

**Pillar III Disclosures  
on a consolidated basis**

**June  
2024**

## Table of Contents

<b>INDEX OF TABLES</b> .....	<b>4</b>
<b>1 INTRODUCTION &amp; GENERAL INFORMATION</b> .....	<b>6</b>
1.1 PILLAR III DISCLOSURE POLICY.....	7
1.2 PILLAR III WRITTEN ATTESTATION.....	7
<b>2 REGULATORY FRAMEWORK &amp; RECENT DEVELOPMENTS</b> .....	<b>8</b>
2.1 REGULATORY FRAMEWORK.....	8
2.1.1 <i>The Main Pillars</i> .....	8
2.1.2 <i>Amendments &amp; Developments to the Single Rulebook</i> .....	8
2.1.3 <i>Regulatory Developments 1H24</i> .....	9
<b>3 NBG'S TRANSFORMATION PROGRAM</b> .....	<b>13</b>
<b>4 REGULATORY OWN FUNDS &amp; PRUDENTIAL REQUIREMENTS</b> .....	<b>16</b>
4.1 KEY METRICS.....	16
4.2 RECONCILIATION OF REGULATORY OWN FUNDS TO BALANCE SHEET IN THE AUDITED FINANCIAL STATEMENTS .....	17
4.3 STRUCTURE OF OWN FUNDS .....	19
4.4 IFRS 9 IMPACT ON OWN FUNDS .....	20
4.5 DTC LAW .....	21
4.6 TRANSITIONAL OWN FUNDS DISCLOSURE TEMPLATE .....	21
4.7 CAPITAL REQUIREMENTS UNDER PILLAR I.....	24
4.8 OVERALL CAPITAL REQUIREMENT (OCR) .....	25
4.9 MREL REQUIREMENTS.....	27
4.10 LEVERAGE RATIO .....	28
<b>5 CREDIT RISK</b> .....	<b>29</b>
5.1 DEFINITIONS AND GENERAL INFORMATION .....	29
5.2 IMPAIRMENT - EXPECTED CREDIT LOSSES.....	29
5.3 MATURITY CLASSIFICATION OF CREDIT EXPOSURES .....	31
5.4 NON-PERFORMING AND FORBORNE EXPOSURES .....	31
5.4.1 <i>Disposal of NPE portfolios</i> .....	31
5.5 CREDIT RISK MITIGATION TECHNIQUES .....	41
5.6 PORTFOLIOS UNDER THE STANDARDISED APPROACH .....	42
<b>6 COUNTERPARTY CREDIT RISK</b> .....	<b>46</b>
<b>7 MARKET RISK</b> .....	<b>51</b>
7.1 STRESS TESTING .....	53
7.2 BACK TESTING.....	54
<b>8 ESG RISKS</b> .....	<b>55</b>
8.1 ESG STRATEGY AND GOVERNANCE .....	55
8.1.1 <i>NBG ESG Strategy</i> .....	55
8.1.2 <i>C&amp;E risks and opportunities integrated in NBG's business strategy</i> .....	56
8.1.3 <i>C&amp;E objectives reflected in key strategic processes</i> .....	56
8.1.4 <i>Responsible Financing</i> .....	57
8.1.5 <i>EU Taxonomy Regulation, Article 8</i> .....	58
8.1.6 <i>ESG Governance, roles and responsibilities</i> .....	58

8.1.7	<i>NBG Governance on C&amp;E risks: 3LoD model</i> .....	62
8.1.8	<i>ESG Internal Framework (Policies, Codes and Procedures)</i> .....	62
8.2	<b>ESG RISK MANAGEMENT FRAMEWORK</b> .....	69
8.2.1	<i>Risk identification and materiality assessment (RIMA) process for C&amp;E risks</i> .....	69
8.2.2	<i>C&amp;E Mitigating Actions</i> .....	76
8.2.3	<i>Incorporation of ESG in Credit Granting and Monitoring Process</i> .....	77
8.2.4	<i>Risk Appetite Framework: ESG Quantitative Statements</i> .....	78
8.2.5	<i>Collateral valuation process</i> .....	79
8.2.6	<i>Risk Control, Monitoring and Reporting</i> .....	79
8.2.7	<i>ESG data and IT infrastructure-related enhancements</i> .....	79
8.2.8	<i>ESG Risk Management - Planned actions</i> .....	79
8.3	<b>QUANTITATIVE DISCLOSURES ON CLIMATE CHANGE TRANSITION AND PHYSICAL RISKS AND MITIGATING ACTIONS</b> .....	80
<b>9</b>	<b>SECURITIZATION</b> .....	<b>104</b>
<b>10</b>	<b>LIQUIDITY RISK</b> .....	<b>110</b>

## Index of tables

<b>Table 1:</b> ESG related Transformation Program initiatives .....	14
<b>Table 2:</b> EU KM1 – Key metrics template .....	16
<b>Table 3:</b> EU CC2- Reconciliation of regulatory own funds to balance sheet in the audited financial statements .....	17
<b>Table 4:</b> Own Funds Structure .....	19
<b>Table 5:</b> IFRS 9 impact .....	20
<b>Table 6:</b> EU CC1 - Transitional Own Funds 30.06.2024 .....	22
<b>Table 7:</b> EU OV1 - Overview of RWAs .....	24
<b>Table 8:</b> EU CCyB2 - Amount of institution-specific countercyclical capital buffer .....	25
<b>Table 9:</b> EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer 30.06.2024 .....	26
<b>Table 10:</b> Leverage ratio .....	28
<b>Table 11:</b> EU LR1, LRSum – Summary reconciliation of accounting assets and leverage ratio exposures as of 30.06.2024 and 31.12.2023 .....	28
<b>Table 12:</b> EU LR3, LRSpl – Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 30.06.2024 compared to 31.12.2023 .....	28
<b>Table 13:</b> EU CR1 A – Maturity of exposures 30.06.2024 .....	31
<b>Table 14:</b> EU CQ1 - Credit quality of forborne exposures 30.06.2024 .....	33
<b>Table 15:</b> EU CR1 - Performing and non-performing exposures and related provisions 30.06.2024 .....	34
<b>Table 16:</b> EU CQ2 - Quality of forbearance 30.06.2024 and 31.12.2023 .....	34
<b>Table 17:</b> EU CQ4 - Quality of non-performing exposures by geography 30.06.2024 .....	36
<b>Table 18:</b> EU CQ5 - Credit quality of loans and advances by industry 30.06.2024 .....	37
<b>Table 19:</b> EU CQ6 - Collateral valuation - loans and advances 30.06.2024 .....	38
<b>Table 20:</b> EU CR2 - Changes in the stock of non-performing loans and advances 30.06.2024 .....	39
<b>Table 21:</b> EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries 30.06.2024 .....	39
<b>Table 22:</b> EU CQ7 - Collateral obtained by taking possession and execution processes 30.06.2024 .....	40
<b>Table 23:</b> EU CQ8 - Collateral obtained by taking possession and execution process - vintage breakdown 30.06.2024 .....	40
<b>Table 24 :</b> EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques 30.06.2024 .....	41
<b>Table 25:</b> EU CR4 - Standardised approach - Credit Risk Exposure and CRM effects 30.06.2024 .....	42
<b>Table 26:</b> Mapping of Credit quality steps .....	42
<b>Table 27 :</b> EU CR5 - Standardised approach 30.06.2024 .....	43
<b>Table 28:</b> EU CCR1 - Analysis of CCR exposure by approach (€ mio) 30.06.2024 .....	46
<b>Table 29:</b> EU CCR2 – CVA capital charge (€ mio) 30.06.2024 .....	47
<b>Table 30:</b> EU CCR8 – Exposures to CCPs (€ mio) 30.06.2024 .....	48
<b>Table 31:</b> EU CCR3 - Standardized approach - CCR exposures by regulatory portfolio and risk (€ mio) 30.06.2024 .....	49
<b>Table 32:</b> EU CCR5 – Composition of collateral for CCR exposures (€ mio) 30.06.2024 .....	50
<b>Table 33:</b> EU CCR6 - Credit derivatives exposures (€ mio) 30.06.2024 .....	50
<b>Table 34:</b> EU MR1 – Market risk under the Standardized approach (€ mio) 30.06.2024 and 31.12.2023 .....	51
<b>Table 35:</b> EU MR2-B – RWA flow statements of market risk exposures under the IMA (€ mio) 30.06.2024 .....	52
<b>Table 36:</b> EU MR2-A – Market risk under the IMA (€ mio) 30.06.2024 .....	52
<b>Table 37:</b> EU MR3 – IMA values for trading portfolios (€ mio) 30.06.2024 .....	53
<b>Table 38:</b> Stress test Scenarios .....	53
<b>Table 39:</b> Volatility stress test Scenarios .....	53
<b>Table 40:</b> ESG Strategic Themes .....	55
<b>Table 41:</b> Overview of NBG's financed emissions per PCAF asset class, Bank, 2023 .....	57
<b>Table 42:</b> NBG's financed emissions targets .....	57
<b>Table 43:</b> ESG Governance - Three Lines of Defence .....	62
<b>Table 53:</b> C&E Risks Identification .....	69
<b>Table 54:</b> Primary drivers of C&E risks .....	70
<b>Table 55:</b> Mapping of risk drivers to risk types .....	72
<b>Table 56:</b> High level outcome of the C&E-related RIMA process .....	75
<b>Table 57:</b> ESG indicators in Risk Appetite dashboard .....	78

<b>Table 49:</b> 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2024.....	81
<b>Table 50:</b> 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector excluding RES 30.06.2024.....	84
<b>Table 51:</b> 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector excluding RES (%) 30.06.2024.....	84
<b>Table 52:</b> 2.CC - Banking book- Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 30.06.2024.....	88
<b>Table 53:</b> 3.CC - Banking book - Climate change transition risk: Alignment metrics 30.06.2024 .....	89
<b>Table 53:</b> 4.CC - Banking book- Climate change transition risk: Climate change transition risk: Exposures to top 20 carbon-intensive firms 30.06.2024 (mio) .....	90
<b>Table 54:</b> 5.CC - Banking book- Climate change physical risk: Exposures subject to physical risk 30.06.2024.....	92
<b>Table 55:</b> 6.CC - Summary of GAR KPIs 30.06.2024 .....	93
<b>Table 56:</b> 8.CC - GAR (%) KPIs on stock 30.06.2024 .....	94
<b>Table 57:</b> 7.CC - Mitigating actions: Assets for the calculation of GAR 30.06.2024.....	98
<b>Table 58:</b> 10.CC - Other climate change mitigating actions that are not covered in the EU Taxonomy 30.06.2024 .....	102
<b>Table 59:</b> EU SEC1 - Securitisation exposures in the non-trading book (€ mio) 30.06.2024.....	107
<b>Table 60:</b> EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor (€ mio) 30.06.2024 .....	107
<b>Table 61:</b> EU SEC5 - Exposures securitised by the institution - .....	108
<b>Table 62:</b> EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor (€ mio) 30.06.2024.....	109
<b>Table 63:</b> EU LIQ1 - Quantitative Information of Liquidity Coverage Ratio 2024 .....	112
<b>Table 64:</b> EU LIQ2 - Net Stable Funding Ratio 30.06.2024.....	114

# 1 INTRODUCTION & GENERAL INFORMATION

National Bank of Greece S.A. (hereinafter “NBG” or the “Bank”) is a financial institution subject to Greek and EU banking legislation. It was founded in 1841 and operated both as a commercial bank and as the official state currency issuer until 1928, when Bank of Greece was established. NBG has been listed on the Athens Stock Exchange since 1880.

The Bank focuses on complying fully with the regulatory requirements and ensures that these requirements are strictly and consistently met in all countries where NBG Group (the “Group”) operates.

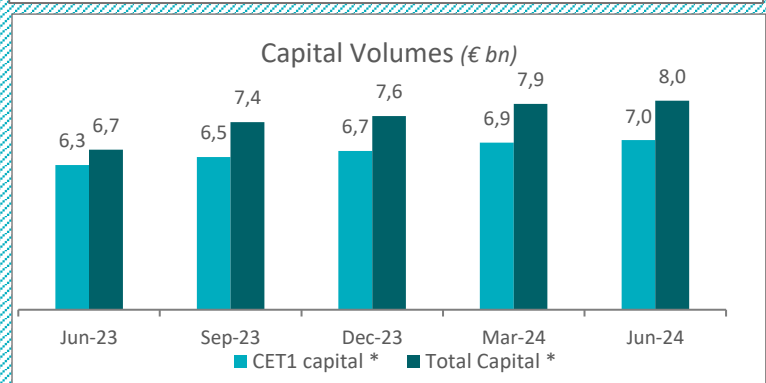
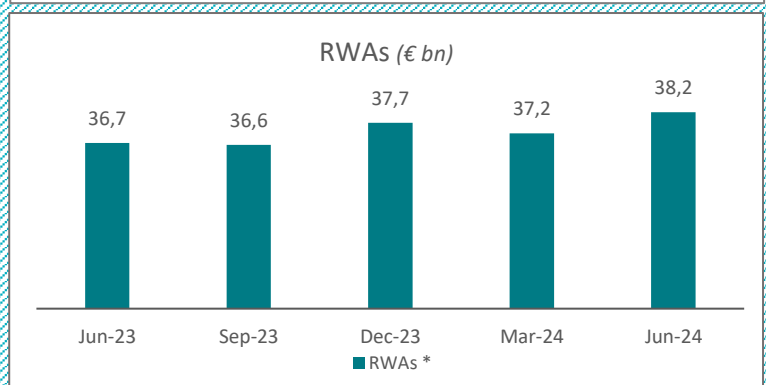
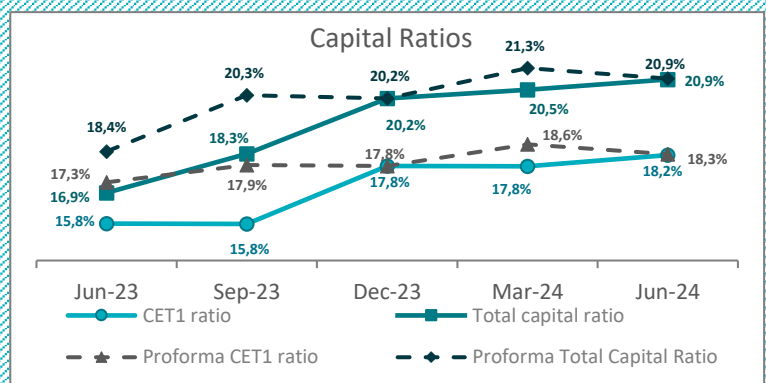
In its 183 years of operation, the Bank has expanded on its commercial banking business by entering into related business areas.

The Group operates mainly in Greece but also abroad through its subsidiaries in North Macedonia, Cyprus, Luxembourg and U.K.<sup>1</sup>

The Bank, as an organization operating in a rapidly growing and changing environment, acknowledges exposure to banking risks and the need for these risks to be managed effectively. Risk management forms an integral part of the Group’s commitment to pursue sound returns for its shareholders, maintaining the right balance between risks and reward in the Group’s day-to-day operations, in its balance sheet and in the Group’s capital structure management.

## Highlights

- 1H24 CET1 at 18.3%, Total Capital ratio at 20.9%;
- Strong profitability pushes CET1 +50bps higher ytd to 18.3%, including a dividend accrual of c0.5% in 1H24, for a 40% payout in 2025 out of 2024 profits;
- Total Capital ratio increase by +c70bps ytd;



\* Including profit for the period, post dividend accrual

<sup>1</sup> Following the respective Bank’s decision in 2021, the Group ceased its operation in Egypt, Malta and NBG London Branch.

## 1.1 Pillar III Disclosure Policy

Pillar III complements the minimum regulatory capital requirements (Pillar I) and the Internal Capital and Liquidity Adequacy Assessment Processes (ICAAP/ILAAP, i.e. Pillar II). NBG is committed to publicly disclose information in compliance with EU Regulation 575/2013 of the European Parliament and of the Council, as well as all applicable additional EU Regulations and EBA Guidelines, and to have adequate internal processes and systems in place to meet these disclosure requirements.

The Bank has established a Pillar III Disclosures Policy that describes the scope, the principles and the content of public disclosures under Pillar III. Moreover, the Policy defines the relevant disclosures' governance, including the assessment of the appropriateness of the disclosures, their verification and frequency. Disclosures on a consolidated basis provide (inter alia) information on capital structure, capital adequacy, risk profile, and the processes in place for assessing and managing risks.

The Bank is firmly committed to best practices regarding public disclosures and recognizes that Pillar III provides an additional layer of market information and transparency, hence contributing to financial stability. Additional information for investors and other stakeholders (regarding e.g. the members of the management body, the Corporate Governance Code etc) is to be found in the Bank's website [www.nbg.gr](http://www.nbg.gr).

The objectives of the Pillar III Disclosures are:

- To provide investors and other stakeholders with the appropriate, complete, accurate and timely information that they reasonably need to make investment decisions and informed judgements of NBG Group;
- To foster and facilitate compliance with all applicable legal and regulatory requirements.

The Pillar III Disclosures Policy:

- Formulates the disclosure framework, including frequency, location, monitoring and verification process for disclosures;
- Defines the authorities and responsibilities for the management of the Pillar III process;
- Articulates the principles for identifying information that is material, confidential and proprietary;
- Raises awareness of the Bank's approach to disclosure among the Board of Directors, Senior Management and Employees.

## 1.2 Pillar III Written attestation

Pursuant to article 431(3) of Part Eight of CRR2, this document is prepared in accordance with the formal internal policies, processes, systems and controls.

NBG's Board of Directors has approved this Pillar III Disclosures Report on 19<sup>th</sup> of September 2024.

It should be also noted that:

- all amounts, unless otherwise specified, are expressed in millions of euro, (therefore, the amounts lower than €0.5 million are reported with "0");
- data refer to the prudential scope of consolidation;
- any discrepancy between data disclosed in this document is solely due to the effect of rounding;
- the amounts reported are coherent with the most recent submissions of the regulatory reporting for each period; as a result, some amounts may differ from those disclosed in previous publications;
- the disclosures to be provided by NBG are published on its website.

## 2 REGULATORY FRAMEWORK & RECENT DEVELOPMENTS

### 2.1 Regulatory Framework

#### 2.1.1 The Main Pillars

Several steps have been made towards the European Banking Union (mandatory for all euro area States). The following are the Banking Union's constituent elements:

- A. The **Single Supervisory Mechanism** that places the ECB as the central prudential supervisor of financial institutions in the euro area. Since November 2014 NBG Group's supervision is assigned directly to the ECB, as NBG is classified as one of the significant banking groups of the Eurozone;
- B. The **Single Resolution Mechanism ("SRM")** that implements the EU-wide Bank Recovery and Resolution Directive (BRRD – see next paragraph) in the euro area. The centralized decision-making is built around the Single Resolution Board ("SRB") and the relevant National Resolution Authorities;
- C. The **Single Rulebook**, a single set of harmonized prudential rules for institutions throughout the EU. Its three basic legal documents are:
  - **CRD IV:** Directive 2013/36/EU of the European Parliament and Council "on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms", transposed into Greek legislation by virtue of Law 4261/2014;
  - **CRR (Capital Requirements Regulation):** Regulation (EU) No. 575/2013 of the European Parliament and Council "on prudential requirements for credit institutions and investment firms", which is legally binding and directly applicable in all Member States; and
  - **BRRD:** Directive 2014/59/EU of the European Parliament and Council "establishing a framework for the recovery and resolution of credit institutions and investment firms", transposed into Greek legislation by virtue of article 2 of Law 4335/2015.

These documents are complemented by numerous Implementing Technical Standards (ITS), Regulatory Technical Standards (RTS), Guidelines (GL) and Recommendations issued by the European Banking Authority, which specify particular aspects of the CRD IV, the CRR and the BRRD and aim at ensuring harmonization in specific areas. EBA's Technical Standards have to be endorsed by the European Commission (EC) and become EU Regulations in order to be legally binding and directly applicable in all Member States.

The CRD IV and the CRR constitute the "Basel III" regulatory framework in the EU.

- D. **Deposit Guarantee Schemes:** Directive 2014/49/EU of the European Parliament and Council "on deposit guarantee schemes" (DGSD), transposed into Greek legislation by virtue of Law 4370/2016. A common

European Deposit Insurance Scheme (EDIS) is intended to be a pillar of the Banking Union.

#### 2.1.2 Amendments & Developments to the Single Rulebook

##### EU package of Risk Reduction Measures: CRR2 / CRD5 / BRRD2 / SRMR2

The Banking Package includes prudential standards adopted by the Basel Committee on Banking Supervision and by the Financial Stability Board (FSB), while its main objective is to reduce risk in the EU banking system.

It comprises two regulations and two directives, relating to:

- bank capital requirements (amendments to regulation 575/2013 and directive 2013/36/EU);
- the recovery and resolution of banks in difficulty (amendments to directive 2014/59/EU and regulation 806/2014).

The Banking Package strengthens bank capital requirements and reduces incentives for excessive risk taking, by including a binding leverage ratio, a binding net stable funding ratio and setting risk sensitive rules for trading in securities and derivatives. In addition, it contains measures to improve banks' lending capacity and facilitate a greater role for banks in the capital markets, such as:

- reducing the administrative burden for smaller and less complex banks, linked in particular to reporting and disclosure requirements;
- enhancing the capacity of banks to lend to SMEs and to fund infrastructure projects.

It also contains a framework for the cooperation and information sharing among various authorities involved in the supervision and resolution of cross-border banking groups.

This marks a milestone in the completion of the Banking Union, in the finalization of the post-crisis regulatory agenda, and in the implementation of international standards. Building on the existing rules, this set of adopted measures addresses the remaining challenges to financial stability, while strengthening the global competitiveness of the EU banking sector. This package had already made subject of an agreement during the inter-institutional negotiations with the Council of the EU.



REGULATORY FRAMEWORK & RECENT DEVELOPMENTS

The main focus areas of Risk Reduction Measures Package are illustrated below:

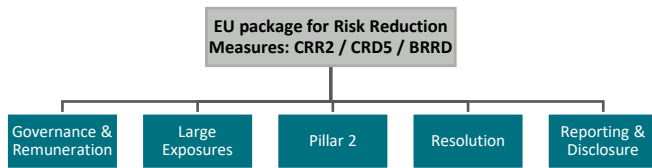


Figure 1: EU package of Risk Reduction Measures

The approved agreement on the package of reforms implements components of the Basel III framework, including the following key aspects:

- Proposal for CRR 2 covers the leverage ratio, the net stable funding ratio, requirements for own funds and eligible liabilities, the Standardized Approach for counterparty credit risk (SA-CCR), market risk and the fundamental review of the trading book (FRTB), exposures to central counterparties, exposures to collective investment undertakings, large exposures, reporting and disclosure requirements, and amends European Market Infrastructure Regulation (EMIR or EU Regulation No 648/2012).
- Proposal for CRD 5 is on exempted entities, financial holding companies, mixed financial holding companies, remuneration, supervisory measures and powers, and capital conservation measures.
- Proposal for SRMR 2 is about loss-absorbing and recapitalization capacity for credit institutions and investment firms.
- Proposal for BRRD 2 is on loss-absorbing and recapitalization capacity of credit institutions and investment firms and it amends Directive 98/26/EC, Directive 2002/47/EC, Directive 2012/30/EU, Directive 2011/35/EU, Directive 2005/56/EC, Directive 2004/25/EC, and Directive 2007/36/EC.

However, it excludes the package of Basel reforms as described below.

**Basel IV: CRR3 / CRD6**

The EU has finalised its banking package legislation in light of the implementation of Basel III international agreements in the EU. Following the 27 June 2023 political agreement reached between the Council of the European Union and the European Parliament on the proposal put forward by the European Commission on 27<sup>th</sup> October 2021 on the banking package, and the provisional agreement of Basel IV on 6<sup>th</sup> December 2023 by the Basel Committee on Banking Supervision (BCBS) often referred to as ‘Basel’ the texts agreed have been finalised by the co-legislators in trilogues. Basel reforms were initially published after the European Parliament legislative resolution of 24<sup>th</sup> April 2024.

On June 20<sup>th</sup> 2024 two legislations were published in the Official Journal of the European Union, amending CRR and CRD IV:

- **Regulation (EU) 2024/1623** of the European Parliament and of the Council amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor. The above shall apply from January 1<sup>st</sup>, 2025, with the exception of certain provisions, the application of which begins on July 9<sup>th</sup>, 2024.

- **Directive (EU) 2024/1619** of the European Parliament and of the Council amending Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks. The above shall apply from January 11<sup>th</sup>, 2026, with the exception of some provisions, the application of which refers to later dates, while the application of certain articles begins on July 29<sup>th</sup>, 2024.

The banking package encompasses a number of innovations in the prudential framework for credit institutions. First, it implements the final framework set up in the Basel III accord, ensuring an international level playing field while taking into account the specific features of the EU's banking sector. Second, the package contributes to the green transition by including a new set of rules requiring banks to systematically identify, disclose and manage risks arising from environmental, social and governance factors (ESG) as part of their risk management. Furthermore, the banking package provides, deepens and facilitates access to the EU single market with stronger enforcement tools for supervisors overseeing EU banks and third-country banks operating in the EU, aiming at ensuring their sound management and, ultimately, better protecting financial stability and depositors.

2.1.3 Regulatory Developments 1H24

**Reporting Framework**

On June 5<sup>th</sup>, 2024, the EBA published its plan for the implementation of the data point model (DPM) 2.0 related to its reporting release 4.0 framework, with the objective of moving towards a more integrated regulatory reporting.

On June 13<sup>th</sup>, 2024, the EBA issued a revised list of validation rules in its Implementing Technical Standards (ITS) on supervisory reporting, highlighting those, which have been deactivated either for incorrectness or for triggering IT problems. Competent Authorities throughout the EU are informed that data submitted in accordance with these ITS should not be formally validated against the set of deactivated rules.

On July 9<sup>th</sup>, 2024, the EBA published its final draft implementing technical standards (ITS) on supervisory reporting requirements implementing the changes necessary to keep the supervisory reporting framework relevant and meaningful and aligned with the amending CRR 3, which implements the latest Basel III reforms, so as to allow supervisors to have sufficient comparable information to monitor compliance by institutions with CRR 3 requirements, thus further promoting enhanced and consistent supervision. The EBA also published a technical package for version 3.5 of its reporting framework, to provide the standard specifications that include the validation rules, the Data Point Model (DPM) and the XBRL taxonomies to support the following reporting obligations:

- amendments to the technical standards on specific reporting requirements for the Fundamental Review of the Trading Book (FRTB);
- diversity benchmarking Guidelines;
- the cross-sectoral technical standards on the standard templates for the purposes of the register of information in relation to all contractual arrangements on the use of ICT services provided by ICT third-party service providers under the Digital Operational Resilience Act (DORA);

## REGULATORY FRAMEWORK &amp; RECENT DEVELOPMENTS

- the amendments to the reporting and disclosure technical standards on minimum requirements for own funds and eligible liabilities and total loss-absorbing capacity (MREL/TLAC), following the final changes introduced by the co-legislators in the level 1 text.

### Supervisory Priorities 2024

ECB Banking Supervision, in cooperation with the national competent authorities, has performed a thorough assessment of the main risks and vulnerabilities faced by the significant institutions under its direct supervision and has set its strategic priorities for the next three years accordingly.

On December 19th, 2023, the European Central Bank (ECB) published the results of its Supervisory Review and Evaluation Process (SREP) for 2023 and its supervisory priorities for the years 2024-26. The main points were:

- SREP results show banks have solid capital and liquidity positions and increased profitability
- Internal governance, risk management and capital planning remain key areas for supervisory action in light of deteriorating risk outlook
- Overall average SREP score broadly unchanged; Pillar 2 requirements for CET1 capital set at 1.2% on average, compared with 1.1% in 2023
- Overall CET1 capital requirements and guidance increased from 10.7% to 11.1%, reflecting impact of macroprudential policies
- Supervisory priorities adjusted to focus on building resilience to short-term risk outlook, strengthening governance and climate and environmental risk management, and making further progress in digital transformation and operational resilience. In particular:
  - Priority 1: Strengthen resilience to immediate macro-financial and geopolitical shocks

Shortcomings in credit risk and counterparty credit risk management frameworks (Asset quality, CRE/RRE values)

Shortcomings in asset and liability management frameworks (Liquidity and Funding Risk & IRRBB)

- Priority 2: Accelerate the effective remediation of shortcomings in governance and the management of climate-related and environmental risks
  - Deficiencies in management bodies' functioning and steering capabilities
  - Deficiencies in risk data aggregation and reporting
  - Material exposures to physical and transition risk drivers of climate change
- Priority 3: Further progress in digital transformation and building robust operational resilience frameworks
  - Deficiencies in digital transformation strategies
  - Deficiencies in operational resilience frameworks, namely IT outsourcing and IT security/cyber risks

### Counterparty Credit Risk

On June 24<sup>th</sup>, 2024 the EBA published its final draft amending Regulatory Technical Standards (RTS) on the standardised approach for counterparty credit risk (SA-CCR) as part of the new roadmap on the Banking Package. The amendments to the Capital Requirements Regulation (CRR3) have expanded the EBA mandate to specify the formula to calculate the supervisory delta of options under the SA-CCR framework. Alongside the

supervisory delta formula for interest rate options compatible with negative interest rates, the mandate now also requires the specification of the supervisory delta formula for commodity options compatible with negative commodity prices. Therefore, the existing RTS on SA-CCR have been amended to include the formula for commodity options.

### Market Risk

On June 20<sup>th</sup>, 2024, the EBA published its final draft Regulatory Technical Standards (RTS) on the conditions for assessing the materiality of model extensions and changes, as well as changes to the subset of modellable risk factors, applicable under the Fundamental Review of the Trading Book (FRTB) rules, to complete its roadmap on market and counterparty credit risk approaches published on 27 June 2019.

On June 28<sup>th</sup>, 2024 the EBA published its final draft Regulatory Technical Standards (RTS) clarifying the extraordinary circumstances for continuing the use of internal models and disregarding certain overshootings in accordance with the Fundamental Review of the Trading book (FRTB) framework.

On July 8<sup>th</sup>, 2024 the EBA launched a consultation on draft Regulatory Technical Standards (RTS) to specify the conditions and the criteria to assess whether the credit valuation adjustment (CVA) risk exposures arising from fair-valued securities financing transactions are material, as well as the frequency of that assessment. The concept of materiality set out in the draft RTS will determine whether fair-valued securities financing transactions can be exempted from own funds requirements for CVA risk. The consultation runs until 8 October 2024.

### Countercyclical capital buffer rate

On March 27<sup>th</sup>, 2024, the Bank of Greece informed that it shall keep the countercyclical capital buffer rate for Greece unchanged at "zero percent" (0%) in the second quarter of 2024, with effect from 1<sup>st</sup> April 2024. The buffer is also kept unchanged at "zero percent" also for the third quarter of 2024, with effect from 1<sup>st</sup> July 2024, following the decision of BoG on June 20<sup>th</sup>, 2024.

### Pillar 3 disclosures framework and supervisory reporting requirements

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

The amending Regulation (EU) 2024/1623 ('CRR 3') introduced new and amended disclosure requirements stemming from the latest Basel III Pillar 3 reforms, and a mandate for the EBA to develop IT solutions, including templates and instructions, for the disclosure requirements laid down in the banking regulation. The new ITS implement the CRR 3 prudential disclosures by including new requirements on output floor, credit risk, market risk, CVA risk, operational risk and a transitional disclosure on exposures to crypto-assets.

These ITS constitute the first Pillar 3 deliverable included in the EBA Roadmap on strengthening the prudential framework published in December 2023. Later in 2024, the EBA will complement these ITS with the CRR 3 disclosure

## REGULATORY FRAMEWORK &amp; RECENT DEVELOPMENTS

requirements that are not directly linked to Basel III implementation, in particular the extension of the disclosure requirements on ESG risks to all institutions in accordance with the proportionality principle, and new disclosure requirements on shadow banking.

Following the mandate for the EBA to develop IT solutions, these ITS are designed to repeal the Commission Implementing Regulation (EU) 2021/637, with a view to make the technical standards more user-friendly for institutions. The IT solutions according to which disclosures have to be provided, including templates and instructions, can be found on the EBA website.

When developing these ITS, the EBA has sought alignment and integration between the disclosure and reporting frameworks, to facilitate institutions' compliance with both requirements, and an updated mapping tool between the revised disclosure templates and the reporting templates is expected to be published at the beginning of July, together with the new ITS on supervisory reporting for the CRR 3 implementation published for consultation, together with these ITS, in December 2024. The EBA will later publish a technical package, including DPM, validation rules and taxonomy, that shall be used by large and other institutions to submit this information to the EBA Pillar 3 data hub.

#### EU-wide Stress Test 2025

On July, 5<sup>th</sup>, 2024, the EBA published for informal consultation its draft methodology, templates, and guidance for the 2025 EU-wide stress test. This step marks the beginning of the dialogue with the banking industry and builds upon the methodology used in the 2023 exercise, with improvements reflecting new insights and regulatory changes. Some important changes are introduced, notably the integration of the upcoming Capital Requirements Regulation (CRR3), set to be implemented on January 1, 2025. It also considers the Commission's announcement to postpone the application date of the fundamental review of the trading book (FRTB). Other enhancements include the centralisation of net interest income (NII) projections and advancements in the market risk methodology to increase risk sensitivity. 68 banks from the EU and Norway, including 54 from the euro area, will participate in the exercise, thus covering 75% of the EU banking sector. The expanded geographical reach and incorporation of proportionality features aim to boost efficiency while ensuring the relevance and transparency of the results.

#### Recovery & Resolution

On January 13, 2022 the EBA published its final Guidelines for institutions and resolution authorities on improving banks' resolvability. These Guidelines represent a significant step in complementing the EU legal framework in the field of resolution based on international standards and leveraging on EU best practices. The **resolvability Guidelines**, taking stock of the best practices developed so far by EU resolution authorities on resolvability topics, set-out requirements to improve resolvability in the areas of operational continuity in resolution, access to financial market infrastructure, funding and liquidity in resolution, bail-in execution, business reorganisation and communication. These Guidelines are addressed to both authorities and institutions in the EU so as to ensure consistent progress on resolvability for all institutions and facilitate resolvability work for cross-border groups and its monitoring in resolution colleges. Institutions and authorities should comply with these Guidelines in full by 1 January 2024. In order to

complement the EBA resolvability guidelines as regards resolution tools other than bail-in, the EBA published on September 27<sup>th</sup> 2022, guidelines on transferability ("transferability guidelines") aiming at assessing the feasibility and credibility of transfer strategies and encompass requirements relating to the implementation of transfer tools when considered as the preferred or variant strategies for institutions. These guidelines deal with the transfer perimeter definition, separability and operational transfer of this perimeter. These guidelines, complementing the EBA resolvability guidelines in order to cover more precisely separability in the context of the application of transfer tools, should be read together with them.

