Of which other CCR*	9	3	1
15	Settlement risk	--	--	--
16	Securitisation exposures in the non-trading book (after the cap)	137	119	11
17	*Of which SEC-IRBA approach*	--	--	--
18	*Of which SEC-ERBA (including IAA)*	92	73	7
19	*Of which SEC-SA approach*	44	46	4
EU 19a	*Of which 1250% / deduction*	--	--	--
20	Position, foreign exchange and commodities risks (Market risk)	1	1	--
21	*Of which the standardised approach*	1	1	--
22	*Of which IMA*	--	--	--
EU 22a	Large exposures	--	--	--
23	Operational risk	733	733	59
EU 23a	*Of which basic indicator approach*	733	733	59
EU 23b	*Of which standardised approach*	--	--	--
EU 23c	*Of which advanced measurement approach*	--	--	--
24	Amounts below the thresholds for deduction (subject to 250% risk weight)	119	120	10
29	**Total**	**5.582**	**5.541**	**447**

The main drivers for any material changes in RWA for CCR risk and securitisation exposures are analysed in Sections 4.3 and 7 respectively.

3.6.2 Minimum Capital Requirements – Market Risk

For calculating the minimum capital requirement, the Group uses the Standardised Approach. The size of the Bank's business subject to market risk is smaller than the thresholds applicable according to the CRR II rules and therefore the Bank continues to use the standardised approach. Based on this method, the capital requirement is calculated as the sum of the capital requirements on risk positions in interest rates, equities, debt securities, foreign exchange and derivatives, which are part of the trading book, based on predetermined models per risk category.

It should be noted that under Article 351 of the CRR, the Bank is required to maintain capital for foreign exchange risk only if its overall net foreign exchange position exceeds 2% of its Own Funds. In the Bank's case, the overall net foreign exchange position was less than 2%, both on 30 June 2022 and 31 December 2021, so there was no need to hold capital for foreign exchange risk.

The table below shows the capital requirements for the trading book, by risk category.

Template 9: EU MR1 – Market risk under the standardised approach

€ million		**a**	**a**
		RWEAs 30 June 2022	**RWEAs 31 December 2021**
	Outright products		
1	*Interest rate risk (general and specific)*	*2*	*1*
2	*Equity risk (general and specific)*	--	--
3	*Foreign exchange risk*	--	--
4	*Commodity risk*	--	--
	Options		
5	*Simplified approach*	--	--
6	*Delta-plus approach*	--	--
7	*Scenario approach*	--	--
8	*Securitisation (specific risk)*	--	--
9	***Total***	***2***	***1***

3.7 Minimum requirement for own funds and eligible liabilities

The Bank, within the framework of the Bank Recovery and Resolution Directive (BRRD), is subject to the minimum requirement for own funds and eligible liabilities (MREL). The framework, which entered into effect on 1 January 2016, provides authorities with a credible set of tools to intervene sufficiently early and quickly in an unsound or failing institution so as to ensure the continuity of the institution's critical financial and economic functions, while minimising the impact of an institution's failure on the economy and financial system. This is achieved by requiring banks to have a funding structure with a certain proportion of liabilities that can be written off or converted into equity in the event of a bank failure (that is: "bailed in"). Such liabilities, in combination with equity, are known as MREL.

On 27 June 2019, as part of the reform package for strengthening the resilience and resolvability of European banks, the BRRD II came into effect and it has recently being transposed into National Law. Further to the above, certain provisions on MREL have been introduced in CRR II, which also came into force on 27 June 2019, as part of the reform package and took immediate effect.

The Bank has received a formal notification (the Decision) from the Single Resolution Board (SRB) in December 2021, of its final decision for the binding minimum requirement for own funds and eligible liabilities (MREL) for the Group.

As per the Decision, the final MREL target is set at 24,13% of total risk exposure amount (TREA), plus combined buffer requirement (CBR) resulting in a total target of 27,63%, while the final MREL target of leverage ratio exposure (LRE) is set at 5,91%, both to be met by 31 December 2025. Additionally, interim binding targets have been set at 16,57% of TREA, plus CBR resulting in a total target of 19,95%, and 5,91% of LRE, both to be met by 1 January 2022. No MREL subordination requirement has been communicated to the Bank.

The MREL ratio[20] of the Group as at 30 June 2022 was 20,95% of TREA and 5,96% of LRE. After adjusting for the Project Starlight and the EIB funding, the pro forma MREL ratio[20,21] of the Group as at 30 June 2022 was c.22,9% of TREA and c.6,4% of LRE.

The Bank established a Euro Medium Term Note (EMTN) Programme of a €1,5 billion size, in order to issue MREL. On 11 July 2022, the Bank announced that it had successfully launched and priced the issuance of €100 million Senior Preferred Notes (the "Notes"), under its €1.500.000.000 Euro Medium Term Note Programme (EMTN). The Notes are priced at par with a fixed coupon of 9% per annum, payable annually in arrears. The fixed coupon will reset on 15 July 2024. The maturity date of the Notes is 15 July 2025, and the Notes are callable at par on 15 July 2024 (3NC2), subject to meeting certain regulatory conditions as specified in the terms and conditions of the Notes. The settlement occurred on 15 July 2022. The Notes were admitted to trading on the Euro Multilateral Trading Facility (MTF) Market of the Luxembourg Stock Exchange and listed on the Official List of the Luxembourg Stock Exchange. The transaction is the Bank's inaugural issuance of notes and is expected to qualify towards the Bank's minimum requirement for own funds and eligible liabilities (MREL).

Following the issuance of €100 million Notes the Group's pro forma MREL ratio[20,21] as at 30 June 2022 was c.24,6% of TREA and c.6,9% of LRE.

Going forward, the Bank will proceed with additional MREL issuances within the compliance period until the end 2025, with the instrument, size, duration and timing of issuance, subject to market conditions and investor interest and taking into account relevant advisor feedback.

The MREL requirement for the final target to be met by 31 December 2025 is expected to change over time due to: (a) possible changes in regulatory capital requirements and/or (b) changes in the financial position of the Bank (such as changes in RWAs, own funds, non-performing exposures etc). The Bank anticipates that the MREL requirement will continue to be assessed and be set on an ongoing basis.

The provisions on disclosures on MREL, as published by the EBA (EBA/ITS/2020/06 on 3 August 2020) and the SRB, apply from 1st January 2024 at the earliest and the first reference date for reporting in accordance with the implementing technical standards was the 30 June 2021.

[20] On IFRS 9 transitional basis, including interim reviewed profits, following permission obtained from Supervisory Authorities.
[21] Pro forma taking into account the positive impact from the Starlight agreement (includes the servicer sale gain, the RWA relief from the NPE disposal and the RWA increase from retaining the Senior Note and the Mezzanine) and the EIB funding which is subject to eligibility confirmation by the SRB.

4 CREDIT RISK

4.1 Credit Risk Quality of assets

4.1.1 Non-performing exposures

The tables below disclose information on NPEs based on the definitions of the EBA standards. The definition of credit impaired loans (Stage 3) is aligned to the EBA NPEs definition.

The EBA published in 2014 its technical standards with respect to non-performing and forborne exposures, which were adopted by the European Commission (EC) through the Commission Implementation Regulation (EU) 2015/1278. Exposures include all debt instruments (loans and advances and debt securities) and off-balance sheet exposures, except those held for trading exposures.

As per the above regulation, the following are considered as NPEs:

(i) Material exposures that are over 90 days past due as per the Regulatory Technical Standards on the materiality threshold for Past due credit obligations (EBA/RTS/2016/06),

(ii) The debtor is assessed as unlikely to pay its credit obligations in full without realisation of collateral, regardless of the existence of any past-due amount or of the number of days past due,

(iii) Exposures in respect of which a default is considered to have occurred in accordance with Article 178 of Regulation (EU) No 575/2013,

(iv) Exposures of debtors against whom legal action has been taken by the Bank or exposures of bankrupt debtors,

(v) Exposures that are found impaired as per the applicable accounting framework,

(vi) Forborne exposures that were NPE at forbearance or became NPE due to forbearance or NPE after forbearance and which are re-forborne while under probation (the probation period for forborne exposures begins once the contract is considered as performing and lasts for two years minimum),

(vii) Forborne exposures reclassified from NPE status i.e. that were NPE at forbearance or became NPE due to forbearance or NPE after forbearance and present more than 30 days past due while under probation,

(viii) Exposures that previously met non-performing criteria and are currently undergoing a 3-month probation period, during which no default entry criteria should be met. Once the probation period ends, exposures are re-classified to performing with the exception of non-performing forborne exposures that continue to undergo a 12-month probation period given material payments have been made.

(ix) Further to the above the all-embracing criteria apply as follows: (a) for debtors classified as retail debtors as per the Regulation (EU) No 575/2013, when the Bank has on-balance sheet exposures to a debtor that are materially past due by more than 90 consecutive days the gross carrying amount of which represents more than 20% of the gross carrying amount of all on-balance sheet exposures to that debtor, all on and off-balance sheet exposures to that debtor shall be considered as non-performing, else only exposures that are non-performing will be classified as such and (b) for debtors classified as non-retail debtors as per the Regulation (EU) No 575/2013, when any on-balance sheet exposure to that debtor is non-performing, all on and off-balance sheet exposures to that debtor shall be considered as NPE.

Loan Portfolio Quality

As part of its ongoing NPE deleveraging efforts, the Bank has been working towards the sale of a non-performing portfolio with gross carrying amount €0,7 billion, which is part of Project Starlight (see below). During the six-month period ended 30 June 2022, an NPE portfolio amounting to c.€15 million has been disposed following the successful completion of the transaction.

Further analysis of the loans and advances portfolios classified as held for sale is disclosed in Note 25 and Section 1.2. "Assets held for sale" in the "Additional information for the six-month period ended 30 June 2022" of the Interim Condensed Consolidated Financial Statements for the six-month period ended 30 June 2022 and presented separately in Section 4.1 of this report.

Project Starlight

On 11 April 2022, the Bank announced that it has reached an agreement for the sale of a NPE portfolio and the disposal of APS Debt Servicing Cyprus Ltd (APS Cyprus), its subsidiary responsible for managing the Bank's NPEs and REOs ("Project Starlight"). The perimeter involved comprises of legacy NPEs totalling a gross amount of c.€0,7 billion. Post completion of the transaction the Bank is expected to reach its medium-term target of mid-single digit NPE ratio (excl. APS-NPEs).

The relevant parties are working closely and intensely for the operationalization and completion of the transaction. Towards this direction significant milestones have been achieved. Kohira Holdings Ltd ("CyCAC", the entity which will acquire the NPEs) has obtained approval by the CBC as (a) a credit acquiring company pursuant to the provisions of the Sale of Credit Facilities and Related Matters Law of 2015 (Law 169(I) of 2015) (the "Sale of Credit Facilities Law") and (b) a non-credit institution under the provisions of the Credit Agreements for Consumers relating to Residential Immovable Property Law of 2017 (Law 41(I) of 2017) (the "Residential Immoveable Property Law"). The 45 days notice letters for the transfer of the "Starlight Portfolio" to the CyCAC to the borrowers/guarantors/security providers of the loans in line with the Sale of Loans Law were sent and Significant Risk Transfer (SRT) applications were filed. The ECB has communicated the SRT approval as well as the approval to allow the Bank to transfer the "Starlight Portfolio" to the CyCAC as per Article 16(1) of the Business of Credit Institutions Law of 1997 (Law 66(I) of 1997) (the "Banking Law").

The transaction is expected to be completed by the end of 2022 and is subject to the remaining customary, regulatory and other approvals and as such the disposal group was classified as held for sale and as discontinued operations as from 31 December 2021.

Agreement to acquire part of the RCB banking operations

The Bank announced on 22 March 2022 that it has entered into an agreement to acquire a performing loan portfolio (the "Transaction") from RCB Bank Limited.

On 21 March 2022, the Bank signed a Business Transfer Agreement ("BTA") to acquire part of the RCB Bank's banking operations (the "Transaction") to be completed in two tranches. The acquisition of Tranche A was completed on 24 March 2022 ("Completion Date A") and the acquisition of Tranche B was completed on 16 June 2022 ("Completion Date B"). The date of acquisition was considered to be the 24 March 2022. The Transaction involved mainly a performing loan portfolio of fair value of c.€346 million (Tranche A c.€285 million and Tranche B c.€61 million) and customer deposits of c.€22 million (Tranche A c.€20 million and Tranche B c.€2 million).

For further information refer to Note 40 of the Interim Condensed Consolidated Financial Statements for the six-month period ended 30 June 2022.

4.1.1.1 Performing and non-performing exposures and related provisions

The tables below present the gross carrying amount, accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions, accumulated partial write-off, and collateral and financial guarantees received, for both performing and non-performing exposures, with a breakdown by exposure class and staging, as at 30 June 2022 and 31 December 2021 respectively.

Template 10: EU CR1 – Performing and non-performing exposures and related provisions

30 June 2022 (€ million)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received[22]	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	**Cash balances at central banks and other demand deposits**	**7.410**	**7.410**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
010	**Loans and advances**	**5.837**	**4.933**	**818**	**646**	**--**	**403**	**(34)**	**(22)**	**(39)**	**(171)**	**--**	**(150)**	**(153)**	**4.715**	**428**
020	*Central banks*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
030	*General governments*	*4*	*4*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*3*	*--*
040	*Credit institutions*	*155*	*155*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
050	*Other financial corporations*	*120*	*118*	*2*	*2*	--	*2*	*(1)*	*(1)*	*--*	*(1)*	*--*	*(1)*	*-*	*73*	*1*
060	*Non-financial corporations*	*2.490*	*1.897*	*579*	*147*	--	*113*	*(39)*	*(12)*	*(32)*	*(58)*	*--*	*(54)*	*(90)*	*1.862*	*80*
070	*Of which SMEs*	*1.897*	*1.335*	*548*	*147*	--	*113*	*(33)*	*(8)*	*(30)*	*(58)*	*--*	*(54)*	*(90)*	*1.675*	*80*
080	*Households*	*3.068*	*2.759*	*237*	*497*	--	*288*	*6*	*(9)*	*(7)*	*(112)*	*--*	*(95)*	*(63)*	*2.777*	*347*
090	**Debt securities**	**4.759**	**4.759**	**--**	**--**	**--**	**--**	**(1)**	**(1)**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
100	*Central banks*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
110	*General governments*	*1.573*	*1.573*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
120	*Credit institutions*	*2.364*	*2.364*	*--*	*--*	*--*	*--*	*(1)*	*(1)*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
130	*Other financial corporations*	*755*	*755*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
140	*Non-financial corporations*	*67*	*67*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
150	**Off-balance-sheet exposures**	**1.329**	**1.216**	**112**	**14**	**--**	**14**	**9**	**5**	**3**	**3**	**--**	**2**		**728**	**6**
160	*Central banks*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*		*--*	*--*
170	*General governments*	*11*	*11*	*1*	*1*	*--*	*1*	*--*	*--*	*--*	*--*	*--*	*--*		*1*	*1*
180	*Credit institutions*	*2*	*2*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*		*--*	*--*
190	*Other financial corporations*	*30*	*29*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*		*7*	*--*
200	*Non-financial corporations*	*899*	*806*	*93*	*10*	*--*	*10*	*7*	*3*	*3*	*3*	*--*	*2*		*523*	*4*
210	*Households*	*387*	*368*	*18*	*3*	*--*	*3*	*2*	*2*	*0*	*0*	*--*	*--*		*197*	*1*
220	***Total***	***19.335***	***18.318***	***930***	***660***	**--**	***417***	***(26)***	***(18)***	***(36)***	***(168)***	**--**	***(148)***	***(153)***	***5.443***	***434***
	Loans and advances to customers classified as held for sale	**12**	**2**	**10**	**720**	**--**	**711**	**(4)**	**(1)**	**(3)**	**(518)**	**--**	**(516)**	**--**	**7**	**196**

[22] Government Guarantee Scheme is not included.

31 December 2021 (€ million)		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o
		Gross carrying amount/nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions[23]							Collateral and financial guarantees received[22]	
		Performing exposures			Non-performing exposures			Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Accumulated partial write-off[23]	On performing exposures	On non-performing exposures
			Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
005	**Cash balances at central banks and other demand deposits**	**7.425**	**7.425**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
010	**Loans and advances**	**5.479**	**4.473**	**919**	**650**	**--**	**394**	**(58)**	**(34)**	**(51)**	**(163)**	**--**	**(143)**	**(199)**	**4.381**	**435**
020	*Central banks*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
030	*General governments*	*5*	*5*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*3*	*--*
040	*Credit institutions*	*177*	*177*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
050	*Other financial corporations*	*127*	*114*	*13*	*--*	*--*	*--*	*(2)*	*(2)*	*--*	*--*	*--*	*--*	*--*	*70*	*--*
060	*Non-financial corporations*	*2.141*	*1.441*	*685*	*145*	*--*	*109*	*(49)*	*(11)*	*(43)*	*(56)*	*--*	*(51)*	*(131)*	*1.587*	*78*
070	*Of which SMEs*	*1.758*	*1.068*	*674*	*145*	*--*	*109*	*(46)*	*(10)*	*(42)*	*(56)*	*--*	*(51)*	*(131)*	*1.503*	*78*
080	*Households*	*3.029*	*2.736*	*221*	*505*	*--*	*285*	*(7)*	*(20)*	*(8)*	*(107)*	*--*	*(92)*	*(68)*	*2.721*	*357*
090	**Debt securities**	**4.465**	**4.465**	**--**	**--**	**--**	**--**	**(1)**	**(1)**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
100	*Central banks*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
110	*General governments*	*1.485*	*1.485*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
120	*Credit institutions*	*2.212*	*2.212*	*--*	*--*	*--*	*--*	*(1)*	*(1)*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
130	*Other financial corporations*	*701*	*701*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
140	*Non-financial corporations*	*67*	*67*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*
150	**Off-balance-sheet exposures**	**1.258**	**1.113**	**144**	**13**	**--**	**13**	**11**	**7**	**4**	**3**	**--**	**3**		**690**	**4**
160	*Central banks*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*		*--*	*--*
170	*General governments*	*10*	*10*	*--*	*1*	*--*	*1*	*--*	*--*	*--*	*--*	*--*	*--*		*2*	*1*
180	*Credit institutions*	*2*	*2*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*		*--*	*--*
190	*Other financial corporations*	*28*	*27*	*1*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*	*--*		*10*	*--*
200	*Non-financial corporations*	*850*	*729*	*121*	*10*	*--*	*10*	*7*	*4*	*3*	*3*	*--*	*3*		*506*	*2*
210	*Households*	*368*	*345*	*22*	*2*	*--*	*2*	*4*	*3*	*1*	*--*	*--*	*--*		*172*	*1*
220	***Total***	***18.627***	***17.476***	***1.063***	***663***	***--***	***407***	***(48)***	***(28)***	***(47)***	***(160)***	***--***	***(140)***	***(199)***	***5.071***	***439***
	Loans and advances to customers classified as held for sale	**12**	**2**	**10**	**764**	**--**	**754**	**(4)**	**(1)**	**(3)**	**(532)**	**--**	**(528)**	**--**	**7**	**225**

A reduction of 0,6% (€4 million) is observed in the total non-performing portfolio, from 31 December 2021 to 30 June 2022, which is mainly driven by organic deleveraging (including loan repayments).

The performing portfolio, excluding "Cash balances at central banks and other deposits" has been increased by 6% (€723 million), as a result of both new lending granted as well as the acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank (c.€340 million[24]) during the six-month period ended 30 June 2022.

[23] The sign of the figures reported for 31 December 2021 have been restated to be in line with the latest "EBA mapping Pillar III disclosures templates with supervisory reporting" tool available.
[24] Gross carrying amount as at 30 June 2022.

4.1.1.2 Changes in the stock of non-performing loans and advances and related net accumulated recoveries

The following table presents the changes in the gross carrying amount of non-performing loans and advances, including information on the opening and closing balances of loans and advances, the gross amount of any of those exposures reverted to non-defaulted status or subject to a write-off, in accordance with Article 442(f) of the CRR.

Template 11: EU CR2: Changes in the stock of non-performing loans and advances

(€ million)[25]		30 June 2022	31 December 2021
		Gross carrying amount	Gross carrying amount
010	**Initial stock of non-performing loans and advances**	**650**	**1.503**
020	Inflows to non-performing portfolios	118	324
030	Outflows from non-performing portfolios	(122)	(1.177)
040	Outflows due to write-offs	(5)	(91)
050	Outflow due to other situations	(117)	(1.086)
060	**Final stock of non-performing loans and advances**	**646**	**650**

The tables below present the movements of the gross carrying amount of non-performing loans and advances from 1 January 2022 to 30 June 2022 and from 1 January 2021 to 31 December 2021 respectively, with specific details on the net accumulated recoveries related to these changes.

Template 12: EU CR2a – Changes in the stock of non-performing loans and advances and related net accumulated recoveries

(€ million)[25]		a	b	a	b
		30 June 2022		31 December 2021	
		Gross carrying amount	Related net accumulated recoveries	Gross carrying amount	Related net accumulated recoveries
010	**Initial stock of non-performing loans and advances**	**650**		**1.503**	
020	Inflows to non-performing portfolios	118		324	
030	Outflows from non-performing portfolios	(122)		(1.177)	
040	Outflow to performing portfolio	(28)		(94)	
050	Outflow due to loan repayment, partial or total	(56)		(117)	
060	Outflow due to collateral liquidations	--	--	(2)	2
070	Outflow due to taking possession of collateral	(3)	3	(30)	25
080	Outflow due to sale of instruments	--	--	--	--
090	Outflow due to risk transfers	--	--	--	--
100	Outflows due to write-offs	(5)		(91)	
110	Outflow due to other situations	(30)		(55)	
120	Outflow due to reclassification as held for sale	--		(788)	
130	**Final stock of non-performing loans and advances**	**646**		**650**	

The Bank continues its efforts to limit its non-performing exposures. During the six-month period ended 30 June 2022, the non-performing loans and advances were reduced by €4 million (0,6%), mainly driven by €56 million loan repayments and the implementation of €5 million non-contractual write offs, cures of accounts successfully meeting the non-performing exposure exit criteria.

[25] Figures reported exclude loans and advances to customers classified as held for sale as per IFRSs.

4.1.1.3 Quality of non-performing exposures by geography

The tables below present the gross carrying amount of performing and non-performing exposures and the related accumulated impairment, provisions and accumulated negative changes in fair value due to credit risk by geographical location as at 30 June 2022 and 31 December 2021 respectively.

Template 13: EU CQ4 – Quality of non-performing exposures by geography

30 June 2022 (€ million)[26]		**a**	**b**	**c**	**d**	**e**	**f**	**g**
		Gross carrying/nominal amount				**Accumulated impairment**	**Provisions on off-balance-sheet commitments and financial guarantees given**	**Accumulated negative changes in fair value due to credit risk on non-performing exposures**
			Of which non-performing		**Of which subject to impairment**			
				Of which defaulted				
010	***On-balance-sheet exposures***	***11.242***	***646***	***646***	***11.242***	***(205)***	**--**	**--**
020	*Cyprus*	7.188	627	627	7.188	(191)	--	--
030	*United Kingdom*	362	13	13	362	(9)	--	--
040	*France*	447	--	--	447	--	--	--
050	*Netherlands*	380	--	--	380	--	--	--
060	*Ireland*	487	1	1	487	--	--	--
070	*Other countries*	2.378	5	5	2.378	(5)	--	--
080	***Off-balance-sheet exposures***	***1.343***	***14***	***14***	**--**	**--**	***11***	**--**
090	*Cyprus*	1.276	14	14	--	--	11	--
100	*United Kingdom*	--	--	--	--	--	--	--
110	*France*	--	--	--	--	--	--	--
130	*Ireland*	--	--	--	--	--	--	--
150	*Netherlands*	9	--	--	--	--	--	--
090	*Other countries*	58	--	--	--	--	--	--
100	***Total***	***12.585***	***660***	***660***	***11.242***	***(205)***	***11***	**--**

[26] Figures reported exclude loans and advances to customers classified as held for sale as per IFRSs and cash balances at central banks and other demand deposits.

31 December 2021 (€ million)		a	b	c	d	e	f	g
		Gross carrying/nominal amount				Accumulated impairment[27]	Provisions on off-balance-sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
			Of which non-performing		Of which subject to impairment			
				Of which defaulted				
010	***On-balance-sheet exposures***	***10.594***	***650***	***650***	***10.594***	***(222)***	**--**	**--**
020	*Cyprus*	7.078	633	633	7.078	(210)	--	--
030	*United Kingdom*	443	13	13	443	(8)	--	--
040	*France*	423	1	1	423	--	--	--
050	*Netherlands*	416	--	--	416	--	--	--
060	*Greece*	361	--	--	361	--	--	--
070	*Other countries*	1.873	3	3	1.873	(4)	--	--
080	***Off-balance-sheet exposures***	***1.272***	***13***	***13***	**--**	**--**	***14***	**--**
090	*Cyprus*	1.253	13	13	--	--	14	--
100	*United Kingdom*	1	--	--	--	--	--	--
110	*France*	--	--	--	--	--	--	--
120	*Netherlands*	3	--	--	--	--	--	--
130	*Greece*	--	--	--	--	--	--	--
140	*Other countries*	15	--	--	--	--	--	--
150	***Total***	***11.866***	***663***	***663***	***10.594***	***(222)***	***14***	--

For the above analysis a materiality threshold of larger total exposures was used to evaluate the material countries. In row "other countries", all immaterial countries were included (please refer to Appendix A for the list of immaterial countries).

During the six-month period ended 30 June 2022, the on-balance sheet exposures increased by 6% (€648 million), as a result of the increase in both loans and advances and debt securities portfolios. The performing exposures have increased mainly due to acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank (c.€340 million[28]), while the reduction in the non-performing exposures is mainly driven by loan repayments during the period. Investments in debt securities have increased mainly due to acquisition of covered bonds partially offset by maturities of debt securities during the six-month period ended 30 June 2022.

[27] The sign of the figures reported for 31 December 2021 have been restated to be in with the latest "EBA mapping Pillar III disclosures templates with supervisory reporting" tool available.
[28] Gross carrying amount as at 30 June 2022.

4.1.1.4 Credit quality of loans and advances to non-financial corporations by industry

The tables below present the gross carrying amount of loans and advances to non-financial corporations, and the related accumulated impairment and accumulated negative changes in fair value due to credit risk by counterparty sector relating to non-financial corporation counterparty as at 30 June 2022 and 31 December 2021 respectively.

Template 14: EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry

		a	b	c	d	e	f
30 June 2022 (€ million)[29]		**Gross carrying amount**				**Accumulated impairment**	**Accumulated negative changes in fair value due to credit risk on non-performing exposures**
			Of which non-performing		**Of which loans and advances subject to impairment**		
				Of which defaulted			
010	Agriculture, forestry and fishing	34	3	3	34	(1)	--
020	Mining and quarrying	10	--	--	10	--	--
030	Manufacturing	453	12	12	453	(7)	--
040	Electricity, gas, steam and air conditioning supply	56	--	--	56	(1)	--
050	Water supply	35	1	1	35	--	--
060	Construction	160	35	35	160	(17)	--
070	Wholesale and retail trade	530	46	46	530	(31)	--
080	Transport and storage	254	1	1	254	(1)	--
090	Accommodation and food service activities	529	21	21	529	(18)	--
100	Information and communication	22	--	--	22	(1)	--
110	Financial and insurance activities	--	--	--	--	--	--
120	Real estate activities	269	12	12	269	(12)	--
130	Professional, scientific and technical activities	62	4	4	62	(1)	--
140	Administrative and support service activities	53	5	5	53	(2)	--
150	Public administration and defence, compulsory social security	--	--	--	--	--	--
160	Education	28	1	1	28	(1)	--
170	Human health services and social work activities	106	--	--	106	(1)	--
180	Arts, entertainment and recreation	19	4	4	19	(1)	--
190	Other services	17	2	2	17	(1)	--
200	***Total***	***2.637***	***147***	***147***	***2.637***	***(96)***	***--***

[29] Figures reported exclude loans and advances to customers classified as held for sale as per IFRSs.

31 December 2021 (€ million)[29]		a	b	c	d	e	f
		Gross carrying amount					
			Of which non-performing				
				Of which defaulted	Of which loans and advances subject to impairment	Accumulated impairment[30]	Accumulated negative changes in fair value due to credit risk on non-performing exposures
010	Agriculture, forestry and fishing	36	3	3	36	(1)	--
020	Mining and quarrying	10	--	--	10	--	--
030	Manufacturing	365	12	12	365	(7)	--
040	Electricity, gas, steam and air conditioning supply	43	--	--	43	(1)	--
050	Water supply	38	1	1	38	--	--
060	Construction	163	21	21	163	(13)	--
070	Wholesale and retail trade	433	53	53	433	(37)	--
080	Transport and storage	260	1	1	260	(2)	--
090	Accommodation and food service activities	442	17	17	442	(19)	--
100	Information and communication	35	--	--	35	(1)	--
110	Financial and insurance activities	--	--	--	--	--	--
120	Real estate activities	220	15	15	220	(17)	--
130	Professional, scientific and technical activities	53	4	4	53	(1)	--
140	Administrative and support service activities	36	5	5	36	(3)	--
150	Public administration and defence, compulsory social security	--	--	--	--	--	--
160	Education	11	1	1	11	--	--
170	Human health services and social work activities	101	--	--	101	(1)	--
180	Arts, entertainment and recreation	23	10	10	23	(1)	--
190	Other services	17	2	2	17	(1)	--
200	***Total***	***2.286***	***145***	***145***	***2.286***	***(105)***	**--**

During the six-month period ended 30 June 2022, an increase of €350 million was observed in the performing loans to non-financial corporations, driven mainly by the c.€340 million[31] acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank (c.€313 million[31] in non-financial corporations).

[30] The sign of the figures reported for 31 December 2021 have been restated to be in with the latest “EBA mapping Pillar III disclosures templates with supervisory reporting” tool available.
[31] Gross carrying amount as at 30 June 2022.

4.1.2 Collateral valuation – loans and advances

The tables below present the gross carrying amount of loans and advances collateralised, both performing and non-performing, broken down by loan-to-value bucket, the related accumulated impairment, and the value of the collateral/financial guarantees received and the partial write-offs for these exposures, as at 30 June 2022 and 31 December 2021 respectively. All this information is further broken down by ageing analysis.

Template 15: EU CQ6 – Collateral valuation – loans and advances

		a	b	c	d	e	f	g	h	i	j	k	l
30 June 2022 (€ million)[32]		**Loans and advances**											
			Performing		**Non-performing**								
						Unlikely to pay that are not past due or are past due ≤ 90 days	**Past due > 90 days**						
				Of which past due > 30 days ≤ 90 days				**Of which past due > 90 days ≤ 180 days**	**Of which: past due > 180 days ≤ 1 year**	**Of which: past due > 1 years ≤ 2 years**	**Of which: past due > 2 years ≤ 5 years**	**Of which: past due > 5 years ≤ 7 years**	**Of which: past due > 7 years**
010	**Gross carrying amount**	**6.483**	**5.837**	**37**	**646**	**165**	**481**	**26**	**63**	**64**	**226**	**33**	**69**
020	*Of which secured*	5.635	5.050	33	585	150	436	23	58	56	211	28	59
030	*Of which secured with immovable property*	5.141	4.570	32	571	144	427	22	57	55	208	28	57
040	*Of which instruments with LTV higher than 60% and lower or equal to 80%*	892	796		96	22	73						
050	*Of which instruments with LTV higher than 80% and lower or equal to 100%*	484	413		71	20	50						
060	*Of which instruments with LTV higher than 100%*	573	396		176	22	154						
070	**Accumulated impairment for secured assets**	(148)	(27)	(1)	(122)	(14)	(108)	(2)	(12)	(10)	(41)	(7)	(35)
080	**Collateral**												
090	*Of which value capped at the value of exposure*	5.063	4.643	30	420	120	300	19	44	43	154	18	22
100	*Of which immovable property*	4.663	4.248	29	415	117	299	19	44	43	153	18	22
110	*Of which value above the cap*	783	612	3	171	40	131						
120	*Of which immovable property*	719	549	3	170	40	130						
130	**Financial guarantees received**	**80**	**72**	**--**	**7**	**2**	**5**	**1**	**1**	**--**	**2**	**1**	**1**
140	**Accumulated partial write-off**	**(153)**	**(5)**	**--**	**(148)**	**(10)**	**(138)**	**--**	**(1)**	**(1)**	**(2)**	**(5)**	**(129)**

[32] Figures reported exclude loans and advances to customers classified as held for sale as per IFRSs.

31 December 2021 (€ million)[32]		a	b	c	d	e	f	g	h	i	j	k	l
		Loans and advances											
			Performing		Non-performing								
						Unlikely to pay that are not past due or are past due ≤ 90 days	Past due > 90 days						
				Of which past due > 30 days ≤ 90 days				Of which past due > 90 days ≤ 180 days	Of which: past due > 180 days ≤ 1 year	Of which: past due > 1 years ≤ 2 years	Of which: past due > 2 years ≤ 5 years	Of which: past due > 5 years ≤ 7 years	Of which: past due > 7 years
010	**Gross carrying amount**	**6.130**	**5.480**	**37**	**650**	**163**	**487**	**30**	**66**	**56**	**239**	**25**	**70**
020	*Of which secured*	5.269	4.677	34	591	148	444	27	60	50	225	21	61
030	*Of which secured with immovable property*	4.813	4.236	33	577	141	435	26	60	49	221	21	59
040	*Of which instruments with LTV higher than 60% and lower or equal to 80%*	879	779		100	22	78						
050	*Of which instruments with LTV higher than 80% and lower or equal to 100%*	422	358		64	18	46						
060	*Of which instruments with LTV higher than 100%*	590	418		173	26	146						
070	**Accumulated impairment for secured assets**	(161)	(44)	(1)	(117)	(17)	(101)	(2)	(8)	(7)	(41)	(6)	(37)
080	**Collateral**												
090	*Of which value capped at the value of exposure*	4.736	4.309	31	427	116	311	23	49	40	166	14	20
100	*Of which immovable property*	4.369	3.947	30	422	112	309	23	49	39	164	14	20
110	*Of which value above the cap*	711	554	3	157	38	119						
120	*Of which immovable property*	641	486	3	155	37	118						
130	**Financial guarantees received**	**80**	**72**	**1**	**8**	**3**	**5**	**1**	**--**	**1**	**3**	**--**	**1**
140	**Accumulated partial write-off[33]**	**(199)**	**(9)**	**--**	**(190)**	**(11)**	**(180)**	**--**	**--**	**(1)**	**(3)**	**(10)**	**(165)**

[33] The sign of the figures reported for 31 December 2021 have been restated to be in with the latest "EBA mapping Pillar III disclosures templates with supervisory reporting" tool available.