In June 2022, the SRB published its updated approach to setting a Minimum Requirement for Own Funds and Eligible Liabilities (MREL). The policy takes into account new regulatory developments, such as the end of the supervisory leverage relief measures of the European Central Bank, changes to the Capital Requirement Regulation (CRR) recently agreed by the EU co-legislators on the indirect holding of internal MREL (iMREL) and the MREL calibration for banks with a multiple point-of-entry resolution strategy. On May 15<sup>th</sup> 2023, the Single Resolution Board (SRB) decided to maintain its policy on the calibration of MREL (total and subordinated component) with minimal changes, aiming to provide a stable regulatory environment in a phase where some banks continued building up their MREL stock ahead of January 1st 2024.

The policy has also further enlarged the coverage of entities under internal MREL and made the subordination policy more dynamic, taking into account evolving balance sheets prior to resolution. It also complements the SRB approach to internal MREL waiver applications in a new annex.

In May 2024, the SRB published 2024 MREL policy. This new policy takes into account a public consultation held between 14 December 2023 and 13 February 2024.

Among the changes, the 2024 MREL policy introduces a revised approach on internal and external Market Confidence Charge calibration and on the monitoring of MREL eligibility. It also reflects the legislative changes on the MREL framework related to entities in a "daisy chain" and to liquidation entities introduced by Directive 2024/1174.

On July 19<sup>th</sup>, 2023 the EBA published Final Guidelines on the overall recovery capacity (ORC) in recovery planning. The Guidelines aim to achieve an harmonised approach to the determination and assessment of the ORC. The Guidelines are composed of two sections. The first is addressed to institutions, providing them with guidance on setting the framework for the determination of the ORC. The second complements the framework by supporting competent authorities in their assessment of the institutions' ORC as part of the overall assessment of the recovery plans.

On July 13<sup>th</sup>, 2023 the EBA published its Guidelines addressed to institutions and resolution authorities on resolvability testing. The Guidelines aim to set-out a framework to ensure that resolvability capabilities developed to comply with the resolvability and transferability Guidelines are fit for purpose and effectively maintained.

On December 20<sup>th</sup>, 2023, the EBA published its final draft Implementing Technical Standards (ITS) on amendments to disclosure and reporting of the minimum requirement for MREL

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**REGULATORY FRAMEWORK & RECENT DEVELOPMENTS**

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and TLAC. These amendments reflect the new requirement to deduct investments in eligible liabilities instruments of entities belonging to the same resolution group, the so called 'daisy chain' framework, and other changes to the prudential framework. The amendments will apply for the reference date of June 2024.

On June 27th, 2024 the EBA published an updated Report on the monitoring of Additional Tier 1 (AT1), Tier 2 and total loss absorbing capacity (TLAC) as well as the minimum requirement for own funds and eligible liabilities (MREL) instruments of European Union (EU) institutions, to providesnew guidance on the prudential valuation of non-CET1 instruments and on other aspects related to the terms and conditions of the issuances.

### 3 NBG's TRANSFORMATION PROGRAM

Following a clear mandate from NBG's Board of Directors, NBG launched a rigorous Transformation Program in the second half of 2018, committing to the delivery of aspiring financial and operational targets. Through more than 5 years of implementation, the Transformation Program has enabled the delivery of impressive results in terms of core profitability – fully in line with the Bank's financial and business targets - and tangible improvements to NBG's business and operating model.

NBG's Transformation Program has been designed and is being delivered across Workstreams, each led by a senior executive of the Bank. While Workstreams broadly coincide with the accountable executives' functional areas, cross-functional collaboration is strongly encouraged and enabled by the Transformation Program. The Board Strategy & Transformation Committee and the Board of Directors are updated on a regular basis, and closely monitor and oversee the Program's progress, key developments and plans, providing strategic direction as appropriate.

#### Transformation Program priorities for 2024

During 2024, the Bank is pursuing the following strategic priorities:

- **Best Bank for our Clients:** Boosting revenue generation through an increased focus on cross-selling and fee generation opportunities in Retail banking, and through deepening large client relationships and broadening the SME client base in Corporate banking:
  - In the case of Retail banking, continuing to strengthen our relationship managers' frontline (primarily for the Small Business and Premium segments), as well as our operating model for the individuals segment, with a stronger focus on fee-generating products (e.g., investment products, cards and bancassurance), and further enhancement of sales capacity through digital channels and third-party partnerships (incl. retailers, e-commerce, agents and the newly launched partnership with the Public Power Corporation (PPC) for home energy upgrades).
  - In the case of Corporate & Investment banking, strengthening the relationship managers' frontline with a comprehensive set of commercial tools, enabling them to spend more time on sales of lending and non-lending products (including new innovative solutions) in collaboration with the Corporate Transaction Banking (CTB) unit. Moreover, completing the centralization of corporate client servicing in the new Corporate Service Unit (CSU).
  - Across Corporate and Retail, enhancing our range of solutions to enable the transition of businesses and households to a more sustainable model. Apart from a market-leading franchise in the financing of renewable energy projects, a core part of our strategy remains to offer solutions for investments in the context of green transition, incl. in the real estate and transport ecosystems.

- **Technology & Processes:**

- Completing the implementation of the new Core Banking System (CBS) to enable revenue generation and cost efficiencies in the medium term, enhancing digital and data infrastructure, as well as migrating to a cloud-enabled environment.
- Rolling out the required infrastructure to transition to a paperless operating model across the organisation and continuing with origination workflow platforms' replacement program.
- Further optimizing core processes (both customer-facing and internal) through simplification, centralization, and automation levers (incl. the application of new technologies, such as RPAs, and OCR) as well as introduction of a bank-wide GenAI governance framework and strategic roadmap.

- **ESG:**

- Capturing business opportunities in green, sustainable and transition finance in line with our Net Zero targets for 2030 and continuing targeted actions to reduce our own emissions.
- Managing the risks emanating from climate and environment change, in line with supervisory expectations and best practices, as well as adhering to the highest disclosure standards.
- Enhancing NBG's social strategy, setting relevant targets and implementing high-impact social initiatives.

- **Special Projects:**

- Accelerating the operationalization and commercial impact of the Bank's strategic partnerships (e.g., with EpsilonNet) and of other key priorities.
- Implementing end-to-end optimization for key customer journeys and revamping Customer Experience (CX) measurement to boost CX actionability across products/services and channels.

Since its launch, the Transformation Program has been structured into semi-annual Seasons. This setup helped gain the necessary pace in the early years and ensured that the Bank remained focused to the targets. From 2022 onwards, recognizing the increased maturity and ownership of the involved employees, the Transformation Program transitioned to an annual planning horizon.

The Bank maintains its agility as new initiatives can be introduced to the Transformation Program, while existing ones are adapted, or withdrawn throughout the year, in line with business developments and strategic priorities.

**Table 1:** ESG related Transformation Program initiatives

Initiative	Objectives
<p><b>Net Zero ambition</b></p>	<p><b>Net Zero target setting</b></p> <ul style="list-style-type: none"> <li>▪ Net Zero target-setting for rest of NZBA priority sectors</li> <li>▪ Transition plans for priority sectors submitted to NZBA</li> </ul> <p><b>Data remediations &amp; improvements</b></p> <ul style="list-style-type: none"> <li>▪ Improvement actions for recording &amp; monitoring of own footprint related data</li> </ul> <p><b>Subsidiaries</b></p> <ul style="list-style-type: none"> <li>▪ Roadmap to address data gaps and enhance group ESG reporting process through necessary automations</li> <li>▪ Standardised process/templates completed to address ESG Reporting requirements for NBG Leasing and NBG Factors</li> </ul>
<p><b>Own emissions reduction actions</b></p>	<p><b>Studies / Tenders</b></p> <ul style="list-style-type: none"> <li>▪ Studies completion for boiler removal and heat-pump installation for selected buildings</li> </ul> <p><b>Implementations</b></p> <ul style="list-style-type: none"> <li>▪ Implementation of boilers removal and heat-pump installation for selected buildings</li> </ul> <p><b>Energy efficiency upgrades</b></p> <ul style="list-style-type: none"> <li>▪ Replacement of Air Handling Units (AHUs) with new technology AHUs in Central HQs complex (Aeolou/Sofokleous)</li> <li>▪ Completion of cabling infrastructure for Building Energy Management System (BEMS) in Central HQs complex (Aeolou/Sofokleous)</li> </ul>
<p><b>C&amp;E Scenario Analysis &amp; Stress testing</b></p>	<p><b>ST scenario analysis</b></p> <ul style="list-style-type: none"> <li>▪ In line with expectation 2.1 of the ECB Guide, development of scenario analysis to determine the climate risk impacts and use during the business planning cycle:                             <ul style="list-style-type: none"> <li>• for at least one sector and for drivers other than macro,</li> <li>• quantify impact in the short and medium term.</li> </ul> </li> </ul> <p><i>(For example, a sensitivity addressing execution risks referring to the NZ targets for 2030 due to shortcomings in borrowers transition plans.)</i></p> <p><b>ST infrastructure</b></p> <ul style="list-style-type: none"> <li>▪ Partial automation of data sourcing for C&amp;E models’ inputs (all pre-existing solvency Stress Test data)</li> </ul>
<p><b>Environmental Risk management practices</b></p>	<ul style="list-style-type: none"> <li>▪ Enhancement of the customer level assessment, using benchmark analysis and location related information</li> <li>▪ Issuance of a dedicated Environmental Risk Monitoring Dashboard, with a first set of environmental risk KRIs, for Risk Monitoring and Reporting process (phased-in approach)</li> </ul>

Table 1: ESG related Transformation Program initiatives (continued)

Initiative	Objectives
<b>EU Taxonomy implementation &amp; Sustainable Financing Framework operationalization</b>	<b>Transaction assessment</b> <ul style="list-style-type: none"> <li>▪ Sustainable Financing Framework (SFF) operationalization (i.e., governance, tools, processes &amp; policy documents/frameworks) for the prioritized (Corporate) Business Processes/ Portfolios to address the EU Taxonomy and NBG Sustainable Lending Criteria:                             <ul style="list-style-type: none"> <li>• Update of the Bank’s current ESG Transaction Assessment tool</li> </ul> </li> </ul> Update of the Bank’s internal documents related to sustainable financing
<b>ESG Reporting Platform</b>	<b>Emissions measurement enhancements &amp; Net Zero Target Setting monitoring</b> <ul style="list-style-type: none"> <li>▪ Further automations in emissions measurement incl. external files (shipping, REO data)</li> <li>▪ Incorporation of Obligor Assessment selected fields and scoring outcome in ESG360</li> </ul> <b>Regulatory KPIs/reporting requirements</b> <ul style="list-style-type: none"> <li>▪ Implementation of Banking Book Taxonomy Alignment Ratio (BTAR) calculation in alignment with current practices of the Bank (proxies)</li> </ul> Assessment of feasibility for integrating subsidiaries’ ESG data in 360 platform with priority on NBG Leasing and NBG Factors
<b>C&amp;E Pillar 3 Disclosures</b>	<b>Pillar III as of 30.06.2024 (incl. climate, transition risk change)</b> <ul style="list-style-type: none"> <li>▪ Application of assumptions to complete ‘Alignment metrics - Climate change transition risk’ calculation according to current practices of the Bank (proxies) following GAP analysis</li> <li>▪ Phase III submission in line with regulatory timeline as well as the H1 ‘24 Financial results and no later than end of September, phased infusion of functionalities for target state for C&amp;E Pillar III reporting requirements (4th submission with data as of 30.06.24)</li> </ul>
<b>C&amp;E Combined Risk reporting</b>	<b>Risk reporting infrastructure</b> <ul style="list-style-type: none"> <li>▪ Set up of C&amp;E risk analytics structure (considering governance, BCBS239 and operational requirements for risk monitoring and control)</li> <li>▪ Fully automated data feeds of C&amp;E data into the ALM Datamart</li> </ul>
<b>Financial Literacy and Inclusion Initiative</b>	<b>Financial literacy execution</b> <ul style="list-style-type: none"> <li>▪ Launch of NBG Financial Literacy initiative (presentations, podcasts, articles, explainer videos) targeted for the selected customer segments</li> <li>▪ Implementation of actions agreed in cooperation with selected partner(s), as per approved roadmap/ quick wins</li> </ul> <b>Communication of financial literacy initiative</b> <ul style="list-style-type: none"> <li>▪ Launch of the Financial Literacy initiative/ program communication plan</li> </ul>
<b>Accessibility actions</b>	<b>Overall</b> <ul style="list-style-type: none"> <li>▪ Implementation of a cross-channel solution for the hearing impaired in 1 channel (subject to Go decision &amp; IT capacity)</li> <li>▪ Implementation of broader accessibility actions</li> </ul> <b>Digital (Internet Banking /Mobile Banking) &amp; Contact center</b> <ul style="list-style-type: none"> <li>▪ Incorporation of video banking in Internet Banking platform to support live caption</li> <li>▪ Voice guidance for visually impaired people on Business mobile app</li> </ul> <b>Self-Service Business</b> <ul style="list-style-type: none"> <li>▪ Voice guidance at ATMs for visually impaired people implemented</li> </ul> <b>Branch Network</b> <ul style="list-style-type: none"> <li>▪ Implementation of portable ramps in 80% of applicable branches (subject to Go decision)</li> </ul>

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

## 4 REGULATORY OWN FUNDS & PRUDENTIAL REQUIREMENTS

### 4.1 Key metrics

The following table presents an overview of Group's prudential regulatory metrics.

Table 2: EU KM1 – Key metrics template

Key Metrics	Q2 24*	Q2 24**	Q1 24	Q1 24*	Q4 23*	Q3 23	Q3 23*	Q2 23	Q2 23*
€ mic									
<b>Available own funds (amounts)</b>									
1 Common Equity Tier 1 (CET1) capital	6,966	6,976	6,915	6,730	5,750	6,543	5,776	6,332	6,040
2 Tier 1 capital	6,966	6,976	6,915	6,730	5,750	6,543	5,776	6,332	6,040
3 Total capital	7,985	7,995	7,915	7,630	6,650	7,443	6,176	6,732	6,439
<b>Risk-weighted exposure amounts</b>									
4 Total risk-weighted exposure amounts	38,224	38,224	37,178	37,727	36,425	36,605	36,569	36,695	36,520
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>									
5 Common Equity Tier 1 ratio (%)	18.22%	18.25%	18.60%	17.84%	15.79%	17.87%	15.80%	17.26%	16.54%
6 Tier 1 ratio (%)	18.22%	18.25%	18.60%	17.84%	15.79%	17.87%	15.80%	17.26%	16.54%
7 Total capital ratio (%)	20.89%	20.92%	21.29%	20.22%	18.26%	20.33%	16.89%	18.35%	17.63%
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>									
EU 7a Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.75%	2.75%	2.75%	2.75%	3.00%	3.00%	3.00%	3.00%	3.00%
EU 7b of which: to be made up of CET1 capital (percentage points)	1.55%	1.55%	1.55%	1.55%	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7c of which: to be made up of Tier 1 (CET1 +AT1) capital (percentage points)	2.06%	2.06%	2.06%	2.06%	2.25%	2.25%	2.25%	2.25%	2.25%
EU 7d Total SREP own funds requirements (%)	10.75%	10.75%	10.75%	10.75%	11.00%	11.00%	11.00%	11.00%	11.00%
<b>Combined buffer requirement (as a percentage of risk-weighted exposure amount)</b>									
8 Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%	2.50%
9 Institution specific countercyclical capital buffer (%)	0.07%	0.07%	0.07%	0.07%	0.07%	0.07%	0.07%	0.03%	0.03%
EU 10a Other Systemically Important Institution buffer	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%	1.00%
11 Combined buffer requirement (%)	3.57%	3.57%	3.57%	3.57%	3.57%	3.57%	3.57%	3.53%	3.53%
EU 11a Overall capital requirements (%)	14.32%	14.32%	14.32%	14.32%	14.57%	14.57%	14.57%	14.53%	14.53%
12 CET1 available after meeting the total SREP own funds requirements (%)	10.14%	10.17%	9.77%	10.54%	9.22%	7.26%	9.33%	5.89%	7.35%
<b>Leverage Ratio</b>									
13 Total exposure measure	74,127	74,127	72,712	72,712	74,790	74,607	74,679	73,485	73,536
14 Leverage ratio (%)	9.40%	9.41%	9.12%	9.51%	9.00%	7.71%	8.76%	7.86%	8.61%
<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>									
EU 14a Additional own funds requirements to address the risk of excessive leverage (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14b of which: to be made up of CET1 capital (percentage points)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14c Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>									
EU 14d Leverage ratio buffer requirement (%)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
EU 14e Overall leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Liquidity Coverage Ratio</b>									
15 Total high-quality liquid assets (HQLA) (Weighted value - average)	22,381	22,381	23,037	23,037	23,252	23,568	23,568	23,752	23,752
16 Total net cash outflows (adjusted value)	8,560	8,560	8,584	8,584	8,706	8,913	8,913	9,166	9,166
17 Liquidity coverage ratio (%)	261.68%	261.68%	268.54%	268.54%	267.22%	264.75%	264.75%	259.84%	259.84%
<b>Net Stable Funding Ratio</b>									
18 Total available stable funding	59,632	59,632	58,587	58,587	58,630	57,478	57,478	57,289	57,289
19 Total required stable funding	40,130	40,130	39,159	39,159	38,997	39,155	39,155	38,383	38,383
20 NSFR ratio (%)	148.60%	148.60%	149.62%	149.62%	150.35%	146.80%	146.80%	149.25%	149.25%

\* Including profit for the period, post dividend accrual

\*\* Including profit for the period, post dividend accrual for a c.40% payout in 2025 out of 2024 profits, subject to AGM and regulatory approvals



## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

## 4.2 Reconciliation of regulatory own funds to balance sheet in the audited financial statements

The table below presents the reconciliation between the balance sheet prepared for statutory and regulatory scope of consolidation. References in this table link to the corresponding references in table

“EU CC1 - Transitional Own Funds”, identifying balances relating to own funds calculation.

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

€ mio	Ref	30 June 2024		31 December 2023	
		Balance Sheet as in published financial statements	Under regulatory scope of consolidation*	Balance Sheet as in published financial statements	Under regulatory scope of consolidation
<b>ASSETS</b>					
Cash and balances with central banks		8,356	8,356	9,015	9,015
Due from banks		2,573	2,573	2,793	2,793
Financial assets at fair value through profit or loss		716	682	707	676
Derivative financial instruments		1,771	1,771	2,074	2,074
Loans and advances to customers		34,419	34,883	34,223	34,223
Investment securities	<i>d</i>	17,003	17,003	16,494	16,494
Investment property		65	65	60	60
Associates and Joint Ventures accounted for equity method investments	<i>c, d</i>	194	194	175	175
Software	<i>c</i>	560	560	524	524
Property and equipment		1,328	1,328	1,339	1,339
Deferred tax assets (DTAs)		4,129	4,129	4,346	4,346
<i>of which: DTAs that rely on future profitability and arise from temporary differences</i>	<i>e</i>	526	526	637	637
<i>of which: DTAs that rely on future profitability and do not arise from temporary differences</i>	<i>f</i>	3	3	3	3
<i>of which: DTAs that do not rely on future profitability</i>		3,600	3,600	3,706	3,706
Current tax asset		250	250	220	220
Other assets		1,878	1,414	1,919	1,919
Non-current assets held for sale		411	411	695	695
<b>Total assets</b>		<b>73,653</b>	<b>73,619</b>	<b>74,584</b>	<b>74,553</b>
<b>LIABILITIES</b>					
Due to banks		1,840	1,840	3,800	3,800
Derivative financial instruments		1,312	1,312	1,414	1,414
Due to customers		57,073	57,073	57,126	57,126
Debt securities in issue		2,961	2,961	2,323	2,323
Other borrowed funds		92	92	96	96
Deferred tax liabilities		24	24	15	15
Retirement benefit obligations		233	233	248	248
Current income tax liabilities		6	6	6	6
Other liabilities		1,801	1,767	1,876	1,845
Liabilities associated with non-current assets held for sale		30	30	28	28
<b>Total liabilities</b>		<b>65,372</b>	<b>65,338</b>	<b>66,932</b>	<b>66,901</b>
<b>SHAREHOLDERS' EQUITY</b>					
Share capital		915	915	915	915
Share premium account		3,542	3,542	3,542	3,542
Less: treasury shares		-24	-24	(2)	(2)
Reserves and retained earnings		3,821	3,821	3,171	3,171
<b>Equity attributable to NBG shareholders</b>	<i>a</i>	<b>8,254</b>	<b>8,254</b>	<b>7,626</b>	<b>7,626</b>
Non-controlling interests	<i>b</i>	27	27	26	26
<b>Total equity</b>		<b>8,281</b>	<b>8,281</b>	<b>7,652</b>	<b>7,652</b>
<b>Total equity and liabilities</b>		<b>73,653</b>	<b>73,619</b>	<b>74,584</b>	<b>74,553</b>

\* "Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures" are incorporated under regulatory scope of consolidation, i.e. reclassifications from "Other Assets" to "Loans and Advances to Customers"

### **Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures**

The Bank has granted mortgage loans to special social groups in Greece by virtue of special ministerial decisions guaranteed by the Greek State, which, as of June 30, 2024, had a total gross carrying amount of €0.8 billion. According to the relevant ministerial decisions, for instalments (or parts of instalments) that are overdue by more than three months, the Bank can claim a receivable from the Greek State instead of enforcing the guarantee on the total loan exposure or terminating the contract. As of June 30, 2024, €0.5 billion of these claims were pending reimbursement, classified in the Group's consolidated statement of financial position under "Other Assets", with €0.3 billion classified under "Loans and Advances to Customers".

The Bank is engaged in legal disputes with the Greek State regarding some of these claims but expects favorable outcomes based on recent court decisions. Moreover, following a legislative update in April 2024, the claims process has been simplified, and payments from the Greek State have been facilitated. Repayments from the Greek State have increased since mid-2021, with cumulative repayments reaching €0.6 billion as of June 30, 2024.

The Bank is expected to apply prudential treatment to these loans, as per supervisory expectations, by December 31, 2024, and its compliance will be confirmed in the relevant context of the SREP decision of 2025. This includes aligning with SREP recommendations on non-performing exposures ("NPEs") coverage of the NPE stock and the Addendum to the ECB Guidance to banks on non-performing loans. As of June 30, 2024, a prudential adjustment of approximately €0.2 billion has been made to the Group's capital ratios. Additionally, only for regulatory reporting purposes (but not, for the avoidance of doubt, for accounting purposes): (i) €0.5 billion were reclassified from "Other Assets" to "Loans and Advances to Customers", and (ii) NPEs were increased by €0.7 billion.

As a result of the foregoing, the Group's capital ratios are temporarily affected until the Greek State-Guaranteed Loans exposure is paid down by either the Greek State or the borrowers or recovered through alternative means. As noted above, this prudential treatment does not have any impact on the respective accounting treatment, including impairment charges or NPE classification. Consequently, for accounting purposes, the Group will continue to adhere to the existing guidelines and criteria for classifying exposures as non-performing and estimating respective impairment charges as dictated by the relevant accounting standards.

It should be noted that, in case of an acceleration of the repayment schedule following a structural solution approved by the Greek State, this prudential treatment may be subject to partial or complete withdrawal.

The Group has already incorporated the impact of this prudential treatment in its capital forecasts and guidance, on the basis of its current expectations regarding the rate and timing of collections.

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

## 4.3 Structure of own funds

**Regulatory capital**, according to CRR rules falls into two categories: Tier 1 and Tier 2 capital. Tier 1 capital is further divided into Common Equity Tier 1 (CET1) capital and Additional Tier 1 capital.

**CET1 capital** includes the Bank's ordinary shareholders' equity, share premium, reserves and retained earnings and minority interest allowed in consolidated CET1.

The following items are deducted from the above:

- positive or negative adjustments in the fair value of financial derivatives used for cash flow hedging;
- fair value gains and losses arising from the institution's own credit risk related to derivative liabilities;

- prudent valuation adjustment calculated according to article 105 of Regulation (EU) No 575/2013
- goodwill and intangibles;
- deferred tax assets not arising from temporary differences;
- deferred tax assets arising from temporary differences; and significant investments that exceed 10%/17.65% of CET1 filter.

**Tier 2 capital** includes the issuance of a Tier 2 note, totalling €1,019 million.

The following table presents the analysis of NBG Group's regulatory capital structure.

**Table 4:** Own Funds Structure

Group's Own Funds Structure (€ mio)	Q2 24 <sup>1</sup>	Q2 24 <sup>2</sup>	Q1 24	Q1 24 <sup>1</sup>
<b>Shareholders' Equity per balance sheet</b>	<b>8,254</b>	<b>8,254</b>	<b>7,960</b>	<b>7,960</b>
<b>Non-controlling interests</b>	<b>13</b>	<b>13</b>	<b>12</b>	<b>12</b>
<i>Non-controlling interests per balance sheet</i>	27	27	26	26
<i>Non-controlling interests not recognized in CET1</i>	(14)	(14)	(14)	(14)
<b>Regulatory Adjustments</b>	<b>(778)</b>	<b>(768)</b>	<b>(846)</b>	<b>(561)</b>
<i>Profit for the period not eligible</i>	(533)	(523)	(690)	(332)
<i>IFRS9 transitional arrangements</i>	0	0	0	0
<i>Own credit risk</i>	(23)	(23)	(24)	(24)
<i>Prudent valuation adjustment</i>	(10)	(10)	(9)	(9)
<i>Cash flow hedging reserve</i>	(2)	(2)	(2)	(2)
<i>Other regulatory adjustments</i>	(210)	(210)	(121)	(194)
<b>Deductions</b>	<b>(523)</b>	<b>(523)</b>	<b>(496)</b>	<b>(496)</b>
<i>Goodwill and other intangibles</i>	(520)	(520)	(493)	(493)
<i>Deferred tax assets that rely on future profitability (excluding those arising from temporary differences)</i>	(3)	(3)	(3)	(3)
<i>Deferred tax assets that rely on future profitability and arise from temporary differences</i>	0	0	0	0
<b>Common Equity Tier 1 Capital (CET1)</b>	<b>6,966</b>	<b>6,976</b>	<b>6,630</b>	<b>6,915</b>
<b>Additional Tier 1 Capital (AT1)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Total Tier 1 Capital</b>	<b>6,966</b>	<b>6,976</b>	<b>6,630</b>	<b>6,915</b>
<b>Capital instruments and subordinated loans eligible as Tier 2 Capital</b>	<b>1,019</b>	<b>1,019</b>	<b>1,000</b>	<b>1,000</b>
<b>Deductions</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Tier 2 Capital</b>	<b>1,019</b>	<b>1,019</b>	<b>1,000</b>	<b>1,000</b>
<b>Total Regulatory Capital</b>	<b>7,985</b>	<b>7,995</b>	<b>7,630</b>	<b>7,915</b>

1. Including profit for the period, post dividend accrual

2. Including profit for the period, post dividend accrual for a c.40% payout in 2025 out of 2024 profits, subject to AGM and regulatory approvals

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

## 4.4 IFRS 9 impact on own funds

On 12 December 2017 the European Parliament and the Council of the European Union adopted Regulation (EU) 2017/2395 (the "Regulation"), which amended Regulation 575/2013 with Article 473a, allowing credit institutions to gradually apply the impact of the application of IFRS 9 to own funds.

In particular, upon adoption of IFRS 9, credit institutions were allowed to include in the Common Equity Tier 1 capital (CET1), a portion of the increased ECL provisions over a 5-year transitional period starting in 2018. The transitional period ended on 1 January 2023 and the full impact of IFRS9 is included in Q1.23 and onwards own funds.

In addition, according to the amendments of IFRS9 transitional arrangements due to CRR II "quickfix", transitional period was extended in order to mitigate the impact on own funds from the potential sudden increase in ECL allowance. More specifically,

the reference date for any increase in ECL allowance (the "dynamic component"), was moved to 1 January 2020 and the CET1 add-back percentages for the new ECL provisions recognized in 2020 were set to:

- 1.00 during the period from 01/01/2020 – 31/12/2021
- 0.75 during the period from 01/01/2022 – 31/12/2022
- 0.50 during the period from 01/01/2023 – 31/12/2023
- 0.25 during the period from 01/01/2024 – 31/12/2024.

Furthermore, the calculation of the RWAs according to the reduction of the ECL provisions by the scaling factor (sf) was replaced by the application of a standard risk weight of 100% to the amounts added back to CET1 capital.

The table below presents a comparison of own funds, capital ratios and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs.

Table 5: IFRS 9 impact

Comparison of own funds, capital ratios and leverage ratios with and without the application of transitional arrangements for IFRS 9 or analogous ECLs	€ mio								
	Q2 24*	Q2 24**	Q1 24	Q1 24*	Q4 23*	Q3 23	Q3 23*	Q2 23	Q2 23*
<b>Available capital (amounts)</b>									
Common Equity Tier 1 (CET1) capital	6,966	6,976	6,630	6,915	6,730	5,750	6,543	5,776	6,332
Common Equity Tier 1 (CET1) capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,966	6,976	6,630	6,915	6,730	5,750	6,543	5,776	6,332
Tier 1 capital	6,966	6,976	6,630	6,915	6,730	5,750	6,543	5,776	6,332
Tier 1 capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	6,966	6,976	6,630	6,915	6,730	5,750	6,543	5,776	6,332
Total capital	7,985	7,995	7,630	7,915	7,630	6,650	7,443	6,176	6,732
Total capital as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	7,985	7,995	7,630	7,915	7,630	6,650	7,443	6,176	6,732
<b>Risk-weighted assets (amounts)</b>									
Total risk-weighted assets	38,224	38,224	37,178	37,178	37,727	36,425	36,605	36,569	36,695
Total risk-weighted assets as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	38,224	38,224	37,178	37,178	37,727	36,425	36,605	36,569	36,695
<b>Capital ratios</b>									
Common Equity Tier 1 (as percentage of risk exposure amount)	18.22%	18.25%	17.83%	18.60%	17.84%	15.79%	17.87%	15.80%	17.26%
Common Equity Tier 1 (as percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18.22%	18.25%	17.83%	18.60%	17.84%	15.79%	17.87%	15.80%	17.26%
Tier 1 (as percentage of risk exposure amount)	18.22%	18.25%	17.83%	18.60%	17.84%	15.79%	17.87%	15.80%	17.26%
Tier 1 (as percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	18.22%	18.25%	17.83%	18.60%	17.84%	15.79%	17.87%	15.80%	17.26%
Total capital (as percentage of risk exposure amount)	20.89%	20.92%	20.52%	21.29%	20.22%	18.26%	20.33%	16.89%	18.35%
Total capital (as percentage of risk exposure amount) as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	20.89%	20.92%	20.52%	21.29%	20.22%	18.26%	20.33%	16.89%	18.35%
<b>Leverage ratio</b>									
Leverage ratio total exposure measure	74,127	74,127	72,712	72,712	74,790	74,607	74,679	73,485	73,536
Leverage ratio	9.40%	9.41%	9.12%	9.51%	9.00%	7.71%	8.76%	7.86%	8.61%
Leverage ratio as if IFRS 9 or analogous ECLs transitional arrangements had not been applied	9.40%	9.41%	9.12%	9.51%	9.00%	7.71%	8.76%	7.86%	8.61%

\* Including profit for the period, post dividend accrual

\*\* Including profit for the period, post dividend accrual for a c.40% payout in 2025 out of 2024 profits, subject to AGM and regulatory approvals

## 4.5 DTC Law

Article 27A of Greek Law 4172/2013 (“DTC Law”), as currently in force, allows credit institutions, under certain conditions, and from 2017 onwards to convert deferred tax assets (“DTAs”) arising from (a) private sector initiative (“PSI”) losses, (b) accumulated provisions for credit losses recognized as at 30 June 2015, (c) losses from final write off or the disposal of loans and (d) accounting write offs, which will ultimately lead to final write offs and losses from disposals, to a receivable (“Tax Credit”) from the Greek State. Items (c) and (d) above were added with Greek Law 4465/2017 enacted on 29 March 2017. The same Greek Law 4465/2017 provided that the total tax relating to cases (b) to (d) above cannot exceed the tax corresponding to accumulated provisions recorded up to 30 June 2015 less (a) any definitive and cleared Tax Credit, which arose in the case of accounting loss for a year according to the provisions of par.2 of article 27A of Greek Law 4172/2013, which relate to the above accumulated provisions, (b) the amount of tax corresponding to any subsequent specific tax provisions, which relate to the above accumulated provisions and (c) the amount of the tax corresponding to the annual amortization of the debit difference that corresponds to the above provisions and other losses in general arising due to credit risk.

The main condition for the conversion of DTAs to a Tax Credit, is the existence of an accounting loss at Bank level of a respective year, starting from accounting year 2016 and onwards. The Tax Credits will be calculated as a ratio of IFRS accounting losses to net equity (excluding the year’s losses) on a solo basis and such ratio will be applied to the remaining Eligible DTAs in a given year to calculate the Tax Credit that will be converted in that year, in respect of the prior tax year. The Tax Credit may be offset against income taxes payable. The non-offset part of the Tax Credit is immediately recognized as a receivable from the Greek State. The Bank is obliged to issue conversion rights to the Greek State for an amount of 100% of the Tax Credit in favour of the Greek State and will create a specific reserve for an equal amount. Common shareholders have pre-emption rights on these conversion rights. The reserve will be capitalized with the issuance of common shares in favour of the Greek State. This legislation allows credit institutions to treat such DTAs as not “relying on future profitability” according to CRD IV, and as a result such DTAs are not deducted from CET1, hence improving a credit institution’s capital position.