The tables below present the value at initial recognition of collateral obtained by taking possession as at 30 June 2022 and 31 December 2021. The value at initial recognition reflects the gross carrying amount at the point in time of the initial recognition and held in the Group's Statement of financial position, while the accumulated negative changes of the respective collaterals reflect the difference between the value at initial recognition and the carrying amount at the reporting date.

Template 16: EU CQ7 – Collateral obtained by taking possession and execution processes

30 June 2022 (€ million)		**Collateral obtained by taking possession**	
		Value at initial recognition	**Accumulated negative changes**
010	Property, plant and equipment (PP&E)	--	--
020	Other than PP&E	213	(53)
030	*Residential immovable property*	15	(1)
040	*Commercial Immovable property*	198	(52)
050	*Movable property (auto, shipping, etc.)*	--	--
060	*Equity and debt instruments*	--	--
070	*Other collateral*	--	--
080	***Total***	***213***	***(53)***

31 December 2021 (€ million)		**Collateral obtained by taking possession**	
		Value at initial recognition	**Accumulated negative changes**
010	Property, plant and equipment (PP&E)	--	--
020	Other than PP&E	229	(52)
030	*Residential immovable property*	23	(1)
040	*Commercial Immovable property*	206	(51)
050	*Movable property (auto, shipping, etc.)*	--	--
060	*Equity and debt instruments*	--	--
070	*Other collateral*	--	--
080	***Total***	***229***	***(52)***

The total value of collateral obtained by taking repossession decreased by €16 million (c.7%) in the first half of 2022 compared to 31 December 2021 mainly due to increased outflows/sales compared to inflows, in both the residential and commercial immovable properties.

The tables below present the gross carrying amount and the related accumulated negative changes of debts cancelled in exchange for the collateral obtained by taking possession, the value at initial recognition and the accumulated negative changes to the initial value of the collateral obtained, including vintage breakdown of the foreclosed assets as at 30 June 2022 and 31 December 2021 respectively. Foreclosed assets (assets repossessed consensually and non-consensually) are reported by asset category.

Template 17: EU CQ8 – Collateral obtained by taking possession and execution processes – vintage breakdown

30 June 2022 (€ million)		**Debt balance reduction**		**Total collateral obtained by taking possession**									
						Foreclosed <=2 years		**Foreclosed >2 years <=5 years**		**Foreclosed >5 years**		**Of which: non-current assets held for sale**	
		Gross carrying amount	**Accumulated negative changes**	**Value at initial recognition**	**Accumulated negative changes**	**Value at initial recognition**	**Accumulated negative changes**	**Value at initial recognition**	**Accumulated negative changes**	**Value at initial recognition**	**Accumulated negative changes**	**Value at initial recognition**	**Accumulated negative changes**
010	Collateral obtained by taking possession classified as PP&E	--	--										
020	Collateral obtained by taking possession other than that classified as PP&E	370	(157)	213	(53)	53	(3)	102	(8)	57	(42)	13	--
030	*Residential immovable property*	27	(12)	15	(1)	9	--	6	--	--	--	2	--
040	*Commercial immovable property*	343	(145)	198	(52)	45	(3)	96	(8)	57	(42)	11	--
050	*Movable property (auto, shipping, etc.)*	--	--	--	--	--	--	--	--	--	--	--	--
060	*Equity and debt instruments*	--	--	--	--	--	--	--	--	--	--	--	--
070	*Other collateral*	--	--	--	--	--	--	--	--	--	--	--	--
080	***Total***	***370***	***(157)***	***213***	***(53)***	***53***	***(3)***	***102***	***(8)***	***57***	***(42)***	***13***	***--***

31 December 2021 (€ million)		Debt balance reduction		Total collateral obtained by taking possession									
						Foreclosed <=2 years		Foreclosed >2 years <=5 years		Foreclosed >5 years		Of which: non-current assets held for sale	
		Gross carrying amount	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
010	Collateral obtained by taking possession classified as PP&E	--	--										
020	Collateral obtained by taking possession other than that classified as PP&E	398	(169)	229	(52)	64	--	125	(14)	41	(38)	10	--
030	*Residential immovable property*	37	(14)	23	(1)	13	--	10	(1)	1	--	3	--
040	*Commercial immovable property*	361	(155)	206	(51)	51	--	115	(13)	40	(38)	7	--
050	*Movable property (auto, shipping, etc.)*	--	--	--	--	--	--	--	--	--	--	--	--
060	*Equity and debt instruments*	--	--	--	--	--	--	--	--	--	--	--	--
070	*Other collateral*	--	--	--	--	--	--	--	--	--	--	--	--
080	***Total***	***398***	***(169)***	***229***	***(52)***	***64***	***--***	***125***	***(14)***	***41***	***(38)***	***10***	***--***

4.1.3 Maturity of exposures

The tables below disclose the net exposure value by residual maturities of loans and advances and debt securities as at 30 June 2022 and 31 December 2021 respectively.

Template 18: EU CR1-A – Maturity of exposures

30 June 2022 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**
		Net exposure value[34]					
		On Demand	**<= 1 year**	**> 1 year <= 5 years**	**> 5 years**	**No stated maturity**	**Total**
1	Loans and advances	534	85	1.051	4.581	--	6.251
2	Debt securities	--	1.225	2.656	877	--	4.758
3	***Total***	***534***	***1.310***	***3.707***	***5.458***	***--***	***11.009***

31 December 2021 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**
		Net exposure value[34]					
		On Demand	**<= 1 year**	**> 1 year <= 5 years**	**> 5 years**	**No stated maturity**	**Total**
1	Loans and advances	471	137	1.000	4.301	--	5.909
2	Debt securities	--	1.053	2.623	787	--	4.463
3	***Total***	***471***	***1.190***	***3.623***	***5.088***	***--***	***10.372***

[34] Figures reported exclude loans and advances to customers classified as held for sale as per IFRSs and cash balances at central banks and other demand deposits.

4.1.4 Forborne exposures

Consistent with the EBA technical standards, the Group considers forborne exposures to be (i) exposures which involve changes in their terms and/or conditions and (ii) the forbearance measures consist of concessions towards a debtor which aim to address existing or anticipated difficulties on the part of the borrower to service debt in accordance with the current repayment schedule. Changes in the terms and conditions of a contract that do not occur because the customer is not able to meet the terms and conditions of the contract due to financial difficulties do not constitute forbearance measures.

The most significant prerequisite for the forbearance of an exposure is the existence of customer repayment ability (i.e. the customer is viable). The Bank's Restructuring Policy includes the terms and conditions on which the Bank determines whether a renegotiated repayment schedule shall be granted.

The forbearance measures to be taken and their duration thereof are determined based on specific customer information, based on the prevailing economic conditions and in accordance with relevant legislation or regulatory Directives. Therefore, the Bank makes every necessary effort for the proper assessment of the new repayment schedule based on the forbearance measures, in order to avoid a new default.

The tables below present the gross carrying amount, the related accumulated impairment, accumulated changes in fair value due to credit risk and provisions, and the collateral and financial guarantees received, of forborne exposures, broken down by exposure class, as at 30 June 2022 and 31 December 2021 respectively.

Template 19: EU CQ1 – Credit quality of forborne exposures

30 June 2022 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**
		Gross carrying amount/nominal amount of exposures with forbearance measures				**Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions**		**Collateral received and financial guarantees received on forborne exposures**	
		Performing forborne	**Non-performing forborne**			**On performing forborne exposures**	**On non-performing forborne exposures**		**Of which collateral and financial guarantees received on non-performing exposures with forbearance measures**
				Of which defaulted	**Of which impaired**				
005	**Cash balances at central banks and other demand deposits**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
010	**Loans and advances**	**353**	**338**	**338**	**338**	**(17)**	**(71)**	**549**	**236**
020	*Central banks*	--	--	--	--	--	--	--	--
030	*General governments*	--	--	--	--	--	--	--	--
040	*Credit institutions*	--	--	--	--	--	--	--	--
050	*Other financial corporations*	--	2	2	2	--	--	1	1
060	*Non-financial corporations*	283	84	84	84	(20)	(29)	302	50
070	*Households*	70	252	252	252	3	(42)	246	185
080	**Debt Securities**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
090	**Loan commitments given**	**2**	**2**	**2**	**2**	**--**	**--**	**4**	**1**
100	***Total***	***355***	***340***	***340***	***340***	***(17)***	***(71)***	***553***	***237***
	Loans and advances to customers classified as held for sale	**3**	**265**	**265**	**265**	**(1)**	**(175)**	**88**	**86**

31 December 2021 (€ million)		a	b	c	d	e	f	g	h
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions[35]		Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne			On performing forborne exposures	On non-performing forborne exposures		Of which collateral and financial guarantees received on non-performing exposures with forbearance measures
				Of which defaulted	Of which impaired				
005	**Cash balances at central banks and other demand deposits**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**
010	**Loans and advances**	**396**	**345**	**345**	**345**	**(21)**	**(66)**	**595**	**244**
020	*Central banks*	--	--	--	--	--	--	--	--
030	*General governments*	--	--	--	--	--	--	--	--
040	*Credit institutions*	--	--	--	--	--	--	--	--
050	*Other financial corporations*	1	--	--	--	--	--	2	--
060	*Non-financial corporations*	307	85	85	85	(24)	(26)	324	52
070	*Households*	88	260	260	260	3	(40)	269	192
080	**Debt Securities**	--	--	--	--	--	--	--	--
090	**Loan commitments given**	**2**	**1**	**1**	**1**	**--**	**--**	**2**	**2**
100	***Total***	***398***	***346***	***346***	***346***	***(21)***	***(66)***	***597***	***246***
	Loans and advances to customers classified as held for sale	**2**	**288**	**288**	**288**	**(1)**	**(180)**	**104**	**103**

During the six-month period ended 30 June 2022, a reduction was observed in the performing forborne exposures of €43 million (11%) driven by €32 million exposures that exited forborne status. A reduction of non-performing forborne accounts amounting to €6 million (2%) is mainly driven by loan repayments incurred during the six-month period ended 30 June 2022.

[35] The sign of the figures reported for 31 December 2021 have been restated to be in with the latest "EBA mapping Pillar III disclosures templates with supervisory reporting" tool available.

The tables below present the gross carrying amount of forborne exposures that have been forborne more than twice, as well as the gross carrying amount of the non-performing forborne exposures that have failed to meet the non-performing exit criteria, as at 30 June 2022 and 31 December 2021 respectively.

Template 20: EU CQ2 – Quality of forbearance

30 June 2022 (€ million)[36]		**a**
		Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	58
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	251

31 December 2021 (€ million)[36]		**a**
		Gross carrying amount of forborne exposures
010	Loans and advances that have been forborne more than twice	63
020	Non-performing forborne loans and advances that failed to meet the non-performing exit criteria	248

A reduction of non-performing forborne accounts amounting to €6 million (2%) is mainly driven by loan repayments incurred during the six-month period ended 30 June 2022.

[36] Figures reported exclude loans and advances to customers classified as held for sale as per IFRSs.

4.2 Credit risk mitigation techniques

4.2.1 Overview of credit risk mitigation techniques

The tables below provide a breakdown of the carrying amount of unsecured and secured exposures (net of allowances/impairments), the carrying amount of exposures (net of allowances/impairments) covered by collateral, financial guarantees and credit derivatives used as credit risk mitigants for loans and advances, debt securities and population which are non-performing and in default, as at 30 June 2022 and 31 December 2021 respectively.

The following template covers all CRM techniques recognised under IFRSs regardless of whether these techniques are recognised under CRR, including, but not only, all types of collateral, financial guarantees and credit derivatives used for all secured exposures, irrespective of whether the standardised approach or the IRB approach is used for the calculation of risk weighted exposure amount. To this end, the template below provides information for the following:

- Unsecured exposures (column (a)) - This column represents the carrying amount of credit risk exposures (net of allowances/impairments) that do not benefit from a credit risk mitigation technique, regardless of whether this technique is recognised in CRR.
- Secured exposures secured (column (b)) – This column represents the carrying amount of exposures that have at least one credit risk mitigation mechanism (collateral, financial guarantees, credit derivatives) associated with them.
- Exposures secured by various credit risk mitigants (columns c-e) – These columns represent the carrying amount of exposures (net of credit risk adjustments) partly or totally secured by collateral, financial guarantees and credit derivatives, whereby on the secured portion of the overall exposures is presented. The allocation of the carrying amount of multi-secured exposures to their different CRM techniques is made by order of priority, starting with the CRM mechanism expected to be called first in the event of non-payment, and within the limits of the carrying amount primarily observed of the secured exposures.

It is noted that the Group does not have any credit derivatives during the six-month period ended 30 June 2022 nor during the year ended 31 December 2021.

Template 21: EU CR3 – CRM techniques overview – Disclosure of the use of credit risk mitigation techniques

30 June 2022 (€ million)		**Unsecured carrying amount**	**Secured carrying amount**			
				Of which **secured by collateral**	Of which **secured by financial guarantees**	
						Of which **secured by credit derivatives**
		a	b	c	d	e
1	Loans and advances[37]	8.545	5.143	5.063	80	--
2	Debt securities	4.759	--	--	--	
3	**Total**	**13.304**	**5.143**	**5.063**	**80**	**--**
4	*Of which non-performing exposures*	47	427	420	7	--
EU-5	*Of which defaulted*	47	427			

[37] Figures reported include cash balances at central banks and other demand deposits and exclude loans and advances to customers classified as held for sale as per IFRSs.

31 December 2021 (€ million)		Unsecured carrying amount[38]	Secured carrying amount			
				Of which **secured by collateral**	Of which **secured by financial guarantees**	
						Of which **secured by credit derivatives**
		a	**b**	**c**	**d**	**e**
1	Loans and advances[37]	8.518	4.816	4.736	80	--
2	Debt securities	4.465	--	--	--	
3	**Total**	**12.983**	**4.816**	**4.736**	**80**	**--**
4	*Of which non-performing exposures*	52	435	427	8	--
EU-5	*Of which defaulted*	52	435			

During 2021, the Bank proceeded with a TLTRO transaction with the ECB (repurchase agreement) for an amount of €2,3 billion where it pledges bonds to received cash. The cash proceeds were placed in the ECB Target 2 account.

Total loans and advances have increased by €354 million (3%) during the six-month period ended 30 June 2022, as a result of the acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank.

Total debt securities have increased by €295 million (7%) during the six-month period ended 30 June 2022, mainly driven by acquisition of debt securities, which have been partially offset by the debt instruments that matured during the period as well as disposals of such instruments.

[38] The figures reported for 31 December 2021 have been restated, for comparability purposes and in with the latest “EBA mapping Pillar III disclosures templates with supervisory reporting” tool available.

4.2.2 Credit risk exposure and CRM effects

The tables below illustrate the credit risk exposures before and post Credit Conversion Factors (“CCF”) and Credit Risk Mitigation Techniques (“CRM”), obtained in the form of eligible financial collateral, guarantees and credit derivatives, as applied in accordance with Part Three, Title II, Chapter 4 of the CRR as at 30 June 2022 and 31 December 2021, respectively. Exposures are split into on - and off- balance sheet exposures and are broken down by exposure class as at each reference date.

Template 22: EU CR4 – Standardised approach – Credit risk exposure and CRM effects

30 June 2022 – (€ million)		**a**	**b**	**c**	**d**	**e**	**f**
		Exposures before CCF and before CRM		**Exposures post CCF and post CRM**		**RWAs and RWAs density**	
Exposure classes[39]		**On-balance-sheet exposures**	**Off-balance-sheet exposures**	**On-balance-sheet exposures**	**Off-balance-sheet exposures**	**RWAs**	**RWA Density**
1	Central governments or central banks	8.795	--	9.967	1	--	0%
2	Regional government or local authorities	4	11	1	--	--	20%
3	Public sector entities	--	--	--	--	--	100%
4	Multilateral development banks	466	--	466	--	--	0%
5	International organisations	--	--	--	--	--	--
6	Institutions	1.447	2	1.451	3	408	28%
7	Corporates	1.851	585	1.692	125	1.643	90%
8	Retail	2.022	601	1.096	96	845	71%
9	Secured by mortgages on immovable property	1.851	56	1.851	35	806	43%
10	Exposures in default	595	13	290	2	311	107%
11	Exposures associated with particularly high risk	136	69	121	31	229	150%
12	Covered bonds	859	--	859	--	120	14%
13	Institutions and corporates with a short-term credit assessment	--	--	--	--	--	--
14	Collective investment undertakings	--	--	--	--	--	--
15	Equity	26	--	26	--	64	250%
16	Other items	593	--	593	--	446	75%
17	**Total**	**18.645**	**1.337**	**18.413**	**293**	**4.872**	**26%**

[39] Figures reported include exposures classified as held for sale as per IFRSs.

31 December 2021 – (€ million)		a	b	c	d	e	f
		Exposures before CCF and before CRM		**Exposures post CCF and post CRM**		**RWAs and RWAs density**	
Exposure classes[39]		**On-balance-sheet exposures**	**Off-balance-sheet exposures**	**On-balance-sheet exposures**	**Off-balance-sheet exposures**	**RWAs**	**RWA Density**
1	Central governments or central banks	8.809	--	10.067	2	--	0%
2	Regional government or local authorities	5	10	2	--	--	20%
3	Public sector entities	--	--	--	--	--	100%
4	Multilateral development banks	429	--	429	--	--	0%
5	International organisations	--	--	--	--	--	--
6	Institutions	1.506	2	1.509	2	427	28%
7	Corporates	1.609	517	1.452	102	1.428	92%
8	Retail	2.061	592	1.083	79	825	71%
9	Secured by mortgages on immovable property	1.638	63	1.638	37	697	42%
10	Exposures in default	668	15	341	2	363	106%
11	Exposures associated with particularly high risk	170	67	155	30	277	150%
12	Covered bonds	630	--	630	--	97	15%
13	Institutions and corporates with a short-term credit assessment	--	--	--	--	--	--
14	Collective investment undertakings	--	--	--	--	--	--
15	Equity	26	--	26	--	64	250%
16	Other items	590	--	590	--	460	78%
17	**Total**	**18.141**	**1.266**	**17.922**	**254**	**4.638**	**26%**

On-balance sheet exposures have increased by €504 million (3%) before CCF and CRM and €491 million (3%) post CCF and post CRM, during the six-month period ended 30 June 2022, as a result of the following:

- Increase in “Corporates” by €242m (15%) before CCF and CRM and €240 million (17%) post CCF and post CRM,
- Increase in “Secured by mortgages on immovable property” by €213 million (13%) before CCF and CRM and € 213 million (13%) post CCF and post CRM, and
- Increase in “Covered Bonds” by €229 million (36%)

The above increase in “Corporates” and “Secured by mortgages on immovable property” exposure classes noted in the tables above, is mainly the result of the acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank. The increase noted in “Covered bonds” is driven by additional investments within the first half of 2022 from Treasury Department in Covered Bond securities, as part of the Bank’s Investment Strategy.

The tables below present the breakdown of exposures by asset class and risk weight as at 30 June 2022 and 31 December 2021, respectively. Deducted or unrated items are presented separately in the table below.

Template 23: EU CR5 – Standardised approach

30 June 2022 – (€ million) *		**Risk Weight**									**Total**	**Of which: unrated**
Exposure Classes[40,41]		**0%**	**10%**	**20%**	**35%**	**50%**	**75%**	**100%**	**150%**	**250%**		
1	Central governments or central banks	9.968	--	--	--	--	--	--	--	--	9.968	--
2	Regional government or local authorities	--	--	1	--	--	--	--	--	--	1	1
3	Public sector entities	--	--	--	--	--	--	--	--	--	--	--
4	Multilateral development banks	466	--	--	--	--	--	--	--	--	466	--
5	International organisations	--	--	--	--	--	--	--	--	--	--	--
6	Institutions	5	--	1.154	--	257	--	30	--	8	1.454	19
7	Corporates	--	--	--	--	24	--	1.705	88	--	1.817	1.442
8	Retail exposures	--	--	--	--	--	1.192	--	--	--	1.192	1.192
9	Exposures secured by mortgages on immovable property	--	--	--	1.250	363	--	274	--	--	1.887	1.887
10	Exposures in default	--	--	--	--	--	--	253	38	--	291	291
11	Exposures associated with particularly high risk	--	--	--	--	--	--	--	152	--	152	153
12	Covered bonds	--	521	338	--	--	--	--	--	--	859	--
13	Exposures to institutions and corporates with a short-term credit assessment	--	--	--	--	--	--	--	--	--	--	--
14	Units or shares in collective investment undertakings	--	--	--	--	--	--	--	--	--	--	--
15	Equity exposures	--	--	--	--	--	--	--	--	26	26	26
16	Other items	150	--	34	--	--	--	390	--	19	593	593
17	**Total**	**10.589**	**521**	**1.527**	**1.250**	**644**	**1.192**	**2.652**	**278**	**53**	**18.706**	**5.604**

[40] Figures reported include exposures classified as held for sale as per IFRSs.
[41] Columns that are not applicable to the Group have not been included.

31 December 2021 – (€ million) *		Risk Weight									Total	Of which: unrated
Exposure Classes[40,41]		**0%**	**10%**	**20%**	**35%**	**50%**	**75%**	**100%**	**150%**	**250%**		
1	Central governments or central banks	10.069	--	--	--	--	--	--	--	--	10.069	--
2	Regional government or local authorities	--	--	2	--	--	--	--	--	--	2	2
3	Public sector entities	--	--	--	--	--	--	--	--	--	--	--
4	Multilateral development banks	429	--	--	--	--	--	--	--	--	429	--
5	International organisations	--	--	--	--	--	--	--	--	--	--	--
6	Institutions	5	--	1.187	--	283	--	29	--	8	1.512	20
7	Corporates	--	--	--	--	34	--	1.365	155	--	1.554	1.081
8	Retail exposures	--	--	--	--	--	1.162	--	--	--	1.162	1.130
9	Exposures secured by mortgages on immovable property	--	--	--	1.175	286	--	213	--	--	1.674	1.656
10	Exposures in default	--	--	--	--	--	--	302	41	--	343	327
11	Exposures associated with particularly high risk	--	--	--	--	--	--	--	185	--	185	184
12	Covered bonds	--	291	338	--	--	--	--	--	--	629	--
13	Exposures to institutions and corporates with a short-term credit assessment	--	--	--	--	--	--	--	--	--	--	--
14	Units or shares in collective investment undertakings	--	--	--	--	--	--	--	--	--	--	--
15	Equity exposures	--	--	--	--	--	--	--	--	26	26	26
16	Other items	142	--	22	--	--	--	407	--	20	591	591
17	**Total**	**10.645**	**291**	**1.549**	**1.175**	**603**	**1.162**	**2.316**	**381**	**54**	**18.176**	**5.017**

It is noted that the figures presented in table for 31 December 2021 were amended to exclude derivatives and SFTs- according to the instructions- so that figures are comparable with the ones presented in table for 30 June 2022.

4.3 Counterparty Credit Risk & Credit Valuation Adjustment (CVA) Risk

Counterparty credit risk arises from the possibility that a counterparty may default on amounts owed on derivative transactions and SFTs such as repurchase agreements.

Analysis of CCR exposures

The methodology used for calculating the exposure in derivatives has changed from June 2021, with the introduction of the provisions of CRRII, since the "Mark-to-Market" method is no longer applicable. The Bank has chosen to follow the "Original exposure method" due to the small size of its derivatives portfolio.

The replacement value of derivatives and as a result, the exposure value and risk weighted assets of derivatives increased during the six-month period ended 30 June 2022, but still remains at relatively low levels.

The tables presented below compare the Group's position as at 30 June 2022 and as at 31 December 2021 and show the methods for calculating the regulatory requirements for CCR exposure including the main parameters for each method.

Template 24: EU CCR1 – Analysis of CCR exposure by approach

30 June 2022 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**
		Replacement cost (RC)	**Potential future exposure (PFE)**	**EEPE**	**Alpha used for computing regulatory exposure value**	**Exposure value pre-CRM**	**Exposure value post-CRM**	**Exposure value**	**RWEA**
EU1	EU – Original Exposure Method (for derivatives)	6	20	--	1,4	36	36	36	7
EU2	EU – Simplified SA-CCR (for derivatives)	--	--	--	1,4	--	--	--	--
1	SA-CCR (for derivatives)	--	--	--	1,4	--	--	--	--
2	IMM (for derivatives and SFTs)				--	--	--	--	--
2a	Of which securities financing transactions netting sets				--	--	--	--	--
2b	Of which derivatives and long settlement transactions netting sets				--	--	--	--	--
2c	Of which from contractual cross-product netting sets				--	--	--	--	--
3	Financial collateral simple method (for SFTs)				--	--	--	--	--
4	Financial collateral comprehensive method (for SFTs)				--	2.781	481	481	--
5	VaR for SFTs				--	--	--	--	--
6	***Total***				--	***2.817***	***517***	***517***	***7***

31 December 2021 (€ million)		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU1	EU – Original Exposure Method (for derivatives)	1	17	--	1,4	25	25	25	6
EU2	EU – Simplified SA-CCR (for derivatives)	--	--	--	1,4	--	--	--	--
1	SA-CCR (for derivatives)	--	--	--	1,4	--	--	--	--
2	IMM (for derivatives and SFTs)				--	--	--	--	--
2a	Of which securities financing transactions netting sets				--	--	--	--	--
2b	Of which derivatives and long settlement transactions netting sets				--	--	--	--	--
2c	Of which from contractual cross-product netting sets				--	--	--	--	--
3	Financial collateral simple method (for SFTs)				--	--	--	--	--
4	Financial collateral comprehensive method (for SFTs)				--	2.595	295	295	--
5	VaR for SFTs				--	--	--	--	--
6	***Total***				--	***2.620***	***320***	***320***	***6***

The table below EU CCR2 provides a breakdown of the credit valuation adjustment (CVA) RWA into advanced and standardized approaches. The tables present total transactions subject to own funds requirements for CVA risk, and relevant breakdown, as at 30 June 2022 and 31 December 2021.

Template 25: EU CCR2 – Transactions subject to own funds requirements for CVA risk

30 June 2022 (€ million)		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method	--	--
2	(i) VaR component (including the 3× multiplier)	--	--
3	(ii) stressed VaR component (including the 3× multiplier)	--	--
4	Transactions subject to the Standardised method	35	7
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	--	--
5	**Total transactions subject to own funds requirements for CVA risk**	**35**	**7**

31 December 2021 (€ million)		a	b
		Exposure value	RWEA
1	Total transactions subject to the Advanced method	--	--
2	(i) VaR component (including the 3× multiplier)	--	--
3	(ii) stressed VaR component (including the 3× multiplier)	--	--
4	Transactions subject to the Standardised method	25	4
EU4	Transactions subject to the Alternative approach (Based on the Original Exposure Method)	--	--
5	**Total transactions subject to own funds requirements for CVA risk**	**25**	**4**

The following table presents information on the Group' counterparty credit risk (CCR) exposure and the composition of collateral used in both derivative transactions and securities financing transactions (SFTs). The table discloses a breakdown of all types of collateral posted or received to support or reduce CCR exposures related to derivatives and SFTs. For SFTs, collateral refers to both legs of the transaction as collateral received and collateral posted.

Template 26: EU CCR5 – Composition of collateral for CCR exposures

30 June 2022 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**
		Collateral used in derivative transactions				**Collateral used in SFTs**			
	Collateral type	**Fair value of collateral received**		**Fair value of posted collateral**		**Fair value of collateral received**		**Fair value of posted collateral**	
		Segregated	**Unsegregated**	**Segregated**	**Unsegregated**	**Segregated**	**Unsegregated**	**Segregated**	**Unsegregated**
1	Cash – domestic currency	1	--	19	--	--	2.300	--	--
2	Cash – other currencies	--	--	1	--	--	--	--	--
3	Domestic sovereign debt	--	--	--	--	--	--	--	1.433
4	Other sovereign debt	--	--	--	--	--	--	--	--
5	Government agency debt	--	--	--	--	--	--	--	--
6	Corporate bonds	--	--	--	--	--	--	--	1.280
7	Equity securities	--	--	--	--	--	--	--	--
8	Other collateral	--	--	--	--	--	--	--	--
9	**Total**	**1**	**--**	**20**	**--**	**--**	**2.300**	**--**	**2.713**

31 December 2021 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**
		Collateral used in derivative transactions				**Collateral used in SFTs**			
	Collateral type	**Fair value of collateral received**		**Fair value of posted collateral**		**Fair value of collateral received**		**Fair value of posted collateral**	
		Segregated	**Unsegregated**	**Segregated**	**Unsegregated**	**Segregated**	**Unsegregated**	**Segregated**	**Unsegregated**
1	Cash – domestic currency	1	--	22	--	--	2.300	--	--
2	Cash – other currencies	--	--	1	--	--	--	--	--
3	Domestic sovereign debt	--	--	--	--	--	--	--	1.475
4	Other sovereign debt	--	--	--	--	--	--	--	--
5	Government agency debt	--	--	--	--	--	--	--	--
6	Corporate bonds	--	--	--	--	--	--	--	1.072
7	Equity securities	--	--	--	--	--	--	--	--
8	Other collateral	--	--	--	--	--	--	--	--
9	**Total**	**1**	**--**	**23**	**--**	**--**	**2.300**	**--**	**2.547**

As presented in the tables above, the fair values of collateral posted and received for derivative transactions remain largely unchanged from 31 December 2021 to 30 June 2022. The fair value of collateral received for SFTs remains at €2,300 million. This relates to the TLTRO transaction with the ECB (repurchase agreement) for an amount of €2,3 billion where it pledges bonds to receive cash. The cash proceeds were placed in the ECB Target 2 account.

4.4 Measures applied in response to the COVID-19 outbreak

The Bank is intensely and continuously monitoring its risk position relevant to the COVID-19 pandemic and taking appropriate actions for contingency management and risk mitigation.

Loan moratorium

In the light of the COVID-19 pandemic, a first moratorium was applied, as voted by the Cyprus Parliament, to all individuals or legal entities across different sectors who applied and were eligible under the scheme (suspension of instalments of capital and interest for a period of nine months) until 31 December 2020.

Following the expiration of the first moratorium on 31 December 2020, a second scheme for the suspension of instalments of capital and interest (loan moratorium) was introduced in January 2021 until 30 June 2021, as announced by the Cyprus Government on 15 January 2021, for customers impacted by the second lockdown, subject to certain criteria. Under the second moratorium scheme, payment deferrals could be offered until 30 June 2021, however, the total months under loan moratorium, when including the loan moratorium offered in 2020, should not exceed a total of nine months. The application period for the second moratorium scheme expired on 31 January 2021 and the assessment was completed on 28 February 2021.

The gross carrying amount of the loans and advances subject to the first and the second moratoria, which expired on 31 December 2020 and 30 June 2021, respectively. These amounted to €2,3 billion (of which €47 million were classified as HFS) as at 30 June 2022, comprising of gross loans to:

- Households of €1,3 billion (of which €11 million were classified as HFS), and
- Non-financial corporations of €1,1 billion (of which €33 million were classified as HFS).

Post Moratorium Arrears Performance

Following expiry of the first moratorium the Bank continues to adopt an appropriately prudent approach and is in readiness in terms of monitoring procedures and day-to-day management of the accounts to deal with early arrears. The Bank’s total performing portfolio in arrears remains at lower levels compared to pre-COVID 19 levels (37% of pre-COVID 19 performing arrears stock), as at the end of June 2022.

4.4.1 Loans and advances subject to legislative and non-legislative moratoria

Following the expiration of both moratoria on 31 December 2020 and 30 June 2021 respectively, no further legislative moratoria have been introduced which explains the reason for not disclosing “COVID-19 Template 1 – Information on loans and advances subject to legislative and non-legislative moratoria”, as Nil values would have been reported therein.

4.4.2 Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria

Template 27: COVID-19 Template 2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria

The tables below provide a breakdown of loans and advances subject to legislative and non-legislative moratoria, broken down by residual maturity with reference date 30 June 2022 and 31 December 2021. Additionally, loans and advances with expired legislative moratoria are also reported on these tables. As provided in the table below, all moratoria of €2.341 million at 30 June 2022 have expired.

		a	b	c	d	e	f	g	h	i
30 June 2022		**Number of obligors**	**Gross carrying amount**							
				of which legislative moratoria	of which expired	Residual maturity of moratoria				
						<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
			€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1	**Loans and advances for which moratorium was offered**	**19.239**	**2.341**							
2	**Loans and advances subject to moratorium (granted)**	**18.821**	**2.341**	**--**	**2.341**	**--**	**--**	**--**	**--**	**--**
3	of which: Households		1.261	--	1.261	--	--	--	--	--
4	of which: Collateralised by residential immovable property		990	--	990	--	--	--	--	--
5	of which: Non-financial corporations		1.066	--	1.066	--	--	--	--	--
6	of which: Small and Medium-sized Enterprises		976	--	976	--	--	--	--	--
7	of which: Collateralised by commercial immovable property		951	--	951	--	--	--	--	--

		a	b	c	d	e	f	g	h	i
31 December 2021		**Number of obligors**	**Gross carrying amount**							
				of which legislative moratoria	of which expired	Residual maturity of moratoria				
						<= 3 months	> 3 months <= 6 months	> 6 months <= 9 months	> 9 months <= 12 months	> 1 year
			€ million	€ million	€ million	€ million	€ million	€ million	€ million	€ million
1	**Loans and advances for which moratorium was offered**	**19.935**	**2.522**							
2	**Loans and advances subject to moratorium (granted)**	**19.482**	**2.481**	**--**	**2.481**	**--**	**--**	**--**	**--**	**--**
3	of which: Households		1.321	--	1.321	--	--	--	--	--
4	of which: Collateralised by residential immovable property		1.030	--	1.030	--	--	--	--	--
5	of which: Non-financial corporations		1.144	--	1.144	--	--	--	--	--
6	of which: Small and Medium-sized Enterprises		1.061	--	1.061	--	--	--	--	--
7	of which: Collateralised by commercial immovable property		1.008	--	1.008	--	--	--	--	--

The Group has not granted newly originated loans and advances under newly applicable public guarantee schemes introduced in response to COVID-19 crisis, as such scheme had not been voted by the Parliament and hence not introduced up to the date of this report. Effectively this explains the reason for not disclosing “COVID-19 Template 3 - Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis”, as Nil values would have been reported therein.