Furthermore, Greek Law 4465/2017 amended article 27 “Carry forward losses” by introducing an amortization period of 20 years for losses due to loan write offs as part of a settlement or restructuring and losses that crystallize as a result of a disposal of loans. In addition, in 2021 Greek Law 4831 further amended article 27 of Greek Law 4172/2013 (see Note 27 “Deferred tax assets and liabilities” of the Annual Financial Report for the year ended 31 December 2023).

On 7 November 2014, the Bank convened an extraordinary General Shareholders Meeting which resolved to include the Bank in the DTC Law. An exit by the Bank from the provisions of the DTC Law requires regulatory approval and a General Shareholders meeting resolution.

As of 30 June 2024, the amount of DTAs that were eligible for conversion to a receivable from the Greek State subject to the DTC Law was €3.6 billion ( 31 December 2023: €3.7 billion). The conditions for conversion rights were not met in the year ended

31 December 2023 and no conversion rights are deliverable in 2024.

## 4.6 Transitional own funds disclosure template

The table below provides information regarding the amounts and nature of specific items on own funds during the IFRS9 transitional period, in accordance with Annex IV of the Commission Implementing Regulation (EU) No 1423/2013.

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

Table 6: EU CC1 - Transitional Own Funds 30.06.2024

Transitional own funds disclosure template as of 30.06.2024		€ mio <sup>1,3</sup>	€ mio <sup>2,3</sup> ref
<b>Common Equity Tier 1 capital: Instruments and Reserves</b>			
1	Capital instruments and the related share premium accounts	4,433	4,433 a
	<i>of which: ordinary shares</i>	4,433	4,433
2	Retained earnings	3,068	3,068 a
3	Accumulated other comprehensive income and other reserves	738	738 a
EU-3a	Funds for general banking risk	15	15 a
5	Minority Interests (amount allowed in consolidated CET1)	13	13 b
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>8,267</b>	<b>8,267</b>
<b>Common Equity Tier 1 capital: Regulatory Adjustments</b>			
7	Additional Value Adjustments	(10)	(10)
8	Intangible assets (net of related tax liability)	(520)	(520) c
9	Part of interim or year-end profit not eligible	(533)	(523)
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences	(3)	(3) f
11	Fair value reserves related to gain or losses on cash flow hedges	(2)	(2)
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	0	0
16	Direct and indirect holdings by an institution of own CET1 instruments	0	0
19	CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold)	0	0
21	Deferred tax assets arising from temporary differences (amount above 10% threshold)	0	0 e
22	Amount exceeding the 17.65% threshold	0	0
	<i>Of which: deferred tax assets arising from temporary differences</i>	0	0
27a	Other regulatory adjustments	(233)	(233)
28	<b>Total regulatory adjustments to Common equity Tier 1 (CET1)</b>	<b>(1,301)</b>	<b>(1,291)</b>
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>6,966</b>	<b>6,976</b>
<b>Additional Tier 1 (AT1) capital</b>			
36	Additional Tier 1 (AT1) capital before regulatory adjustments	0	
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>			
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	<b>0</b>	<b>0</b>
44	Additional Tier 1 (AT1) capital	0	0
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>6,966</b>	<b>6,976</b>
<b>Tier 2 (T2) capital</b>			
46	Capital instruments and the related share premium accounts	1,019	1,019
51	<b>Tier 2 capital (T2) capital before regulatory adjustments</b>	<b>1,019</b>	<b>1,019</b>
<b>Tier 2 (T2) capital: Regulatory adjustments</b>			
55	Direct and indirect 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	0	0
57	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>	<b>0</b>	<b>0</b>
58	<b>Tier 2 (T2) capital</b>	<b>1,019</b>	<b>1,019</b>
59	<b>Total capital (TC = T1 + T2)</b>	<b>7,985</b>	<b>7,995</b>
60	<b>Total risk exposure amount</b>	<b>38,224</b>	<b>38,224</b>
<b>Capital Adequacy Ratios</b>			
61	<b>Common Equity Tier 1</b>	<b>18.22%</b>	<b>18.25%</b>
62	<b>Tier 1</b>	<b>18.22%</b>	<b>18.25%</b>
63	<b>Total capital</b>	<b>20.89%</b>	<b>20.92%</b>
64	Institution CET1 overall capital requirement	9.62%	9.62%
65	<i>of which: capital conservation buffer requirement</i>	2.50%	2.50%
66	<i>of which: countercyclical capital buffer requirement</i>	0.07%	0.07%
67	<i>of which: systemic risk buffer requirement</i>	0.00%	0.00%
EU-67a	<i>of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer</i>	1.00%	1.00%
EU-67b	<i>of which: additional own funds requirements to address the risks other than the risk of excessive leverage</i>	1.55%	1.55%
68	<b>Common Equity Tier 1 available after meeting the minimum capital requirements</b>	<b>10.14%</b>	<b>10.17%</b>
<b>Amounts below the thresholds for deduction (before risk weighting)</b>			
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	280	280 d
73	Direct and indirect holdings by the institution of the CET1 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)	34	34 d
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) are met)	526	526 e

1. Including profit for the period, post dividend accrual

2. Including profit for the period, post dividend accrual for a c.40% payout in 2025 out of 2024 profits, subject to AGM and regulatory approvals

3. Including prudential treatment (in line with relevant supervisory guidance regarding the application of the minimum NPE coverage level in accordance with the SREP recommendation on the coverage of the NPE stock and the Addendum to the ECB Guidance to banks on non-performing loans) accrual of c.€0.2 billion on State Guaranteed Loans granted to special social groups under specific Ministerial Decisions. This prudential treatment is temporary, subject to the repayments from the Greek State and obligors and does not have any impact on the respective accounting treatment.

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

Table 6: EU CC1 - Transitional Own Funds 31.12.2023

Transitional own funds disclosure template as of 31.12.2023		€ mio	ref
<b>Common Equity Tier 1 capital: Instruments and Reserves</b>			
1	Capital instruments and the related share premium accounts <i>of which: ordinary shares</i>	4,455	a
2	Retained earnings	2,672	a
3	Accumulated other comprehensive income and other reserves	484	a
3a	Funds for general banking risk	15	a
5	Minority Interests (amount allowed in consolidated CET1)	14	b
6	<b>Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>	<b>7,640</b>	
<b>Common Equity Tier 1 capital: Regulatory Adjustments</b>			
7	Additional Value Adjustments	(10)	
8	Intangible assets (net of related tax liability)	(505)	c
9	Part of interim or year-end profit not eligible	(332)	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences	(3)	f
11	Fair value reserves related to gain or losses on cash flow hedges	(3)	
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	0	
16	Direct and indirect holdings by an institution of own CET1 instruments	0	
19	CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold)	0	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold)	0	e
22	Amount exceeding the 17.65% threshold <i>Of which: deferred tax assets arising from temporary differences</i>	0	
27a	Other regulatory adjustments	(57)	
28	<b>Total regulatory adjustments to Common equity Tier 1 (CET1)</b>	<b>(910)</b>	
29	<b>Common Equity Tier 1 (CET1) capital</b>	<b>6,730</b>	
<b>Additional Tier 1 (AT1) capital</b>			
36	Additional Tier 1 (AT1) capital before regulatory adjustments	0	
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>			
43	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	<b>0</b>	
44	Additional Tier 1 (AT1) capital	0	
45	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>6,730</b>	
<b>Tier 2 (T2) capital</b>			
46	Capital instruments and the related share premium accounts	900	
51	<b>Tier 2 capital (T2) capital before regulatory adjustments</b>	<b>900</b>	
<b>Tier 2 (T2) capital: Regulatory adjustments</b>			
55	Direct and indirect 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	0	
57	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>	<b>0</b>	
58	<b>Tier 2 (T2) capital</b>	<b>900</b>	
59	<b>Total capital (TC = T1 + T2)</b>	<b>7,630</b>	
60	<b>Total Risk Weighted Assets (RWAs)</b>	<b>37,727</b>	
<b>Capital Adequacy Ratios</b>			
		%	
61	<b>Common Equity Tier 1</b>	<b>17.84%</b>	
62	<b>Tier 1</b>	<b>17.84%</b>	
63	<b>Total capital</b>	<b>20.22%</b>	
64	Institution CET1 overall capital requirement	9.76%	
65	<i>of which: capital conservation buffer requirement</i>	2.50%	
66	<i>of which: countercyclical capital buffer requirement</i>	0.07%	
67	<i>of which: systemic risk buffer requirement</i>	0.00%	
EU-67a	<i>of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer</i>	1.00%	
EU-67b	<i>of which: additional own funds requirements to address the risks other than the risk of excessive leverage</i>	1.69%	
68	<b>Common Equity Tier 1 available after meeting the minimum capital requirements</b>	<b>9.22%</b>	
<b>Amounts below the thresholds for deduction (before risk weighting)</b>			
72	Direct and indirect holdings of the capital 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)	261	d
73	Direct and indirect holdings by the institution of CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	34	d
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in 38 (3) are met)	637	e

\* Including profits for the period

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

## 4.7 Capital requirements under Pillar I

The next table presents the risk exposure amounts (or Risk Weighted Assets - RWAs) and the capital requirements at Group level under Pillar I as of 30.06.2024 and 31.03.2024, according to the CRR/CRD IV regulatory framework. The capital requirements under Pillar I are equal to 8% of the risk exposure amounts.

Total RWAs are broken down in 85.5% Credit (including Counterparty Credit Risk), 5.1% Market and 9.4% Operational RWAs, respectively.

On a quarterly basis total Group RWAs increased to €38.2Bn. Concerning Credit RWAs the increase (+€1.2Bn) is attributed mainly to corporate credit expansion. Market and Operational Risk stable.

Table 7: EU OV1 - Overview of RWAs

Overview of RWAs		RWAs		Minimum Capital Requirements
		30.06.24	31.03.24	30.06.24
1	<b>Credit risk (excluding CCR)</b>	<b>31,970</b>	<b>30,796</b>	<b>2,558</b>
2	<i>Of which the standardised approach</i>	31,970	30,796	2,558
3	<i>Of which the foundation IRB (FIRB) approach</i>	-	-	-
4	<i>Of which: slotting approach</i>	-	-	-
EU 4a	<i>Of which: equities under the simple riskweighted approach</i>	-	-	-
5	<i>Of which the advanced IRB (AIRB) approach</i>	-	-	-
6	<b>Counterparty credit risk – CCR</b>	<b>744</b>	<b>876</b>	<b>60</b>
7	<i>Of which the standardised approach</i>	505	612	40
8	<i>Of which internal model method (IMM)</i>	-	-	-
EU 8a	<i>Of which exposures to a CCP</i>	11	10	1
EU 8b	<i>Of which credit valuation adjustment-CVA</i>	226	254	18
9	<i>Of which other CCR</i>	2	0	0
15	<b>Settlement risk</b>	-	-	-
16	<b>Securitisation exposures in the non-trading book (after the cap)</b>	<b>216</b>	<b>217</b>	<b>17</b>
17	<i>Of which SEC-IRBA approach</i>	0	0	0
18	<i>Of which SEC-ERBA (including IAA)</i>	<b>122</b>	<b>125</b>	<b>10</b>
19	<i>Of which SEC-SA approach</i>	95	92	8
EU 19a	<i>Of which 1250% deduction</i>	-	-	-
20	<b>Position, foreign exchange and commodities risks (Market risk)</b>	<b>1,693</b>	<b>1,688</b>	<b>135</b>
21	<i>Of which the standardised approach</i>	335	317	27
22	<i>Of which IMA</i>	1,358	1,371	109
EU 22a	<b>Large exposures</b>	-	-	-
23	<b>Operational risk</b>	<b>3,601</b>	<b>3,601</b>	<b>288</b>
EU 23a	<i>Of which basic indicator approach</i>	-	-	-
EU 23b	<i>Of which standardised approach</i>	3,601	3,601	288
EU 23c	<i>Of which advanced measurement approach</i>	-	-	-
24	<b>Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)</b>	<b>1,401</b>	<b>1,519</b>	<b>112</b>
29	<b>Total</b>	<b>38,224</b>	<b>37,178</b>	<b>3,058</b>



REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

### 4.8 Overall Capital Requirement (OCR)

According to the ECB decision it is required for National Bank of Greece to maintain, on a consolidated basis, a total SREP capital requirement of 10.75%.

The TSCR of 10.75% includes:

- the minimum Pillar I own funds requirement of 8% to be maintained at all times in accordance with Article 92(1) of Regulation (EU) No 575/2013; and
- an additional Pillar II own funds requirement (P2R) of 2.75% to be maintained at all times in accordance with Article 16(2)(a) of Regulation (EU) No 1024/2013, to be covered at least by CET1 capital by 56.25% and by Tier 1 capital by 75%.

In addition to the TSCR, the Group is also subject to the Overall Capital Requirement (OCR). The OCR consists of the TSCR and the combined buffer requirement as defined in point (6) of Article 128 of Directive 2013/36/EU.

The combined buffer (CB) requirement is defined as the sum of:

- the Capital Conservation Buffer;
- the institution specific Countercyclical Capital Buffer (CCyB);
- the systemic risk; and
- the systemically important institutions buffer, as applicable.

The Capital Conservation Buffer stands at 2.5% for all banks in the EU.

The systemic risk is 0% and the systemically important institutions buffer for 2024 is 1.0% for NBG, due to the imposition of such an O-SII buffer by the Bank of Greece.

Bank of Greece defined its methodology for determining the CCyB and set the CCyB at 0% for Greece throughout 2018-2023 and the first half of 2024 according to its quarterly decisions. CCyB is also currently 0% in all other countries in which NBG Group has significant exposures with the exception of Great Britain and North Macedonia where the CCyB is currently set at 2% and 0.75%, respectively for Q2 2024.

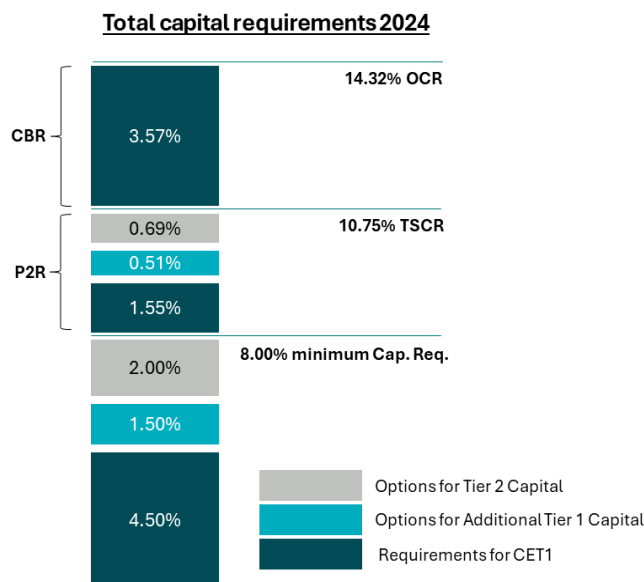
**Thus, the institution specific Countercyclical Capital Buffer for NBG Group is currently 0.071%, as depicted in the following table.**

**Table 8:** EU CCyB2 - Amount of institution-specific countercyclical capital buffer

	a
Total risk exposure amount	38,224
Institution specific countercyclical capital buffer rate	0.071%
Institution specific countercyclical capital buffer requirement	27

NBG’s total capital requirement for 2024, taking into account the combined capital buffers, have been set to 14.32%.

The stacking order of the various own funds requirements for 2024 is shown in the figure below.



**Figure 2:** Stacking order of own funds requirements

On June 30<sup>th</sup>, 2024, NBG Group’s CET1 capital ratio and Total capital ratio, including profit for the period, post dividend accrual, stood at 18.22% and 20.89% respectively (including profit for the period, post dividend accrual for a c.40% payout in 2025 out of 2024 profits, subject to AGM and regulatory approvals 18.25% and 20.92% respectively), well above the required capital requirement of 9.62% for CET1 Capital and of 14.32% for Total Capital.

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

The table below presents figures of credit and market exposures relevant for the calculation of the Countercyclical Capital Buffer for 30.06.2024 broken down by country.

**Table 9: EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer 30.06.2024**

	a	b	c	d	e	f	g	h	i	j	k	l	m
	General Credit Exposures		Relevant Credit exposures – Market Risk		Securitisation exposures	Total exposure value	Total exposure value				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	Exposure value for non-trading book		Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book	Total			
<b>Breakdown by country</b>													
<b>Greece</b>	81,175	0	70	0	407	81,652	1,759	6	16	1,781	22,260	84.21%	0.00%
<b>North Macedonia</b>	1,616	0	0	0	0	1,616	79	0	0	79	989	3.74%	0.75%
<b>Marshall Islands*</b>	1,767	0	0	0	0	1,767	141	0	0	141	1,767	6.68%	0.00%
<b>Liberia*</b>	853	0	0	0	0	853	68	0	0	68	850	3.21%	0.00%
<b>Great Britain</b>	413	0	0	0	75	488	44	0	1	46	569	2.15%	2.00%
<b>Total</b>	<b>85,824</b>	<b>0</b>	<b>70</b>	<b>0</b>	<b>482</b>	<b>86,376</b>	<b>2,092</b>	<b>6</b>	<b>17</b>	<b>2,115</b>	<b>26,434</b>	-	-

\* Exposures to Marshall Islands and Liberia are related to ocean shipping only.

## 4.9 MREL Requirements

Under the Directive 2014/59 Bank Recovery and Resolution Directive or (“BRRD”), as amended by Directive 2019/879 (BRRD II), banks in the European Union are required to maintain a Minimum Requirement for own funds and Eligible Liabilities (“MREL”), which ensures sufficient loss-absorbing capacity in resolution. MREL includes a risk- and a leverage-based dimension. MREL is therefore expressed as two ratios that both have to be met: (i) as a percentage of Total Risk Exposure Amount (“TREA”), (the “MREL-TREA”); and (ii) as a percentage of the Leverage Ratio Exposure (“LRE”), (the “MREL-LRE”).

Instruments qualifying for MREL are own funds (Common Equity Tier 1, Additional Tier 1 and Tier 2), as well as certain eligible liabilities (mainly senior unsecured bonds). Regulation (EU) No 806/2014 of the European Parliament and of the Council, as amended by Regulation (EU) No 877/2019 of the European Parliament and of the Council allows the Single Resolution Board (“SRB”) to set in addition to the MREL requirement, a “subordination” requirement, within MREL, against which only subordinated liabilities and own funds count.

On 21<sup>st</sup> December 2023, the Bank received the SRB’s decision, via the Bank of Greece, requiring it to meet the following targets by 31<sup>st</sup> December 2025: MREL of 24.22% plus CBR of TREA and LRE (leverage ratio exposure) of 5.91%. Both targets should be calculated on a consolidated basis. The interim annual targets until 31 December 2025 are informative and are calculated through linear interpolation/build-up between the two binding targets of 1 January 2022 and 31 December 2025. Therefore, the interim non-binding MREL target, which stood at 22.73% including CBR of 3.57% of TREA for 1/1/2024, moves to 25.26% including CBR of 3.57% of TREA for 1/1/2025.

As at 30 June 2024, the Bank’s MREL ratio at consolidated level stands at 25.9% of TREA (including profit for the period), which is significantly above the interim non-binding MREL target of 1/1/2024 and continues meeting the LRE requirement.

Moreover, in the context of the implementation of NBG’s strategy to ensure ongoing compliance with its MREL requirements, the Bank has successfully completed the below transactions in 2024:

- On 22 January 2024, the Bank completed the placement of €600 million senior preferred bond in the international capital markets with a yield of 4.5%. The bond matures in five years and is callable in four years.
- On 20 March 2024, the Bank completed the placement of €500 million Subordinated Tier II bonds in the international capital markets with a yield of 5.875%. The bond matures in 11.25 years and is callable in 6.25 years. On 27 March 2024, the Bank announced the results of the Tender Offer in respect of €400 million Subordinated Fixed Rate Resettable Tier 2 Notes due 2029 issued by the Bank. The Bank accepted for purchase all validly tendered Notes and the Acceptance Amount was equal to €320 million.
- On 30 April 2024, the Bank announced the commencement of the call option exercise process with respect to €150 million Fixed Rate Resettable Unsubordinated MREL Notes due 25 May 2025 (XS2560090214) issued on 25 November 2022 under the €5 billion Global Medium Term Note Programme of the Bank. All of the outstanding Notes with

principal amount of €150 million were called and redeemed at par on 27th May 2024.

- On 26 June 2024, the Bank announced the commencement of the call option exercise process with respect to €400 million Subordinated Fixed Rate Resettable Tier 2 Notes due 2029 (XS2028846363) issued on 18 July 2019 under the €5 billion Global Medium Term Note Programme of the Bank. All of the outstanding Notes with principal amount of €80 million were called and redeemed at par on 18th July 2024.

## REGULATORY OWN FUNDS AND PRUDENTIAL REQUIREMENTS

## 4.10 Leverage Ratio

Leverage ratio is calculated in accordance with the methodology set out in article 429 of the regulation (EU) No 575/2013 of the European Parliament and of the Council, as amended by European Commission delegated Regulation 62/2015 of 10 October 2014. It is defined as an institution's capital measure divided by that institution's total leverage exposure measure and is expressed as a percentage. The Group submits to the competent authority the leverage ratio on a quarterly basis. The following table includes the summary of the Group's leverage ratio with reference dates 30.06.2024 and 31.03.2024 (amounts in € mio):

Table 10: Leverage ratio

Leverage Ratio	Q2 24**	Q2 24*	Q1 24	Q1 24*
<b>Tier I</b>	6,976	6,966	6,630	6,915
<b>Total Exposure Measure</b>	74,127	74,127	72,712	72,712
<b>Leverage Ratio</b>	<b>9.41%</b>	<b>9.40%</b>	<b>9.12%</b>	<b>9.51%</b>

\* Including profit for the period, post dividend accrual

\*\* Including profit for the period, post dividend accrual for a c.40% payout in 2025 out of 2024 profits, subject to AGM and regulatory approvals

During the second quarter of 2024, the Group's leverage ratio, according to the transitional definition of Tier I and the EU Regulation 62/2015 (incl. profits for the period), stands at 9.4%, well above the proposed minimum threshold of 3%. The decrease by 0.15% is mainly driven by Total Leverage Exposure increase (€1.4bn) mainly as a result of corporate credit expansion.

The following tables include the detailed disclosures on the Group's leverage ratio with reference date 30.06.2024 and 31.12.2023 (amounts in € mio):

Table 11: EU LR1, LRSum – Summary reconciliation of accounting assets and leverage ratio exposures as of 30.06.2024 and 31.12.2023

€ mio		Applicable amount Q2 24	Applicable amount Q4 23
<b>1</b>	<b>Total assets as per published financial statements</b>	<b>73,653</b>	<b>74,552</b>
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio 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	(804)	(1,035)
9	Adjustment for securities financing transactions (SFTs)	10	105
10	Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2,599	2,435
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 leverage ratio total exposure measure in accordance with point (c) of Article 429a(1) CRR)	-	-
EU-11b	(Adjustment for exposures excluded from the leverage ratio total exposure measure in accordance with point (j) of Article 429a(1) CRR)	-	-
12	Other adjustments	(1,330)	(1,267)
<b>13</b>	<b>Leverage ratio Total exposure measure</b>	<b>74,127</b>	<b>74,790</b>

Table 12: EU LR3, LRSpl – Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) as of 30.06.2024 compared to 31.12.2023

CRR leverage ratio exposures	Q2 24	Q4 23
<b>Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:</b>	<b>70,693</b>	<b>70,140</b>
EU-1 <i>Trading book exposures</i>	1,125	1,095
EU-3 <i>Banking book exposures, of which:</i>	69,567	69,045
EU-4 <i>Covered bonds</i>	-	-
EU-5 <i>Exposures treated as sovereigns</i>	32,464	32,821
EU-6 <i>Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns</i>	252	767
EU-7 <i>Institutions</i>	1,977	2,185
EU-8 <i>Secured by mortgages of immovable properties</i>	9,017	8,980
EU-9 <i>Retail exposures</i>	2,984	2,880
EU-10 <i>Corporate</i>	17,145	15,595
EU-11 <i>Exposures in default</i>	1,065	1,302
EU-12 <i>Other exposures (eg equity, securitisations, and other non-credit obligation assets)</i>	4,663	4,515

## 5 CREDIT RISK

### 5.1 Definitions and general information

The Group has aligned the definition of default for financial reporting purposes, with the NPE definition used for regulatory purposes, as per the EBA ITS, thus a financial asset is considered as credit impaired, and is classified into Stage 3, when it is classified as NPE in accordance with the Group's NPE and Forbearance Classification Policy. Furthermore, EBA published the Final Guidelines (EBA/GL/2016/07) on the application of the definition of default under Article 178 of Regulation (EU) No. 575/2013 and Regulation (EU) 2018/1845 of the European Central Bank (ECB), in relation to the threshold for assessing the materiality of credit obligations past due, with the intention of harmonizing its application among European Financial institutions and improving consistency in the way these institutions estimate regulatory requirements to their capital positions, being applied from 1 January 2021.

The new definition of default results in classification of exposures (except for those held for trading or debt securities where the borrower has no other exposures with the Group) into Stage 3 according to the following main criteria:

- A. Unpaid payments of over €100 for Retail €500 for Non-retail for more than 90 consecutive days, representing at least 1% of the total exposure of the obligor. For the Corporate portfolio, the assessment takes place at obligor level across the Group, as opposed to a facility level assessment for Retail exposures. In case of credit cards, the exposure is considered non-performing in case of more than three (3) unpaid monthly instalments. Only missed payments related to business litigations, specific contractual features or IT failures (i.e., 'technical past due' situations) may avoid automatic transfer into Stage 3 after 90 days.
- B. A 3-month probation period for non-forborne exposures, during which no default trigger applies.
- C. Identification of other criteria that evidence, even in the absence of missed payments, that it is unlikely that the counterparty could meet all its financial obligations (UTPs), including indicatively the following:
  - o the granting of concessions towards obligors facing or about to face difficulties in meeting their financial commitments that result in a decrease in the present value of cash flows of more than 1% of its initial value (a distressed restructuring resulting in a diminished financial obligation);
  - o the partial or full sale of credit obligations at a material credit-related economic loss, i.e. >5%;
  - o losses recognised in the Income Statement for instruments measured at fair value that represent credit risk impairment.

A commitment is regarded as NPE if, when withdrawn or otherwise used, it would lead to exposures that present a risk of not being paid back in full without realisation of collateral. Financial guarantees written by the Bank are regarded as NPE for their nominal value when the financial guarantee is at risk of being called by the holder of the guarantee, including, in particular, when the underlying guaranteed exposure meets the criteria to be considered as NPE.

A debt security is considered as credit impaired under an objective approach, and classified into Stage 3, when at least one payment of capital or interest is overdue by the issuer, based on the contractual terms of the instrument, irrespective of the days past due. In addition, a debt security is assessed as credit impaired if there is at least one external credit rating on the security or the issuer (if no external rating on the security is available) corresponding to Default or Selective Default.

### 5.2 Impairment - Expected credit losses

ECL are recognised for all financial assets measured at amortised cost, debt financial assets measured at FVTOCI, lease receivables, financial guarantees and certain loan commitments. ECL represent the difference between contractual cash flows and those that the Group expects to receive, discounted at the financial asset's EIR. For loan commitments and other credit facilities in scope of ECL, the expected cash shortfalls are determined by considering expected future drawdowns.

#### ■ Recognition of expected credit losses

At initial recognition, an impairment allowance is required for ECL resulting from default events that are possible within the next 12 months (12-month ECL), weighted by the risk of a default occurring. Instruments in this category are referred to as instruments in Stage 1. For instruments with a remaining maturity of less than 12 months, ECL are determined for this shorter period.

In the event of a significant increase in credit risk ("SICR"), an ECL allowance is required, reflecting lifetime cash shortfalls that would result from all possible default events over the expected life of the financial instrument ("lifetime ECL"), weighted by the risk of a default occurring. Instruments in this category are referred to as instruments in Stage 2.

Lifetime ECL are always recognised on financial assets for which there is objective evidence of impairment, that is they are considered to be in default or otherwise credit-impaired. Such instruments are referred to as instruments in Stage 3.

#### ■ Write-off

A write-off is made when the Group does not have a reasonable expectation to recover all or part of a financial asset. Write-offs reduce the principal amount of a claim and are charged against previously established allowances for credit losses. Recoveries, in part or in full, of amounts previously written off are generally credited to "Credit provisions and other impairment charges". Write-offs and partial write-offs represent derecognition or partial derecognition events.

#### ■ Measurement of expected credit losses

The Group assesses on a forward-looking basis the ECL associated with all financial assets subject to impairment under IFRS 9. The Group recognises an ECL allowance for such losses at each reporting date. The measurement of ECL reflects:

- An unbiased and probability-weighted amount that is determined by evaluating a range of possible outcomes. The Group uses three macroeconomic scenarios and estimates

the ECL that would arise under each scenario. A weighting is allocated to each scenario, such that the weighted probabilities of all three scenarios are equal to one. The distribution of possible ECL may be non-linear, hence three distinct calculations are performed, where the associated ECLs are multiplied by the weighting allocated to the respective scenario. The sum of the three weighted ECL calculations represents the probability-weighted ECL.

- The time value of money.
- Reasonable and supportable information that is available without undue cost or effort at the reporting date about past events, current conditions and forecasts of future economic conditions.

For the purposes of measuring ECL, the estimate of expected cash shortfalls reflects the cash proceeds expected from collateral liquidation (if any) and other credit enhancements that are part of the contractual terms and are not recognised separately by the Group. The estimate of expected cash shortfalls on a collateralized loan exposure reflects the assumptions used regarding the amount and timing of cash flows that are expected from foreclosure on the collateral less the costs of obtaining and selling the collateral, irrespective of whether the foreclosure is probable or not.

The ECL calculations are based on the following factors:

- **Exposure at Default ("EAD"):** This is an estimate of the exposure at a future default date, taking into account expected changes in the exposure after the reporting date, including repayments of principal and interest, and expected drawdowns on committed facilities.
- **Probability of Default ("PD"):** Represents the likelihood of a borrower/issuer defaulting on its financial obligation, assessed on the prevailing economic conditions at the reporting date, adjusted to take into account estimates of future economic conditions that are likely to impact the risk of default either over the next 12 months for Stage 1 financial assets, or over the remaining lifetime, for Stage 2 financial assets.
- **Loss given default ("LGD"):** Represents the Group's expectation of the extent of loss on a defaulted exposure. The LGD varies by type of counterparty, type and seniority of claim and availability of collateral or other credit support. The determination of LGD takes into account expected future cash flows from collateral and other credit enhancements or expected payouts from bankruptcy proceedings for unsecured claims and, where applicable, time to realization of collateral and the seniority of claims. LGD is expressed as a percentage loss per unit of EAD.
- **Discount Rate:** The implied discount factor based on the original EIR of the financial asset or an approximation thereof.

The PD and LGD are determined for three different scenarios whereas EAD projections are treated as scenario independent.

The ECL is determined by projecting the PD, LGD and EAD for each time step between future cash flow dates and for each individual exposure or collective segment. These three components are multiplied together and adjusted for the likelihood of survival, if appropriate. This effectively calculates an ECL for each future period, which is then discounted back to the reporting date and added up.

The Group recognises an ECL allowance on irrevocable commitments to extend credit, financial guarantee contracts (LGs) and letters of credit (LCs), on the date that the Group becomes a party to the irrevocable commitment. No ECL allowance is recognised on revocable loan commitments, as such commitments do not meet the definition of a financial instrument. For revolving lending exposures (i.e. facilities that include both a loan and a revocable undrawn commitment component), the EAD represents the expected balance at default, taking into account any expected drawdowns, based on the Group's historical experience. The ECL allowance on financial guarantees and letters of credit written by the Group, is based on the Credit Conversion Factor ("CCF") applicable to the relevant financial instrument type, which converts the off-balance sheet amount to an EAD amount.

The Bank has initiated the process of enhancing its credit risk assessment process, incorporating climate and environmental factors for the purposes of evaluating borrower's risk of default and ultimately the ECL calculation. Acknowledging the importance and potential impact of Environmental, Social and Governance (ESG) risks, the Bank has proceeded with the identification and materiality assessment of such risks and their incorporation in the overall risk management framework, and is committed to monitoring, assessing and managing the particular risks going forward.

More specifically, taking into account the relevant supervisory expectations regarding the climate-related risk classification and in particular, the requirement to use granular information, evaluate and quantify how climate related risks affect credit risk (and effectively ECL) as well as the ECB's "Good Practices for climate-related and environmental Risk Management", the Bank:

1. has developed and implements bespoke ESG obligor assessment questionnaires (scorecards) in its credit approval process, in order to assess the performance of its corporate clientele on ESG factors, taking into account sector level characteristics and the significance of certain ESG factors for individual companies depending on their economic activity, and is in the process to investigate the incorporation of Climate and Environmental ("C&E") risks to credit rating, by combining the outcome of ESG scorecards with the obligor's internal risk rating. Relevant analyses are underway and are expected to be further enhanced, as more historical data becomes available and methodological approaches mature.

In addition, the Bank has already incorporated the impact of physical and transition risks in the collateral valuation performed through physical inspection of real estate properties. The subsequent use of these valuations in the estimation of LGD and LTV (Loan-to-Value) practically affects the ECL calculation for the real estate collateralized exposures.

#### Management adjustments to expected credit losses

Management adjustments may be performed to factor in certain conditions and circumstances prevailing at the reporting date which are not fully captured into the ECL models, based on management judgment. These relate to post-model adjustments ("PMAs") to the ECL model output which are calculated and allocated at a granular level following relevant risk assessment and analysis, resulting in either an increase or a decrease in the

total ECL allowance, and to in-model adjustments to model inputs.

#### Forward looking economic inputs

Forward looking information (FLI) is incorporated in the ECL measurement of collectively assessed loans and debt securities through the PD and LGD models. The expected recoveries (cash flow recoveries or liquidation of collateral) used in the ECL measurement of wholesale lending exposures individually assessed, takes into account FLI based on the Bank's forecasts of the relevant macroeconomic factors.

The Group applies three scenarios, i.e. baseline, optimistic, adverse, developed by the Bank's Economic Analysis Division ("EADN"). The macroeconomic scenarios used for measuring ECL are the same with the ones used for evaluating SICR.