5 INVESTMENT, MARKET AND LIQUIDITY RISK MANAGEMENT

5.1 Market risk Management

5.1.1 Exposures in equity securities

The Bank's exposure in equity securities amounts to €28 million for 30 June 2022 (31 December 2021: €29 million) and the Bank does not have the risk appetite to increase this exposure. It is noted that all investments in equity securities are currently held in the Banking Book. A large proportion of the Bank's exposures in equity positions are of a strategic nature in unlisted equities, amounting to €27,0 million, out of which €19,1 million are measured at Fair Value through Profit or Loss ("FVPL") and €7,9 million are measured at Fair value through other comprehensive income ("FVOCI"). The latter consists of two positions, out of which the most significant, amounting to €7,6 million is in an unlisted company held on business grounds (JCC Payment Systems Ltd). The exposures to listed equities, measured at FVOCI, amounts to €1,3 million and concerns equity securities in companies listed on the Cyprus Stock Exchange.

5.1.2 Interest rate risk on positions not held in the trading book

The table below shows the changes in the Economic Value of Equity (EVE) and Net Interest Income (NII) for the Banking book positions. The NII sensitivity is calculated for the next 12 months, under a change of ±200 basis points in interest rates. The EVE sensitivity is calculated for interest rate changes under the six standardised scenarios defined by the Commission Implementing Regulation (EU) 2022/631 and EBA Guidelines on IRRBB (EBA/GL/2018/02)[42]. Both the EVE and NII sensitivity measures are calculated for the significant currencies which are EUR and USD.

Template 28: EU IRRBB1 – Interest rate risks of non-trading book activities

Amounts (€ million)	Changes in the EVE		Changes in Net Interest Income	
	30 June 2022	31 December 2021	30 June 2022	31 December 2021
Parallel up	60	187	35	35
Parallel down	(41)	(71)	(11)	(10)
Steepener	13	91		
Flattener	(5)	(55)		
Short rates up	16	8		
Short rates down	(1)	(35)		

Based on the above results, the maximum EVE loss as at 30 June 2022 and 31 December 2021 was under the "Parallel down" scenario and amounted to €41 million or 3,6% of the Bank's Tier 1 Capital (31 December 2021: 71 million or 6% of the Bank's Tier 1 Capital). This mainly derives from the sensitivity of the Bank's EUR denominated assets and liabilities. The decrease compared to 31 December 2021 EVE results was mainly the result of the following factors:

- the revision of assumptions on core deposits and NPEs following the finalisation and submission of the ICAAP exercise,
- the increased sensitivity from bonds due to new acquisitions, reducing the duration gap between assets and liabilities.

The aggregation of the impact on EVE was performed based on the EBA Guidelines on IRRBB (EBA/GL/2018/02) according to which, when there is a need to add negative and positive changes occurring in each currency, positive changes are weighted by a factor of 50%.

It is also noted that for the calculation of both EVE and NII sensitivity under scenarios with interest rate reductions, the EBA Guidelines on IRRBB were followed for currencies with negative interest rates (a post shock floor of -1% was assumed) and, in addition, floors were inserted to specific products for which interest rates cannot be reduced lower than zero.

[42] According to the EBA Guidelines (EBA/GL/2018/02), for the Euro, the parallel shock scenario is set at 200 basis points (bps), the short-term shock scenario at 250 bps and the long-term shock scenario at 100 bps. For the US Dollar, the parallel shock scenario is set at 200 bps, the short-term shock scenario at 300 bps and the long-term shock scenario at 150 bps. The flattener and the steepener shock scenarios are a combination of short and long-term shock scenarios.

5.2 Liquidity Risk Management

Liquidity risk is the risk of a decrease in profits or capital, arising from a weakness of the Bank to meet its immediate obligations, without incurring additional costs. The Group's approach in managing liquidity risk is to ensure, to the extent possible (considering that the main role of the Bank as an intermediary is to accept short term deposits and grant long term loans), that there is adequate liquidity to satisfy its obligations, when they arise, under "normal" circumstances as well as under stress conditions, without the Group incurring any additional costs.

5.2.1 Liquidity Coverage Ratio

The Group must comply with the Liquidity Coverage Ratio (LCR) as per the provisions of the Commission Delegated Regulation (EU) 2018/1620 of 13 July 2018 amending Delegated Regulation (EU) 2015/61 (which supplements CRR with regards to the liquidity coverage requirement for Credit Institutions). The LCR was in effect from 1 October 2015 with a regulatory limit of 60%, increasing to 100% from 1 January 2018 when the full phase-in of the requirement was effected.

The Group's LCR ratio reached 473% in June 2022, compared to the December 2021 figure of 499% and remained well within its regulatory limit of 100% and Risk Appetite Statement (RAS) limit throughout the six-month period ended 30 June 2022.

Total High-Quality Liquid Assets (HQLA) of the Bank remained fairly stable at high level primarily due to the increase in customer deposits and the acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank, during the six-month period ended 30 June 2022. At the same time the net outflows of the Bank have increased due to the increase in customer deposits.

Concentration of funding sources

The Group places emphasis on the maintenance of stable customer deposits, as they represent its main funding source. This is effectively achieved through the maintenance of good and long-standing relationships of trust with customers and through competitive and transparent pricing strategies, also taking into consideration the liquidity position of the Bank.

Furthermore, the Bank does not have any concentration in individual large depositors.

Composition of the institution`s liquidity buffer

The Bank aims to maintain an adequate liquidity buffer, which will allow it not only to meet its obligations as they fall due in a business-as-usual scenario, but also to be able to survive a combined market-wide and idiosyncratic scenario, as defined in the Bank's ILAAP. To determine the minimum required level of liquid assets, the Bank considers the Risk Appetite Framework (RAF) Management Action Trigger levels of Liquidity Risk metrics.

The Bank holds a liquidity buffer in the form of a portfolio of unencumbered, high quality liquid assets which could be monetized quickly in the event that the Bank experiences a liquidity crisis. The Liquidity Buffer is primarily comprised of Central Bank reserves. The rest of the buffer is mainly held in Level 1 high quality securities and some Level 2 securities.

The quality of the liquid assets held by the Bank is safeguarded by the Hellenic Bank Investment Framework (HBIF), which promotes a well-diversified, high credit quality investment portfolio, while placing a limit on non-ECB eligible securities.

Derivative exposures and potential collateral calls

The Bank has a relatively small derivatives portfolio which mainly consists of FX-swaps that are short term. Therefore, any potential collateral calls, which may be the result of either changes in market value of the derivatives or a deterioration in the Bank's credit quality, are not expected to materially affect the liquidity position of the Bank.

Currency mismatch in the LCR

It is noted that for the USD, which is the Bank's foreign currency with material positions, the Bank does not have a mismatch, meaning that it maintains a ratio well above 100%. The Bank has included LCR USD in its RAS with a risk appetite limit set to 100%.

It is noted that according to the Pillar III disclosure requirements (table below), each quarterly observation is the average of the previous 12 months preceding the end of each quarter.

The following table shows a quantitative analysis of LCR, in accordance with Article 451a of CRR.

Template 29: EU LIQ1 – Quantitative information of LCR

Scope of consolidation: Consolidated		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**
€ million		**Total unweighted value (average)**				**Total weighted value (average)**			
EU 1a	Quarter ending on:	**30-Jun-22**	**31-Mar-22**	**31-Dec-21**	**30-Sep-21**	**30-Jun-22**	**31-Mar-22**	**31-Dec-21**	**30-Sep-21**
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
HIGH-QUALITY LIQUID ASSETS									
1	Total high-quality liquid assets (HQLA)					7.909	7.703	7.431	7.195
CASH – OUTFLOWS									
2	Retail deposits and deposits from small business customers, of which:	7.698	7.493	7.299	7.080	485	470	457	443
3	*Stable deposits*	5.894	5.762	5.624	5.460	295	288	281	273
4	*Less stable deposits*	1.804	1.731	1.675	1.620	190	182	176	170
5	Unsecured wholesale funding	2.627	2.498	2.365	2.281	1.511	1.428	1.353	1.328
6	*Operational deposits (all counterparties) and deposits in networks of cooperative banks*	17	22	27	33	4	5	7	8
7	*Non-operational deposits (all counterparties)*	2.610	2.476	2.338	2.248	1.507	1.423	1.346	1.320
8	*Unsecured debt*	--	--	--	--	--	--	--	--
9	Secured wholesale funding					--	--	--	--
10	Additional requirements	415	392	379	378	37	35	34	34
11	*Outflows related to derivative exposures and other collateral requirements*	6	5	5	5	6	5	5	5
12	*Outflows related to loss of funding on debt products*	--	--	--	--	--	--	--	--
13	*Credit and liquidity facilities*	409	387	374	373	31	30	29	29
14	Other contractual funding obligations	23	22	22	19	1	1	1	1
15	Other contingent funding obligations	919	928	938	952	58	58	59	59
16	**TOTAL CASH OUTFLOWS**					2.092	1.992	1.904	1.865
CASH – INFLOWS									
17	Secured lending (e.g. reverse repos)	--	--	--	--	--	--	--	--
18	Inflows from fully performing exposures	330	311	299	304	316	298	286	292
19	Other cash inflows	396	387	380	376	96	93	88	82
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					--	--	--	--
EU-19b	(Excess inflows from a related specialised credit institution)					--	--	--	--
20	**TOTAL CASH INFLOWS**	726	698	679	680	412	391	374	374
EU-20a	***Fully exempt inflows***	--	--	--	--	--	--	--	--
EU-20b	***Inflows subject to 90% cap***	--	--	--	--	--	--	--	--
EU-20c	***Inflows subject to 75% cap***	726	698	679	680	412	391	374	374
						TOTAL ADJUSTED VALUE			
21	**LIQUIDITY BUFFER**					7.909	7.703	7.431	7.195
22	**TOTAL NET CASH OUTFLOWS**					1.680	1.601	1.530	1.491
23	**LIQUIDITY COVERAGE RATIO (%)**					471%	481%	486%	483%

5.2.2 Net Stable Funding Ratio

The Bank monitors the Net Stable Funding Ratio (NSFR) which has been developed to provide a sustainable maturity structure of assets and liabilities. It calculates the proportion of available stable funding via the capital and liabilities over required stable funding for the assets. The components of stable funding are not equally weighted.

Overall, the NSFR requires banks to maintain a stable funding profile in relation to their on- and off-balance sheet activities. The CRR II, which was finalized in June 2019 and is effective from June 2021, defines and implements the NSFR for the EU, with the regulatory minimum limit of 100%.

The Bank is calculating this ratio on a quarterly basis, as per the Basel III requirements. The Bank has included NSFR in its Risk Appetite Statement with a RAS limit of 110%, higher than the expected regulatory limit. The NSFR as of 30 June 2022 stands at 178% compared to 197% as at 31 December 2021, well above the regulatory minimum and RAS limit. The main reason for the decrease is the approval for the extension of the TLTRO, as the bonds encumbered are now accounted 100% as Required Stable Funding (RSF) while the liability is now also accounted as 100% Available Stable Funding (ASF).

The table below shows a quantitative analysis of NSFR in accordance with Article 451a (3) CRR.

Template 30: EU LIQ2 – Net Stable Funding Ratio

30 June 2022		**a**	**b**	**c**	**d**	**e**
(in € million)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	**--**	**130**	--	**1103**	**1.103**
2	*Own funds*	--	130	--	1.103	1.103
3	*Other capital instruments*		--	--	--	--
4	Retail deposits		**10.413**	**1.537**	**621**	**11.855**
5	*Stable deposits*		8.155	1.428	572	9.677
6	*Less stable deposits*		2.257	108	49	2.178
7	Wholesale funding:		**2.883**	**35**	**2.404**	**3.398**
8	*Operational deposits*		--	--	--	--
9	*Other wholesale funding*		2.883	35	2.404	3.398
10	Interdependent liabilities		**--**	**--**	**--**	**--**
11	Other liabilities:	**--**	**--**	**--**	**209**	**209**
12	*NSFR derivative liabilities*	--				
13	*All other liabilities and capital instruments not included in the above categories*		--	--	209	209
14	**Total available stable funding (ASF)**					**16.565**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**2.105**
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		--	--	--	--
16	Deposits held at other financial institutions for operational purposes		**340**	--	--	**170**
17	Performing loans and securities:		**243**	**188**	**6.512**	**5.543**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		--	--	--	--
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		--	--	--	--
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		68	13	3.749	3.227
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		44	--	--	22
22	*Performing residential mortgages, of which:*		1	1	1.234	807
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		1	1	1.220	794
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		174	174	1.528	1.509
25	Interdependent assets		--	--	--	--
26	Other assets:	**--**	**6**	**438**	**1.226**	**1.450**
27	*Physical traded commodities*				**--**	**--**
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*				--	--
29	*NSFR derivative assets*				5	5
30	*NSFR derivative liabilities before deduction of variation margin posted*				2	--
31	*All other assets not included in the above categories*		--	438	1.226	1.445
32	Off-balance sheet items		**606**	**--**	**20**	**51**
33	**Total RSF**					**9.319**
34	**Net Stable Funding Ratio (%)**					**178%**

31 December 2021		a	b	c	d	e
(in € million)		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1yr	≥ 1yr	
Available stable funding (ASF) Items						
1	Capital items and instruments	--	**130**	--	**1.058**	**1.058**
2	*Own funds*	--	130	--	1.058	1.058
3	*Other capital instruments*		--	--	--	--
4	Retail deposits		**10.228**	**1.443**	**608**	**11.588**
5	*Stable deposits*		8.195	1.332	562	9.613
6	*Less stable deposits*		2.033	111	46	1.975
7	Wholesale funding:		**4.960**	**18**	**108**	**1.032**
8	*Operational deposits*		--	--	--	--
9	*Other wholesale funding*		4.960	18	108	1.032
10	Interdependent liabilities		--	--	--	--
11	Other liabilities:	--	--	--	**170**	**170**
12	*NSFR derivative liabilities*	--				
13	*All other liabilities and capital instruments not included in the above categories*		--	--	**170**	**170**
14	**Total available stable funding (ASF)**					**13.848**
Required stable funding (RSF) Items						
15	Total high-quality liquid assets (HQLA)					**97**
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		--	--	--	--
16	Deposits held at other financial institutions for operational purposes		**342**	--	--	**171**
17	Performing loans and securities:		**270**	**63**	**6.349**	**5.337**
18	*Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut*		--	--	--	--
19	*Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions*		--	--	--	--
20	*Performing loans to non- financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:*		76	23	3.543	3.061
21	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		48	--	--	25
22	*Performing residential mortgages, of which:*		1	1	1.164	760
23	*With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk*		1	1	1.150	748
24	*Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products*		193	39	1.642	1.516
25	Interdependent assets		--	--	--	--
26	Other assets:	--	**--**	**385**	**1.195**	**1.387**
27	*Physical traded commodities*				--	--
28	*Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs*				--	--
29	*NSFR derivative assets*				--	--
30	*NSFR derivative liabilities before deduction of variation margin posted*				--	--
31	*All other assets not included in the above categories*		--	385	1.195	1.387
32	Off-balance sheet items		**530**	**--**	**16**	**43**
33	**Total RSF**					**7.035**
34	**Net Stable Funding Ratio (%)**					**197%**

6 DISCLOSURE OF LEVERAGE RATIO

6.1 Leverage Ratio according to CRR/CRD Framework

The disclosures have been prepared using the format set out in Annexes XI and XII of the Commission Implementing Regulation (EU) 2021/637 laying down implementing technical standards (ITS) with regards to the disclosure of the leverage ratio, as per Article 451 of Regulation (EU) No 575/2013. The disclosure templates take into account the CRR II revisions but also the new December 2018 BCBS Pillar III standards and the changes implemented by the BCBS in June 2019.

As per CRR II applicable from June 2021 a binding minimum leverage ratio of 3% is introduced.

According to Article 429 of the CRR, the leverage ratio is calculated as an institution's capital measure divided by the institution's total exposure measure expressed as a percentage.

The leverage ratio of the Group is calculated using two capital measures as follows:

a) Tier 1 capital: IFRS 9 fully phased-in definition
b) Tier 1 capital: IFRS 9 transitional definition

6.2 Factors that had an impact on the leverage ratio during the six-month period

As at 30 June 2022, the Group's leverage ratio[43] was 5,96% (31 December 2021: 6,14%) on IFRS 9 transitional basis and 5,88% (31 December 2021: 5,90%) on IFRS 9 fully loaded basis. This ratio is well above the regulatory 3% limit.

The Group's Leverage ratio[43] on IFRS 9 transitional basis, which is above the minimum leverage ratio set at 3% by the amended CRR II rules effective from June 2021, has decreased by 18 basis points basis points compared to 31 December 2021 mainly due to the increase in "Leverage ratio total exposure measure" despite the increase in Tier 1 capital.

The main reason for the increase in "Leverage ratio total exposure measure" was the increase in total assets as a result of the increase in customer deposits during the six-month period which was reflected in the net increase in investment in debt securities and the increase in loans and advances primarily due to the acquisition of part of the performing loan portfolio (Tranche A and Tranche B) from RCB Bank. The increase in Tier 1 capital was the result of the main drivers for the change in CET 1 capital as explained in Section 3.2.

[43] As per the final regulatory reporting submissions, for which interim profits are included, following permission granted by the Supervisory Authorities.

6.3 Summary reconciliation of accounting assets and leverage ratio exposures

This section of the Disclosures provides a reconciliation of the total exposure measure with the relevant information disclosed in the published financial statements of the Group. Even though this template was previously reported in line with ITS/2016/200, it has been amended in line with the updated BCBS standard and the updated CRR II framework for leverage. In particular, the table set out below includes a breakdown of all the adjustments that lead from the total assets as published in the financial statements of the Group to the leverage exposure measure.

Template 31: EU LR1 – LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

(€ million)		30 June 2022	31 December 2021
1	**Total assets as per published financial statements**	**19.472**	**18.836**
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	(137)	(114)
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	--	--
4	(Adjustment for temporary exemption of exposures to central banks (if applicable))	--	--
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of Article 429a(1) CRR)	--	--
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	--	--
7	Adjustment for eligible cash pooling transactions	--	--
8	Adjustments for derivative financial instruments	31	24
9	Adjustment for securities financing transactions (SFTs)	413	247
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	393	358
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	--	--
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Article 429a (1) CRR)	--	--
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a (1) CRR)	--	--
12	Other adjustments	(73)	(19)
13	**Total leverage exposure measure**	**20.099**	**19.332**

The Leverage exposure measure has increased by €766 million (4%) during the six-month period ended 30 June 2022, which is mainly driven by the overall increase of the Group's balance sheet total assets as shown in the table above and as explained in the previous section.

6.4 Leverage ratio common disclosure

Template 32: EU LR2 – LRCom: Leverage ratio common disclosure

(€ million)		CRR leverage ratio exposures	
		30 June 2022	**31 December 2021**
	On-balance sheet exposures (excluding derivatives and SFTs)		
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	19.333	18.765
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	--	--
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	--	--
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	--	--
5	(General credit risk adjustments to on-balance sheet items)	--	--
6	(Asset amounts deducted in determining Tier 1 capital)	(77)	(63)
7	**Total on-balance sheet exposures (excluding derivatives and SFTs)**	**19.256**	**18.702**
	Derivative exposures		
8	Replacement cost associated with SA-CCR derivatives transactions (ie net of eligible cash variation margin)	--	--
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	--	--
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	--	--
EU-9a	Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach	--	--
EU-9b	Exposure determined under Original Exposure Method	36	25
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	--	
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	--	--
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)	--	--
11	Adjusted effective notional amount of written credit derivatives	--	--
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	--	--
13	**Total derivatives exposures**	**36**	**25**
	Securities financing transaction (SFT) exposures		
14	Gross SFT assets (with no recognition of netting), after adjustment for sales accounting transactions	--	--
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	--	--
16	Counterparty credit risk exposure for SFT assets	413	247
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Articles 429e (5) and 222 CRR	--	--
17	Agent transaction exposures	--	--
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	--	--
18	**Total securities financing transaction exposures**	**413**	**247**
	Other off-balance sheet exposures		
19	Off-balance sheet exposures at gross notional amount	1.352	1.284
20	(Adjustments for conversion to credit equivalent amounts)	(959)	(926)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated associated with off-balance sheet exposures)	--	--
22	**Off-balance sheet exposures**	**393**	**358**
	Excluded exposures		
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) of Article 429a (1) CRR)	--	--
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off-balance sheet))	--	--
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	--	--
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	--	--

(€ million)		CRR leverage ratio exposures	
		30 June 2022	**31 December 2021**
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	--	--
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	--	--
EU-22g	(Excluded excess collateral deposited at triparty agents)	--	--
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a (1) CRR)	--	--
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a (1) CRR)	--	--
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	--	--
EU-22k	**(Total exempted exposures)**	**--**	**--**
Capital and total exposure measure			
23	**Tier 1 capital**	**1.198**	**1.187**
24	**Total exposure measure**	**20.099**	**19.332**
Leverage ratio			
25	Leverage ratio (%)	5,96%	6,14%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5,96%	6,14%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	5,96%	6,14%
26	Regulatory minimum leverage ratio requirement (%)	3,00%	3,00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	0,00%	0,00%
EU-26b	of which: to be made up of CET1 capital	0,00%	0,00%
27	Leverage ratio buffer requirement (%)	0,00%	0,00%
EU-27a	Overall leverage ratio requirement (%)	3,00%	3,00%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Transitional	Transitional

6.5 Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

Template 33: EU LR3 – LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

(€ million)		CRR Leverage Ratio Exposures	
		30 June 2022	**31 December 2021**
EU-1	**Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:**	**19.333**	**18.765**
EU-2	Trading book exposures	--	--
EU-3	Banking book exposures, of which:	19.333	18.765
EU-4	Covered bonds	859	630
EU-5	Exposures treated as sovereigns	9.261	9.237
EU-6	Exposures to regional governments, MDB, international organisations and PSE, not treated as sovereigns	4	5
EU-7	Institutions	1.447	1.506
EU-8	Secured by mortgages of immovable properties	1.851	1.638
EU-9	Retail exposures	2.022	2.061
EU-10	Corporates	1.851	1.609
EU-11	Exposures in default	595	668
EU-12	Other exposures (eg equity, securitisations, and other non-credit obligation assets)	1.443	1.411

7 SECURITISATION POSITIONS

Securitisation transactions are defined as transactions or schemes, whereby the credit risk associated with an exposure or pool of exposures is tranched, with payments in the transaction or scheme which depend on the performance of the exposure or pool of exposures, while the subordination of tranches determines the distribution of losses during the ongoing life of the transaction scheme. A “tranche” as defined in the Securitisation Regulation (EU) 2017/2402 as subsequently amended by Regulation (EU) 2021/557, is a contractually established segment of the credit risk associated with an exposure or a pool of exposures, where a position in the segment entails a risk of credit loss greater than or less than a position of the same amount in another segment, without taking account of credit protection provided by third parties directly to the holders of positions in the segment or in other segments.

The Bank holds a portfolio of securitisation positions, classified under its Banking Book. During the six-month period ended 30 June 2022 and year ended 31 December 2021, with respect to securitisations, the Bank has acted only as an investor and has not originated, issued or sponsored any securitisations. The Bank does not hold any re-securitisation positions.

The Bank’s investments in bonds are governed by the Hellenic Bank Investment Framework (HBIF), a risk-sensitive framework establishing the main principles for investments in securitisations, which is reviewed and approved by the Board of Directors on a yearly basis (latest revision was in December 2021). The Framework provides, among others, limits and qualitative guidelines for investing in a diversified bonds portfolio, while also allowing for investments in securitisation positions and restricting investments in re-securitisations. The BoD has approved (under the HBIF) a proportion of the Bank’s total bond investments to be in AAA-rated senior securitisation tranches, as part of the efforts to maintain a well-diversified portfolio of bonds.

The Bank manages the credit risk stemming from its investments in securitisations in accordance with the HBIF, which sets a maximum concentration limit for exposures in securitisations, expressed as a percentage of the Group’s CET1 Capital. In addition to the overall exposure limit in securitisations, HBIF sets “Issuer” concentration limits for securitisations, expressed as a percentage on the Group’s CET1 capital, duration limits, liquidity limits and other qualitative limits. The “Issuer” concentration limit allows investments only in tranches which are AAA-rated (according to CRR Article 138). Investments in securitisations are performed only if a tranche meets the requirements of Article 405 of CRR as well as Articles 5 and 6 referring to risk retention of Regulation (EU) 2017/2402 and in specific that the originator, sponsor or original lender has explicitly disclosed to the institution that it will retain, on an ongoing basis, a material net economic interest which, shall not be less than 5%.

Investment Process and Ongoing Monitoring

The Bank’s investments in securitisations involve the following process, which is explained in detail later in this section:

1. Treasury and Risk Management Departments analyse and review the investment opportunity;
2. Investment proposal is discussed at ALCO alongside separate Risk opinion;
3. Deal execution and ongoing monitoring of portfolio and limits;
4. Limit breach escalation process, if required; and
5. Breach rectification, if required

As described above, in addition to the approved limit framework, before proceeding with an investment in a securitisation position, a relevant investment process is followed, whereby Treasury prepares an investment proposal which is discussed at the Bank’s ALCO, alongside Risk Management Department’s comments. Before approving each investment in a securitisation position, ALCO reviews the structure of each securitisation, the credit quality of the securitised pool of assets, adherence to approved limits, performance of previous securitisations, credit enhancement, adherence with the CRR regulation as well as, the expected yield and Return on Equity of the transaction along with several sensitivities.

Following the approval and execution of each investment, the Bank monitors possible deterioration of the securitisations’ risk metrics through the procedures established in the HBIF. For example, through the “Early Warning Signals” procedure, the price and credit spread changes of the securities are monitored, while any deviations above trigger levels are communicated to the appropriate management bodies. Similar procedures are in place in the event of changes in the credit ratings or in the outlook of the credit ratings, while the approved breach escalation process is adhered to. In addition, the quality of the underlying collaterals (e.g. default rates, collateralization levels, weighted average rating factors, etc.) supporting the securitisation positions is also actively monitored.

The Bank, as part of its securitisation portfolio monitoring process maintains a subscription to a specialized platform for monitoring and performing scenarios on securitised investments, while also maintaining subscription services to the three largest rating agencies (Moody’s, S&P and Fitch) that provide access to the information needed for monitoring securitisation positions.

The risks of securitisation positions are actively monitored and reported to ALCO on a monthly basis and to the Bank’s BRMC on a monthly and quarterly basis. Additionally, any breaches in limits or early warnings are escalated in accordance with the breach escalation process.

RWA calculation approaches for securitisation positions

The Bank calculates the risk weighted exposure amount of a securitisation position by applying the relevant risk weight to the exposure value, where the exposure value equals the accounting value remaining after specific credit risk adjustments have been applied. With respect to calculating risk weighted assets for securitisations, the Bank uses the SEC – ERBA approach, Article 263 for non-STS and Article 264 for STS securitisations of Regulation (EU) 2017/2401 except for an exposure in a senior unrated securitisation tranche, for which the Bank has adopted the SEC-SA approach as defined in Article 261 of Regulation (EU) 2017/2401.

The securitisation positions held by the Bank as at 30 June 2022 amounted to €655,1 million (31 December 2021: €592.6 million), out of which an amount of €156,6 million (31 December 2021: €161,5 million) is classified as Level 2B for liquidity risk and LCR purposes, while the rest are not considered as High-Quality Liquid Assets.

The interest rate risk stemming from these positions is monitored as part of the Bank's overall interest rate risk management framework.

Securitisation Activity of the Current Period (6M2022)

During the six-month period ended June 2022, the Bank increased its investments in securitisation positions. As at 30 June 2022, the Bank had a total exposure of €655,1 million in securitisation positions, compared to €592,6 million as at 31 December 2021. An amount of €17,4 million refers to an investment in a senior unrated tranche of a securitisation that was exceptionally approved by the Bank's BoD, as the limits included in HBIF do not allow for investments in unrated securitisations. Excluding the investment exceptionally approved by the BoD, the rest of the securitisation positions are investments in the most senior AAA-rated tranches, out of which, €166,2 million are in residential mortgage-backed securities (RMBS) which are mainly backed by prime Dutch mortgage loans and €471,5 million are in euro denominated collateralized loan obligations (CLOs) that are supported by corporate loans. Finally, as at 30 June 2022 the Bank did not have any investments in asset backed commercial paper (ABCP) securities.

Summary of accounting policies for securitisation activity

All securitisation positions are classified as investments in debt securities at amortised cost. At initial recognition, they are measured at fair value including any directly attributable transaction costs and are subsequently measured at amortised cost using the effective interest rate method. Amortised cost is calculated by taking into account any discount or premium on acquisition and fees that are an integral part of the EIR. The amortised cost is also reduced with any expected credit loss. For more information in relation to the accounting policy refer to Note 4.15 "Financial instruments" in the Financial Statements for the year ended 31 December 2021.

The Group applies the "Expected Credit Loss (ECL)" approach to all debt instruments that are measured at amortised cost. For more information refer to Note 5.1 "Measurement of expected credit loss (ECL)" in the Interim Condensed Consolidated Financial Statements for the six-month period ended 30 June 2022.

As at 30 June 2022, there were no off-balance sheet and no outstanding securitisation exposures.

The tables below provide information of the securitisation exposures in the non-trading book, broken down by exposure type, for which the institution may act as originator, sponsor or investor, and also securitisation exposures which are investment positions purchased by the institution, as at 30 June 2022 and 31 December 2021. Each table also provides a break-down by traditional and synthetic as well as simple transparent and standardized (STS) and non-STS securitisation transactions.

Template 34: EU-SEC1 – Securitisation exposures in the non-trading book

30 June 2022 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**	**i**	**j**	**k**	**l**	**m**	**n**	**o**
		Institution acts as originator							**Institution acts as sponsor**				**Institution acts as investor**			
		Traditional				**Synthetic**		**Sub-total**	**Traditional**		**Synthetic**	**Sub-total**	**Traditional**		**Synthetic**	**Sub-total**
		STS		Non-STS			of which SRT		STS	Non-STS			STS	Non-STS		
			of which SRT		of which SRT											
1	**Total exposures**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**157**	**499**	**--**	**--**
2	Retail (total)	--	--	--	--	--	--	--	--	--	--	--	157	10	--	--
3	residential mortgage	--	--	--	--	--	--	--	--	--	--	--	157	10	--	--
4	credit card	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
5	other retail exposures	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
6	re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
7	Wholesale (total)	--	--	--	--	--	--	--	--	--	--	--	--	489	--	--
8	loans to corporates	--	--	--	--	--	--	--	--	--	--	--	--	489	--	--
9	commercial mortgage	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
10	lease and receivables	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11	other wholesale	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
12	re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

31 December 2021 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**	**i**	**j**	**k**	**l**	**m**	**n**	**o**
		Institution acts as originator							**Institution acts as sponsor**				**Institution acts as investor**			
		Traditional				**Synthetic**		**Sub-total**	**Traditional**		**Synthetic**	**Sub-total**	**Traditional**		**Synthetic**	**Sub-total**
		STS		Non-STS			of which SRT		STS	Non-STS			STS	Non-STS		
			of which SRT		of which SRT											
1	**Total exposures**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**--**	**161**	**431**	**--**	**--**
2	Retail (total)	--	--	--	--	--	--	--	--	--	--	--	161	10	--	--
3	residential mortgage	--	--	--	--	--	--	--	--	--	--	--	161	10	--	--
4	credit card	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
5	other retail exposures	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
6	re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
7	Wholesale (total)	--	--	--	--	--	--	--	--	--	--	--	--	421	--	--
8	loans to corporates	--	--	--	--	--	--	--	--	--	--	--	--	421	--	--
9	commercial mortgage	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
10	lease and receivables	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11	other wholesale	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
12	re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

The tables below provide information of the securitisation exposures which are investment positions purchased by the institution, broken down by traditional and synthetic transactions, securitisation and re-securitisation, as well as by retail or wholesale transactions, as at 30 June 2022 and 31 December 2021. Additionally, the exposure values broken down by risk-weight bands, the risk weighted exposure amounts and capital requirements for securitisation positions for each regulatory RWA calculation approach is also provided below.

Template 35: EU-SEC4 – Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor

30 June 2022 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**	**i**	**j**	**k**	**l**	**m**	**n**	**o**	**p**	**q**
		Exposure values (by RW bands/deductions)					**Exposure values (by regulatory approach)**				**RWEA (by regulatory approach)**				**Capital charge after cap**			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions
1	**Total exposures**	**638**	**--**	**--**	**17**	**--**	**--**	**638**	**17**	**--**	**--**	**112**	**26**	**--**	**--**	**9**	**2**	**--**
2	Traditional securitisation	638	--	--	17	--	--	638	17	--	--	112	26	--	--	9	2	--
3	Securitisation	638	--	--	17	--	--	638	17	--	--	112	26	--	--	9	2	--
4	Retail underlying	166	--	--	--	--	--	166	--	--	--	18	--	--	--	1	--	--
5	of which STS	157	--	--	--	--	--	157	--	--	--	16	--	--	--	1	--	--
6	Wholesale	472	--	--	17	--	--	472	17	--	--	94	26	--	--	8	2	--
7	of which STS	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
8	Re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
9	Synthetic securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
10	Securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11	Retail underlying	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
12	Wholesale	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
13	Re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

31 December 2021 (€ million)		**a**	**b**	**c**	**d**	**e**	**f**	**g**	**h**	**i**	**j**	**k**	**l**	**m**	**n**	**o**	**p**	**q**
		Exposure values (by RW bands/deductions)					**Exposure values (by regulatory approach)**				**RWEA (by regulatory approach)**				**Capital charge after cap**			
		≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250%/ deductions
1	**Total exposures**	**568**	**--**	**--**	**24**	**--**	**--**	**568**	**24**	**--**	**--**	**97**	**37**	**--**	**--**	**8**	**3**	**--**
2	Traditional securitisation	568	--	--	24	--	--	568	24	--	--	97	37	--	--	8	3	--
3	Securitisation	568	--	--	24	--	--	568	24	--	--	97	37	--	--	8	3	--
4	Retail underlying	172	--	--	--	--	--	172	--	--	--	18	--	--	--	1	--	--
5	of which STS	161	--	--	--	--	--	161	--	--	--	16	--	--	--	1	--	--
6	Wholesale	396	--	--	24	--	--	396	24	--	--	79	37	--	--	6	3	--
7	of which STS	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
8	Re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
9	Synthetic securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
10	Securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
11	Retail underlying	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
12	Wholesale	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--
13	Re-securitisation	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

The overall exposures in the non-trading book increased by about €70 million to €638 million during the six-month period ended 30 June 2022, mainly due to acquisitions.