The main macroeconomic variables utilized by the Group, affecting the level of ECL are the following:

- GDP growth rate
- House price index (HPI)

#### Significant increase of credit risk

A financial asset is classified as Stage 2 when a SICR since its initial recognition has occurred and the financial asset does not meet the definition for Stage 3. At each reporting date, the Group performs the SICR assessment on the individual financial instrument level by comparing the risk of a default occurring over the remaining expected lifetime of the exposure with the expected risk of a default as estimated at origination.

The Group's process to assess SICR is multi-factor and has three main components:

- **a quantitative element**, i.e. reflecting a quantitative comparison of PD or credit rating at the reporting date versus the respective metric at initial recognition;
- **a qualitative element**, i.e. all Forborne Performing Exposures (FPE), in accordance with EBA ITS, internal watch list for corporate obligors; and
- **"backstop" indicators**: The Group applies on all lending exposures the IFRS 9 presumption that a SICR has occurred when the financial asset is more than 30 days past due. In addition, the EBA backstop indicator of the threefold increase in PD is applied as a rule for Stage 2 allocation for lending exposures.

## 5.3 Maturity classification of Credit exposures

The table below presents the remaining maturity of Loans and advances and Debt securities broken down by maturity buckets for 30.06.2024 and 31.12.2023.

Table 13: EU CR1 A – Maturity of exposures 30.06.2024

Exposure Class	a	b	c	d	e	f
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
Loans and Advances	920	6,260	10,908	19,133	0	37,221
Debt Securities		6,262	1,295	9,324	0	16,880
<b>Total</b>	<b>920</b>	<b>12,522</b>	<b>12,203</b>	<b>28,457</b>	<b>0</b>	<b>54,102</b>

Table 13: EU CR1 A – Maturity of exposures 31.12.2023

Exposure Class	a	b	c	d	e	f
	On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
Loans and Advances	875	5,764	11,395	18,645	0	36,679
Debt Securities		6,648	1,086	8,660	0	16,394
<b>Total</b>	<b>875</b>	<b>12,412</b>	<b>12,481</b>	<b>27,305</b>	<b>0</b>	<b>53,073</b>

## 5.4 Non-performing and forborne exposures

The Bank continues to operate in a challenging economic environment as a result of the Greek financial crisis. Against this backdrop, the Bank is executing a well-developed strategy that aims to reduce its NPE ratio and maximize collections from the Bank's troubled assets portfolio. This strategy includes a set of detailed operational targets and Key Performance Indicators as well as a time-bound action plan for their implementation with a view to significantly reducing NPE stocks.

The strategy establishes realistic but sufficiently ambitious targets, and NBG assesses its effectiveness and adequacy on a regular basis. The strategy is both consistent with, and linked to, the Bank's business plan and the current ICAAP.

### 5.4.1 Disposal of NPE portfolios

#### Project "Frontier II"

In the context of deleveraging its NPEs through inorganic actions and according to its NPE Divestment Policy, the Bank decided the disposal of a portfolio of Greek Non-Performing Exposures in the form of a rated securitization that will utilize the provisions of Hellenic Asset Protection Scheme ("HAPS"), known as Hercules

III. The portfolio includes secured Large Corporate, Small and Medium Enterprises, Small Business Lending, Residential Mortgage loans and Consumer loans with a total gross book value of c. €1 billion (as of the cut-off date 31 December 2021).

On 29 July 2022, the Bank announced that it has entered into a definitive agreement with funds managed by Bracebridge Capital LLC for the sale of 95% of the Mezzanine and Junior notes. NBG will retain the 100% of the Senior notes and 5% of the Mezzanine and Junior notes.

The transaction was completed on 16 February 2024 following the receipt of all necessary approvals, including the provision of the State guarantee on the Senior notes.

#### ■ **Project “Pronto”**

The Bank decided the disposal of the Non-Performing leasing exposures through: i) the sale of the shares of the Probank Leasing S.A. and ii) the sale of the Bank’s leasing portfolio (ex-FBB) and NBG Leasing S.A. (“NBGL”) leasing portfolio, with a total gross book value of €33 million as of 30 June 2024.

The transaction is estimated to be completed within the second half of 2024, subject to required approvals.

#### ■ **Project “Solar”**

In December 2021, the Bank decided to launch the divestment of the secured portfolio of SMEs (Project “Solar”) with a gross book value c. €170 million (as of the cut-off date 30 September 2021), through a joint transaction with the other Greek systemic banks in a form of a rated securitisation under HAPS.

On 1 November 2023, NBG together with the other Greek systemic banks entered into a definitive agreement with funds managed by Waterwheel Capital Management, L.P. for the sale of 95% of the Mezzanine and Junior notes. The banks will retain 100% of the Senior notes and 5% of the Mezzanine and Junior notes for risk retention purposes. In June 2024, the Systemic Banks submitted to the Greek Ministry of Finance a joint application for the inclusion of the senior notes to be issued in the Hercules III scheme.

The transaction is expected to be completed within the second half of 2024, subject to required approvals.

#### ■ **Project “Frontier III”**

In September 2023, the Bank decided the disposal of a portfolio of Greek Non-Performing Exposures in the form of a rated securitization aiming to utilize the provisions of HAPS. The portfolio consists of predominantly secured Large Corporate, SMEs, SBL, Mortgage Loans and Consumer Loans with a total gross book value of c. €0.7 billion (as of the cut-off date, i.e., 30 June 2023).

In May 2024, the Bank submitted to the Greek Ministry of Finance an application for the inclusion of the senior notes to be issued in the context of the Frontier III Securitization in the Hercules III scheme.

The transaction is estimated to be completed within the second half of 2024, subject to required approvals



Table 14: EU CQ1 - Credit quality of forborne exposures 30.06.2024

	a				b		c		d		e		f		g		h	
	Gross carrying amount/ nominal amount of exposures with forbearance measures								Accumulated impairment				Collateral received and financial guarantees received on forborne exposures					
	Performing forborne	Non performing forborne			Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures							Of which collateral and financial guarantees received on non-performing exposures with forbearance measures			
005		Cash balances at central banks and other demand deposits	0	0											0	0	0	0
010	Loans and advances	1,037	547	547	546	(100)	(255)	1,116	272									
020	Central Banks	0	0	0	0	0	0	0	0									
030	General Governments	0	0	0	0	0	0	0	0									
040	Credit Institutions	0	0	0	0	0	0	0	0									
050	Other Financial Corporations	8	0	0	0	(3)	(0)	5	0									
060	Non-Financial Corporations	196	369	369	369	(45)	(213)	259	143									
070	Households	833	177	177	177	(52)	(42)	852	129									
080	Debt Securities	0	0	0	0	0	0	0	0									
090	Loan Commitments given	0	0	0	0	0	0	0	0									
100	<b>Total</b>	<b>1,037</b>	<b>547</b>	<b>547</b>	<b>546</b>	<b>(100)</b>	<b>(255)</b>	<b>1,116</b>	<b>272</b>									

Table 14: EU CQ1 - Credit quality of forborne exposures 31.12.2023

	a				b		c		d		e		f		g		h	
	Gross carrying amount/ nominal amount of exposures with forbearance measures								Accumulated impairment				Collateral received and financial guarantees received on forborne exposures					
	Performing forborne	Non performing forborne			Of which defaulted	Of which impaired	On performing forborne exposures	On non-performing forborne exposures							Of which collateral and financial guarantees received on non-performing exposures with forbearance measures			
005		Cash balances at central banks and other demand deposits	0	0											0	0	0	0
010	Loans and advances	1,339	676	676	676	(124)	(304)	1,381	346									
020	Central Banks	0	0	0	0	0	0	0	0									
030	General Governments	14	6	6	6	(6)	(4)	9	1									
040	Credit Institutions	0	0	0	0	0	0	0	0									
050	Other Financial Corporations	11	1	1	1	(3)	0	9	1									
060	Non-Financial Corporations	267	413	413	412	(45)	(215)	301	180									
070	Households	1,047	257	257	257	(70)	(84)	1,062	165									
080	Debt Securities	0	0	0	0	0	0	0	0									
090	Loan Commitments given	0	0	0	0	0	0	0	0									
100	<b>Total</b>	<b>1,339</b>	<b>676</b>	<b>676</b>	<b>676</b>	<b>(124)</b>	<b>(304)</b>	<b>1,381</b>	<b>346</b>									

Table 16: EU CQ2 - Quality of forbearance 30.06.2024 and 31.12.2023

	a	a	
	Gross carrying amount of forborne exposures 30.06.2024	Gross carrying amount of forborne exposures 31.12.2023	
1	Loans and advances that have been forborne more than twice	668	814
2	Non-performing forborne loan and advances that failed to meet the non-performing exit criteria	515	635

Table 15: EU CR1 - Performing and non-performing exposures and related provisions 30.06.2024

	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-offs	Collaterals and financial guarantees received	
	Performing exposures		Non performing exposures		Performing exposures-accumulated impairment and provisions				Non-performing exposures-accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					On performing exposures	On non-performing exposures
	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3							
<b>Cash balances at central banks and other demand deposits</b>	<b>7,797</b>	<b>7,797</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Loans and advances</b>	<b>36,324</b>	<b>33,348</b>	<b>2,592</b>	<b>1,886</b>	<b>0</b>	<b>1,881</b>	<b>(401)</b>	<b>(205)</b>	<b>(197)</b>	<b>(587)</b>	<b>0</b>	<b>(584)</b>	<b>(106)</b>	<b>19,208</b>	<b>1,181</b>
Central Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
General Governments	218	189	29	8	0	8	(3)	(3)	(0)	(8)	0	(8)	0	71	0
Credit Institutions	2,339	2,339	0	0	0	0	(0)	(0)	0	(0)	0	(0)	0	0	0
Other Financial Corporations	4,125	3,744	8	1	0	1	(27)	(24)	(3)	(0)	0	(0)	(0)	2,880	0
Non-Financial Corporations	21,027	20,038	978	824	0	819	(239)	(134)	(106)	(428)	0	(425)	(89)	9,582	316
Of which SMEs	6,535	5,943	593	375	0	373	(110)	(52)	(58)	(156)	0	(154)	(34)	3,279	182
Households	8,615	7,038	1,577	1,053	0	1,053	(132)	(44)	(88)	(151)	0	(151)	(17)	6,674	864
<b>Debt Securities</b>	<b>16,930</b>	<b>15,534</b>	<b>1,395</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(49)</b>	<b>(16)</b>	<b>(33)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Central Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
General Governments	15,604	14,208	1,395	0	0	0	(47)	(13)	(33)	0	0	0	0	0	0
Credit Institutions	636	636	0	0	0	0	(1)	(1)	0	0	0	0	0	0	0
Other Financial Corporations	437	437	0	0	0	0	(0)	(0)	0	0	0	0	0	0	0
Non-Financial Corporations	253	253	0	0	0	0	(1)	(1)	0	0	0	0	0	0	0
<b>Off-balance sheet exposures</b>	<b>19,672</b>	<b>18,933</b>	<b>739</b>	<b>124</b>	<b>0</b>	<b>124</b>	<b>(4)</b>	<b>(2)</b>	<b>(2)</b>	<b>(30)</b>	<b>0</b>	<b>(30)</b>	<b>68</b>	<b>0</b>	
Central Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
General Governments	159	159	0	0	0	0	(0)	(0)	0	0	0	0	0	0	0
Credit Institutions	3	3	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Financial Corporations	725	724	1	0	0	0	(0)	(0)	0	0	0	0	6	0	0
Non-Financial Corporations	16,936	16,228	708	119	0	119	(4)	(2)	(2)	(30)	0	(30)	62	0	0
Households	1,848	1,818	30	5	0	5	(0)	(0)	(0)	(0)	0	(0)	0	0	0
<b>Total</b>	<b>80,723</b>	<b>75,613</b>	<b>4,726</b>	<b>2,010</b>	<b>0</b>	<b>2,005</b>	<b>(455)</b>	<b>(223)</b>	<b>(232)</b>	<b>(617)</b>	<b>0</b>	<b>(614)</b>	<b>(106)</b>	<b>19,276</b>	<b>1,181</b>

## CREDIT RISK

Table 15: EU CR1 - Performing and non-performing exposures and related provisions 31.12.2023

	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-offs	Collateral and financial guarantees received	
	Performing exposures		Non performing exposures		Performing exposures-accumulated impairment and provisions				Non-performing exposures-accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					On performing exposures	On non-performing exposures
	Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3	Of which stage 1	Of which stage 2	Of which stage 2	Of which stage 3						
<b>Cash balances at central banks and other demand deposits</b>	<b>8,476</b>	<b>8,476</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>Loans and advances</b>	<b>36,479</b>	<b>32,943</b>	<b>3,140</b>	<b>1,290</b>	<b>0</b>	<b>1,281</b>	<b>(440)</b>	<b>(215)</b>	<b>(225)</b>	<b>(649)</b>	<b>0</b>	<b>(643)</b>	<b>(137)</b>	<b>18,857</b>	<b>538</b>
Central Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
General Governments	1,729	1,686	43	15	0	15	(15)	(8)	(8)	(13)	0	(13)	0	179	2
Credit Institutions	2,457	2,457	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Financial Corporations	3,642	3,247	11	1	0	1	(25)	(22)	(3)	0	0	0	0	2,648	1
Non-Financial Corporations	19,725	18,461	1,252	857	0	848	(241)	(131)	(109)	(460)	0	(455)	(93)	9,136	333
Of which SMEs	5,842	5,179	663	378	0	373	(109)	(47)	(62)	(170)	0	(167)	(45)	3,001	177
Households	8,926	7,092	1,834	416	0	416	(159)	(54)	(106)	(175)	0	(175)	(43)	6,895	203
<b>Debt Securities</b>	<b>16,446</b>	<b>15,030</b>	<b>1,410</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>(52)</b>	<b>(19)</b>	<b>(33)</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Central Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
General Governments	14,313	12,903	1,410	0	0	0	(48)	(15)	(33)	0	0	0	0	0	0
Credit Institutions	668	666	0	0	0	0	(2)	(2)	0	0	0	0	0	0	0
Other Financial Corporations	1,207	1,203	0	0	0	0	(1)	(1)	0	0	0	0	0	0	0
Non-Financial Corporations	258	258	0	0	0	0	(1)	(1)	0	0	0	0	0	0	0
<b>Off-balance sheet exposures</b>	<b>17,966</b>	<b>17,171</b>	<b>796</b>	<b>130</b>	<b>0</b>	<b>130</b>	<b>(5)</b>	<b>(4)</b>	<b>(2)</b>	<b>(33)</b>	<b>0</b>	<b>(33)</b>		<b>66</b>	<b>0</b>
Central Banks	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
General Governments	301	285	16	0	0	0	0	0	0	0	0	0	0	0	0
Credit Institutions	2	2	0	0	0	0	0	0	0	0	0	0	0	0	0
Other Financial Corporations	683	683	1	0	0	0	0	0	0	0	0	0	0	0	0
Non-Financial Corporations	15,277	14,520	757	126	0	126	(5)	(3)	(1)	(33)	0	(33)	66	0	0
Households	1,703	1,681	22	4	0	4	0	0	0	0	0	0	0	0	0
<b>Total</b>	<b>79,367</b>	<b>73,620</b>	<b>5,346</b>	<b>1,420</b>	<b>0</b>	<b>1,411</b>	<b>(497)</b>	<b>(237)</b>	<b>(260)</b>	<b>(682)</b>	<b>0</b>	<b>(676)</b>	<b>(137)</b>	<b>18,923</b>	<b>538</b>

Table 17: EU CQ4 - Quality of non-performing exposures by geography 30.06.2024

		Gross carrying amount/ 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					
		a	b	c			
<b>1</b>	<b>On-balance-sheet exposures**</b>	<b>55,140</b>	<b>1,886</b>	<b>1,886</b>	<b>54,750</b>	<b>(1,035)</b>	<b>(3)</b>
2	Greece**	38,655	1,811	1,811	38,276	(943)	(3)
3	Italy	3,557	0	0	3,557	(4)	0
4	Spain	2,573	0	0	2,573	(1)	0
5	Germany	1,935	0	0	1,935	(1)	0
6	North Macedonia	1,908	55	55	1,908	(61)	0
7	Marshall Islands***	1,729	0	0	1,729	(8)	0
8	Cyprus	850	20	20	850	(16)	0
9	United Kingdom	459	0	0	459	(0)	0
10	Other countries***	3,473	0	0	3,462	(2)	0
<b>11</b>	<b>Off-balance-sheet-exposures</b>	<b>19,796</b>	<b>124</b>	<b>124</b>			<b>34</b>
12	Greece	18,617	124	124			33
13	Italy	0	0	0			0
14	Spain	0	0	0			0
15	Germany	0	0	0			0
16	North Macedonia	336	0	0			0
17	Marshall Islands***	15	0	0			0
18	Cyprus	741	0	0			0
19	United Kingdom	0	0	0			0
20	Other countries***	88	0	0			0
<b>21</b>	<b>Total**</b>	<b>74,936</b>	<b>2,010</b>	<b>2,010</b>	<b>54,750</b>	<b>(1,035)</b>	<b>34</b>

\* Accumulated impairment is not reported for off balance-sheet exposures

\*\* "Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures" are incorporated

\*\*\* Exposures to Marshall Islands are related to ocean shipping. The same applies for Other Countries that include exposures to Liberia.

Table 17: EU CQ4 - Quality of non-performing exposures by geography 31.12.2023

		Gross carrying amount/ 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					
		a	b	c			
<b>1</b>	<b>On-balance-sheet exposures</b>	<b>54,214</b>	<b>1,290</b>	<b>1,290</b>	<b>53,804</b>	<b>(1,135)</b>	<b>(5)</b>
2	Greece	38,982	1,204	1,204	38,589	(1,054)	(5)
3	Italy	3,323	0	0	3,323	(4)	0
4	Spain	2,316	0	0	2,316	(1)	0
5	North Macedonia	1,846	62	62	1,846	(60)	0
6	Germany	1,562	0	0	1,562	0	0
7	Marshall Islands**	1,442	0	0	1,442	(2)	0
8	Cyprus	717	23	23	717	(12)	0
9	United Kingdom	511	0	0	511	0	0
10	Other countries**	3,516	0	0	3,498	(2)	0
<b>11</b>	<b>Off-balance-sheet-exposures</b>	<b>18,096</b>	<b>130</b>	<b>130</b>			<b>38</b>
12	Greece	17,181	119	119			36
13	Italy	0	0	0			0
14	Spain	0	0	0			0
15	North Macedonia	334	11	11			3
16	Germany	0	0	0			0
17	Marshall Islands**	5	0	0			0
18	Cyprus	526	0	0			0
19	United Kingdom	0	0	0			0
20	Other countries**	51	0	0			0
<b>21</b>	<b>Total</b>	<b>72,310</b>	<b>1,420</b>	<b>1,420</b>	<b>53,804</b>	<b>(1,135)</b>	<b>38</b>

\* Accumulated impairment is not reported for off balance-sheet exposures

\*\* Exposures to Marshall Islands are related to ocean shipping. The same applies for Other Countries that include exposures to Liberia.

## CREDIT RISK

Table 18: EU CQ5 - Credit quality of loans and advances by industry 30.06.2024

	a	b	c	d	e	f
	Gross carrying amount			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which non-performing		of which defaulted			
1 Agriculture, forestry and fishing	294	11	11	294	(9)	(0)
2 Mining and quarrying	91	2	2	91	(1)	(0)
3 Manufacturing	3,982	224	224	3,980	(197)	(0)
4 Electricity, gas, steam and air conditioning supply	3,479	9	9	3,479	(33)	0
5 Water supply	56	0	0	56	(1)	0
6 Construction	525	23	23	525	(21)	(0)
7 Wholesale and retail trade	3,331	252	252	3,331	(182)	(0)
8 Transport and storage	4,689	13	13	4,677	(31)	(2)
9 Accommodation and food service activities	1,972	155	155	1,972	(78)	(0)
10 Information and communication	563	27	27	563	(36)	0
11 Financial and insurance activities	33	0	0	33	(0)	0
12 Real estate activities	1,415	21	21	1,415	(20)	0
13 Professional, scientific and technical activities	497	25	25	497	(26)	(0)
14 Administrative and support service activities	246	1	1	246	(3)	0
15 Public administration and defense, compulsory social security	1	0	0	1	(0)	0
16 Education	28	0	0	28	(1)	0
17 Human health services and social work activities	128	6	6	128	(3)	0
18 Arts, entertainment and recreation	22	1	1	22	(2)	0
19 Other services	497	53	53	497	(21)	(0)
<b>20 Total</b>	<b>21,850</b>	<b>824</b>	<b>824</b>	<b>21,835</b>	<b>(664)</b>	<b>(3)</b>

Table 18: EU CQ5 - Credit quality of loans and advances by industry 31.12.2023

	a	b	c	d	e	f
	Gross carrying amount			Of which loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which non-performing		of which defaulted			
1 Agriculture, forestry and fishing	348	9	9	348	(14)	0
2 Mining and quarrying	94	2	2	93	(2)	0
3 Manufacturing	4,283	290	290	4,277	(237)	(3)
4 Electricity, gas, steam and air conditioning supply	2,633	9	9	2,633	(25)	0
5 Water supply	52	1	1	52	(1)	0
6 Construction	486	22	22	486	(20)	0
7 Wholesale and retail trade	3,272	241	241	3,271	(168)	0
8 Transport and storage	4,334	15	15	4,320	(28)	(2)
9 Accommodation and food service activities	1,800	139	139	1,800	(79)	0
10 Information and communication	430	27	27	430	(52)	0
11 Financial and insurance activities	61	0	0	61	0	0
12 Real estate activities	1,424	29	29	1,424	(22)	0
13 Professional, scientific and technical activities	393	25	25	393	(23)	0
14 Administrative and support service activities	230	1	1	230	(3)	0
15 Public administration and defense, compulsory social security	0	0	0	0	0	0
16 Education	26	0	0	26	(1)	0
17 Human health services and social work activities	125	5	5	125	(3)	0
18 Arts, entertainment and recreation	31	1	1	31	(2)	0
19 Other services	560	39	39	560	(18)	0
<b>20 Total</b>	<b>20,582</b>	<b>857</b>	<b>857</b>	<b>20,561</b>	<b>(696)</b>	<b>(5)</b>

## CREDIT RISK

Table 19: EU CQ6 - Collateral valuation - loans and advances 30.06.2024

	a	b	c	d	e	f	g	h	i	j	k	l
	Loans and advances*											
	Performing			Non- performing*		Past due >90 days						
		of which past due >30 days ≤90 days		Unlikely to pay that are not past due or past due ≤90 days		of which past due > 90 days ≤180 days	of which past due > 180 days ≤ 1 year	of which past due > 1 year ≤ 2 years	of which past due > 2 years ≤ 5 years	of which past due > 5 years ≤ 7 years	of which past due > 7 years	
1 Gross carrying amount	38,210	36,324	233	1,886	646	1,240	101	86	91	88	154	720
2 Of which: secured	27,600	25,914	210	1,686	581	1,104	71	54	73	71	119	716
3 Of which: secured with immovable property	12,147	11,080	119	1,066	470	596	54	27	36	54	71	354
4 Of which: instruments with LTV higher than 60% and lower or equal to 80%	2,800	2,628		172	87	84						
5 Of which: instruments with LTV higher than 80% and lower or equal to 100%	1,866	1,558		308	101	207						
6 Of which: instruments with LTV higher than 100%	2,127	1,831		296	187	109						
7 Accumulated impairment for secured assets	(688)	(247)	(11)	(441)	(231)	(209)	(17)	(15)	(37)	(26)	(82)	(32)
8 Collateral												
9 Of which value capped at the value of exposure	16,016	15,311	184	705	288	417	46	21	18	33	21	278
10 Of which: Immovable property	10,672	10,006	111	666	265	401	43	18	15	32	15	278
11 Of which value above the cap	17,458	16,718	73	740	321	419	0	0	0	0	74	345
12 Of which: Immovable property	11,989	11,428	62	561	283	278	0	0	0	0	40	238
13 Financial guarantees received	4,373	3,897	8	476	16	460	6	12	14	8	15	405
14 Accumulated partial write-off	(106)	(1)	0	(105)	(8)	(97)	0	0	(2)	(13)	(82)	0

\* "Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures" are incorporated

Table 19: EU CQ6 - Collateral valuation - loans and advances 31.12.2023

	a	b	c	d	e	f	g	h	i	j	k	l
	Loans and advances											
	Performing			Non- performing		Past due >90 days						
		of which past due >30 days ≤90 days		Unlikely to pay that are not past due or are past due ≤90 days		of which past due > 90 days ≤180 days	of which past due > 180 days ≤ 1 year	of which past due > 1 year ≤ 2 years	of which past due > 2 years ≤ 5 years	of which past due > 5 years ≤ 7 years	of which past due > 7 years	
1 Gross carrying amount	37,768	36,479	389	1,290	684	606	69	75	99	107	245	11
2 Of which: secured	27,776	26,678	351	1,098	616	482	51	58	79	88	199	7
3 Of which: secured with immovable property	12,241	11,388	254	853	549	303	39	24	37	56	140	7
4 Of which: instruments with LTV higher than 60% and lower or equal to 80%	2,742	2,601		141	102	39						
5 Of which: instruments with LTV higher than 80% and lower or equal to 100%	1,699	1,592		108	93	15						
6 Of which: instruments with LTV higher than 100%	2,624	2,274		351	259	92						
7 Accumulated impairment for secured assets	(781)	(271)	(19)	(510)	(236)	(274)	(13)	(23)	(45)	(40)	(147)	(5)
8 Collateral												
9 Of which value capped at the value of exposure	15,328	14,866	296	462	333	129	32	20	15	35	25	2
10 Of which: Immovable property	10,386	9,969	236	417	302	115	30	16	13	33	20	2
11 Of which value above the cap	17,559	16,554	207	1,005	380	625	0	0	0	0	597	28
12 Of which: Immovable property	11,696	10,943	184	753	341	412	0	0	0	0	398	15
13 Financial guarantees received	4,068	3,991	17	76	23	53	2	10	12	7	22	0
14 Accumulated partial write-off	(137)	(2)	0	(135)	(27)	(108)	(1)	0	0	(28)	(80)	0

## CREDIT RISK

**Table 20:** EU CR2 - Changes in the stock of non-performing loans and advances 30.06.2024

		a
		Gross carrying amount
<b>1</b>	<b>Initial stock of non-performing loans and advances, Dec 31, 2023</b>	<b>1,290</b>
2	Inflows to non-performing portfolios	1,270
3	Outflows from non-performing portfolios	(674)
4	Outflows due to write-offs	(131)
5	Outflow due to other situations	(543)
<b>6</b>	<b>Final stock of non-performing loans and advances, Jun 30, 2024 *</b>	<b>1,886</b>

\* "Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures" are incorporated

**Table 20:** EU CR2 - Changes in the stock of non-performing loans and advances 31.12.2023

		a
		Gross carrying amount
<b>1</b>	<b>Initial stock of non-performing loans and advances, Dec 31, 2022</b>	<b>1,793</b>
2	Inflows to non-performing portfolios	925
3	Outflows from non-performing portfolios	(1,428)
4	Outflows due to write-offs	(264)
5	Outflow due to other situations	(1,164)
<b>6</b>	<b>Final stock of non-performing loans and advances, Dec 31, 2023</b>	<b>1,290</b>

**Table 21:** EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries 30.06.2024

		a	b
		Gross carrying amount	Related net accumulated recoveries
<b>1</b>	<b>Initial stock of non-performing loans and advances, Dec 31, 2023</b>	<b>1,290</b>	
2	Inflows to non performing portfolios	1,270	
3	Outflows from non-performing portfolios	(674)	
4	Outflow to performing portfolio	(177)	
5	Outflow due to loan repayment, partial or total	(230)	
6	Outflow due to collateral liquidations	(5)	5
7	Outflow due to taking possession of collateral	(2)	2
8	Outflow due to sale of instruments	0	0
9	Outflow due to risk transfers	0	0
10	Outflows due to write-offs	(131)	
11	Outflow due to Other Situations	(40)	
12	Outflow due to reclassification as held for sale	(90)	
<b>13</b>	<b>Final stock of non-performing loans and advances, Jun 30, 2024 *</b>	<b>1,886</b>	

\* "Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures" are incorporated

**Table 21:** EU CR2a - Changes in the stock of non-performing loans and advances and related net accumulated recoveries 31.12.2023

		a	b
		Gross carrying amount	Related net accumulated recoveries
<b>1</b>	<b>Initial stock of non-performing loans and advances, Dec 31, 2022</b>	<b>1,793</b>	
2	Inflows to non performing portfolios	925	
3	Outflows from non-performing portfolios	(1,428)	
4	Outflow to performing portfolio	(287)	
5	Outflow due to loan repayment, partial or total	(167)	
6	Outflow due to collateral liquidations	(10)	10
7	Outflow due to taking possession of collateral	(1)	1
8	Outflow due to sale of instruments	0	0
9	Outflow due to risk transfers	0	0
10	Outflows due to write-offs	(264)	
11	Outflow due to Other Situations	(71)	
12	Outflow due to reclassification as held for sale	(628)	
<b>13</b>	<b>Final stock of non-performing loans and advances, Dec 31, 2023</b>	<b>1,290</b>	

CREDIT RISK

**Table 22: EU CQ7 - Collateral obtained by taking possession and execution processes 30.06.2024**

	a		b	
	Collateral obtained by taking possession			
	Value at initial recognition	Accumulated negative changes		
1 Property Plant and Equipment (PP&E)	0	0		
2 Other than Property Plant and Equipment	593	(154)		
3 Residential immovable property	212	(20)		
4 Commercial Immovable property	303	(62)		
5 Movable property (auto, shipping, etc.)	1	(0)		
6 Equity and debt instruments	71	(71)		
7 Other collateral	6	0		
<b>8 Total</b>	<b>593</b>	<b>(154)</b>		

**Table 22: EU CQ7 - Collateral obtained by taking possession and execution processes 31.12.2023**

	a		b	
	Collateral obtained by taking possession			
	Value at initial recognition	Accumulated negative changes		
1 Property Plant and Equipment (PP&E)	0	0		
2 Other than Property Plant and Equipment	616	(160)		
3 Residential immovable property	228	(22)		
4 Commercial Immovable property	308	(66)		
5 Movable property (auto, shipping, etc.)	1	(1)		
6 Equity and debt instruments	71	(71)		
7 Other collateral	8	0		
<b>8 Total</b>	<b>616</b>	<b>(160)</b>		

**Table 23: EU CQ8 - Collateral obtained by taking possession and execution process - vintage breakdown 30.06.2024**

	a		b		c		d		e		f		g		h		i		j		k		l	
	Debt balance reduction		Total collateral obtained by taking possession																					
	Gross carrying amount	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Foreclosed ≤ 2 years	Foreclosed >2 years and ≤ 5 years	Foreclosed >5 years	of which non-current assets held-for-sale	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes
1 Collateral obtained by taking possession classified as PP&E	0	0	0	0																				
2 Collateral obtained by taking possession other than classified as PP&E	608	(227)	593	(154)	155	(65)	205	(10)	233	(78)	277	(41)												
3 Residential immovable property	293	(97)	212	(20)	22	(0)	131	(5)	60	(15)	139	(15)												
4 Commercial Immovable Property	291	(113)	303	(62)	65	(2)	73	(5)	165	(55)	137	(26)												
5 Movable property (auto, shipping, etc.)	1	(0)	1	(0)	0	0	1	(0)	0	(0)	1	(0)												
6 Equity and debt instruments	17	(17)	71	(71)	63	(63)	0	0	8	(8)	0	0												
7 Other	6	0	6	0	6	0	0	0	0	0	0	0												
<b>8 Total</b>	<b>608</b>	<b>(227)</b>	<b>593</b>	<b>(154)</b>	<b>155</b>	<b>(65)</b>	<b>205</b>	<b>(10)</b>	<b>233</b>	<b>(78)</b>	<b>277</b>	<b>(41)</b>												

**Table 23: EU CQ8 - Collateral obtained by taking possession and execution process - vintage breakdown 31.12.2023**

	a		b		c		d		e		f		g		h		i		j		k		l	
	Debt balance reduction		Total collateral obtained by taking possession																					
	Gross carrying amount	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Foreclosed ≤ 2 years	Foreclosed >2 years and ≤ 5 years	Foreclosed >5 years	of which non-current assets held-for-sale	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes	Value at initial recogn.	Accum. neg. changes
1 Collateral obtained by taking possession classified as PP&E	0	0	0	0																				
2 Collateral obtained by taking possession other than that classified as PP&E	641	(239)	616	(160)	152	(65)	231	(20)	233	(75)	308	(45)												
3 Residential immovable property	311	(102)	228	(22)	19	0	146	(6)	64	(16)	161	(17)												
4 Commercial immovable property	304	(119)	308	(66)	63	(2)	76	(5)	169	(59)	146	(27)												
5 Movable property (auto, shipping etc.)	2	(1)	1	(1)	0	0	1	0	0	0	1	0												
6 Equity and debt instruments	17	(17)	71	(71)	63	(63)	8	(8)	0	0	0	0												
7 Other	8	0	8	0	8	0	0	0	0	0	0	0												
<b>8 Total</b>	<b>641</b>	<b>(239)</b>	<b>616</b>	<b>(160)</b>	<b>152</b>	<b>(65)</b>	<b>231</b>	<b>(20)</b>	<b>233</b>	<b>(75)</b>	<b>308</b>	<b>(45)</b>												



## 5.5 Credit risk mitigation techniques

Since 2007, NBG uses a specialized Collateral Management system, both for corporate and retail exposures. The system aims to:

- Record Bank's collaterals;
- Establish a connection between loan contract and collateral;
- Assess qualitatively all collaterals;
- Monitor collaterals' market value and estimate coverage ratio;
- Provide information regarding each and every obligor's collaterals;
- Retrieve necessary data for the estimation of capital requirements per facility;
- Automatically monitor the obligor's entire credit risk position.

The Collateral Management system provides a large number of control elements, reducing operational risk, also keeping track of all securities offered to the Bank, both those that are currently active and those that matured.

The system calculates and/or keeps the following values per collateral:

- Value as of input day;
- Current market value (for traded securities, etc.);
- Guarantee value: this is lower than the Current market value by a fixed proportion which, in turn, is based on the collateral's liquidation feasibility;
- Market value, Tax value, Forced Sale value, Land and Buildings value and Construction Cost for all real estate collaterals.