8 APPENDICES

8.1 APPENDIX A: List of immaterial countries

“Other countries” included in Template EU CQ4 - Quality of non-performing exposures by geography

EU countries

Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, Finland, Greece, Germany, Hungary, Italy, Latvia, Lithuania, Luxembourg, Malta, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.

Non-EU countries

Canada, Australia, United States, Norway, Russian Federation, Singapore, Ukraine, Japan, Isle of Man, Switzerland, United Arab Emirates, Belarus, South Africa, Lebanon, Kazakhstan, Saudi Arabia, Iran, China, Egypt, Kuwait, Israel, Serbia, Qatar, Monaco, Zimbabwe, Marshall Islands, Seychelles, British Virgin Islands, Armenia, Belize, Bermuda, India, Venezuela, Bahrain, United States Minor Outlying Islands, Botswana, Pakistan, Montenegro, Jordan, Hong Kong, Syria, Chile, Albania, Vietnam, Bosnia and Herzegovina, New Zealand, Iraq, Azerbaijan, Ghana, Moldova, Uzbekistan, Kyrgyzstan, Morocco, Panama, Bahamas, Sierra Leone, Guadeloupe, Philippines, Dominican Republic, Taiwan.

8.2 APPENDIX B: List of EBA templates

8.3 APPENDIX C: List of EBA Templates disclosed and cross reference with Pillar III Disclosures

EBA TEMPLATE	Pillar III Disclosures Reference
EU KM1 - Key metrics template	Section 2
EU OV1 - Overview of risk weighted exposure amounts	Section 3.6.1
EU OVC - ICAAP information	Not applicable for semi-annual disclosure as per Article 433a
EU INS1 - Insurance participations	Not applicable for semi-annual disclosure as per Article 433a
EU INS2 - Financial conglomerates information on own funds and capital adequacy ratio	Not applicable for semi-annual disclosure as per Article 433a
EU OVA - Institution risk management approach	Not applicable for semi-annual disclosure as per Article 433a
EU OVB - Disclosure on governance arrangements	Not applicable for semi-annual disclosure as per Article 433a
EU LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories	Not applicable for semi-annual disclosure as per Article 433a
EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements	Not applicable for semi-annual disclosure as per Article 433a
EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)	Not applicable for semi-annual disclosure as per Article 433a
EU LIA - Explanations of differences between accounting and regulatory exposure amounts	Not applicable for semi-annual disclosure as per Article 433a
EU PV1: Prudent valuation adjustments (PVA)	Not applicable for semi-annual disclosure as per Article 433a
EU LIB - Other qualitative information on the scope of application	Not applicable for semi-annual disclosure as per Article 433a
EU CC1 - Composition of regulatory own funds	Section 3.2
EU CC2 - reconciliation of regulatory own funds to statement of financial position in the audited financial statements	Section 3.3
EU CCA: Main features of regulatory own funds instruments and eligible liabilities instruments	Not applicable for semi-annual disclosure as per Article 433a
EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer	Section 3.5
EU CCyB2 - Amount of institution-specific countercyclical capital buffer	Section 3.5
EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures	Section 6.3
EU LR2 - LRCom: Leverage ratio common disclosure	Section 6.4
EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	Section 6.5
EU LRA: Free format text boxes for disclosure on qualitative items	Not applicable for semi-annual disclosure as per Article 433a
EU LIQA - Liquidity risk management	Not applicable for semi-annual disclosure as per Article 433a
EU LIQ1 - Quantitative information of LCR	Section 5.2.1
EU LIQB on qualitative information on LCR, which complements template EU LIQ1	Section 5.2.1
EU LIQ2: Net Stable Funding Ratio	Section 5.2.2
EU CRA: General qualitative information about credit risk	Not applicable for semi-annual disclosure as per Article 433a

EBA TEMPLATE	Pillar III Disclosures Reference
EU CRB: Additional disclosure related to the credit quality of assets	Not applicable for semi-annual disclosure as per Article 433a
EU CR1-A: Maturity of exposures	Section 4.1.3
EU CR2: Changes in the stock of non-performing loans and advances	Section 4.1.1.2
EU CR1: Performing and non-performing exposures and related provisions	Section 4.1.1.1
EU CQ1: Credit quality of forborne exposures	Section 4.1.4
EU CQ2: Quality of forbearance	Section 4.1.4
EU CQ3: Credit quality of performing and non-performing exposures by past due days	Not applicable for semi-annual disclosure as per Article 433a
EU CQ4: Quality of non-performing exposures by geography	Section 4.1.1.3
EU CQ5: Credit quality of loans and advances by industry	Section 4.1.1.4
EU CQ6: Collateral valuation - loans and advances	Section 4.1.2
EU CQ7: Collateral obtained by taking possession and execution processes	Section 4.1.2
EU CQ8: Collateral obtained by taking possession and execution processes – vintage breakdown	Section 4.1.2
EU CR2a: Changes in the stock of non-performing loans and advances and related net accumulated recoveries	Section 4.1.1.2
EU CRC – Qualitative disclosure requirements related to CRM techniques	Not applicable for semi-annual disclosure as per Article 433a
EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques	Section 4.2.1
EU CRD – Qualitative disclosure requirements related to standardised model	Not applicable for semi-annual disclosure as per Article 433a
EU CR4 – standardised approach – Credit risk exposure and CRM effects	Section 4.2.2
EU CR5 – standardised approach	Section 4.2.2
EU CRE – Qualitative disclosure requirements related to IRB approach	Not applicable
EU CR6-A – Scope of the use of IRB and SA approaches	Not applicable
EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range	Not applicable
EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques	Not applicable
EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques	Not applicable
EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach	Not applicable
EU CR9 –IRB approach – Back-testing of PD per exposure class (fixed PD scale)	Not applicable for semi-annual disclosure as per Article 433a
EU CR9.1 –IRB approach – Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)	Not applicable for semi-annual disclosure as per Article 433a
EU CR10 – Specialised lending and equity exposures under the simple risk weighted approach	Not applicable
EU CCRA – Qualitative disclosure related to CCR	Not applicable for semi-annual disclosure as per Article 433a
EU CCR1 – Analysis of CCR exposure by approach	Section 4.3
EU CCR2 – Transactions subject to own funds requirements for CVA risk	Section 4.3
EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights	Not applicable
EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale	Not applicable
EU CCR5 – Composition of collateral for CCR exposures	Section 4.3
EU CCR6 – Credit derivatives exposures	Not applicable

EBA TEMPLATE	Pillar III Disclosures Reference
EU CCR7 – RWEA flow statements of CCR exposures under the IMM	Not applicable
EU CCR8 – Exposures to CCPs	Not applicable
EU-SECA - Qualitative disclosure requirements related to securitisation exposures	Not applicable for semi-annual disclosure as per Article 433a
EU-SEC1 - Securitisation exposures in the non-trading book	Section 7
EU-SEC2 - Securitisation exposures in the trading book	Not applicable
EU-SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor	Not applicable
EU-SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor	Section 7
EU-SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	Not applicable
EU MRA: Qualitative disclosure requirements related to market risk	Not applicable for semi-annual disclosure as per Article 433a
EU MRB: Qualitative disclosure requirements for institutions using the internal Market Risk Models	Not applicable for semi-annual disclosure as per Article 433a
EU MR1 - Market risk under the standardised approach	Section 3.6.2
EU MR2-A - Market risk under the internal Model Approach (IMA)	Not applicable
EU MR2-B - RWA flow statements of market risk exposures under the IMA	Not applicable
EU MR3 - IMA values for trading portfolios	Not applicable
EU MR4 - Comparison of VaR estimates with gains/losses	Not applicable
EU ORA - Qualitative information on operational risk	Not applicable for semi-annual disclosure as per Article 433a
EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts	Not applicable for semi-annual disclosure as per Article 433a
EU REMA - Remuneration policy	Not applicable for semi-annual disclosure as per Article 433a
EU REM1 - Remuneration awarded for the financial year	Not applicable for semi-annual disclosure as per Article 433a
EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)	Not applicable
EU REM3 - Deferred remuneration	Not applicable
EU REM4 - Remuneration of 1 million EUR or more per year	Not applicable
EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)	Not applicable for semi-annual disclosure as per Article 433a
EU AE1 - Encumbered and unencumbered assets	Not applicable for semi-annual disclosure as per Article 433a
EU AE2 - Collateral received and own debt securities issued	Not applicable for semi-annual disclosure as per Article 433a
EU AE3 - Sources of encumbrance	Not applicable for semi-annual disclosure as per Article 433a
EU AE4 - Accompanying narrative information	Not applicable for semi-annual disclosure as per Article 433a
COVID-19 Template 1: Information on loans and advances subject to legislative and non-legislative moratoria	Section 4.4.1
COVID-19 Template 2: Breakdown of loans and advances subject to legislative and non-legislative moratoria by residual maturity of moratoria	Section 4.4.2

EBA TEMPLATE	Pillar III Disclosures Reference
COVID-19 Template 3: Information on newly originated loans and advances provided under newly applicable public guarantee schemes introduced in response to COVID-19 crisis	Not applicable
EU IRRBB1 - Interest rate risks of non-trading book activities	Section 5.1.2
IFRS 9 – FL - Comparison of own funds and capital and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs, and with and without the application of the temporary treatment in accordance with Article 468 CRR	Section 3.4

8.4 APPENDIX D: References to Part Eight of CRR Articles

CRR ref.	High-level summary	Pillar III Disclosures cross-reference
CRR Part Eight - Title I: General Principles		
Disclosure Requirements and policies		
431(1)	Requirement to publish Pillar III disclosures	Section 1.2
431(2)	Disclosure for Operational Risk information	Not applicable for semi-annual disclosure as per Article 433a
431(3)	The management body or senior management shall adopt formal policies to comply with the disclosure requirements of Part Eight of the CRR. At least one member of the management body or senior management shall attest in writing that the disclosures required under Part Eight of CRR are prepared in accordance with the formal policies and internal processes, systems and controls. The written attestation and the key elements of the institution's formal policies to comply with the disclosure requirements shall be included in institutions' disclosures.	Sections 1.3
431(4)	All quantitative disclosures shall be accompanied by a qualitative narrative and any other supplementary information to allow users understand the quantitative disclosures.	Compliance with this provision is covered through the Disclosures.
431(5)	Explanation of ratings decisions to SMEs upon request.	Not applicable to the Group.
Non-material, proprietary or confidential information		
432	Non-material, proprietary or confidential information – EBA Guidelines on materiality, proprietary, confidentiality and on disclosure frequency.	Compliance with this provision is covered through the Report. The Group discloses all the minimum requirements set by the CRR and omits any information only on the basis of materiality, proprietary, confidentiality.
Frequency and scope of disclosure		
433	Annual disclosures shall be published on the same date as the date on which institutions publish their financial statements or as soon as possible thereafter. Semi-annual and quarterly disclosures shall be published on the same date as the date on which institutions publish their financial reports for the corresponding period where applicable or as soon as possible thereafter. Any delay between the date of publication of the disclosures and the relevant financial statements shall be reasonable and, in any event, shall not exceed the timeframe set by competent authorities pursuant to Article 106 of Directive 2013/36/EU.	Section 1.3
Disclosures by large institutions		
433a	Large institutions shall disclose the information outlined in this article on an annual, semi-annual or quarterly basis.	Section 1.3
Disclosures by small and non-complex institutions		
433b	Small and non-complex institutions shall disclose the information outlined in this article on an annual or semi-annual basis.	Not applicable - the Bank is a large institution
Disclosures by other institution		
433c	Institutions that are not subject to Article 433a or 433b shall disclose the information outlined in this article on an annual or semi-annual basis.	Not applicable - the Bank is a large institution
Means of disclosures		
434 (1)	Provide disclosures in an electronic format and in a single medium or location.	The Group publishes the Report in its website as described in Section 1.3.
434 (2)	Disclosures shall be available on the Institution's website or, in the absence of a website, in any other appropriate location an archive of the information.	
Uniform disclosure formats		
434a	Uniform Disclosure requirements shall be used, in accordance with EBA implementing technical standards.	The Group applies the EBA implementation technical standards, in accordance with the specified uniform disclosure formats and their associated instructions. Compliance with this article is established throughout the Report.
CRR Part Eight - Title II: Technical Criteria on Transparency and Disclosure		
Risk management objectives and policies		
435 (1) (a)	Disclosure of the strategies and processes to manage each separate category of risk.	Not applicable for semi-annual disclosure as per Article 433a
435 (1) (b)	The structure and organisation of the relevant risk management function, for each separate category of risk, including information on the basis of its authority, its powers and accountability in accordance with the institution's incorporation and governing documents.	
435 (1) (c)	The scope and nature of risk reporting and measurement systems	

CRR ref.	High-level summary	Pillar III Disclosures cross-reference
435 (1) (d)	The policies for hedging and mitigating risk, and the strategies and processes for monitoring the continuing effectiveness of hedges and mitigants.	
435 (1) (e)	Declaration approved by the BoD on adequacy of risk management arrangements.	Not applicable for semi-annual disclosure as per Article 433a
435 (1) (f)	Concise risk statement approved by the BoD describing the institution's overall risk profile associated with the business strategy.	Not applicable for semi-annual disclosure as per Article 433a
435 (2)	Information, including regular, at least annual updates, regarding the institution's governance arrangements:	Not applicable for semi-annual disclosure as per Article 433a
435 (2) (a)	Number of directorships held by members of the BoD.	Not applicable for semi-annual disclosure as per Article 433a
435 (2) (b)	Recruitment policy of BoD members, their experience, skills and expertise.	Not applicable for semi-annual disclosure as per Article 433a
435 (2) (c)	Diversity policy of BoD members, its objectives and the extent to which these objectives and targets have been achieved.	Not applicable for semi-annual disclosure as per Article 433a
435 (2) (d)	Disclosure of whether a separate risk committee is in place, and number of meetings held in the year.	Not applicable for semi-annual disclosure as per Article 433a
435 (2) (e)	Description of information flow on risk to BoD.	Not applicable for semi-annual disclosure as per Article 433a
Scope of application		
436 (a)	Name of institution	Not applicable for semi-annual disclosure as per Article 433a
436 (b)	Reconciliation between the consolidated financial statements prepared in accordance with IFRSs and the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation.	Not applicable for semi-annual disclosure as per Article 433a
436 (c)	A breakdown of assets and liabilities of the consolidated financial statements broken down by type of risks as referred to under Part Eight of CRR.	Not applicable for semi-annual disclosure as per Article 433a
436 (d)	Reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation and the exposure amount used for regulatory purposes.	Not applicable for semi-annual disclosure as per Article 433a
436 (e)	For exposures from the trading book and the non-trading book that are adjusted in accordance with Article 34 and Article 105, a breakdown of the amounts of the constituent elements of an institution's prudent valuation adjustment, by type of risks, and the total of constituent elements separately for the trading book and non-trading book positions.	Not applicable for semi-annual disclosure as per Article 433a
436 (f)	Any current or expected material practical or legal impediment to the prompt transfer of own funds or to the repayment of liabilities between the parent undertaking and its subsidiaries.	Not applicable for semi-annual disclosure as per Article 433a
436 (g)	The aggregate amount by which the actual own funds are less than required in all subsidiaries that are not included in the consolidation, and the name or names of those subsidiaries.	Not applicable for semi-annual disclosure as per Article 433a
436 (h)	The circumstances under which use is made of the derogation referred to in Article 7 or the individual consolidation method laid down in Article 9 (where applicable).	Not applicable for semi-annual disclosure as per Article 433a
Own funds		
437 (a)	Full reconciliation of Common Equity Tier 1 items, Additional Tier 1 items, Tier 2 items and the filters and deductions applied to own funds of the institution with the balance sheet in the audited financial statements of the institution.	Section 3.3
437 (b)	Main features of the Common Equity Tier 1 and Additional Tier 1 instruments and Tier 2 instruments issued by the institution.	Not applicable for semi-annual disclosure as per Article 433a
437 (c)	The full terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 instruments.	Not applicable for semi-annual disclosure as per Article 433a
437 (d)	Separate disclosure of the nature and amounts of prudential filters, items deducted and not deducted from own funds.	Not applicable for semi-annual disclosure as per Article 433a
437 (e)	Description of all restrictions applied to own funds.	Not applicable for semi-annual disclosure as per Article 433a
437 (f)	Explanation of the basis on which capital ratios are calculated on a basis other than the one in the CRR.	Not applicable for semi-annual disclosure as per Article 433a
Disclosure of own funds and eligible liabilities		
437a (a)	Composition of their own funds and eligible liabilities, their maturity and their main features;	Not applicable to the Group for the six-month period ended 30 June 2022 - refer to Section 3.7
437a (b)	Ranking of eligible liabilities in the creditor hierarchy;	
437a (c)	The total amount of each issuance of eligible liabilities instruments and the amount of those issuances that is included in eligible liabilities items	
437a (d)	Total amount of excluded liabilities	
Own funds requirements and risk-weighted exposure amounts		
438 (a)	Summary of institution's approach to assessing adequacy of internal capital to support current and future activities	Not applicable for semi-annual disclosure as per Article 433a
438 (b)	Amount of the additional own funds requirements based on the supervisory review process and its composition in terms of Common Equity Tier 1, additional Tier 1 and Tier 2 instruments.	Not applicable for semi-annual disclosure as per Article 433a