In principle, NBG accepts the following credit risk mitigation types (funded and unfunded) for capital calculation purposes under the Standardised Approach:

- Guarantees from:
  - Legal entities, both from the Private and Public Sector
  - Central governments, Regional governments, local authorities and PSEs
  - Financial institutions
  - The Greek Government
  - The Hellenic Development Bank (HDB)
  - The European Investment Fund (EIF)
  - The European Investment Bank (EIB)
- Pledges of
  - Securities (cheques and bills of exchange)
  - Deposits
  - Equity, Mutual funds and Non-tangible securities (bonds, etc.)
  - Claims against Central Government, Public and Private Sector Entities
  - Letters of Guarantee
  - Claims on Insurance Contracts
- Liens
  - On Real Estate

Credit and Counterparty Risk exposures secured by CRR eligible credit risk mitigation instruments (collateral and guarantees) as of 30.06.2023 (in € mio) were as follows:

**Table 24 : EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques 30.06.2024**

	a	b	c	d	e
	Exposures unsecured - Carrying amount	Exposures secured - Carrying amount	Of which: secured by collateral	Of which: secured by financial guarantees	Of which: secured by credit derivatives
1 Total loans*	10,309	26,912	18,928	7,984	0
2 Total debt securities	16,880	0	0	0	0
<b>3 Total exposures</b>	<b>27,190</b>	<b>26,912</b>	<b>18,928</b>	<b>7,984</b>	<b>0</b>
4 Of which non-performing exposures	53	1,245	1,116	130	0
5 Of which defaulted*	53	1,245	1,116	130	0

\*"Supervisory Expectations on Prudential Treatment of Greek State-Guaranteed Exposures" are incorporated

**Table 24 : EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques 31.12.2023**

	a	b	c	d	e
	Exposures unsecured - Carrying amount	Exposures secured - Carrying amount	Of which: secured by collateral	Of which: secured by financial guarantees	Of which: secured by credit derivatives
1 Total loans	9,684	26,995	18,746	8,250	0
2 Total debt securities	16,394	0	0	0	0
<b>3 Total exposures</b>	<b>26,078</b>	<b>26,995</b>	<b>18,746</b>	<b>8,250</b>	<b>0</b>
4 Of which non-performing exposures	53	588	464	124	0
5 Of which defaulted*					

\*According to the EBA Guidelines on definition of default (EBA/GL/2016/07), in force from 1 January 2021, default is fully aligned with the NPE definition.

## 5.6 Portfolios under the Standardised Approach

External Credit Assessment Institutions (ECAI) used to risk weight exposures under the Standardised Approach are Standard & Poor's, Moody's Investors Service Ltd and Fitch Ratings Ltd. There is no process to transfer the issuer and issue credit assessments onto items not included in the trading book, as this is not applicable to NBG Group's portfolios.

The asset classes for which ECAI ratings are used are the following:

- Central Governments and Central Banks
- Regional Governments and Local Authorities
- Public Sector Entities
- Financial Institutions
- Corporate

The table on the right depicts the mapping of external credit assessments to the corresponding credit quality steps.

**Table 26:** Mapping of Credit quality steps

Fitch	Standard & Poor's	Moody's	Credit Quality Steps
From AA to AAA	From AA to AAA	From Aa1 to Aaa	1
From A to A+	From A to A+	From A1 to A3	2
From BBB to BBB+	From BBB to BBB+	From Baa1 to Baa3	3
From BB to BB+	From BB to BB+	From Ba1 to Ba3	4
From B to B+	From B to B+	From B1 to B3	5
From C to CCC+	From C to CCC+	From C1 to Caa3	6

The table below presents the Exposures (net of accounting provisions), before and after Credit Risk Mitigation (CRM), as of 30.06.2024, according to the supervisory exposure classes (amounts are in € mio):

**Table 25:** EU CR4 - Standardised approach - Credit Risk Exposure and CRM effects 30.06.2024

Exposure classes	a		b		c		d		e		f	
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density							
	On-balance-sheet amount	Off-balance-sheet amount	On-balance-sheet amount	Off-balance-sheet amount	RWAs*	RWA density						
Central governments or central banks	26,999	0	30,082	0	5,129	17%						
Regional governments or local authorities	10	1	10	0	2	20%						
Public sector entities	1,258	23	1,534	3	243	16%						
Multilateral development banks	202	0	836	0	0	0%						
International organisations	67	0	67	0	0	0%						
Institutions	2,344	593	2,379	123	810	32%						
Corporates	17,838	15,614	16,590	1,060	16,262	92%						
Retail	3,448	2,176	2,898	16	1,996	68%						
Secured by mortgages on immovable property	9,017	123	9,017	42	3,277	36%						
Exposures in default	1,131	90	1,045	8	1,150	109%						
Exposures associated with particularly high risk	446	28	445	2	671	150%						
Covered bonds	0	0	0	0	0							
Institutions and corporates with a short-term credit assessment	0	0	0	0	0							
Collective investment undertakings	0	0	0	0	0							
Equity	161	0	161	0	213	132%						
Other items	3,025	0	3,025	0	2,220	73%						
<b>Total</b>	<b>65,947</b>	<b>18,648</b>	<b>68,090</b>	<b>1,254</b>	<b>31,970</b>	<b>46%</b>						

\*Counterparty Credit Risk RWAs are not included

## CREDIT RISK

Table 25: EU CR4 - Standardised approach - Credit Risk Exposure and CRM effects 31.12.2023

Exposure classes	a	b	c	d	e	f
	Exposures before CCF and CRM		Exposures post CCF and CRM		RWAs and RWA density	
	On-balance-sheet amount	Off-balance-sheet amount	On-balance-sheet amount	Off-balance-sheet amount	RWAs*	RWA density
Central governments or central banks	27,986	0	30,866	0	5,503	18%
Regional governments or local authorities	11	1	11	0	2	20%
Public sector entities	1,337	175	1,718	6	736	43%
Multilateral development banks	203	0	905	0	0	0%
International organisations	60	0	60	0	0	0%
Institutions	2,653	587	2,671	121	859	31%
Corporates	16,440	13,864	14,969	1,052	14,825	93%
Retail	3,416	2,070	2,793	14	1,938	69%
Secured by mortgages on immovable property	8,980	140	8,980	43	3,280	36%
Exposures in default	1,379	106	1,271	7	1,340	105%
Exposures associated with particularly high risk	454	16	454	2	684	150%
Covered bonds	0	0	0	0	0	
Institutions and corporates with a short-term credit assessment	0	0	0	0	0	
Collective investment undertakings	0	0	0	0	0	
Equity	124	0	124	0	174	141%
Other items	3,073	0	3,073	0	2,178	71%
<b>Total</b>	<b>66,116</b>	<b>16,958</b>	<b>67,894</b>	<b>1,246</b>	<b>31,520</b>	<b>46%</b>

\*Counterparty Credit Risk RWAs are not included

Table 27 : EU CR5 - Standardised approach 30.06.2024

Exposure classes	Risk Weight							
	0%	2%	4%	10%	20%	35%	50%	70%
1 Central governments or central banks	25,717	0	0	0	0	0	50	0
2 Regional governments or local authorities	0	0	0	0	10	0	0	0
3 Public sector entities	1,294	0	0	0	0	0	0	0
4 Multilateral development banks	836	0	0	0	0	0	0	0
5 International organisations	67	0	0	0	0	0	0	0
6 Institutions	1,254	0	0	0	410	0	253	0
7 Corporates	0	0	0	0	0	0	0	0
8 Retail	0	0	0	0	0	0	0	0
9 Secured by mortgages on immovable property	0	0	0	0	0	6,213	2,845	0
10 Exposures in default	0	0	0	0	0	0	0	0
11 Exposures associated with particularly high risk	0	0	0	0	0	0	0	0
12 Covered bonds	0	0	0	0	0	0	0	0
13 Institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	0
14 Collective investment undertakings	0	0	0	0	0	0	0	0
15 Equity	0	0	0	0	0	0	0	0
16 Other items	805	0	0	0	0	0	0	0
<b>17 Total</b>	<b>29,973</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>421</b>	<b>6,213</b>	<b>3,148</b>	<b>0</b>

\*Counterparty Credit Risk RWAs are not included

Table 27: EU CR5 - Standardised approach 30.06.2024 (continued)

Exposure classes	Risk Weight							Total	Of which unrated
	75%	100%	150%	250%	370%	1250%	Others		
1 Central governments or central banks	0	3,789	0	526	0	0	0	<b>30,082</b>	
2 Regional governments or local authorities	0	0	0	0	0	0	0	<b>10</b>	10
3 Public sector entities	0	243	0	0	0	0	0	<b>1,537</b>	525
4 Multilateral development banks	0	0	0	0	0	0	0	<b>836</b>	
5 International organisations	0	0	0	0	0	0	0	<b>67</b>	
6 Institutions	0	552	32	0	0	0	0	<b>2,502</b>	492
7 Corporates	0	17,625	25	0	0	0	0	<b>17,650</b>	16,927
8 Retail	2,914	0	0	0	0	0	0	<b>2,914</b>	
9 Secured by mortgages on immovable property	0	0	0	0	0	0	0	<b>9,059</b>	
10 Exposures in default	0	862	191	0	0	0	0	<b>1,054</b>	
11 Exposures associated with particularly high risk	0	0	447	0	0	0	0	<b>447</b>	
12 Covered bonds	0	0	0	0	0	0	0	<b>0</b>	
13 Institutions and corporates with a short-term credit assessment	0	0	0	0	0	0	0	<b>0</b>	
14 Collective investment undertakings	0	0	0	0	0	0	0	<b>0</b>	
15 Equity	0	127	0	34	0	0	0	<b>161</b>	
16 Other items	0	2,220	0	0	0	0	0	<b>3,025</b>	
<b>17 Total</b>	<b>2,914</b>	<b>25,418</b>	<b>696</b>	<b>560</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>69,344</b>	

\*Counterparty Credit Risk RWAS are not included

Table 27 : EU CR5 - Standardised approach 31.12.2023

Exposure classes	Risk Weight							
	0%	2%	4%	10%	20%	35%	50%	70%
1 Central governments or central banks	26,294				0	0	49	
2 Regional governments or local authorities	0				11	0	0	
3 Public sector entities	988				0	0	0	
4 Multilateral development banks	905				0	0	0	
5 International organisations	60				0	0	0	
6 Institutions	1,299				660	0	244	
7 Corporates	0				0	0	0	
8 Retail	0				0	0	0	
9 Secured by mortgages on immovable property	0				0	6,208	2,815	
10 Exposures in default	0				0	0	0	
11 Exposures associated with particularly high risk	0				0	0	0	
12 Covered bonds	0				0	0	0	
13 Institutions and corporates with a short-term credit assessment	0				0	0	0	
14 Collective investment undertakings	0				0	0	0	
15 Equity	0				0	0	0	
16 Other items	886				11	0	0	
<b>17 Total</b>	<b>30,432</b>				<b>682</b>	<b>6,208</b>	<b>3,107</b>	

\*Counterparty Credit Risk RWAS are not included

Table 27: EU CR5 - Standardised approach 31.12.2023 (continued)

Exposure classes	Risk Weight							Total	Of which unrated
	75%	100%	150%	250%	370%	1250%	Others		
1 Central governments or central banks	0	3,886	0	637				<b>30,866</b>	
2 Regional governments or local authorities	0	0	0	0				<b>11</b>	11
3 Public sector entities	0	736	0	0				<b>1,724</b>	1,162
4 Multilateral development banks	0	0	0	0				<b>905</b>	
5 International organisations	0	0	0	0				<b>60</b>	
6 Institutions	0	557	32	0				<b>2,793</b>	643
7 Corporates	0	16,008	13	0				<b>16,021</b>	15,331
8 Retail	2,807	0	0	0				<b>2,807</b>	
9 Secured by mortgages on immovable property	0	0	0	0				<b>9,023</b>	
10 Exposures in default	0	1,154	124	0				<b>1,278</b>	
11 Exposures associated with particularly high risk	0	0	456	0				<b>456</b>	
12 Covered bonds	0	0	0	0				<b>0</b>	
13 Institutions and corporates with a short-term credit assessment	0	0	0	0				<b>0</b>	
14 Collective investment undertakings	0	0	0	0				<b>0</b>	
15 Equity	0	90	0	34				<b>124</b>	
16 Other items	0	2,176	0	0				<b>3,073</b>	
<b>17 Total</b>	<b>2,807</b>	<b>24,608</b>	<b>625</b>	<b>671</b>				<b>69,140</b>	<b>17,146</b>

\*Counterparty Credit Risk RWAS are not included

## 6 COUNTERPARTY CREDIT RISK

Counterparty Credit Risk (CCR) mainly stems from the OTC derivative and secured interbank transactions, namely repurchase agreements, included in the trading portfolio and the banking book. The main contributor to CCR within NBG Group is the Bank.

The approach for the calculation of the exposure values for CRR depends on the type of transaction. For OTC and exchange-traded derivative transactions, the exposure at default (EAD) is calculated based on the SA-CCR methodology which has replaced both the Mark-to-Market Method (MtMM) and the Standardized Method.

More specifically, the EAD is calculated as the product of an alpha factor – which equals to 1.4 – and the sum of the replacement cost (RC) and the potential future exposure (PFE), i.e.,  $EAD = \alpha * (RC + PFE)$ . The RC reflects the current value adjusted for the effects of net collateral (including independent amounts, thresholds and minimum transfer amounts).

The PFE add-on consists of a multiplier that allows for the partial recognition of excess collateral or negative mark-to-market value for the transactions and an aggregate add-on which is derived from the respective add-ons of each asset class (interest rate, foreign exchange, credit, equity and commodity).

Therefore, the RC is calculated at the netting set level, whereas the PFE add-ons are calculated for each asset class, within a given netting set and then aggregated.

In the case of repurchase agreements, the EAD is calculated in accordance with the financial collateral comprehensive method.

In addition, the GFLRM Division calculates the capital requirements against Credit Valuation Adjustment (CVA) risk. CVA is an adjustment to the fair value of derivative instruments to account for CCR, due to possible changes in the creditworthiness of the counterparty. As per the current regulatory framework, the calculations only pertain to transactions with financial institutions. NBG employs the Standardized approach for the calculation of the respective capital charges, whereas the EADs are calculated in accordance with the SA-CCR framework.

The components of CCR, on a Group level, are shown in the tables below, as of 30 June 2024.

**Table 28:** EU CCR1 - Analysis of CCR exposure by approach (€ mio) 30.06.2024

		Replacement cost (RC)	Potential Future Exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre CRM	Exposure value post CRM	Exposure value	RWEAs
EU1	EU - Original Exposure Method (for derivatives)								
EU2	EU - Simplified SA-CCR (for derivatives)								
1	SA-CCR (for derivatives)	248	332		1.4	2,716	811	778	505
2	IMM (for derivatives and SFTs)								
2a	<i>Of which securities financing transactions netting sets</i>								
2b	<i>Of which derivatives and long settlement transactions netting sets</i>								
2c	<i>Of which from contractual cross-product netting sets</i>								
3	Financial collateral simple method (for SFTs)								
4	Financial collateral comprehensive method (for SFTs)					10	10	10	2
5	VaR for SFTs								
<b>6</b>	<b>Total</b>					<b>2,727</b>	<b>822</b>	<b>788</b>	<b>507</b>

## COUNTERPARTY CREDIT RISK

**Table 28: EU CCR1 - Analysis of CCR exposure by approach (€ mio) 31.12.2023**

		Replacement cost (RC)	Potential Future Exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre CRM	Exposure value post CRM	Exposure value	RWEAs
EU1	EU - Original Exposure Method (for derivatives)								
EU2	EU - Simplified SA-CCR (for derivatives)								
1	SA-CCR (for derivatives)	231	373		1.4	2,959	846	804	555
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)					1,005	105	105	1
5	VaR for SFTs								
<b>6</b>	<b>Total</b>					<b>3,964</b>	<b>950</b>	<b>909</b>	<b>556</b>

**Table 29: EU CCR2 – CVA capital charge (€ mio) 30.06.2024**

		Exposure value	RWEAs
1	Total transactions subject to the advanced method		
2	(i) VaR component (including the 3x multiplier)		
3	(ii) stressed VaR component (including the 3x multiplier)		
4	Transactions subject to the Standardized method	305	226
EU4	Transactions subject to the Alternative Approach (Based on the Original Exposure Method)		
<b>5</b>	<b>Total transactions subject to own funds requirements for CVA risk</b>		

**Table 29: EU CCR2 – CVA capital charge (€ mio) 31.12.2023**

		Exposure value	RWEAs
1	Total transactions subject to the advanced method		
2	(i) VaR component (including the 3x multiplier)		
3	(ii) stressed VaR component (including the 3x multiplier)		
4	Transactions subject to the Standardized method	305	200
EU4	Transactions subject to the Alternative Approach (Based on the Original Exposure Method)		
<b>5</b>	<b>Total transactions subject to own funds requirements for CVA risk</b>	<b>305</b>	<b>200</b>

## COUNTERPARTY CREDIT RISK

Table 30: EU CCR8 – Exposures to CCPs (€ mio) 30.06.2024

	Exposure Value	RWEAs
<b>1</b>	<b>Exposures to QCCPs* (total)</b>	<b>11</b>
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	5
3	(i) OTC derivatives	5
4	(ii) Exchange-traded derivatives	0.1
5	(iii) SFTs	
6	(iv) Netting sets where cross-product netting has been approved	
7	Segregated initial margin	724
8	Non-segregated initial margin	5
9	Prefunded default fund contributions	27
10	Alternative calculation of own funds requirements for exposures	
<b>11</b>	<b>Exposures to non-QCCPs* (total)</b>	
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	
13	(i) OTC derivatives	
14	(ii) Exchange-traded derivatives	
15	(iii) SFTs	
17	Segregated initial margin	
18	Non-segregated initial margin	
19	Prefunded default fund contributions	
20	Unfunded default fund contributions	

\*QCCP: Qyalifying Central Counterparty

Table 30: EU CCR8 – Exposures to CCPs (€ mio) 31.12.2023

	Exposure Value	RWEAs
<b>1</b>	<b>Exposures to QCCPs* (total)</b>	<b>8</b>
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	5
3	(i) OTC derivatives	5
4	(ii) Exchange-traded derivatives	0.1
5	(iii) SFTs	
6	(iv) Netting sets where cross-product netting has been approved	
7	Segregated initial margin	754
8	Non-segregated initial margin	26
9	Prefunded default fund contributions	13
10	Alternative calculation of own funds requirements for exposures	
<b>11</b>	<b>Exposures to non-QCCPs* (total)</b>	
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which	
13	(i) OTC derivatives	
14	(ii) Exchange-traded derivatives	
15	(iii) SFTs	
17	Segregated initial margin	
18	Non-segregated initial margin	
19	Prefunded default fund contributions	
20	Unfunded default fund contributions	

\*QCCP: Qyalifying Central Counterparty



## COUNTERPARTY CREDIT RISK

**Table 31:** EU CCR3 - Standardized approach - CCR exposures by regulatory portfolio and risk (€ mio) 30.06.2024

Exposure classes	Risk Weight											Total	
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others		
1 Central governments or central banks	38												38
2 Regional governments or local authorities													
3 Public sector entities													
4 Multilateral development banks													
5 International organisations													
6 Institutions		267			179	200			9				655
7 Corporates									362				362
8 Retail													
9 Institutions and corporates with a short-term credit assessment													
10 Other items													
<b>11 Total</b>	<b>38</b>	<b>267</b>			<b>179</b>	<b>200</b>			<b>371</b>				<b>1,055</b>

**Table 31:** EU CCR3 - Standardized approach - CCR exposures by regulatory portfolio and risk (€ mio) 31.12.2023

Exposure classes	Risk Weight											Total	
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others		
1 Central governments or central banks	174												174
2 Regional governments or local authorities													
3 Public sector entities													
4 Multilateral development banks													
5 International organisations													
6 Institutions		275			65	255			3				598
7 Corporates									416				416
8 Retail													
9 Institutions and corporates with a short-term credit assessment													
10 Other items													
<b>11 Total</b>	<b>174</b>	<b>275</b>			<b>65</b>	<b>255</b>			<b>419</b>				<b>1,188</b>

## COUNTERPARTY CREDIT RISK

Table 32: EU CCR5 – Composition of collateral for CCR exposures (€ mio) 30.06.2024

Collateral type	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1 Cash – domestic currency		1,764	621	1,189				2
2 Cash – other currencies		355		5				
3 Domestic sovereign debt	9	31						
4 Other sovereign debt			142					
5 Government agency debt								
6 Corporate bonds		4						
7 Equity securities								
10 Other collateral		33						
<b>11 Total</b>	<b>9</b>	<b>2,187</b>	<b>764</b>	<b>1,194</b>				<b>2</b>

Table 32: EU CCR5 – Composition of collateral for CCR exposures (€ mio) 31.12.2023

Collateral type	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
1 Cash – domestic currency		1,829	638	619			2	
2 Cash – other currencies		344		5			0	
3 Domestic sovereign debt		46				900		21
4 Other sovereign debt			158					89
5 Government agency debt								
6 Corporate bonds		4						
7 Equity securities								
10 Other collateral		45						
<b>11 Total</b>		<b>2,269</b>	<b>796</b>	<b>624</b>		<b>902</b>		<b>110</b>

Table 33: EU CCR6 - Credit derivatives exposures (€ mio) 30.06.2024

	Credit derivative hedges		Other credit derivatives
	Protection bought	Protection sold	
<b>Notionals</b>			
Single-name credit default swaps		100	
Index credit default swaps			
Total return swaps			
Credit options			
Other credit derivatives			
<b>Total notionals</b>		<b>100</b>	
<b>Fair values</b>			
Positive fair value (asset)			
Negative fair value (liability)		(5)	

Table 33: EU CCR6 - Credit derivatives exposures (€ mio) 31.12.2023

	Credit derivative hedges		Other credit derivatives
	Protection bought	Protection sold	
<b>Notionals</b>			
Single-name credit default swaps		100	
Index credit default swaps			
Total return swaps			
Credit options			
Other credit derivatives			
<b>Total notionals</b>		<b>100</b>	
<b>Fair values</b>			
Positive fair value (asset)			
Negative fair value (liability)		(3)	

## 7 MARKET RISK

The Bank uses internally developed and implemented market risk models and systems to assess and quantify the portfolio market risk, based on best practice and industry-wide accepted risk metrics. More specifically, the Bank estimates the market risk of its trading and the held to collect and sell (HTCS) portfolios using the Value at Risk (VaR) methodology. In particular, the Bank has adopted the Variance-Covariance (VCV) methodology, with a 99% confidence interval and 1-day holding period.

The VaR calculation process is summarized as follows:

1. Collection of transactional data per type of product;
2. Identification of “risk factors” i.e., variables whose price changes could affect the value of the portfolio. The risk factors relevant to the financial products in the Bank’s portfolio are interest rates, equity indices, foreign exchange rates, commodity prices and their implied volatilities;
3. Collection of market data for instruments/positions valuation;
4. Specification of the confidence interval and the holding period for the VaR calculations at 99% and 1-day, respectively;
5. Estimation of the model’s parameters:
  - o the variance of each risk factor, from which respective volatilities are derived;
  - o the covariance of the risk factors, from which respective correlations are derived;
  - o the beta of stocks;
  - o the volatility for the estimation of equity specific risk.
6. Estimation of the VaR per type of risk (interest rate risk, equity risk, foreign exchange risk, commodity risk);
7. Estimation of Total VaR, taking into consideration the correlation matrix among all risk factors.

The VaR is calculated on a daily basis for the Bank’s trading and held-to-collect-and-sell (HTCS) portfolios, along with the VaR per risk type (interest rate, equity, foreign exchange and commodity risk). The VaR estimates are used internally as a risk management tool, as well as for regulatory purposes. More specifically, the GFLRM Division calculates the VaR of the Bank’s trading and HTCS portfolios, for internal use, using the latest 75 exponentially weighted daily observations to construct the VCV matrices. For regulatory purposes, the calculations apply only on the trading portfolio and the VCV matrices are based on 252, equally weighted, daily observations per risk factor.

Moreover, since the Bank has approval to use an internal model approach (IMA) only for general market risk purposes, the issuer risk and the equity specific risk of the portfolio are excluded from the regulatory VaR calculations. The respective capital requirements are based on the Standardized Approach (SA).

Additionally, the GFLRM Division calculates the stressed VaR (sVaR) of the Bank’s trading portfolio, which is defined as the VaR, where model inputs are calibrated to historical data from a continuous 1-year period of significant financial stress, relevant to the Bank’s portfolio. To identify this 1-year time window of

significant stress, NBG follows a conservative approach, which covers the entire period from the beginning of the financial crisis of 2008. More specifically, VCV matrices dating back to the 3rd of January 2008, are calculated on a monthly basis and the VCV matrix that corresponds to the maximum VaR of NBG’s trading portfolio, over the entire period, is selected. To ensure consistency, at each year-end, the process is repeated for certain days of the last calendar month of the year, and subsequently the identified “stressed VCV matrix” is applied over the next year. Similarly to VaR, NBG calculates sVaR on a daily basis, using a 1-day holding period and 99% confidence level.

For the calculation of the regulatory capital requirements, the VaR/sVaR is scaled up to 10-days via the square-root-of-time rule<sup>2</sup>.

Based on the above, the capital charges for the Bank’s general market risk are calculated as the sum of the following two amounts:

- the maximum of: a) the VaR of the previous day, calculated with a 10-days holding period, b) the average VaR of the last 60-days, using a 10-days holding period and multiplied by a factor (mc), determined by the regulator and varying between three (3) and four (4); plus
- the maximum of: a) the Stressed VaR of the previous day, calculated with a 10-days holding period, b) the average Stressed VaR of the last 60-days, using a 10-days holding period and multiplied by a factor (ms), determined by the regulator and varying between three (3) and four (4).

Finally, the use of internal model is granted only for NBG, therefore the calculation of market risk capital charges for the rest of the Group’s subsidiaries is based on the Standardized Approach.

The components of capital requirements under both the standardized method and the internal model approach for market risk, as of 30th June, 2024, are shown in the tables below.

**Table 34:** EU MR1 – Market risk under the Standardized approach (€ mio) 30.06.2024 and 31.12.2023

	RWAs Q2.24	RWAs Q4.23
<b>Outright products</b>		
1 Interest rate risk (general and specific)	5	5
2 Equity risk (general and specific)	67	59
3 Foreign exchange risk	104	112
4 Commodity risk		
<b>Options</b>		
5 Simplified approach		
6 Delta-plus approach	157	213
7 Scenario approach	2	1
8 <b>Securitisation (specific risk)</b>		
<b>9 Total</b>	<b>335</b>	<b>390</b>

<sup>2</sup> 10-day VaR is obtained by multiplying the 1-day VaR with the square root of 10 (i.e.  $VaR_{10-day} = VaR_{1-day} * \sqrt{10}$ )

## MARKET RISK

Table 36: EU MR2-A – Market risk under the IMA (€ mio) 30.06.2024

	RWAs	Own funds requirements
<b>1 VaR</b> (higher of values a and b)	<b>476</b>	<b>38</b>
(a) Previous day's VaR (VaRt-1)		12
(b) Multiplication factor (mc) x average of previous 60 working days (VaRavg)		38
<b>2 SVaR</b> (higher of values a and b)	<b>882</b>	<b>71</b>
(a) Latest available SVaR (SVaRt-1)		22
(b) Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		71
<b>3 IRC</b> (higher of values a and b)		
(a) Most recent IRC measure		
(b) 12 weeks average IRC measure		
<b>4 Comprehensive risk measure</b> (higher of values a, b and c)		
(a) Most recent risk measure of comprehensive risk measure		
(b) 12 weeks average of comprehensive risk measure		
(c) Comprehensive risk measure Floor		
<b>5 Other</b>		
<b>6 Total</b>	<b>1,358</b>	<b>109</b>

Table 36: EU MR2-A – Market risk under the IMA (€ mio) 31.12.2023

	RWAs	Own funds requirements
<b>1 VaR</b> (higher of values a and b)	<b>524</b>	<b>42</b>
(a) Previous day's VaR (VaRt-1)		13
(b) Multiplication factor (mc) x average of previous 60 working days (VaRavg)		42
<b>2 SVaR</b> (higher of values a and b)	<b>750</b>	<b>60</b>
(a) Latest available SVaR (SVaRt-1)		24
(b) Multiplication factor (ms) x average of previous 60 working days (sVaRavg)		60
<b>3 IRC</b> (higher of values a and b)		
(a) Most recent IRC measure		
(b) 12 weeks average IRC measure		
<b>4 Comprehensive risk measure</b> (higher of values a, b and c)		
(a) Most recent risk measure of comprehensive risk measure		
(b) 12 weeks average of comprehensive risk measure		
(c) Comprehensive risk measure Floor		
<b>5 Other</b>		
<b>6 Total</b>	<b>1,274</b>	<b>102</b>

Table 35: EU MR2-B – RWA flow statements of market risk exposures under the IMA (€ mio) 30.06.2024

	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
<b>1 RWAs as of March 31, 2024</b>	<b>512</b>	<b>859</b>				<b>1,371</b>	<b>110</b>
1a Regulatory adjustment	350	578				928	74
1b RWAs at the previous quarter-end (end of the day)	162	282				443	35
2 Movement in risk levels	(1)	9					
3 Model updates/changes							
4 Methodology and policy							
5 Acquisitions and disposals							
6 Foreign exchange movements							
7 Other	(11)	(14)					
8a RWAs at the end of the reporting period (end of the day)	150	276				427	34
8b Regulatory adjustment	326	605				931	75
<b>8 RWAs as of June 30, 2024</b>	<b>476</b>	<b>882</b>				<b>1,358</b>	<b>109</b>

Table 35: EU MR2-B – RWA flow statements of market risk exposures under the IMA (€ mio) 31.03.2024

	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWAs	Total own funds requirements
<b>1 RWAs as of December 31, 2023</b>	<b>524</b>	<b>750</b>				<b>1274</b>	<b>102</b>
1a Regulatory adjustment	362	448				811	65
1b RWAs at the previous quarter-end (end of the day)	162	301				463	37
2 Movement in risk levels	(6)	(52)					
3 Model updates/changes							
4 Methodology and policy							
5 Acquisitions and disposals							
6 Foreign exchange movements							
7 Other	7	32					
8a RWAs at the end of the reporting period (end of the day)	162	282				443	35
8b Regulatory adjustment	350	578				928	74
<b>8 RWAs as of March 31, 2024</b>	<b>512</b>	<b>859</b>				<b>1,371</b>	<b>110</b>

**MARKET RISK**

During the second quarter of 2024, the Market Risk RWAs, based on the Internal model approach (IMA), remained stable, compared to the respective figure at the end of the previous quarter.

Finally, the Bank’s regulatory VaR/sVaR estimates during the last six months of 2023 are shown in the table below.

**Table 37:** EU MR3 – IMA values for trading portfolios (€ mio) 30.06.2024

VaR (10 day 99%)		
1	Maximum value	16
2	Average value	13
3	Minimum value	11
4	Period end	13
SVaR (10 day 99%)		
5	Maximum value	26
6	Average value	23
7	Minimum value	21
8	Period end	22

**Table 37:** EU MR3 – IMA values for trading portfolios (€ mio) 31.12.2023

VaR (10 day 99%)		
1	Maximum value	16
2	Average value	13
3	Minimum value	10
4	Period end	13
SVaR (10 day 99%)		
5	Maximum value	28
6	Average value	20
7	Minimum value	16
8	Period end	24

## 7.1 Stress testing

The daily VaR refers to “normal” market conditions. Supplementary analysis is, however, necessary for capturing the potential loss that might incur under extreme and unusual conditions in financial markets. Thus, the GFLRM Division conducts stress testing on a weekly basis, through the application of different stress scenarios on the relevant risk factors (interest rates, equity indices, foreign exchange rates). Stress testing is performed on both the Trading and the HTCS portfolios, as well as separately on the positions of the Trading Book.

The scenarios used are shown in the following table:

**Table 38:** Stress test Scenarios

Scenario	Description	0 - 3 months	3 months - 5 years	> 5 years
<b>Interest Rate Risk</b>				
1	Parallel Curve shift	+200 bps.	+200 bps.	+200 bps.
2	Parallel Curve shift	-200 bps.	-200 bps.	-200 bps.
3	Steepening of the curve	0 bps.	+100 bps.	+200 bps.
4	Flattening of the curve	+200 bps.	+100 bps.	0 bps.
<b>Equity Risk</b>				
		-30% for all indices		
<b>Foreign Exchange Risk</b>				
		EUR depreciation by 30%/EUR appreciation by 30%		

Additionally, the following volatility stress test scenarios are defined and the Trading and HTCS portfolios are assessed, on a daily basis:

**Table 39:** Volatility stress test Scenarios

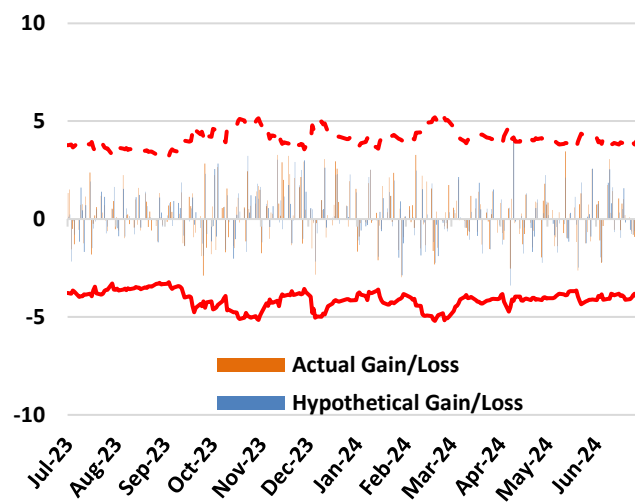
Scenario	Description
1	IR: normal +1bp, lognormal +1%, EQT & FX: +1%
2	IR: normal +5bp, lognormal +5%, EQT & FX: +5%
3	IR: normal +10bp, lognormal +10%, EQT & FX: +10%
4	IR: normal -1bp, lognormal -1%, EQT & FX: -1%
5	IR: normal -5bp, lognormal -5%, EQT & FX: -5%
6	IR: normal -10bp, lognormal -10%, EQT & FX: -10%

## 7.2 Back testing

In order to verify the predictive power of the VaR model used for the calculation of Market Risk capital requirements, the Bank conducts back-testing on a daily basis. In accordance with the guidelines set out in the Capital Requirements Regulation 575/2013, the calculations only refer to the Bank’s trading portfolio and involve the comparison of the hypothetical as well as the actual daily gains/losses of the portfolio, with the respective estimates of the VaR model used for regulatory purposes. The hypothetical gains/losses is the change in the value of the portfolio between days t and t+1, assuming that the portfolio remains constant between the two days. In the same context, the actual gains/losses is the change in the value of the portfolio between days t and t+1, including all the transactions and/or any realized gains/losses that took place in day t+1, excluding fees, commissions and net interest income.

Any excess of the hypothetical/actual losses over the VaR estimate is reported to the regulatory authorities. Moreover, the Board is informed about the total number of excesses, on a monthly basis. During the first semester of 2024, no overshootings in the VaR of the Trading Book were recorded, while the VaR/sVaR multiplier reverted back to its lowest level of 3, since Q2.2024.

**Figure 3:** EU MR4 – Comparison of VaR estimates with gains/losses



## 8 ESG RISKS

### 8.1 ESG Strategy and Governance

#### 8.1.1 NBG ESG Strategy




Environmental, social and governance topics have evolved so fast and so dramatically that they have inevitably become a focal component of banks’ strategic agendas. In this context, banks acknowledge their role in accelerating the transition to a low-carbon world by supporting capital allocation to low-carbon activities, while also financing the transition of businesses and households to more sustainable models. NBG is attuned to this imperative with a heightened sense of responsibility.

NBG applies a holistic approach to ESG, anchoring its ESG strategy in 3 strategic pillars (see table below). The 3 E-S-G pillars are closely aligned with the Bank’s purpose to create a more prosperous and sustainable future, together with its customers, people, and shareholders. To this end, NBG has laid out its ESG strategy in 9 strategic themes

These themes stem from and reflect NBG’s revamped core values, align with selected UN Sustainable Development Goals (“SDGs”), and complement the Bank’s overall business strategy and transformation, as well as its vision to become the undisputed Bank of First Choice in Greece.

The ‘E’ environment-related themes encapsulate NBG’s climate change action, portfolio and own operations decarbonization strategy, all of which the Bank is committed to evolving, detailing, monitoring and adjusting as required, on an on-going basis.

Table 40: ESG Strategic Themes

ESG pillars	ESG strategic themes	ESG commitments	Our core values	UN Sustainable Development Goals (SDGs)
Environment	Lead the market in <b>sustainable energy financing</b>	Lead the development of the <b>renewable energy</b> sector	Responsive Growth catalyst	
		Pioneer <b>sustainable bond issuing</b> in the Greek market		
	Accelerate transition to a <b>sustainable economy</b>	Support <b>green transition</b> of corporates		
		Lead <b>green retail financing &amp; sustainable investments</b>		
	Role-model <b>environmentally responsible practices</b>	Establish a <b>carbon-neutral</b> NBG footprint		
		Protect <b>biodiversity</b> and <b>ecosystem health</b>		
Society	Champion <b>diversity &amp; inclusion</b>	Establish <b>equality</b> in the workplace	Human	
		Promote <b>inclusion</b> in the society		
	Enable <b>public health &amp; well-being</b>	Protect the <b>health and family life</b> of our people		
		Enable <b>public health, well-being</b> and <b>sports</b>		
	Promote <b>Greek heritage, culture &amp; creativity</b>	Lead the preservation of <b>Greek cultural heritage</b>		
		Promote <b>contemporary Greek</b> culture and <b>creativity</b>		
	Foster <b>entrepreneurship &amp; innovation</b>	Foster <b>entrepreneurship</b> and <b>innovation</b>		
		Motivate <b>public contribution</b> to new projects		
Support <b>prosperity through learning &amp; digital literacy</b>	Encourage <b>lifelong learning</b> in and out of the workplace			
	Champion <b>digital literacy</b> across age groups			
Governance	Adhere to the <b>highest governance standards</b>	Ensure <b>best-in-class corporate governance</b>	Trustworthy	
		Ensure <b>transparency in disclosures</b> and <b>reporting</b>		

### 8.1.2 C&E risks and opportunities integrated in NBG's business strategy

At NBG, our Climate and Environment (C&E) priorities, as well as our Net Zero aspirations, make an integral part of our overall Business Strategy and hence of our Budgeting & Business Planning, and are supported by our Transformation Program initiatives. In the area of C&E, NBG's overarching strategic objective is to create value through supporting the country's transition to Net-Zero:

1. Since 2021, when we first articulated our C&E Business Strategy in 3 themes (sustainable energy financing, transition to a sustainable economy, and environmentally responsible practices), we have outlined specific priorities within each theme, the progress of which we measure via selected metrics, thus ensuring that strategy articulation and Business Plan execution are linked to key C&E considerations, both risk- and opportunity-driven.
2. As of October 2023, we have committed to specific net zero emissions targets for 2030, understanding the business context for prioritized high-emitting, high-transition risk sectors / portfolios (Power Generation, Oil & Gas, Cement, Aluminum, CRE, RRE). Specifically, we studied the decarbonization levers per sector/portfolio, preparing the ground for our businesses (Corporate for key sectors, and Retail for mortgages) to support the transition of each sector/portfolio through our credit expansion, and, as part of our Budget & Business Plan 2024-26 process, we also estimated short-term (2026) financed emissions for selected material sectors / portfolios, in line with our 2030 net zero aspirations and commitments (see also 10.1.3, below). True to our commitment, we keep monitoring our progress towards our interim 2030 net zero targets, publishing where we stand in our journey to achieving these in our recent 2023 ESG Report ([nbg-esg-report-2023-en.pdf](#)).
3. C&E risks are being analyzed in terms of impact in the Budget & Business Plan (BP) cycle, and the risk perspective, including a CRO Opinion containing explicit reference to C&E risks, is presented to the Management Bodies ahead of Business Plan approval.
4. Risk Management views are informed by a recently introduced risk identification and materiality assessment (RIMA) process, which feeds into the Group Planning cycle. In the RIMA, both physical and transition Climate risks are covered, with a forward-looking impact approach, distinctly per primary risk type and on aggregate, considering all material business lines/portfolios, regions and distinct time horizons: short, medium and long term. Environmental risks, beyond Climate, are also covered.
5. Moreover, NBG's Risk Appetite has been enhanced to address forward-looking elements directly connected with the C&E Strategy (including quantitative limits/KRIs).

Points 4 and 5 are further analyzed under section [8.2 ESG Risk Management Framework](#), respective subsections 10.2.1 Risk identification and materiality assessment (RIMA) process for C&E risks and 10.2.3 Risk Appetite Framework: ESG Quantitative Statements.

### 8.1.3 C&E objectives reflected in key strategic processes

Year after year NBG is strengthening the connection between Budget & Business Plan, C&E Business Strategy, and C&E risk management, via reflecting the key C&E strategic themes, and the strategic initiatives undertaken for their execution, in businesses' projections for key Business Plan levers, such as credit expansion, OpEx and CapEx. Within these levers, we also include drivers of our Carbon Footprint, both from our own operations and due to our financing and investment activity.

In 2023, NBG made a step-change improvement in its Carbon Footprint measurement. Specifically, NBG measured and disclosed GHG emissions for 2022 for the majority of its loans and investments portfolio, achieving a 94% coverage of PCAF-eligible perimeter (see [NBG ESG Report 2022](#), page 100).

In 2024, we continued monitoring our financed GHG emissions footprint, with full coverage of all eligible for measurement assets in the 2023 measurement of NBG Bank's financed emissions, as shown below:



**Table 41: Overview of NBG’s financed emissions per PCAF asset class, Bank, 2023**

NBG’s financed emissions per PCAF asset class							
PCAF asset class	Exposure (€ mn)	Exposure Measured (€ mn)	Scope 1,2 financed emissions (tCO <sub>2</sub> e)	Scope 3 financed emissions (tCO <sub>2</sub> e)	Total financed emissions (tCO <sub>2</sub> e)	Intensity (tCO <sub>2</sub> e/€ mn) <sup>1</sup>	PCAF data quality score
Business Loans & Unlisted Equities	11,905	11,319	3,535	6,674	10,209	902	3.6
Project Finance	5,486	5,486	1,224	202	1,426	260	2.9
Commercial Real Estate	2,029	2,029	97	0	97	48	4.0
Mortgages	6,920	6,366	191	0	191	30	4.0
Corporate Bonds & Listed Equities	2,193	1,548	407	278	685	443	1.8
Sovereign Debt	14,223	14,106	2,329	1,163	3,492	248	1.0
Motor Vehicle Loans	108	108	4	0	4	38	5.0
<b>PCAF in-scope portfolio</b>	<b>42,863</b>	<b>40,962</b>	<b>7,787</b>	<b>8,318</b>	<b>16,105</b>	<b>393</b>	<b>2.6</b>

1. Intensity as shown here: Scope 1 + 2 + 3 financed emissions over exposure measured.

NBG joined PCAF<sup>3</sup> in October 2023, hence the Bank’s Financed Emissions measurement, as shown above, is using latest available emission factors from PCAF’s database.

In the 2<sup>nd</sup> half of 2023 NBG undertook a major engagement to set science-based net-zero targets in selected (NZBA ‘priority’) sectors and portfolios, and for its own operations. Specifically, NBG defined medium-term (2030) financed emissions targets for 6 sectors / portfolios while at the same time, also committing to net-zero financed emissions in the long-term (2050) through its membership in the NZBA, announced in Nov 2023<sup>4</sup>.

**Table 42: NBG’s financed emissions targets**

Sector	Exposure Measured (€ mn)	Scopes Covered	Unit of measurement	Reference Scenario / Pathway	Baseline Year	Baseline Value	2030 Target	2030 vs. Baseline Delta
Power Generation	1,483	Scope 1, 2	kgCO <sub>2</sub> / MWh	IEA NZE 2050	2022	169	120	-29%
Oil & Gas	1,029	Scope 1, 2	Indexed, tCO <sub>2</sub> of 2021 = 100	IEA NZE 2050	2022	100	70	-30%
Cement	50	Scope 1, 2	tCO <sub>2</sub> / tcementitious	IEA NZE 2050	2022	0.71	0.52	-27%
Aluminium	43	Scope 1, 2	tCO <sub>2</sub> / taluminium	MPP	2022	11.2	3.9	-65%
CRE	1,441	Scope 1, 2	kgCO <sub>2</sub> e/m <sup>2</sup>	CRREM Greek 1.5°C scenario	2022	83	30	-64%
RRE	6,298	Scope 1, 2	kgCO <sub>2</sub> e/m <sup>2</sup>	CRREM Greek 1.5°C scenario	2022	29	16	-45%

As part of the Budget & Business Plan 2024-26, NBG also estimated short-term (2026) financed emissions for selected material sectors / portfolios, in line with the above net zero aspirations and commitments (as above, 8.1.2). At NBG we regard emissions target-setting as a key means to achieving business model resilience, in that, the process followed to define 2030 interim Net-Zero targets, including portfolio analyses and projections, market growth drivers research, and deep-dives into counterparties’ plans to decarbonize, provided us with a good understanding of our own business model’s vulnerability to C&E factors (both risks and opportunities) and a good degree of trust on its resilience. Vice versa, our regular monitoring of progress against these set targets ensures we check, steer, and take timely portfolio alignment actions.

Further details on our short-, medium- and long-term emission reduction targets, plus on progress towards achieving such targets, are provided in NBG’s 2023 ESG report [nbg-esg-report-2022-en.pdf](#) p. 99-108.

### 8.1.4 Responsible Financing

The Bank places special emphasis on approvals of loans that serve to support business activities that will protect the environment. Failure on the borrower’s or the guarantor’s part to comply with the environmental and sanitary legislation may lead to termination of the loan contract by the Bank.

The Bank does not undertake the funding of activities banned by EU regulations, indicatively: trade in protected wild fauna, production and trade of radioactive materials and chemicals that have been banned by international protocols, transportation and release of genetically modified products into the natural environment, etc. Furthermore, the Bank introduced a dedicated C&E exclusion list and an updated sectoral limits’ methodology, aligning its risk appetite accordingly. The

<sup>3</sup> [Financial institutions taking action carbonaccountingfinancials.com](https://www.carbonaccountingfinancials.com)

<sup>4</sup> [National Bank of Greece joins the industry-led, United Nations-convened Net-Zero Banking Alliance | NBG](#)

exclusion list also considers elements beyond climate (e.g., related to the Nature and biodiversity preservation).

NBG continues to assess existing and prospect counterparties' strategies, policies and procedures around climate action, environmental protection -among a list of wider ESG considerations- and counterparties' C&E risk mitigation capabilities. Since Q1.22 an Obligor-level ESG Assessment has been incorporated in the Bank's origination, credit granting and monitoring policies, process and procedures, and since December of 2023 NBG participates in an inter-bank initiative that aims at centralizing this process to the benefit of the companies (bank clients) being assessed, via a single, user-friendly platform facilitating the collection and analysis of Obligor ESG data in a unified and consistent manner for all participating banks<sup>5</sup>.

Albeit being at the early stage of EU Taxonomy adoption, and starting off from a low baseline of Taxonomy alignment (see section 10.1.5 below), NBG has laid down solid foundations in terms of current investment activities and future development potential in activities, which are either EU Taxonomy aligned or, if not, within a wider Sustainable Financing umbrella. Such investments are channeled to RES projects financing, and towards establishing the Bank's position as a pioneer in the green/sustainable energy market, with offerings, partnerships, and ecosystems serving climate and environmental objectives, such as, for example, our strategic partnership with PPC in the market of home energy upgrade financing.

Also, our Sponsorships and CSR activity strives to serve, alongside the S – Social, also our E-Environmental strategic orientation, with NBG committing a significant budget towards environmental objectives, including support to restore storm- or fire-impacted areas, including Thessaly, North Evia, and South Rhodes, and support volunteer firefighting teams for fire prevention.

Lastly, by being the first among domestic peers to issue a Sustainable Bond Framework (SBF), NBG places itself in full readiness to channel proceeds from any upcoming instrument(s) to be issued under this Framework towards financing / investing in a series of Green and Social projects, i.e. in eligible project categories, as these are detailed in the SBF<sup>6</sup>.

### 8.1.5 EU Taxonomy Regulation, Article 8

#### ■ EU Taxonomy Disclosures

The Commission Delegated Regulation (EU) 2021/2178 of 6 July 2021, supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council, specifies the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU, concerning environmentally sustainable economic activities, and states the methodology to comply with that disclosure obligation. More specifically, it establishes the criteria for determining whether an economic activity qualifies as environmentally sustainable and incorporates an obligation that companies subject to the Non-Financial Reporting Directive

("NFRD"), including financial corporations, must disclose how their operations align with the EU Taxonomy.

The Taxonomy Regulation is a key component of the European Commission's action plan to redirect capital flows towards a more sustainable economy. The primary aim of the Taxonomy is to help investors identify environmentally sustainable investments.

As per the Taxonomy Regulation, credit institutions are required to disclose information and relevant KPIs based on the scope of their prudential consolidation. These disclosures should focus on how their financing and investments contribute to environmental objectives, the degree of alignment with the EU Taxonomy, and the significant adverse impacts of investment decisions on sustainability factors. The uniform application of these disclosure standards is intended to enhance transparency, facilitating informed decision-making for investors and users of the Financial Statements.

In particular, starting from January 1st, 2024, credit institutions are required to disclose the Green Asset Ratio ("GAR") KPI and KPIs for off-balance sheet exposures regarding financial guarantees to either financial or non-financial undertakings and assets under management, as per the Delegated act 2021/2178. Additionally, credit institutions should assess their exposures to economic activities related to fossil gas and nuclear energy according to Delegated Regulation 2022/1214.

Following the guidelines prescribed under ESG P3 ITS, information disclosed as part of the Group's disclosures for GAR are fully aligned with the disclosures under Article 8 of the Taxonomy Regulation included in the FY2023 Annual Financial Report based on the turnover alignment of the counterparties to determine the level of Taxonomy alignment.

For more information on Key performance indicators (KPIs) on the Taxonomy-aligned exposures as well as assets for the calculation of GAR please see section [8.3 Quantitative disclosures on Climate change transition and physical Risks and mitigating actions](#).

### 8.1.6 ESG Governance, roles and responsibilities

#### ■ Sustainability oversight at Board level

As per NBG's Corporate Governance Code, the Board is responsible for setting strategy, overseeing management and adequately controlling the Bank, with the ultimate aim of enhancing the long-term value of NBG and upholding the general corporate interest in accordance with the Law.

During 2023 and the first semester of 2024, the Board focused on a number of key areas, including but not limited to the activities described below, taking into account in its discussions and decision-making the interests of its stakeholders.

Indicatively, the Board of Directors:

- continued focusing on sustainable development and strong performance of the Bank, while maintaining high standards in its corporate governance and conduct arrangements;

<sup>5</sup> [ESGr \(esgrportal.gr\)](https://esgrportal.gr)

<sup>6</sup> [National Bank of Greece joins the industry-led, United Nations-convened Net-Zero Banking Alliance | NBG , national-bank-of-greece-spo.pdf \(nbg.gr\)](#)

- initiated extensive governance projects, in collaboration with specialized consultants, including a broad scope covering among others ESG readiness, for which the results highlighted that good progress has been achieved on Board ESG Readiness;
- hosted the Annual Strategy Days Off Site event and extensive Board training programs, including important topics such as European banking trends, ESG Sustainability, Artificial Intelligence, Data Management, Cybersecurity etc.;
- monitored developments in terms of changing conditions, e.g. macroeconomic environment, geopolitical factors, inflationary pressure, and of the successful implementation of the Bank's Business Plan and Budget;
- reviewed and approved the 2024-2026 Business Plan (incl. stress scenarios and highlights of NPE plan and Capital plan), as well as the 2024 Annual Budget which also incorporates the Bank's Climate and Environment Strategy;
- monitored the Bank's initiatives in the context of the Bank's Transformation Program, e.g. for ESG/Sustainability, digitalisation and evolution of systems used, initiatives on Purpose and Values and the Bank's Culture;
- carried out oversight of key risks, including for example, ESG Risks, credit risk, IT/Cyber risk, outsourcing risk;
- reviewed regular/annual submissions, such as ICAAP, ILAAP, Annual Reports to Supervisory Authorities (e.g. Annual Compliance and AML Reports), Pillar III disclosures
- reviewed the Bank's initiatives in the context of the Bank's ESG Strategy and climate risk related initiatives.

Additionally in 2023, the Board of Directors during the Off-Site Strategy Days Meetings, among others, was presented and extensively discussed on strategic topics with respect to ESG and Sustainability.

It is noted that the Board of Directors, places special focus on setting the Bank's ESG Strategy, as well as on the monitoring of the Bank's ESG Initiatives, while further the Board receives regular reporting on ESG related matters, among others, through the Monthly CEO Report to the Board of Directors.

During 2023 and the first semester of 2024, discussions on ESG (C&E) Strategy Implementation Roadmap and on ESG Business Commercialization took place at the Innovation and Sustainability Committee, as well as discussions on Net Zero target-setting follow-up and on Transformation Program initiatives relevant to ESG/Sustainability at the Strategy and Transformation Committee. Additionally, presentations of C&E risk materiality assessment and risk related regulatory developments, ECB Operational Act on C&E Risk Identification and Materiality Assessment and respective implementation of C&E action plan progress update, as well as Scenario Analysis on Fit for 55 EBA Climate Risk and deep dive on C&E Risks, were provided and discussed at the Board Risk Committee. Moreover, presentation of ESG IFRS Reporting Requirements took place at the Audit Committee.

It is also noted that the Board of Directors Suitability Assessment Policy and Procedure stipulates particular provisions for the Board of Directors to collectively possess an appropriate understanding of those areas for which the Members are collectively accountable, and the skills to effectively manage and oversee the Bank, including, among others, ESG aspects.

During 2023 the Board of Directors convened 25 times in total.

The Board has explicitly allocated duties and tasks related to ESG risks among its seven Committees for facilitating the development and implementation of a sound internal ESG governance framework, with a focus on the oversight and management of C&E risks. Within 2023, the Bank further updated the Board Committee Charters, by elaborating more responsibilities relevant to ESG issues.

#### ■ BoD Compliance, Ethics and Culture Committee

The The Compliance, Ethics and Culture Committee assists NBG's Board of Directors in performing its duties among others in respect of enhancing responsible company and management behavior towards sustainable growth and long-term value creation, including considering environmental, climate change and social criteria, and corporate social responsibility, as well as in respect of overseeing the Bank's Corporate Social Responsibility policies.

More specifically its responsibilities include:

- Oversight of Policies the NBG adopts in compliance with the regulatory framework and best practices (incl. policies on ESG and sustainability).
- Interaction with the Innovation & Sustainability Committee, with regard to long-term trends or significant developments esp. on ESG and sustainability.
- Oversight of the Bank's management of compliance risks, including compliance risks stemming from ESG risks (i.e., C&E, ethical breach, social, HR, and reputational risks).
- Oversight of ethical conduct and culture matters, including the fair treatment of customers in terms of products and services, sales processes, transparency of fees, and complaints management.

The Committee convenes regularly, keeps minutes of its proceedings and reports regularly to the Board of Directors.

During 2023, the Compliance, Ethics and Culture Committee convened ten times and its workings included among others:

- Review of compliance reports (such as the Annual Compliance Report, the AML/CFT Annual Report, Annual Transactions Transparency Report submitted to the Bank of Greece, Report over the suitability of measures taken by the Bank as regards safeguarding of financial instruments and client's funds as well as of use of client's financial instruments-MiFID II), report and statistical data on Complaints, whistleblowing reports submitted, briefings on related parties' transactions.
- Oversight of Compliance / AML Strategic Projects.
- Oversight of Ethical Conduct Framework and Bank initiatives on raising awareness on misconduct behaviours (e.g. Whistleblowing training programme, Code of Ethics Monitoring Project).
- Review and approval of policies that fall under its responsibilities.
- Oversight of Compliance Monitoring Programme.
- Update on the Group's outsourcing arrangements and their compliance status (jointly with the BRC).

#### ■ BoD Innovation and Sustainability Committee

The Board Innovation and Sustainability Committee ("BISC"), established in February 2022 following a relevant Board decision, assists NBG's Board of Directors in performing its duties, among others, with respect to developing a sustainable long-term strategy. Specifically, the Committee's mandate includes:

- Continuous monitoring and tracking of important developments and long-term trends related to banking, innovation, IT, ESG and sustainability (incl. on matters pertaining to C&E risks).
- Awareness at Board level of how the banking and broader financial sector landscape is evolving, and updated knowledge of the factors that can affect the the Bank's long-term strategy, its performance and /position in the market and the perception stakeholders may have about the Bank (incl. on ESG and sustainability).
- Out-of-the-box thinking, exploring and incubation of innovative ideas and practices (incl. on ESG and sustainability).

Within this context it may provide feedback to the Compliance, Ethics and Culture and other Committees, for further consideration.

Furthermore, given the nature of its role, the Committee shall receive necessary inputs including by means of consultants/advisors providing information and support as required, indicatively in terms of how international developments and ESG trends may affect or be applied at the Bank. Additionally, the Committee cooperates with Executives having competence over issues relevant to its areas of activity, and any other Executive of the Bank or Group entities, as deemed appropriate in the discharge of its responsibilities. Finally, all Board Committees may be involved in relevant matters depending on the particular topic per case.

The Committee may convene with an estimated quarterly frequency and keeps minutes of its proceedings. During 2023, the Innovation and Sustainability Committee convened three times and its workings included among others the:

- Review of the Bank's ESG Strategy and the respective implementation roadmap.
- Formulation of Proposals/arrangements for Board trainings, including in the areas of ESG (Net Zero Lessons) and Digital.
- Review of the Digital Banking Strategy, as well as of the initiatives regarding the use of Artificial Intelligence and Data Management.
- Update on Digital laws (Digital Operational Resilience – DORA) and on anti-fraud status (incl. phishing laws).

#### Board Risk Committee (BRC)

The Board Risk Committee ("BRC") assists NBG's Board of Directors in performing its duties, among others, with respect to risk management issues, including matters relevant to Non-Performing Exposures (NPEs). The Committee ensures that the Bank adheres to supervisory expectations and follows best practices in managing, monitoring, and mitigating C&E risks, and aligning them with the overall risk management framework. Specifically, the Committee's mandate includes:

- Independent review, challenge, approval and oversight of NBG's overall framework for managing financial and non-financial risks (including C&E risks), as well as effective and efficient risk management at the Bank and the Group level.
- Definition of risk appetite (including risk tolerance and capacity thresholds), and definition and implementation of risk strategy, considering all types of risks (including C&E risks), in line with business strategy, objectives, and culture of the Bank and the Group.

- Effective oversight of risk frameworks, policies, governance and resources for managing, monitoring and mitigating risks the Bank and Group are exposed to (including C&E risks).
- Risk awareness and risk culture are fostered as core components of effective risk management (including with respect to C&E risks).
- Execution of regulatory Stress Tests (including Climate Stress Tests), and the delivery of managerial Stress Tests contributing to the strategy setting, budgeting and business planning processes.

The BRC convenes at least on a monthly basis, as well as extraordinarily, whenever deemed necessary by its Chair. The Committee keeps minutes of its proceedings and reports regularly to the Board of Directors. During 2023, the BRC convened twelve times and its workings included among others the:

- Annual review and update of ICAAP/ILAAP, as well as the update of the ICAAP/Stress Test Frameworks, and the Risk Appetite Framework, including additions in the area of Commercial Real Estate (CRE), Climate and Environment (C&E).
- Enhancements in risk reporting (e.g., disclosure of C&E qualitative and quantitative figures on Pillar III reporting).
- Review/Deep dive on C&E risk materiality assessment, ECB C&E Thematic Review.

#### Other Board Committees with roles and responsibilities relevant to ESG risks

- Strategy & Transformation Committee: reviews and approves NBG's strategic direction, budget and business plan, as well as oversees the planning and implementation of NBG's Transformation Programme initiatives, and other strategic projects and transactions
- Corp. Governance & Nomination Committee: ensures adherence to legal and regulatory requirements on its composition, organization, policies and procedures, as well as facilitates the development and implementation of a sound Group corporate governance framework, in alignment with the regulatory framework and international best practices.
- HR & Remuneration Committee reviews and oversees HR and talent management, performance evaluation, as well as remuneration policy and practices.
- Audit Committee: assists NBG's Board of Directors in performing its duties, among others, with respect to the financial reporting process, the external audit process, the effectiveness of the Internal Control System, and the performance of the Group Internal Audit Function.

#### ESG Management Committee

In addition to the Board of Directors and Board Committees, the Bank monitors its impacts to the environment, society and economy through the ESG Management Committee chaired by the CEO. The ESG Management Committee (one of the key Executive Committees) was established in 2021 to contribute to the governance of multiple aspects of NBG's ESG strategy and risk management, supporting all the key strategic decisions regarding ESG topics.

The members of the ESG Management Committee are as follows:

- Group CEO (*Chair of the Committee*)
- General Manager Retail Banking

- General Manager Group Compliance & Corporate Governance
- General Manager Group Risk Management, Chief Risk Officer (“CRO”)
- General Manager Corporate and Investment Banking
- General Manager Transformation, Business Strategy & International Activities
- General Manager Group Chief Financial Officer (“CFO”)
- General Manager Chief Operations Officer (“COO”)
- General Manager Group Human Resources
- General Manager Group Marketing
- General Manager Group Real Estate.

The purpose of the ESG Management Committee is to foster the Bank’s strategic commitment to sustainable development and corporate responsibility, as well as to ensure the appropriate management of ESG matters, including C&E performance and targets, sustainable finance, health and safety, social issues, CSR, corporate governance, and other sustainability matters. Specifically, the responsibilities of the ESG Management Committee include:

- Ensuring adherence to the relevant regulatory framework for ESG and sustainability (including on matters relevant to the management of C&E risks), taking also into account best practices included in international treaties and initiatives.
- Considering trends and best practices with respect to ESG matters, over and above the legal framework/regulatory expectations.
- Determining the Bank’s overall strategy regarding ESG and sustainability issues (including on matters relevant to the management of C&E risks).
- Overseeing the execution of the Bank’s ESG strategy (including matters relevant to the management of C&E risks).
- Deciding on ESG and sustainability KPIs and targets (including for C&E risks and GHG financed and non-financed emissions).
- Monitoring and assessing performance against ESG and sustainability KPIs and targets (including for C&E risks and GHG financed and non-financed emissions).
- Deciding on the policies, initiatives and actions that result in mitigating and/or reducing the environmental impacts and footprint of the Bank.
- Approving the Bank’s disclosures concerning non-financial information and regular public disclosures regarding ESG (including C&E risks, GHG financed and non-financed emissions, and sustainable finance issues).
- Overseeing internal and external communications with respect to ESG and sustainability issues.

In 2023, the Committee convened five times and its workings, among others, included the:

- Review of the Bank’s ESG Strategy where C&E issues were prioritized.
- Discussion and review regarding NBG’s carbon footprint for 2022 with particular emphasis to financed emissions, which were measured for the first time in 2022.
- Decision on Membership in Partnership for Carbon Accounting Financials (PCAF) and on Commitment to Net Zero Banking Alliance (NZBA).
- Discussion and decision on Financed and Non-Financed Emissions Baseline and Targets.

- Overview and status update regarding the implementation of UNEP FI principles for responsible banking.
- Review and approval of sustainability reports and other non-financial disclosures (ESG report, 2nd UNEP FI PRB Report and Self-Assessment).
- Review and approval of NBG’s Green Bond related issues (overview and approval of NBG’s Sustainable Bond Framework, approval of Green Bond Final Allocation and Impact Report etc.).
- Update regarding ECB’s Thematic Review and other C&E risk-related topics.

The Committee cooperates with other management committees as deemed necessary (e.g., the Stress Test & ICAAP/ILAAP Committee, which oversees activities during the regulatory Stress Test process, reviewing and challenging assumptions and results, and providing guidance on major items that require decision-making during the execution of supervisory Stress Tests, including the 2022 Climate Stress Test).

#### ❖ Organizational changes to further strengthen the governance of NBG’s ESG strategy

The Bank is strongly committed to managing ESG risks, while also addressing related impacts and opportunities, as a strategic priority. This requires an increased focus on availability and capacity in dedicated expert functions, to manage related activities, including the ongoing ESG initiatives that fall under the umbrella of the Bank’s Transformation Programme.

Importantly, NBG has strengthened its capacity and skills with respect to ESG, with the appointment of specific roles and responsibilities within existing organizational units, as well as the establishment of new ESG-related teams.

In December 2023, the Bank proceeded to organizational changes to further strengthen the governance of its ESG strategy and to address the upcoming regulatory requirements more effectively as well as business opportunities and risks.

Two new senior executive roles were introduced within our Strategy and Risk Management functions. Namely the Assistant General Manager (AGM) of Strategy & Sustainability with reporting line to the General Manager of Transformation, Strategy & International Activities and the AGM Group Strategic, ESG & Operational Risk Management with reporting line to the Group CRO, overlooking, inter alia, the C&E, Social strategy and ESG Reporting and the C&E Risk respectively.

In addition, the pre-existing Corporate Social Responsibility & Sustainable Development Division of the Bank and Group, was split into two new Divisions: the Corporate Social Responsibility (“CSR”) & ESG Reporting Division reporting to the AGM of Strategy & Sustainability, and the Data Privacy, Technology & ESG Compliance Advisory Division reporting to the GM Group Compliance & Corporate Governance. By creating separate divisions, the focus on the specific areas of expertise, alongside the clearly defined roles and responsibilities between first and second lines of defence, will lead to increasingly effective and efficient operations in the context of ESG.

#### ■ Climate & Environmental Strategy Sector

The Independent Climate & Environmental Strategy Sector, was set up in December 2022 to strengthen NBG’s ESG Governance and the shaping and execution of the Bank and Group’s ESG Strategy across the first line businesses units and functions, including, among others, CIB, Retail Banking, Real Estate,

Procurement, HR, Marketing, Finance, and IT. To serve its mission, the Sector bears responsibility to:

- Actively support the Bank and Group’s Management in shaping NBG’s climate and environmental strategy, as well as enabling and monitoring its execution.
- Co-ordinate involved 1st line of defence units in identifying, articulating, road-mapping, and carrying out specific initiatives pertaining to Climate & Environmental target-setting and implementation actions to achieve the Bank’s C&E targets.
- Enhance and deepen the awareness on how NBG impacts and is impacted by the environmental and climate change, and on NBG’s institutional role in promoting the transition of its customers and own operations to more sustainable models.
- Develop, enhance, and safeguard methodologies and tools used for measuring and monitoring C&E KPIs, relevant to the 1st line of defence activity, while also measuring carbon footprint related metrics and other C&E KPIs.
- Calculate the Bank’s and the Group’s financed and non-financed emissions, while monitoring the Bank’s and the Group’s progress towards any targets set, including the NZBA targets, by, inter alia, developing and monitoring transitions plans per target category sector.
- Contribute to EU taxonomy and sustainable finance strategy, implementation and classification.
- Provide input, in cooperation with the 1st and 2nd line of defence Units, to internal management reports, to external disclosures, as well as to ESG Raters and investors.

### 8.1.7 NBG Governance on C&E risks: 3LoD model

The Bank has assigned the responsibility for the management of climate related and environmental risks throughout its organizational structure, cascading down through the 3 lines of defense and has simultaneously established new Committees (BoD Innovation and Sustainability Committee and ESG Management Committee) and new organizational changes, as described above in section 8.1.6, to further enhance management and oversight of C&E risks and ESG matters overall.

- The Group CRO is accountable for the supervision of C&E risks and closely collaborates with the GM Transformation, Strategy & International Activities and the GM Group Compliance & Corporate Governance on all major C&E topics.
- The Group Chief Credit Officer and Credit Divisions ensure incorporation of ESG assessments within lending policies & processes.
- The Group Strategic Risk Management Division has been assigned the role to exercise a holistic view on C&E risk management activities, being the central C&E reference point within the Risk Management function, and the primary liaison between Risk Management and Business Strategy stakeholders for ESG matters, with a main focus on C&E risks. It aims to align C&E risk management processes involving the different Risk Management Divisions and experts across risk types (including the execution of C&E Stress Testing). This is aligned with NBG’s Enterprise Risk Management (ERM) concept, which is also applicable for

the C&E risk area. A dedicated C&E Risk Management sub-division has been established within the Division to oversee and coordinate the ESG-related risk management activities and provide a holistic view of such risks, across primary risk types.