CRR ref.	High-level summary	Pillar III Disclosures cross-reference
438 (c)	Result of ICAAP on demand from competent authority.	Not such a request received from the Competent Authority, thus not applicable for the Group.
438 (d)	Total risk-weighted exposure amount and the corresponding total own funds requirement broken down by the different risk categories	Section 3.6.1
438 (e)	On- and off-balance-sheet exposures, the risk-weighted exposure amounts and associated expected losses for each category of specialised lending and the on- and off-balance sheet exposures and risk-weighted exposure amounts for the categories of equity exposures	Not applicable to the Group.
438 (f)	Exposure value and the risk-weighted exposure amount of own funds instruments held in any insurance undertaking, reinsurance undertaking or insurance holding company that the institutions do not deduct from their own funds.	Not applicable for semi-annual disclosure as per Article 433a
438 (g)	Supplementary own funds requirement and capital adequacy ratio of the financial conglomerate	Not applicable to the Group.
438 (h)	Variation of risk weighted exposure amounts of the current disclosure period compared to immediately preceding disclosure period that result from use of internal models.	Not applicable to the Group.
Exposure to counterparty credit risk		
439 (a)	Information of the methodology used to assign internal capital and credit limits for counterparty credit exposures;	Not applicable for semi-annual disclosure as per Article 433a
439 (b)	Description of policies related to guarantees and other credit risk mitigants, such as the policies for securing collateral and establishing credit reserves.	Not applicable for semi-annual disclosure as per Article 433a
439 (c)	Description of policies as regards to general and specific wrong-way risk exposures.	Not applicable for semi-annual disclosure as per Article 433a
439 (d)	The amount of collateral the institution would have to provide given a downgrade in its credit rating.	Not applicable for semi-annual disclosure as per Article 433a
439 (e)	The amount of segregated and unsegregated collateral received and posted per type of collateral, further broken down between collateral used for derivatives and securities financing transactions.	Section 4.3
439 (f)	For derivative transactions, the exposure values before and after the effect of the credit risk mitigation.	Section 4.3
439 (g)	For securities financing transactions, the exposure values before and after the effect of the credit risk mitigation.	Section 4.3
439 (h)	The exposure values after credit risk mitigation effects and the associated risk exposures for credit valuation adjustment capital charge, separately for each method	Section 4.3
439 (i)	The exposure value to central counterparties and the associated risk exposures separately for qualifying and non-qualifying central counterparties, and broken down by types of exposures;	Not applicable to the Group.
439 (j)	The notional amounts and fair value of credit derivative transactions, broken down by credit protection bought and sold.	Not applicable to the Group.
439 (k)	The estimation of alpha (“α”) if the institution has received the permission of the competent authorities to estimate α.	Section 4.3
439 (l)	Separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452	Not applicable to the Group.
439 (m)	For institutions using the original exposure method and standardised method, the size of the on- and off-balance-sheet derivative business	Not applicable for semi-annual disclosure as per Article 433a
Capital Buffers		
440 (1) (a)	Geographical distributions of exposure amounts and risk-weighted exposure amounts of its credit exposures, used as a basis for the calculation of its countercyclical capital buffer	Section 3.5
440 (1) (b)	The amount of the institution specific countercyclical capital buffer	Section 3.5
Indicators of global systemic importance		
441	Indicators of global systemic importance	Not applicable to the Group - the Bank is an O-SII institution.
Credit risk adjustments		
442 (a)	The scope and definitions used for accounting purposes of ‘past due’ and ‘impaired’ and the differences, if any, between the definitions of ‘past due’ and ‘default’ for accounting and regulatory purposes.	Not applicable for semi-annual disclosure as per Article 433a
442 (b)	Description of the approaches and methods adopted for determining specific and general credit risk adjustments.	Not applicable for semi-annual disclosure as per Article 433a
442 (c)	Information on the amount and quality of performing, non-performing and forborne exposures for loans, debt securities and off-balance-sheet exposures, including their related accumulated impairment, provisions and negative fair value changes due to credit risk and amounts of collateral and financial guarantees received;	Section 4.1
442 (d)	An ageing analysis of accounting past due exposures.	Not applicable for semi-annual disclosure as per Article 433a
442 (e)	The gross carrying amounts of both defaulted and non-defaulted exposures, the accumulated specific and general credit risk adjustments, the accumulated write-offs taken against those exposures and the net carrying amounts and their distribution by	Section 4.1

CRR ref.	High-level summary	Pillar III Disclosures cross-reference
	geographical area and industry type and for loans, debt securities and off-balance sheet exposures.	
442 (f)	Any changes in the gross amount of defaulted on- and off-balance sheet exposures, including, as a minimum, information on the opening and closing balances of those exposures, the gross amount of any of those exposures reverted to non-defaulted status or subject to a write-off.	Section 4.1
442 (g)	The breakdown of loans and debt securities by residual maturity.	Section 4.1
Unencumbered assets		
443	Disclosures on unencumbered assets.	Not applicable for semi-annual disclosure as per Article 433a
Use of ECAIs		
444 (a)	Names of the nominated ECAIs used in the calculation of Standardised approach RWAs, and reasons for any changes.	Not applicable for semi-annual disclosure as per Article 433a
444 (b)	Exposure classes associated with each ECAI.	Not applicable for semi-annual disclosure as per Article 433a
444 (c)	Description of the process used to transfer the issuer and issue credit ratings onto items not included in the trading book.	Not applicable for semi-annual disclosure as per Article 433a
444 (d)	Mapping of external rating to credit quality steps.	Not applicable for semi-annual disclosure as per Article 433a
444 (e)	Exposure values pre-credit risk mitigation and post-credit risk mitigation, by credit quality step.	Section 4.2
Exposure to market risk		
445	Institutions calculating their own funds requirements in accordance with points (b) and (c) of Article 92(3) shall disclose those requirements separately for each risk referred to in those points.	Section 3.6.2
Operational risk		
446 (a)	The approaches for the assessment of own funds requirements for operational risk that the institution qualifies for.	Not applicable for semi-annual disclosure as per Article 433a
446 (b)	Where the institution makes use of it, a description of the methodology set out in Article 312(2), which shall include a discussion of the relevant internal and external factors being considered in the institution's advanced measurement approach.	Not applicable to the Group.
446 (c)	In the case of partial use, the scope and coverage of the different methodologies used.	Not applicable to the Group.
Key metrics		
447	Disclose of information on key metrics	Section 2
Exposure to interest rate risk on positions not included in the trading book		
448 (1) (a)	The changes in the economic value of equity calculated under the six supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods.	Section 5.1.2
448 (1) (b)	The changes in the net interest income calculated under the two supervisory shock scenarios referred to in Article 98(5) of Directive 2013/36/EU for the current and previous disclosure periods.	Section 5.1.2
448 (1) (c)	A description of key modelling and parametric assumptions, other than those referred to in points (b) and (c) of Article 98(5a) of Directive 2013/36/EU used to calculate changes in the economic value of equity and in the net interest income required under points (a) and (b) of this paragraph.	Not applicable for semi-annual disclosure as per Article 433a
448 (1) (d)	An explanation of the significance of the risk measures disclosed under points (a) and (b) of this paragraph and of any significant variations of those risk measures since the previous disclosure reference date.	Not applicable for semi-annual disclosure as per Article 433a
448 (1) (e)	The description of how the institution defines, measures, mitigates and controls the interest rate risk of their non-trading book activities for the purposes of the competent authorities' review in accordance with Article 84 of Directive 2013/36/EU.	Not applicable for semi-annual disclosure as per Article 433a
448 (1) (f)	The description of the overall risk management and mitigation strategies for those risks.	Not applicable for semi-annual disclosure as per Article 433a
448 (1) (g)	The average and longest repricing maturity assigned to non-maturity deposits.	Not applicable for semi-annual disclosure as per Article 433a
448 (2)	By way of derogation from paragraph 1 of this Article, the requirements set out in points (c) and (e)(i) to (e)(iv) of paragraph 1 of this Article shall not apply to institutions that use the standardised methodology or the simplified standardised methodology referred to in Article 84(1) of Directive 2013/36/EU.	Not applicable to the Group.
Exposure to securitisation positions		
449	Exposure to securitisation positions	Section 7
Environmental, social and governance risks disclosures		
449a	From 28 June 2022, large institutions which have issued securities that are admitted to trading on a regulated market of any Member State, as defined in point (21) of Article 4(1) of Directive 2014/65/EU, shall disclose information on ESG risks, including physical risks and transition risks, as defined in the report referred to in Article 98(8) of Directive 2013/36/EU.	As indicated in Section 1.2.3.2, this is not applicable for the Group for the semi-annual disclosures, for the six-month period ended 30 June 2022.

CRR ref.	High-level summary	Pillar III Disclosures cross-reference
	The information referred to in the first paragraph shall be disclosed on an annual basis for the first year and biannually thereafter.	
Remuneration disclosures		
450	Remuneration policy	Not applicable for semi-annual disclosure as per Article 433a
Leverage		
451 (1) (a)	The leverage ratio and how the institutions apply Article 499(2).	Section 6
451 (1) (b)	A breakdown of the total exposure measure referred to in Article 429(4), as well as a reconciliation of the total exposure measure with the relevant information disclosed in published financial statements.	Sections 6.3, 6.4 and 6.5
451 (1) (c)	Where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a(1) and the adjusted leverage ratio calculated in accordance with Article 429a(7).	Not applicable for the Group.
451 (1) (d)	A description of the processes used to manage the risk of excessive leverage.	Not applicable for semi-annual disclosure as per Article 433a
451 (1) (e)	A description of the factors that had an impact on the leverage ratio during the period to which the disclosed leverage ratio refers.	Not applicable for semi-annual disclosure as per Article 433a
451 (2)	Public development credit institutions as defined in Article 429a(2) shall disclose the leverage ratio without the adjustment to the total exposure measure determined in accordance with point (d) of the first subparagraph of Article 429a(1).	Not applicable for the Group.
451 (3)	In addition to points (a) and (b) of paragraph 1 of this Article, large institutions shall disclose the leverage ratio and the breakdown of the total exposure measure referred to in Article 429(4) based on averages calculated in accordance with the implementing act referred to in Article 430(7).	Not applicable for semi-annual disclosure as per Article 433a
Disclosure of liquidity requirements		
451a (1)	Institutions that are subject to Part Six shall disclose information on their liquidity coverage ratio, net stable funding ratio and liquidity risk management in accordance with this Article.	Not applicable for semi-annual disclosure as per Article 433a
451a (2) (a)	The average or averages, as applicable, of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period.	Not applicable for semi-annual disclosure as per Article 433a
451a (2) (b)	The average or averages, as applicable, of total liquid assets, after applying the relevant haircuts, included in the liquidity buffer pursuant to the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer.	Not applicable for semi-annual disclosure as per Article 433a
451a (2) (c)	The averages of the institutions liquidity outflows, inflows and net liquidity outflows as calculated in accordance with the delegated act referred to in Article 460(1), based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.	Not applicable for semi-annual disclosure as per Article 433a
451a (3) (a)	The quarter-end figures of the institutions net stable funding ratio calculated in accordance with Chapter 2 of Title IV of Part Six for each quarter of the relevant disclosure period.	Section 5.2.2
451a (3) (b)	Overview of the amount of available stable funding calculated in accordance with Chapter 3 of Title IV of Part Six.	Section 5.2.2
451a (3) (c)	Overview of the amount of required stable funding calculated in accordance with Chapter 4 of Title IV of Part Six.	Section 5.2.2
451a (4)	Institutions shall disclose the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor their liquidity risk in accordance with Article 86 of Directive 2013/36/EU.	Not applicable for semi-annual disclosure as per Article 433a
CRR Part Eight - Title III Qualifying requirements for the use of particular instruments or methodologies		
Use of the IRB Approach to credit risk		
452	Use of the IRB Approach to credit risk	Not applicable to the Group.
Use of credit risk mitigation techniques		
453 (a)	Disclosure of the core features of the policies and processes for on- and off- balance sheet netting and an indication of the extent to which the institution makes use of balance sheet netting.	Not applicable for semi-annual disclosure as per Article 433a
453 (b)	Disclosure of the core features of the policies and processes for eligible collateral valuation and management.	Not applicable for semi-annual disclosure as per Article 433a
453 (c)	A description of types of collateral used by the institution to mitigate credit risk.	Not applicable for semi-annual disclosure as per Article 433a
453 (d)	Types of guarantor and credit derivative counterparty, and their creditworthiness.	Not applicable for semi-annual disclosure as per Article 433a
453 (e)	Information about market or credit risk concentrations within the credit mitigation taken.	Not applicable for semi-annual disclosure as per Article 433a
453 (f)	For exposures under either the Standardised or the IRB approach, disclosure of the exposure value covered and not covered by eligible credit protection, separately for loans and debt securities and including a breakdown of defaulted exposures.	Section 4.2.2

CRR ref.	High-level summary	Pillar III Disclosures cross-reference
453 (g)	The corresponding conversion factor and the credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effect.	Section 4.2.2
453 (h)	For institutions calculating risk-weighted exposure amounts under the Standardised Approach, the on- and off-balance-sheet exposure value by exposure class before and after the application of conversion factors and any associated credit risk mitigation.	Section 4.2.2
453 (i)	For institutions calculating risk-weighted exposure amounts under the Standardised Approach, the risk- weighted exposure amount and the ratio between that risk-weighted exposure amount and the exposure value after applying the corresponding conversion factor and the credit risk mitigation associated with the exposure; the disclosure set out in this point shall be made separately for each exposure class.	Section 4.2.2
453 (j)	For institutions calculating risk-weighted exposure amounts under the IRB Approach, the risk-weighted exposure amount before and after recognition of the credit risk mitigation impact of credit derivatives; where institutions have received permission to use own LGDs and conversion factors for the calculation of risk- weighted exposure amounts, they shall make the disclosure set out in this point separately for the exposure classes subject to that permission.	Not applicable to the Group.
Use of Internal Market Risk Models		
455	Use of Internal Market Risk Models	Not applicable to the Group.

8.5 APPENDIX E: Glossary & Definitions

A	
APS	Asset Protection Scheme
AT1	Additional Tier 1 Capital
AVA	Additional Value Adjustments
B	
BAC	Board Audit Committee
BCBS	Basel Committee on Banking Supervision
BoD	Board of Directors
BRMC	Board Risk Management Committee
BRRD	Bank Recovery and Resolution Directive
BTA	Business Transfer Agreement
C	
CBC	Central Bank of Cyprus
CBR	Combined buffer requirement
CCB	Capital conservation buffer
CCF	Credit Conversion Factor
CCR	Counterparty credit risk
CCS	Convertible Capital Securities
CCyB	Countercyclical capital buffer
CET1	Common Equity Tier 1 capital
CRD	Capital Requirements Directive
CRM	Credit Risk Mitigation
CRR	Capital Requirements Regulation
CVA	Credit Valuation Adjustment
CyCAC	Credit Acquiring Companies
E	
EBA	European Banking Authority
ECA	Export Credit Agencies
ECAI	External Credit Assessment Institutions
ECB	European Central Bank
ECL	Expected Credit Losses
EIB	European Investment Bank
EIR	Effective interest rate
EMTN Programme	Euro Medium-Term Note Programme
ESG	Environmental, Social and Governance
EU	European Union
EVE	Economic Value of Equity
F	
FVOCI	Fair value through other comprehensive income
FVPL	Fair value through other profit or loss
G	
GDP	Gross Domestic Product
H	
HBIF	Hellenic Bank Investment Framework
HQLA	High Quality Liquid Assets
I	
ICAAP	Internal Capital Adequacy Assessment Process
IFRSs	International Financial Reporting Standards
ILAAP	Internal Liquidity Adequacy Assessment Process
IRB	Internal ratings-based approach
IRRBB	Interest rate risk arising from the banking book
ITS	Implementing Technical Standards
L	
LCR	Liquidity Coverage Ratio
LGD	Loss given default
LTV	Loan to value

M	
MB	Management Board
MDB	Multilateral development banks
MRA	Material Risk Assessment
MREL	Minimum requirements for own funds and eligible liabilities
MTF	Multilateral Trading Facility
N	
NII	Net interest income
NPE	Non-performing exposures
NPL	Non-performing loans
NSFR	Net Stable Funding Ratio
O	
O-SII	Other Systemically Important Institution
P	
P2G	Pillar II Guidance
P2R	Pillar II Requirement
PD	Probability of Default
PP&E	Property, Plant and Equipment
R	
RAF	Risk Appetite Framework
RAS	Risk Appetite Statement
REO	Real Estate Owned
RTS	Regulatory Technical Standards
RWA	Risk Weighted Assets
RWEA	Risk Weighted Exposure Amounts
S	
SA	Standardised Approach
SEC-SA	Securitisation Standardised Approach
SEC-ERBA	Securitisation External Ratings Based Approach
SFTs	Securities Financing Transactions
SME	Small and Medium sized enterprises
SRB	Single Resolution Board
SREP	Supervisory Review and Evaluation Process
SPVs	Special Purpose Vehicles
SRT	Significant risk transfer
T	
T1	Tier 1 Capital
T2	Tier 2 Capital
TC	Total Capital
TLTROs	Targeted longer term Refinancing Operations
Tranche	Segment (part, portion) of a security issued
TREA	Total Risk Exposure Amounts
V	
VaR	Value at Risk