- C&E risks are integrated in the existing risk identification, measurement, and assessment processes per primary risk type, therefore each Risk Management Division (Credit Risk, Market & Liquidity Risk, Operational Risk, Strategic Risk):
  - measures, manages and mitigates C&E risks/drivers and their impact on the existing financial & non-financial risk types;
  - incorporates C&E risks/drivers in their internal frameworks, policies, procedures and reporting

**Table 43: ESG Governance - Three Lines of Defence**

<b>1st LoD</b>	<ul style="list-style-type: none"> <li>◦ <b>Transformation &amp; Strategy:</b> Coordination and support of involved 1<sup>st</sup> Line units in the development and execution of C&amp;E strategy through C&amp;E Strategy Sector and new Corporate Social Responsibility &amp; ESG Reporting Division ; key cross-functional efforts included in ESG workstream of NBG’s Transformation Program.</li> <li>◦ <b>Business Units (Corporate &amp; Investment Banking, Retail Banking):</b> Risk-taking and management of C&amp;E risks (incl. sustainable financing, origination strategies to reduce financed emissions).</li> <li>◦ <b>Other 1<sup>st</sup> Line Functions (Real Estate, Finance/Procurement, IT/Operations, HR, etc.):</b> Support/enableness of management of C&amp;E risks (incl. actions to reduce greenhouse emissions).</li> </ul>
<b>2nd LoD – Risk</b>	<ul style="list-style-type: none"> <li>◦ <b>Risk Functions:</b> Identification, assessment, measurement, monitoring and reporting of C&amp;E risks within the Bank’s risk management framework. Strategic Risk Management Division has been assigned the role to exercise a holistic overview on C&amp;E risk content, supported in terms of coordination by the Risk Culture &amp; Risk PMO Division.</li> </ul>
<b>2nd LoD – Compliance</b>	<ul style="list-style-type: none"> <li>◦ <b>Compliance &amp; Corporate Governance:</b> Identification of legal framework/regulatory expectations with respect to C&amp;E matters, provision of advice and appropriate guidance to Banks’ units to ensure relevant compliance risks are duly managed, and updating of Management Body on measures to be taken to ensure compliance, through the new Data Privacy, Technology &amp; ESG Compliance Advisory Division</li> </ul>
<b>3rd LoD</b>	<ul style="list-style-type: none"> <li>◦ <b>Internal Audit:</b> Assessment of Bank’s capacity and capability to manage C&amp;E risks through relevant Audit diagnostics and reviews.</li> </ul>

framework and implements enhancements as needed.

The above setup is supported in terms of coordination by the Risk Culture & Risk PMO Unit.

### 8.1.8 ESG Internal Framework (Policies, Codes and Procedures)

NBG constantly seeks to ensure that its contribution substantially and positively impacts the country and its people, always looking ahead to the next day of Greek society. The Bank aims to create positive economic and social impacts for its

Stakeholders and more broadly for the economies and societies where it operates, through its activities (i.e the provision of financing, products and services), its role as an employer, as well as with the deployment of its Corporate Social Responsibility ("CSR") actions.

NBG ensures ethical factors are properly embedded when conducting business. In this context we adhere to several policies and internal procedures by incorporating the applicable Greek and EU legal and regulatory framework and best practices into the Group's operation.

The Bank's Board of Directors is responsible for the approval of the Bank's policies and strategies and the supervision of their application, including the Sustainability Policy and our ESG strategy.

Other than the NBG's Corporate Governance Key Policies (e.g. Group Governance Policy, Board Evaluation Policy, Board Suitability Policy, Board Diversity Policy, Board Nomination Policy, BoD & Senior Managers Remuneration Policy etc.) the key policies and procedures that support our responsible banking practices and mitigate social, governance and reputational risks categorized to the following areas of responsibility:

- **Responsible behavior and respect of human rights** (e.g. Code of Ethics, policies for the prevention of conflict of interest, Whistleblowing Policy, Group policy against Violence and Harassment at Work, Group Internal Violence and Harassment Complaints Management Policy).
- **Combating financial crime** (e.g. Anti-Bribery and Anti-Corruption Policy, Anti-fraud Policy, Policies for combating money laundering and terrorist financing issues, Policy on Donations, Sponsorships, Charity Contributions and other Actions of the Group).
- **Acting with responsibility towards customers** (e.g. Group Complaints Handling Policy Customer protection & Marketing practices, Policies for the proper provision of Investment and Insurance Services).
- **Responsible approach for the protection of personal data and data security.**

More information regarding our policies and responsible practices can be found on the Group and Bank Annual Financial Report 31 December 2023, (Corporate Governance Statement and Non-Financial Statement) and on Chapter 4 & 5 of our ESG Report 2023.

Further analysis on selected significant policies and procedures for the management and mitigation of social, governance and reputational risks is provided below:

#### **NBG Group Sustainability Policy**

As of 2021 the new NBG Sustainability Policy has been approved by the Board of Directors and the Audit Committee, as per the provisions of the applicable legal framework, who reviewed and opined on the Sustainability Policy as part of their Report to Shareholders.

NBG Group Sustainability Policy is publicly available on its website and is also communicated to its employees through various environmental awareness announcements through NBG's internet/intranet.

Fully aware of the significance of our role in contributing to sustainable development, the purpose of the Sustainability Policy is to set the framework for the development of actions that assist in the management of economic, environmental, social,

and governance impacts of the Bank and the Group of Companies and mainly lead in:

- 1 Reducing and, where possible, offsetting our environmental impacts (including those related to climate change), as such arises from the financing of our customers' activities, as well as from the operation of NBG itself (including energy consumption of buildings);  
Generating long-term value for our Stakeholders, the economy at large and the communities where all our Group companies operate in Greece and abroad;  
Undertaking initiatives and innovative actions in the fields of Corporate Governance, Corporate Social Responsibility and Business Ethics, in addition to ensuring compliance with the current legal and regulatory framework for these issues, thereby contributing to our vision of making NBG the Bank of First Choice;  
Protecting the reputation and reliability of the Group and the cultivation / strengthening of our renewed value system.

#### **ESG in Loan Origination**

In response to ECB's Climate & Environmental Guide expectations and as part of executing its short-term action plan included in the Thematic Review exercise, NBG has already effectuated enhancements in its lending policies and processes, incorporating the assessment of E, S and G risks of its corporate borrowers. This ESG risk assessment, in which climate and environmental factors are a prominent component, of the "E" part, is performed via an ESG Obligor Assessment questionnaire at the stage of loan origination. The corporate obligor is required to submit responses (qualitative and quantitative), which are fed into respective models (tailored to size and sector), and yield a standardized ESG risk vulnerability outcome, that is co-evaluated together with transaction-specific attributes (in line with the TSC of the 2 first Environmental Goals of the EU Taxonomy, as reflected in NBG's Sustainable Lending Criteria Framework), at the stage of credit assessment.

Social risk is currently not assessed in isolation; instead, social factors are being evaluated together with climate and environmental and governance-related ones in the process (and with the tools) of the ESG Obligor Assessment, taking place at loan origination and credit assessment.

NBG includes a description of the enhancements effectuated in its lending policies and processes, incorporating the assessment of social risk of its corporate borrowers (e.g., existence and validity of Human Rights policy, existence and validity of Health & Safety policy and/or management system e.g., ISO, OHSAS, and/or zero-accidents rule, complaints management process & system, activities' impact on local communities, non-compliance regarding social matters), performed via an ESG Obligor Assessment questionnaire at loan origination. The identification and quantification of social risk is -technically- an area not as advanced as climate and environmental risk, therefore with relatively large room for different interpretations and weighing (as it is not standardized with respective 'technical screening'-type criteria or ways to depict and stratify the risk across portfolios, business lines, sectors, as is done for example via the financed emissions metric for transition risk). Hence, lacking currently a solid measurable baseline, the setting of specific targets and limits in the conventional sense, as well as of objectives adhering to such targets and monitoring thereof, is not something the Bank is pursuing explicitly at the moment.

Given that the definition and the quantification of social factors and risks impact has not yet matured, any further updates/enhancements to the business strategy, financial planning, and risk management practices with respect to social factors and related risks will be duly added and included in the upcoming disclosures.

Finally, via the ‘G’ part of Obligor Assessment, Governance risks are assessed (e.g. Regulatory Compliance, Transparency, Business Ethics, Remuneration, etc.)

In cases where increased ESG risk vulnerability is identified, NBG requires from its clients to submit relevant action plans and monitors those as part of the credit monitoring process. So far, we are not looping the collective outcome of these assessments back to adjust the Bank's business strategy, in a mechanic/automated way. Rather, we address it on a client by client basis, while we keep collecting such data and information to enhance our database, with the aim to evaluate it holistically in due course. (Please also see section 10.2.4 Incorporation of ESG in the Credit Granting and Monitoring Process).

Moreover, as a standard practice, NBG conducts evaluation of its service providers on ESG issues, such as human/employee rights, work health and safety, social equality/solidarity, child labor etc. These principles and expectations on the part of NBG apply to any kind of employment relationship, as well as to any third party collaborating with the Bank or a Group company, either within the context of providing on-going services or specific project work.

#### ■ Remuneration Policy: Alignment with ESG objectives

In line with regulatory provisions and supervisory expectations, the NBG Group Remuneration Policy is designed with particular attention to avoiding incentive elements (especially in terms of variable compensation) that may induce behaviors not aligned with the Bank's aim for achieving sustainable business results or inconsistent with its risk appetite.

Specifically, variable remuneration is supported by the annual Performance Management System (PMS) process assuring consistency and clarity of relevant performance objectives, including environmental (and climate-related), social and governance (ESG) objectives, as well as broader behavioral expectations aligned with business strategy, culture and values.

The PMS incorporates ESG criteria, and starting from 2021, specific ESG-related targets and Key Performance Indicators (KPIs) have been established for the Top Management, including the CEO and Senior Executives. Each year, the ESG-related targets and KPIs are further strengthened and refined, becoming more specific and comprehensive.

#### ■ Other ESG related policies and procedures

##### ❖ Code of Ethics

The Code of Ethics sets out clearly the ethical moral principles and values, as well as the rules of conduct upheld by the Bank and Group. To this end, the Bank, is aware of its responsibility to respect human rights, meaning avoiding infringing human rights of others and addressing such impacts where they occur and shows zero tolerance to forced and child labor. In this context, the Bank and Group companies express their commitment to observe and promote values such as integrity, accountability, honesty, transparency, trust, equality and high ethical standards in all operations.

The Bank highly appreciates the importance of ethics and ethical behavior. Therefore, the relevant issues are escalated to Board of Directors level. Specifically, as it is described in the charter of the Board Compliance, Ethics & Culture Committee, its purpose is to assist the Board of Directors in performing its duties in respect of enhancing the internal ethics culture and business integrity, by:

- ensuring that the highest standards of ethics and integrity are applied throughout all of the activities of the Bank in accordance with international best practice; and
- overseeing senior management's efforts to foster a culture of ethics and compliance within the Bank and the Group, to enhance the internal ethics culture and business integrity and to discourage unethical behavior.

##### ❖ NBG Group Policy against Violence and Harassment at Work

The development of a working environment that respects, guarantees and promotes the right of every person to work without violence and harassment is a commitment and priority for the Group of Companies of the National Bank of Greece. In this context, the purpose of this new Policy is to establish a specific framework for the prevention and control of all forms of violence and harassment that occurs, whether related to or arising from work, including gender-based violence and harassment, as well as sexual harassment. It is noted that the Policy is in accordance with the provisions of the International Labor Convention No. 190 for the elimination of violence and harassment in the world of work, which was ratified by Article 1 of Greek Law 4808/2021, as well as the provisions of articles 2 et seq. of Greek Law 4808/2021.

##### ❖ NBG Group Internal Violence and Harassment Complaints Management Policy

To the same direction, and in order to best implement the Group's commitment to tackling and – ultimately – eliminating violence and harassment in the workplace, the Bank implements the Internal Violence and Harassment Complaints Management Policy, which provides guidance on the credible reporting of an incident or incidents of violence and harassment at work. In general, the Bank encourages all those involved in the scope of the Policy to report any form of violence and harassment that occurs during, or is associated with, the work, including violence and harassment due to gender and sexual harassment as soon as it comes to their notice. These reports can be made anonymously or signed through the established whistleblowing channels.

Accordingly, the Bank is committed, both through the Policy and through its other procedures, to ensure the complete confidentiality and protection of the complainant. All complaints will be taken seriously and investigated with full objectivity and independence. The Bank assures that those who make complaints will be protected from retaliation, and that the personal data of all parties involved will be protected through the implementation of the necessary technical and organizational security measures.

##### ❖ Health and Safety

Health and safety in the workplace and preventing any associated risks remain a priority both for the Bank and the Group companies, ensuring a safe working environment, enhancing the quality of employees' work experience, as well as



ensuring the servicing of our customers and other stakeholders of the Bank and the Group without disruption.

In this context, the Bank conducts regular inspections to ensure the appropriateness and adequacy of the existing standards of health and safety in the workplace, ensures appropriate training and consultation with employees on such issues, while it has also prepared emergency plans aimed at preventing occupational hazards and supporting employees in cases of violent incidents (robberies and verbal/physical abuse).

The Bank, in implementation of Greek Law 3850/2010, puts into effect its Regulation for the Protection of the Health and Safety of NBG employees and informs them with every means at its disposal in order to eliminate the risks related to their health and safety. The Bank's Health and Safety Framework (e.g., regulations, procedures and measures) covers all the staff who have an employment relationship with the Bank, as well as all of its facilities.

Regarding hygiene and safety issues the Bank has set up the Health and Safety Committee, comprising elected employee representatives, as well as a representative from the Bank, and convenes on a quarterly basis.

In this context, each employee has the right to express their concerns about the safety of a task and has the right to refuse tasks considered unsafe. There is also an available mechanism for employees to submit relevant complaints. Complaints can be either unofficial (submitted orally) or official (submitted via e-mail, through the Bank's complaints platform). The detailed process is described in the relevant Complaints Management Policy.

Furthermore, the Bank assesses the occupational risks through scheduled visits of Occupational Physicians and Safety Technicians provided by an external specialist. It is noted that the Bank has a documented Occupational Risk Assessment for all its buildings.

The Bank has also developed a Safety Regulation which determines the roles, responsibilities and actions/procedures of the Bank's officers involved in the prevention and handling of fire, emergencies and natural disasters.

#### ❖ Responsible supply chain management

NBG maintains the strategic option to outsource some of its operations/functions/activities (partially or fully) to Service Providers and/or to provide products and services through third parties. Such cases are ruled by the provisions of its Outsourcing Policy and the relevant Outsourcing Procedures. The Outsourcing Policy, defines and specifies the involvement of the Bank's Units, in all stages of the life cycle of outsourcing agreements, from the design of outsourcing agreements, their implementation, monitoring and management, documentation and other issues. Through the adoption and implementation of the Outsourcing Policy, NBG among others:

- Complies with the relevant legal and regulatory framework.
- Achieves more efficient and effective management of outsourced activities.
- Achieves more efficient and effective identification, assessment and management of risks deriving from and connected to its outsourced activities (third party vendors outsourcing arrangements).
- Applies efficient and effective controls and enables immediate initiation of risk mitigating actions.

- Establishes and maintains outsourcing risk awareness, identifying significant relevant risk exposures within the Group.

The Outsourcing Policy, among other controls, has enacted a dedicated questionnaire for the evaluation of ESG risks of Service Providers/Third Parties, and relevant assessments are being carried out.

#### ❖ Outsourcing procedures

Standing by its longstanding commitment to responsible operations, NBG has adopted policies, regulations and processes which are given formal substance in relevant Codes of Conduct ensuring transparency and impartiality as well as avoidance of conflicts of interest in its supplies and implementation of technical projects. NBG uses a Suppliers Relationship Management System (SRM-SAP), which facilitates cooperation with its suppliers across most of the business sectors.

Pursuant to the institutional framework, all parties involved in procurement and technical projects must be aware of and conform with the Bank's and the Group's Code of Ethics, which also applies to purchasing and technical projects. The Bank reviews and evaluates its suppliers (in terms of quality, certifications, respect for human/employee rights, etc.) on an ongoing basis Regular sample qualitative and quantitative controls are carried out for every order and delivery of goods/equipment, etc. In 2023, there were no confirmed incidents where contracts with business partners were terminated or not renewed due to violations related to corruption. All prospective suppliers are under the obligation to comply with Corporate Social Responsibility requirements (documenting compliance by sending relevant supporting material), as these are stipulated in the relevant EU Directives, on issues such as:

- Environmental protection.
- Child labour.
- Work health and safety.
- Social equality/solidarity.

All NBG suppliers resulting from tender procedures comply with this obligation. Based on the above, it is estimated that c. 97% of the suppliers, associated with the Bank, have been assessed with regard to environmental criteria as well. Furthermore, the Bank within 2023:

1. has developed a supplier bribery risk assessment through a specially designed questionnaire, where the Bank assesses the bribery/corruption risk its Third Parties may pose to the Bank; and
2. has updated NBG Group's Outsourcing Policy where among others enacts the ESG questionnaire for the Service Providers/ third parties.

NBG Complaints Handling Policy of the Bank and the Group, To manage effectively customer complaints, the Bank has introduced the Complaints Handling Policy of the Bank and the Group which sets out the key rules and principles that govern the handling of complaints in respect of products and services provided. Furthermore, the specialized Client Conduct Sector of the Group Business Regulatory Compliance and Client Conduct Division, operates as the Complaints Handling Function aiming at the implementation of the Complaints Handling Policy, ensuring the investigation of complaints which are submitted either directly by the Bank's customers or by other bodies /

Supervisory and other Authorities, in an impartial manner, as well as their resolution by minimizing any potential conflicts of interests and within the deadlines, according to the provisions of the current regulatory framework..

Given the importance of the appropriate handling of complaints the Bank has established a reporting line at Board level. In this context the Compliance, Ethics and Culture Committee of the Board of Directors shall:

- A. be responsible for monitoring on an ongoing basis the implementation of the Policy and the processes established within its context,
- B. evaluate on a regular basis the adequacy and the effectiveness of the Policy and be responsible for submitting any recommendations to the Bank's Board of Directors for its review, upon proposal of the Group Business Regulatory Compliance and Client Conduct Division, whenever required, depending on any changes in the legal and regulatory framework,
- C. proceed to further assessment of the analysis of the information deriving from complaints handling, especially regarding significant risks associated with or arising from the complaints handling, and take the measures or corrective actions required, following relevant recommendation by the Group Business Regulatory Compliance and Client Conduct Division.

#### ❖ Complaints regarding the environment

The Bank always makes every possible effort to comply with the relevant regulations and the applicable legislation. However, during 2023, the Bank received, 3 complaints regarding the environmental impact, and all were settled within the year. The respective complaints concerned the following issues: condition of external areas/facades of branches, repair of damages and air quality/cleaning inside the Branches. In this context, the Bank completed all the appropriate measures.

In 2023, the Bank has not identified any non-compliance with environmental laws and/or regulations, and no fines were imposed on the Bank regarding the environment.

#### ❖ Customer protection & Marketing practices

In its endeavor to remain fully compliant on an ongoing basis with its legal and regulatory requirements, the Bank

places special emphasis on the provision of accurate information to customers and ensures, through its staff and procedures, transparency and objectivity. The Bank follows specific control procedures, prior to the implementation of any informational/promotional activities concerning existing and/or new products and/or services, which provide the necessary information to customers. In this context, during 2023 all the Bank's promotional and advertising activities, were reviewed by the Compliance Function and the Bank's Legal Function, in terms of their content, presentation, and recipients, according to the legal and regulatory framework regarding consumer protection, transaction transparency and personal data protection.

Moreover, the Bank ensured that its communications and promotional material are consistent with the provisions of the applicable legislative and regulatory framework, and particularly the Hellenic Code of Advertising-Communications, and the provisions on unfair competition.

With a view to coordinating the actions required to promote the Bank's corporate identity, the Bank has established the Strategic Communication Committee. The Committee's duties include the approval of programs regarding the promotion of the Bank's corporate image, products and services, as well as the evaluation of proposals for the best development of the Bank's website and alternative channels as a means of marketing its products and services.

#### ❖ Combating bribery and issues related to corruption

The Bank's activities entail exposure to corruption and bribery phenomena, which if not appropriately and timely managed, they may present a significant risk for the Bank, and could adversely affect its financial results, with a serious impact on the Bank and its subsidiaries' reputation, as well as on the further development of its activities, while at the same time they could cause adverse effects on the interests of its clients, shareholders and employees.

In this context, preventive control mechanisms are applied so as to safeguard against any potential risk of bribery and corruption to which the Bank may be exposed in the course of its business/operations. To that end, the Bank's anti-bribery program consists of various essential components, such as anti-bribery and anti-corruption risk assessments, policies and procedures, tone from the top, financial and non-financial controls, raising concerns, management information and periodic reporting, and records' keeping.

This approach is reflected in the Codes and Policies that the Bank has adopted, on the controls embedded within the procedures followed in the Bank's day-to-day operations and on the monitoring and audit processes applied.

The Bank has in place procedures and internal controls which serve to mitigate potential risk and ensure that the Bank is compliant with laws and regulations, which in the event of non-compliance could have a material effect on the Financial Statements. The effective operation of these procedures and internal controls are independently monitored by the various Risk and Control Functions and audited periodically by the Group Internal Audit Function, while the Audit Committee of the Bank's Board of Directors and the Board of Directors through its committees are duly and timely informed through reporting on internal controls, as well as any issues/deficiencies/findings classified as F3 or F4 by the various Risk and Control Functions.

Additionally, in accordance with particular requirements within the applicable regulatory framework (Bank of Greece Governor's Act 2577/2006) imposes in this respect, external auditors review and assess the effectiveness of the Bank's Internal Control System on a three-year basis. In June 2022 the Bank obtained the assessment performed by the external auditor for the period 2019-2021 with no significant findings.

A set of Codes and Policies which the Board of Directors has approved include several measures against the risk of bribery and corruption. Indicatively, such measures are incorporated in the NBG Group Code of Ethics, the Code of Ethics for Financial Professionals, the Anti-Fraud Policy, the Conflicts of Interest Policy and the Anti-Bribery Policy. Furthermore, process level controls are in place for the timely prevention or detection of fraud risks. Such control types include clearly defined approval / authorization levels, verifications, physical controls, reconciliation controls, controls over information used in the control and controls with a review element. The nature of

controls in place are a mix of automated, semi-automated or manual.

At a further level, the Whistleblowing Policy in force, provides for the existence of appropriate communication channels enabling the submission of whistle-blowers' reports, both in case these may come from within the Bank as well as in case such reports are being submitted by third-parties.

The Board of Directors is committed to prevent bribery and corruption and promotes the establishment of a culture against them, according to which any form of bribery and corruption is non-acceptable, while it is responsible for approving the relevant Policies, as well as overseeing its implementation and periodic assessment.

Further, mandatory learning programs on the NBG Group's applicable Code of Ethics, which, focuses, among others, on bribery, corruption issues, and Whistleblowing Policy, as well as an e-learning program dedicated to the Whistleblowing Policy, are provided to all employees of the Bank, and all personnel has access to the internal e-communication network of the Bank (intranet), through which they are able to get prompt and full information on all key matters regarding Group's developments and operations, including internal communication announcements, internal circulars, policies that the Bank has in place etc.

In this context, with the Bank laying great emphasis on ensuring that the highest standards on ethics and integrity are applied throughout all of its activities in accordance with international best practices, the Bank has established the Compliance, Ethics and Culture Committee of the Board of Directors.

Lastly, the Group Compliance and Corporate Governance Functions were certified with the international standard ISO 37001:2016 (Anti-bribery management systems) for the antibribery management systems in line with the above standard.

With a view to the Bank's full compliance with the current legal and regulatory framework, as well as international best practices and guidelines regarding the combating of corruption and bribery, and considering that these phenomena are very common in international business transactions and undermine the effective corporate governance of the companies, the Bank has in place the following arrangements, Policies and Codes:

- NBG Group Code of Ethics
- NBG Code of Ethics for Financial Professionals;
- NBG Group Anti-Bribery and Anti-Porruption Policy;
- NBG Group Whistleblowing Policy;
- NBG Group Anti-Fraud Policy;
- Policy for avoiding Conflicts of Interest for Board Members, senior executives and other related parties of NBG;
- Policy for Connected Borrowers
- NBG Group AML/CFT Policy, which incorporates New Customers Acceptance Policy;
- NBG Group AML/CFT Policy on Cross-border correspondent banking relationships;
- NBG Group Sanctions Policy;
- NBG Group Policy for Virtual Assets.

#### ❖ Personal Data Management Policy

NBG recognizes and attaches particular importance to the obligation of both the Bank and its Group companies to comply with the applicable legislative and regulatory framework, in

general, on the protection of natural persons to the processing of personal data. The Bank and its Group companies collect and manage specific information, which concerns their employees, shareholders, customers with whom they maintain any kind of business relationship, persons with whom they maintain a customer relationship, and third parties in the context of any relationship other than those mentioned above. This information, which contains personal data, is managed in a lawful manner, regardless of the means of collection or storage, ensuring compliance with the current legislative and regulatory framework and the provisions for confidentiality.

In view of the above, NBG has adopted the "Personal Data Management Policy", which has been revised according to the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

The Personal Data Management Policy:

- is binding on the Bank and the Group companies
- is binding on all members of the Board of Directors, senior executives, employees of the Bank and the Group companies, and in general all persons employed in the Group either by employment contract or otherwise (including Management Advisors, Special Associates, Staff of companies associated with the Bank or the Group companies);
- is binding on all third parties that provide services to the Group or in the name and on behalf of the Group (including partners, intermediaries, agents and any other persons who cooperate with the Group under outsourcing agreements or otherwise);
- covers all activities of the Group in Greece and abroad, including all operations carried out by any Bank Unit, by a subsidiary or an associated Company, agent, advisor or third party acting on behalf of or in collaboration with the Group;
- covers all forms of processing that are carried out in the context of servicing the operations of the Bank and the Group companies and relate to the maintenance of either physical or electronic data.

#### ❖ Responsible approach to tax

- The effective collection of taxes is a key component of an orderly, well-governed state operation, with the fair allocation of the tax burden being one of the state's principal contributions to society. The NBG Group is subject to income tax, which is paid duly and on time. The NBG Group's primary principles regarding tax compliance are to:
  - handle tax issues in accordance with best international practices, guidelines (including OECD Transfer Pricing Guidelines) and EU legislation (EU Directives);
  - act under transparency;
  - render taxes in a responsible and effective manner;
  - maintain good cooperative relations with the Tax Authorities based on the principles of transparency and mutual trust;
  - adopt safe handling on tax matters, in particular by avoiding abusive tax planning, by rejecting transactions which have no economic or commercial substance;
  - avoid the creation of non-transparent corporate organizational structures;

- do not promote or even encourage tax avoidance, both for their own transactions and for those of their customers;
- do not provide tax advice to their customers.

❖ **Policy on Donations, Sponsorships, Charity Contributions and other Actions of the Group**

The NBG Group has developed and implemented, since May 2016, Policy on Donations, Sponsorships, Charity Contributions and other Actions of the Group. This Policy aims, among others, at setting specific principles and rules concerning actions related to donations, sponsorships, charitable contributions, scholarships and other related activities in the context of this Policy, at ensuring high level of ethics on donations, complying with the applicable legal and regulatory framework regarding actions that fall into the scope of this policy (e.g., transparency), as well as adopting procedures that promote transparency in NBG Group's donations.

According to the Policy, the NBG Group shall not undertake and / or participate in actions to support political organizations, parties or movements. The Bank does not make grants and donations to political parties and does not offer contributions or other facilities to public office candidates or political parties or other political bodies. This Policy applies in parallel, complements and is complemented by the provisions set out in other Group Policies, such as the Conflict of Interest Policy for Senior Executives and the Anti-Bribery Policy.

Furthermore, in accordance with international best practices related to donations, sponsorships and other related actions and in compliance with the provisions of Article 6 of Greek Law 4374/2016 regarding transparency in the relationships between banks and media companies and sponsored persons, the Bank discloses information on all payments made within the relevant fiscal year, to media companies and sponsored persons.

## 8.2 ESG Risk Management Framework

Acknowledging the importance and potential impact of ESG risks, and in particular C&E risks, NBG has proceeded with the identification and materiality assessment of such risks and their incorporation in the overall Risk Management Framework of NBG, and is committed to continuously monitor, assess and manage the particular risks.

Specifically, NBG has implemented the following actions:

- Incorporated ESG risks in its Risk Taxonomy Framework and Risk Identification processes, by recognizing them as transversal risks and considering them as drivers of existing types of financial and non-financial risks.
- Incorporated ESG risks/drivers in its Risk Management Framework and implemented enhancements per primary risk area, as follows:
  - Developed the methodological approach to identify C&E risks and assess their materiality by:
    - Performing a distinct mapping of C&E risk drivers and transmission channels, to existing risk types;
    - Considering the impact of environmental risk, beyond climate;
    - Incorporating forward-looking assessments.
  - Enhanced ESG related risk metrics in the Risk Appetite Framework with the inclusion of 5 (five) metrics with

**Table 44:** C&E Risks Identification

C&E-related risk type	Definition
Physical	Refers to the financial impact due to acute events or chronic patterns deriving from climate change and environmental degradation.
Transition	Refers to the financial or reputational impact that can result, directly or indirectly, from the process of adjustment towards a lower-carbon and more environmentally sustainable economy.

threshold and 8 (eight) KRIs for monitoring purposes, considering also forward-looking aspects, in connection with Net Zero targets and C&E strategy.

- Enhanced the incorporation of ESG risks in Credit Risk Management Framework. In summary NBG:
  - Introduced a dedicated C&E exclusion list and an updated sectoral limits' methodology, aligning its risk appetite accordingly. The exclusion list also considers elements beyond climate (e.g., related to the Nature and biodiversity preservation).
  - Thoroughly analysed and approved specific policy actions connected with the ESG credit risk assessment and classification.
  - Performed a prototype deep-dive analysis to incorporate C&E risks in Credit Rating.
  - Enhanced the risk pricing framework for the incorporation of C&E risks.
  - Reviewed its collateral policies to improve C&E risk

mitigation measures, taking into account the most recent C&E Risk identification and materiality assessment (hereinafter referred to also as "RIMA").

- The outcome of C&E stress scenario analysis has been considered for capital assessment in ICAAP.
- Aligned the Operational Risk Taxonomy (2022) and all other Operational Risk Programmes with the inclusion of ESG risks based on the requirements set by the competent authorities.
- Aligned the Strategic/Business Risk Taxonomy (2022) with the inclusion of ESG risks (including reputational impacts from strategic risk perspective). Furthermore, during 2023, NBG:
  - Introduced a dedicated C&E RIMA process and informed the ICAAP cycle
  - Enhanced C&E risk scenario analysis, stress testing and forward-looking quantification capabilities; in accordance with market leading practices, NBG has implemented an advanced climate stress testing methodology in order to assess transition and physical risks in different horizons, upgrading its integrated forecasting and stress testing platform.
- Initiated actions in relation to combined C&E risk data, analytics and monitoring setup, aiming to enhance the C&E risk monitoring capabilities and regular reporting processes.

### 8.2.1 Risk identification and materiality assessment (RIMA) process for C&E risks

#### Key principles and definitions

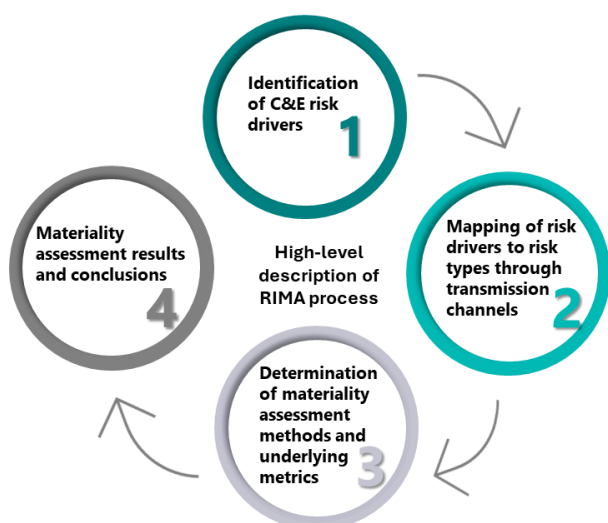
The materiality assessment follows the guidelines of the Task Force on Climate-related Financial Disclosures (TCFD) and the United Nations Environmental Programme Finance Initiative (UNEP-FI).

Taking into consideration the respective regulatory guidance, C&E risks are defined as:

#### Risk identification and materiality assessment (RIMA)

process for C&E risks NBG acknowledges the risk materiality assessment as an essential process towards informed decision-making and setting out the strategic priorities with regards to Sustainability, as integral part of the overall Group Strategy. The ownership of C&E RIMA process lies within the Group Risk Management function. Due to the multidisciplinary nature of C&E risks the process involves the contribution of a variety of internal stakeholders from all three lines of defence with expertise on C&E risks.

- **High-level definition:** The Group follows a four-step approach with regards to the identification and materiality assessment of C&E which is aligned with widely followed market practices.



**Figure 4:** Identification and materiality assessment of C&E risks

**Step1: Identification of C&E risk drivers:**

The Group recognizes that the systematic identification of the relevant risk drivers with regards to the C&E risks is a matter of vital importance for sound risk management and decision-making. The identification of primary C&E risk drivers takes into account their degree of relevance with a set of factors specific to Group including its business model and overall business strategy, risk profile, as well as, sectoral and geographical concentrations of its portfolio.

The C&E risk drivers identification process relies on a variety of internal and external sources of information.

From an external perspective the Group relies on scientific literature, supervisory expectations and relevant regulatory guidance, climate scenarios developed by industry leading bodies such as the Network for Greening the Financial System (“NGFS”), data from global multi-regional databases such as the ENCORE (Exploring Natural Capital

Opportunities, Risks and Exposure) tool, as well as, publications from internationally renowned organizations. These external inputs are used to develop a well-informed understanding of relevant C&E risk drivers and assessment of ways (i.e. transmission channels) that could affect the risks the Group is exposed to.

On the basis of the aforementioned sources of information and factors, the Group has identified as primary drivers of C&E risks the following non-exhaustive list.

**❖ Transition risk**

In accordance with the scientific literature and regulatory guidance the Group acknowledges that transition risks are inherently associated with uncertain financial and/or reputational impacts that could result from transition to a low-carbon economy, including policy changes, new legislations, technological breakthroughs and shifts in market preferences and norms.

- **Policy and legal:** Policy actions relating to climate change aim either to constrain activities that contribute to the adverse effects of climate change or to promote the adaptation to climate change. For example, the introduction of carbon-pricing mechanisms in order to reduce GHG emissions, the shift of energy use toward lower emission sources, the promotion of energy-efficiency solutions,

water efficiency measures, and more sustainable land-use practices. The risk and the financial impact of policy changes depend on the nature and timing of the policy change. Litigation or legal risk in relation to transition refer to potential failure to mitigate impacts of climate change, or failure to adapt to climate change, and the insufficiency of disclosure around material financial risks.

- **Technological developments:** The ability to implement technological improvements or innovations that support the transition to a lower-carbon and energy-efficient economic system may have significant financial impact, to the extent that new technology displaces old systems and disrupts parts of the existing economic system. For example, the development and use of emerging technologies (such as renewable energy, battery storage, energy efficiency, carbon capture and storage) may affect the operating costs of enterprises, the demand for their products and services from end users, and ultimately their competitiveness. The timing of technology development and deployment is a key uncertainty in assessing the technology risk.
- **Market sentiment:** Climate change may trigger shifts in supply and demand for certain commodities, products and services, as climate-related risks and opportunities are increasingly taken into account. The ways in which markets could be affected by climate change are complex and may entail, among others, reputational aspects, connected to changing customer or investors’ perceptions of an organization’s contribution to or detraction from the transition to a lower-carbon economy.

**❖ Physical Risks**

Physical Risks are defined as risks which arise from the physical effects of climate change and environmental degradation and may have financial implications, such as direct damage to assets and indirect impacts from supply chain disruption and implications in entities’ financial performance. They are categorized either as **acute** -if they arise from climate and weather-related events, or **chronic** -if they arise from progressive shifts in climate and weather patterns or a gradual loss of ecosystem services.

**Table 45:** Primary drivers of C&E risks

C&E Risks		Risk drivers
Climate-related risks	Transition risks	Policy & Legal
		Technological developments
		Market Sentiment
	Physical risks	Acute weather events
Chronic changes to weather patterns		
Environmental risks <small>(Biodiversity loss and environmental degradation)</small>	Nature-related dependencies	Natural disasters
		Systemic risks
		Health risks
	Nature-related impacts	Policy & Legal
		Market Sentiment

**❖ Environmental Risks**

NBG has expanded its RIMA process beyond climate risks, to also consider risks stemming from biodiversity loss and environmental degradation. NBG acknowledges that such risks may affect the Bank due to the nature-related dependencies and

impacts of its financed activities and performs its assessment for both the above. Specifically:

- Dependencies of economic sectors on environment, either directly or via supply chains, may lead to financial risk if disruptions of essential ecosystems (i.e. for clients' activities) occur. For example, falling crop yields stemming from decline in pollinating insects or from degradation of agricultural land.
- Impacts that economic sectors have on nature may lead to financial risk if they are unable to comply with measures taken to protect the environment.

In addition to the above, the Bank monitors scientific developments and continuously assesses the relevance of additional risk drivers to its risk profile and strategy. As scientific perspectives on potential risk drivers mature, and as reliable data become available, NBG will further enhance the environmental risk management approach and methodologies, for risk factors beyond climate.

### **Step 2: Mapping of risk drivers to risk types through transmission channels**

Acknowledging the importance of risks stemming from C&E factors, as well as in alignment with the regulatory expectations regarding a robust RIMA process, the Bank has developed a bottom-up process with regards to the mapping of risk drivers and transmission channels to primary risk types (Credit Risk, Market Risk, Liquidity Risk, Operational Risk, Strategic/Business Risk).

The mapping refers to the internal process established by the Bank for the interconnection among C&E-related risk drivers, transmission channels (i.e., the pathways through which the impacts of these risks are transmitted or spread throughout various sectors of the economy and society) and risk types in order to assess both potential financial and non-financial impacts that may arise for the Group, such as losses due to credit quality deterioration, loss of market share and customer trust, litigation/liability e.tc.

The materiality assessment is tailored to the Group's business model and risk profile, and it is performed in order to obtain a holistic and well-documented view of the impact of C&E-related risks on existing risk types that might affect the Bank or the business environment in which it operates, and therefore its strategic and business decision making.

The mapping of risk drivers to risk type is depicted in the following table:

Table 46: Mapping of risk drivers to risk types

Risk	Risk Driver	Transmission channels	Affected Primary Risk Types	Description and Potential Impact(s)
Climate Transition risk	Policy & Legal	Policy changes & associated rising cost of legal and regulatory compliance / Non-compliance with the C&E regulatory framework & related fines	Credit Risk	The risk of deteriorating clients' creditworthiness as a result of late adoption or non-adherence to regulations (i.e., declining profitability/losses due to higher carbon price, fines, value of the property), resulting in credit losses for the Bank. In the longer term, credit risk may be influenced by business realignment of borrowers to comply with evolving regulations or/and reassessment of the Bank's portfolio to align with regulatory goals over an extended period.
			Strategic/ Business Risk	The risk that policy- and/or regulation-driven changes in business practices may impact the Bank's ability to execute its budget/business plan. Indirect financial impact and loss of business may also result from reputational impact, due to impairment of the competitiveness and brand value. In the longer term, strategic risk may be influenced by strategic realignment in response to evolving regulations (e.g. shifting financing away from carbon-intensive industries towards sustainable projects) and/or reassessment of the portfolio to align with long-term regulatory goals.
			Operational Risk	The risk that fines are imposed to the Bank due to breaches of environmental requirements or failures in producing climate related disclosures as required/ expected by the regulator. Indirect financial impact may also result from the adverse publicity and reputational damage that stem from such events. The legal risk to the Group due to litigation associated with clients affected by the transition process.
			Market Risk	The risk that abrupt regulatory changes affect investor perceptions and lead to short-term market volatility. In the longer term, market risk can be impacted from business realignment of industries in response to evolving regulations, affecting stock valuations and market dynamics or/and by reassessment of industries in terms of regulatory goals, affecting long-term stock valuations.
			Liquidity Risk	The risk that Bank's liquidity position faces an adverse impact due to a potential value deterioration of liquid assets and/or impact on deposits.
	Technological Developments	Increased costs for the substitution of existing products & services or low energy efficiency properties	Credit Risk	The risk of deteriorating clients' creditworthiness, either operating in non-green industries (e.g., due to increased costs or inability to transition their business by applying new technologies), or possessing low energy efficiency properties/collaterals, resulting in credit losses for the Bank. In the longer term, the shift towards innovative technologies and potential restructuring of borrowers' technological infrastructure may affect their operational and financial performance, leading to potential credit losses for the Bank.
			Strategic/ Business Risk	The risk that increased investment cost due to adoption of technological solutions to address new (sustainable) product offerings, as well as enhanced digital tools to ensure monitoring and reporting based on climate-related parameters, may impact the Bank's profitability. In the longer term, strategic risks may arise from failure to develop appropriate partnerships and/or restructure the Bank's technological infrastructure. Such risks may lead to impact on profitability through increased investment costs and/or operating cost, as well as to reputational impacts.
			Market Risk	The risk that in the longer term, the integration of sustainable technologies or/and shift towards innovative technologies, influence the competitiveness of industries and stock performance.
	Market Sentiment	Stakeholders (investors, consumers e.tc.) seeking sustainable products and services	Credit Risk	The risk that the clients of the Bank might experience loss of business and lack of trust, and therefore declining revenues and profits, due to late or no transition to sustainable products and services, resulting in credit losses for the Bank. In the longer term, credit risk may be influenced by borrowers' commercial realignment and/or the reassessment of the Bank's market position or evolving sustainable financing criteria.
			Strategic/ Business Risk	The risk that the Bank's potential association with industries facing climate-related controversies compromise its competitive position and ability to increase its planned market share/profitability targets. In the longer term, financial and reputational implications could be triggered due to the sustainability profile of borrowers affecting the Bank's achievement of its medium-term financed emissions targets. A potential failure to meet long-term climate targets can erode brand value, impacting the overall strategic standing in the market. Also, sustainability of the Bank's long-term market position might include increased costs for a comprehensive branding strategy, while also potential failure to evaluate other actions timely, such as partnerships with green technology companies, could affect the Bank's competitiveness.
			Market Risk	The risk that shifts in consumer sentiment, lead to impact on demand for certain products or industries and to market fluctuations. In the longer term, market risk may be impacted by business realignment based on changing consumer preferences or/and by reassessment of the Bank's market position and integration of sustainable practices, impacting market demand, financial performance, investor confidence and stock values.
			Liquidity Risk	The risk that the Bank's liquidity position faces an adverse impact due to a potential value deterioration of liquid assets and/or impact on deposits.



Table 55: Mapping of Risk drivers to Risk Type (continued)

Risk	Risk Driver	Transmission channels	Affected Primary Risk Types	Description and Potential Impact(s)
Climate Physical risks	Acute weather events	Damage to property and assets in high-risk locations	Credit Risk	The risk that the clients' ability to repay their obligations is diminished or the value of their properties/premises is reduced due to acute climate events (e.g., wildfires or floods leading to loss of business and/or increased cost of repair), resulting in credit losses for the Bank.
			Operational Risk	The risk of damage to the Bank's properties and/or business disruptions from inaccessibility to premises and/or electricity or telecommunication outages due to acute climate events (e.g., wildfires, floods) may result in incurred expenses, e.g. cost of repairs or replacement, for the Bank.
			Liquidity Risk	The risk that the Bank's liquidity position faces an adverse impact due to a potential value deterioration of liquid assets and/or impact on deposits.
	Chronic changes to weather patterns	Increased costs to address damages or losses caused by climatic incidents	Credit Risk	The risk that increased costs for the clients that face structural deterioration due to climate change in the geographical location of their business operations (corporate) and value of property (retail), might affect their creditworthiness, resulting in credit losses for the Bank.
Environmental risk (Biodiversity loss and environmental degradation)	Nature-related dependencies	- Increased costs to address damages or losses caused by environmental degradation or increases in raw material prices or destruction of physical capital or due to relocation of activities.	Credit Risk	The risk that increased costs, for the clients that face disruption in their business operations and/or production processes (directly or via supply chain), due to environmental degradation and biodiversity loss, might affect their creditworthiness, resulting in credit losses for the Bank.
			Strategic/Business Risk	The risk that the clients experience declining revenues and profits, due to disruption in their business operations and/or production processes (directly or via supply chain), resulting in financial impact for the Bank through decrease in profitability and core income generating capacity.
	Nature-related impacts	- Increased operating and/or research and/or development costs. - Relocation and adjustments of activities and of business model. - Stranded assets - Loss of market share and pressure on prices. - Market sentiment	Credit Risk	The risk of deteriorating clients' creditworthiness as a result of late adoption or non-adherence to regulations (i.e. specific restrictions for products, declining profitability/losses due to lower demand, fines), resulting in credit losses for the Bank.
			Strategic/Business Risk	The risk of experiencing adverse impacts as a result of regulations (i.e., declining profitability/losses due to lower demand, specific restrictions for products, value of the property being diminished), resulting in financial impact for the Bank through decrease in profitability and core income generating capacity and/or reputational impact attributed to adverse market sentiment.

**Step 3: Determination of materiality assessment methods and underlying metrics**

The materiality assessment process established by the Group for C&E risks ensures that the potential impacts identified through the mapping of C&E risk drivers and transmission channels, are assessed qualitatively and/or quantitatively through the use of relevant metrics, as part of the C&E Risk Materiality Assessment process.

The methodology and approach implemented is developed per risk type and involves:

❖ **Credit risk & Strategic/Business risk:**

- **Climate Transition risk:**

The Corporate portfolio is assessed through concentration analysis of exposures in sectors classified as bearing elevated transition risk, considering sectors' contribution to NBG's GHG emissions' intensity and total Financed emissions. The core income reliance on the aforementioned sectors is, also, assessed. The analysis is conducted before any active portfolio diversification actions are taken (inherent risk).

It is noted that NBG has no exposures towards the top-20 carbon intensive firms globally.

The Retail portfolio is assessed through concentration analysis of exposures and core income reliance on exposures, according to the EPC classification of the underlying collaterals.

- **Climate Physical risk:**

The Physical Risk Materiality analysis is performed at sectoral and/or geographical level considering the nature of physical hazards and the portfolios under assessment.

In this context, the Bank has laid down a methodology based on sensitivity and exposure analysis, to derive vulnerability to physical risk factors.

The vulnerability assessment is aligned with the Invest EU methodology ("Technical guidance on the climate proofing of infrastructure in the period 2021-2027") and with the ECB expectations ("ECB: Good practices for climate related and environmental risk management: Observations from the 2022 Thematic Review").

The analysis addresses the:

- Corporate portfolio, decomposed per NACE (General Industrial Classification of Economic Activities within the European Communities) sector (22 NACE codes) at country level (Greece): the process follows a three-step approach, comprising of (1) a sensitivity analysis, (2) an assessment of the exposure, and (3) a combination of

the two for the conclusion of the vulnerability assessment. The methodology is further analysed in Section 8.3.

- Collateralized portfolio, secured with RRE and CRE properties at regional level for the 4 (four) climate zones in Greece: Properties were mapped to Climate Zones (A, B, C, D) according to their postcode. NBG has developed a methodological approach to estimate the vulnerability of real estate properties to all physical climate risks (sea level rise, soil & coastal erosion; wildfire; cyclone/hurricane/typhoon/storm/tornado; floods), and to selected risks which are more relevant to buildings considering their type, taking into consideration their maximum value per climate zone. Concluding the analysis, each climate zone has been assigned with a vulnerability score.

- **Environmental Risk** (incl. Biodiversity loss and environmental degradation):

#### **Environmental Impact analysis:**

NBG conducted the Environmental Impact analysis, exploring in detail the potential contribution of the financed economic activities to risk drivers of Nature loss, for 11 Environmental risk impact drivers individually (e.g. GHG emissions, Water pollutants, Soil pollutants etc.); these correspond to 5 (five) categories of overarching nature related issues (e.g. Climate change, Pollution etc.). The process employs the ENCORE tool, which sets out how the economy – sectors, subsectors and production processes – depends and impacts on nature.

In this context, the Corporate portfolio is assessed through concentration analysis of exposures to economic activity segments which have a potentially High or Very High contribution to at least one of the 11 examined Environmental risk impact drivers, as well as, through the core income reliance on the aforementioned economic activity segments.

#### **Environmental Dependency analysis:**

Further to the Impact analysis, NBG conducted the Environmental dependency analysis, investigating the potential dependencies of its financed economic activities on the ecosystem services, for 21 ecosystem services individually (e.g. Surface and Ground water, Soil quality etc.). The Corporate portfolio is assessed through concentration analysis of exposures to economic activity segments which have a potentially High or Very High dependency on at least one of the 21 examined ecosystem services, as well as, through the core income reliance on the aforementioned economic activity segments.

- ❖ **Reputational impact (Strategic/Business risk):**

NBG considers ESG factors as drivers of Strategic/Business risk, acknowledging that a potential misalignment of its strategic plans to market practices and expectations (positioning risk), as well as potential failure to meet major C&E-related expectations (execution risk) may adversely affect the sustainability of its Business model. The reputational impact has been assessed qualitatively, based on the identified transmission channels of the C&E risk drivers in the short, medium and long term (mainly related to policies/regulations and market sentiment).

- ❖ **Market risk:**

Concentration analysis of the Bank's Trading book in sectors classified as bearing elevated transition risk, considering sectors' contribution to NBG's GHG emissions' intensity and total Financed emissions, has been performed to assess the materiality of climate transition risk under Market risk perspective.

- ❖ **Liquidity risk:**

The assessment of C&E risks is performed in the context of the ILAAP exercise through a liquidity buffer and funding profile analysis. C&E in liquidity risk is linked with physical risks due to extreme weather events that could adversely impact liquidity. Transition risks are due to Net Zero emission policies, and how these could impact the Bank's liquidity.

- ❖ **Operational risk:**

A scenario related to climate change and environmental sustainability risks has been developed to assess the C&E risk. Impact assessed includes damages to premises, equipment and/or monetary content, cost of repairs or replacement, business disruption due to inaccessibility to premises and/or due to electricity or telecommunication outages, loss/injury of employees and/or customers and respective compensations, decrease in labor productivity, deterioration of working conditions, environmental restitution costs, fines and lawsuits due to breaches of environmental requirements, adverse publicity and reputational damage (Operational risk perspective).

#### **Forward – looking perspective (based on Scenario Analysis)**

The Bank has incorporated a forward-looking perspective into its materiality assessment of C&E risks, focusing on the Corporate and the Real Estate portfolios.

The incorporated forward-looking climate scenario analysis used to quantify the financial impact of transition and physical risks through the core credit risk metrics, considering both macroeconomic and climate variables. The assessment covers a combination of different time horizons: short (up to 3Y), medium (up to 2030) and long-term (up to 2050), in alignment with NBG's strategy setting approach. Specifically:

- For **Transition risk**, the impact is captured leveraging on the results of the NGFS Orderly and Disorderly scenarios; with the key risk drivers per scenario being the following:
  - **Orderly scenario:** Transition measures (e.g. carbon taxes) are introduced early, i.e. before 2030, to prevent a temperature increase. Moderate disruptions to economic activities are assumed, and companies reduce most emissions by 2040.
  - **Disorderly scenario:** The implementation of climate policies to prevent temperature increase is late (not introduced until 2030), leading to economic disruption affecting business. The emissions reduction needs to be sharper, hence higher carbon taxes are assumed. Companies reduce emissions later, mostly by 2050.
- For **Physical risk**, the combination of physical climate events is being captured through the NGFS scenario of **Hot House World (HHW)**, with the key risk drivers being the absence of additional policy actions against climate

change/risks, leading to higher temperatures and extreme weather events which trigger sharp sectoral financial shocks and physical assets’ devaluation.

In order to quantify the financial impact of Corporate portfolio, the analysis takes into account the potential future impact of scenarios’ assumptions on each sector, considering, among others, counterparty specific information (e.g., emission intensity, transition plans, financials etc), transmission channels such as demand destruction and creation, carbon taxes and physical risk impact and other dynamic factors, e.g. passthrough of additional carbon costs to consumers. Following a bottom up approach, the impact of climate risk drivers is converted into stress on the core credit risk metrics of NBG’s counterparties, such as Probability of Default (PD) and Loss Given Default (LGD), using also sector-level impact information from a climate data-vendor.

For Real Estate portfolios, the real estate value shocks, assumed under the scenarios, are the key transmission channels for climate risk, which are linked with the underlying Energy Performance Certificate labels, i.e. collaterals with better performance are expected to be impacted less by possible climate policies or by global warming. In addition, a key driver of physical risk is also the location of collateral.

**Step 4: Materiality assessment results and conclusions**

The outcome of the C&E materiality assessment performed, both for the current state and the forward-looking perspective, is presented on an aggregated level per risk type, in the table below. Overall, the quantified forward-looking assessment indicated that:

- C&E Transition risks are material in all horizons (short-, medium- and long-term), largely in relation to the GHG emissions, which is a component relevant to both Climate

risk impacts, as well as to the Environmental risks where NBG is primarily exposed (Climate change related issues).

- C&E Physical risks are material in the short-term, considering acute Climate risk drivers (floods, wildfires), while in the medium- and long-term, the material impacts are connected to chronic factors related to both climate change and environmental degradation (heat and water stress, also affecting ecosystem services where the Bank’s portfolio is highly dependent, such as climate regulation and water supply). There is strong interconnection between the risk drivers and the financial impacts, viewed from the climate and the environmental physical risk perspectives.

**Table 47: High level outcome of the C&E-related RIMA process**

C&E Risk type		Primary Risk Type	Result
Climate Risk	Transition	Credit Risk	Material
		Strategic/Business Risk	Material
		Market Risk	Not Material
		Liquidity Risk	Not Material
	Physical	Credit Risk	Material
		Strategic/Business Risk	Material
		Market Risk	Not Material
		Liquidity Risk	Not Material
Operational Risk	Operational Risk	Not Material	
	Operational Risk	Not Material	
	Operational Risk	Not Material	
	Operational Risk	Not Material	
Environmental risk (Biodiversity loss and environmental degradation)	Dependency analysis	Credit Risk	Material
		Strategic/Business Risk	Material
	Impact analysis	Credit Risk	Material
		Strategic/Business Risk	Material

## 8.2.2 C&E Mitigating Actions

The Risk Materiality assessment is conducted on a gross risk principle (inherent risk basis). The RIMA outcome and conclusions inform responsible stakeholders and are utilized in decision-making and key processes of NBG, both strategic and operational, in a way that C&E risk awareness is promoted, management actions are prioritized and set in place to efficiently manage the material C&E risks identified, towards minimizing the residual C&E risk impacts on NBG's Business Model and operations.

Such actions involve all levels of management and are implemented across the three Lines of Defense. Actions address both the downside risks (aiming to minimize the impact of significant risk sources) and the opportunities (aiming to promote Sustainability objectives, hence maximize positive impacts which offset the adverse effects of C&E risks).

More specifically, the outcomes and conclusions of the C&E RIMA inform on:

- The (existing) risk types which are materially affected by C&E risk drivers.
- The main regions/geographies which are mostly relevant, in terms of materiality, for the Group's overall C&E risk profile.
- The way that C&E risk factors may affect the main portfolios/business lines, where the Business Model is materially relying on.
- The main economic activities (sectors) which are likely more vulnerable to C&E risk factors, at present and with a forward-looking perspective.
- The time horizons where such risk impacts are likely to be manifested and the sizing of the estimated impact, relative to NBG's size and operations.
- The assumptions used, otherwise describing the conditions, under which the various C&E risk implications may be amplified or mitigated.

On these grounds, the effective management of C&E risks in NBG involves:

- **Strategy definition elements:** formulating clearly defined strategic goals and priorities relating to C&E objectives, as an integral part of the overall Strategy and internal target setting. This involves:
  - Setting strategic goals in relation to NBG's C&E profile, focusing as a priority on the carbon footprint ambition (own and financed GHG emissions); the measurement and assessment of current state of financed emissions being followed by forward-looking targets and KPIs, being part of the strategic plan.
  - Sustainability financing initiatives.
  - Introduction of exclusion policies.
  - Definition of risk appetite thresholds (limits, credit appetite statement).
  - Consideration of Risk management views ahead of strategy approval, involving forward-looking scenario analysis.
  - Consideration of investment needs in connection with C&E considerations (technology and resources planning, infrastructure changes etc.).
  - Monitoring of the business, regulatory and financial environment, in relation to developments connected to

C&E risk transmission channels, for timely identification of strategy modifications and/or enhancements.

- **Strategy execution enablers:** pursuing the implementation of strategic objectives, and timely intervention for corrective actions. Execution enablers are supported through NBG's Transformation Programme (implementation of strategically important projects, with impact across functions/business lines), execution of tactical projects and amendments of standard policies and procedures (regular operations). This includes:
  - Arrangements for regular monitoring and reporting of KPIs within the 1st line of defence (LoD); this involves multi-level activities, quantitative and qualitative (measurement of performance against financial targets, operational targets, inclusion in remuneration schemes).
  - Independent control, monitoring and reporting from the Risk Management perspective, employing financial and non-financial KRIs and risk analytics, addressing holistically the C&E risks across primary risk types.
  - Continuous enhancement of Credit granting processes in relation to C&E set of assessment criteria (within a broader ESG context), at obligor and transaction level.
  - Introduction of pricing arrangements, supporting the C&E objectives' achievement.
  - Introduction of enhanced sophistication in the overall operational framework to address C&E risk classification requirements, primarily with reference to the EU Taxonomy framework and sustainable financing criteria; examination of technical, governance and resources' elements to enable an efficient and effective internal mechanism, with sufficient level of controls.
  - Design and commercialization of products and services promoting sustainability targets for material lines of business.
  - Inclusion of C&E elements in the collateral policies and relevant valuation processes; specific provisions relating to energy efficiency and insurance policies, grounded on the indications of the C&E RIMA on the secured portfolios (both in terms of transition and physical risk components).
  - Active participation in domestic and international initiatives, groups and tasks forces, to leverage and contribute to the maturity of the financial sector (in terms of data availability and quality, methodologies, disclosures, knowledge development and building expertise).
  - Enhancement of technologies and HR training expertise, both in relation to risk control functions as well as risk taking units, focusing on material risk areas.
- **Governance arrangements:** Strengthening NBG's ESG governance structure to enable the promotion of the long-term sustainability principles and protect stakeholder's interests.
- **Transparency and disclosure initiatives:** Communicating Net Zero (NZ) Targets for 2030 and adhering to relevant disclosure requirements.

### 8.2.3 Incorporation of ESG in Credit Granting and Monitoring Process

The Bank has incorporated the assessment of ESG Risks in its credit-granting and monitoring process for the corporate portfolio since 2022. In this context, documentation and tools have been developed and are used by the corporate underwriters in order to assess and classify obligors in terms of ESG related risks.

Overall, the ESG assessment consists of two pillars, the ESG Obligor assessment and the ESG Facility assessment.

#### ❖ ESG Obligor assessment

The Bank has developed ESG obligor assessment questionnaires, in order to assess the performance of its corporate customers on ESG factors (e.g. environmental policies, quantitative data on air and water pollution, mitigating actions etc.)

In line with market best practices, the Bank has followed a comprehensive approach for the development of the ESG Obligor assessment questionnaires, including the identification of the ESG sensitive perimeter, the identification of material ESG factors per sector, the identification of key assessment dimensions and performance measurement for the E, S & G components' assessment. The key assessment dimensions considered are depicted in the following figure.

For the ESG sensitive perimeter (e.g. Oil & Gas, Electricity & Water Utilities, Aviation, Chemicals, Shipping, Metals & Mining), the Bank applies a comprehensive sector specific assessment, while for all other sectors a simplified assessment is performed.

The ESG Obligor assessment process results in a score for each component (Environmental, Social and Governance), as well as for the overall ESG assessment of the obligor.

Going forward, the ESG Obligor questionnaires and underlying data will be sourced from the interbank platform ESGr, which has been set up with the initiative of the Hellenic Bank Association. The ESGr platform questionnaires are aligned to the ESG obligor assessment questionnaires already applied by NBG.

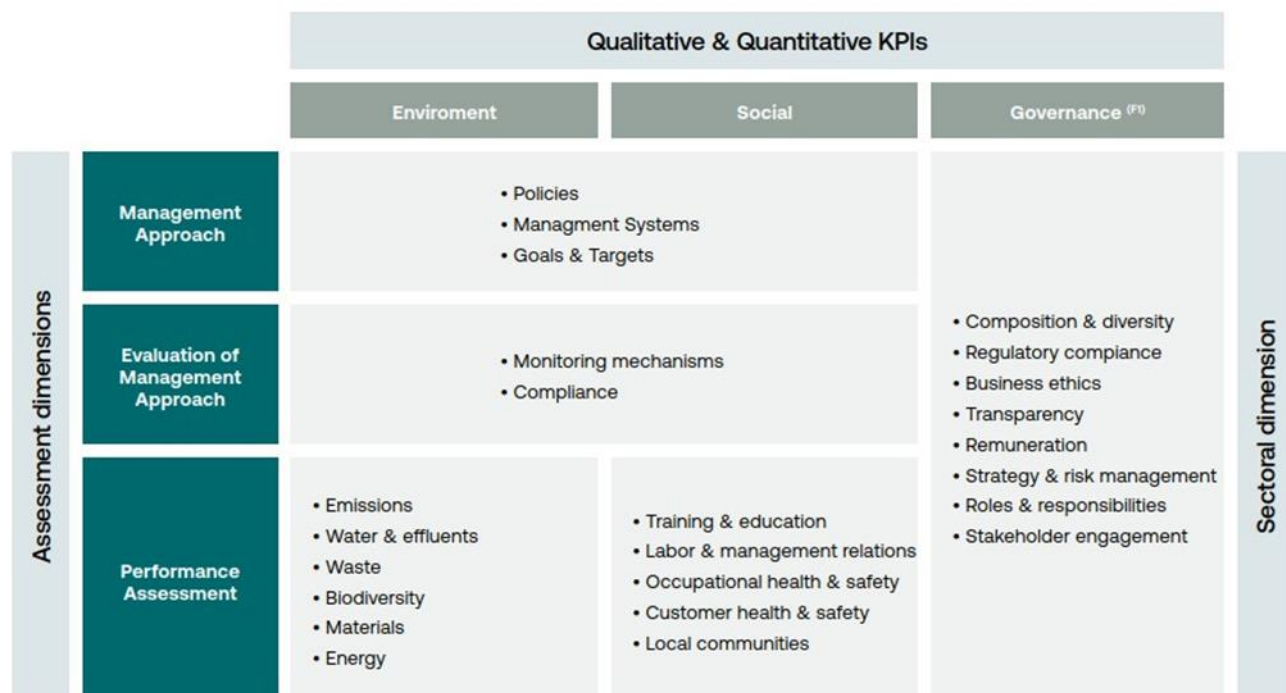
#### ❖ ESG Facility Assessment Criteria

The Bank has developed the ESG Facility assessment, in order to classify transactions/loans to different categories defined by the Bank, indicating the level of sustainability of each transaction based on its characteristics (e.g., maturity, alignment of loan purpose with the Sustainable Lending Criteria Framework etc). The Sustainable Lending Criteria Framework establishes a consistent and comprehensive list of sustainable lending criteria, to identify corporate lending which contributes to the transition towards more sustainable business activities.

#### ❖ ESG Overall Assessment

The Bank has in place a set of policy actions applicable to obligors with certain combinations of ESG scorecard outcome, credit rating and ESG facility assessment outcome.

These policy actions relate to credit risk classification, loan pricing, frequency of ESG obligor assessment and submission of Obligators' action plans, in order to mitigate the climate and ESG related risks.



(F): common across all sectors

Figure 5: Key assessment dimensions of ESG Obligor assessment

### 8.2.4 Risk Appetite Framework: ESG Quantitative Statements

The Bank has already introduced into its Risk Appetite Framework ('RAF') ESG-related KRIs addressing all material risk types.

In 2023, the Bank enhanced its RAF with the introduction of quantitative indicators and respective thresholds, aiming at setting its risk appetite towards financing of ESG sensitive sectors and in relation to its overall business strategy.

Specifically, the Bank has included into its RAF 5 (five) Key Risk indicators, taking explicitly into consideration the following:

- NBG joined the Net-Zero Banking Alliance (NZBA) and announced Net Zero Targets for 2030; dedicated RAF metrics were introduced for the execution risk of meeting the commitments, with a forward-looking view.
- The Risk Identification & Materiality Assessment outcome.

All KRIs' breach escalation process is performed at Executive Committee (ExCo) level. Additionally, the Bank has supplemented its RAF with 8 (eight) metrics for monitoring purposes of C&E risks, covering credit risk and strategy-related risk considerations. Specifically, these metrics cover both climate transition and physical risk (e.g. concentration of exposures in sectors bearing elevated transition risk, concentration of Sustainable exposures, insurance physical risk coverage), as well as, Environmental risk.

The Bank is planning to enhance its RAF as methodological approaches mature, quantification/analytical capabilities are being developed, and additional climate and environmental data becomes available.

In addition to the above:

- An ESG-related dimension is included in the Credit Concentration Risk metrics, positively accounting for the financing of transition plans to a green economy.
- The sector limits methodology has been updated, by incorporating a climate related component.
- A C&E dedicated exclusion list has been introduced, containing activities considered to bear negative climate-related and environmental impact, including mining & coal related financing, as well as activities with negative impacts on nature preservation and biodiversity. The identification leveraged on local and international market practices, as well as external benchmarks.

**Table 48:** ESG indicators in Risk Appetite dashboard

Metric Type	Indicator name	Remarks
Risk appetite limit	ESG rating	The metric addresses the perception of market regarding the ambition and pace of implementation of the ESG strategy; to this end, a composite index is used, which comprises ratings from 8 (eight) important rating agencies.
Risk appetite limit	Oil & Gas sector financed emissions (FE)	NBG has announced targets for 2030 for reduction of financed emissions to Oil & Gas sector (absolute FEs); the metric addresses the execution risk around reaching the target, using relevant projections.
Risk appetite limit	Power Generation sector financed emissions intensity	NBG has announced targets for 2030 for reduction of financed emissions (intensity) for the Power Generation sector; the metric addresses the execution risk around reaching the target, using relevant projections.
Risk appetite limit	EPC allocation of new mortgage portfolio disbursements	NBG has announced targets for 2030 for reduction of financed emissions (intensity) for the RRE portfolio; the metric addresses the execution risk around reaching the target for its element which is directly controlled by the Bank (i.e. the energy profile of new Mortgages).
Risk appetite limit	High emitting sectors	The purpose of the metric is to identify the ratio of the exposure of corporate obligors operating in high emitting sectors, over total corporate exposures.

### 8.2.5 Collateral valuation process

In order to mitigate C&E risks, in 2023 the Bank integrated specific C&E factors in the collaterals' valuation process, including, among other elements, the consideration of EPC labels.

In addition, the Bank has also integrated within its valuation system an automatic designation process that informs the valuer whether the collateral under valuation lies within the boundaries of:

- Natura 2000 designated areas
- International Convention sites (e.g., RAMSAR/ The Convention on Wetlands)
- National Parks & Forests
- Wildlife Protected Habitats

Moreover, in line with C&E exclusion list, the Bank has no appetite to finance:

- Any transaction located in and with negative impact on UNESCO World Heritage Sites, unless the required environmental permits are approved.
- Any transaction located in and with negative impact on Wetlands registered by the Ramsar Convention, unless the required environmental permits are approved.
- Any transaction located in and with negative impact on protected areas designated as part of Natura 2000 in accordance to EU Directive 92/43/EWG, or any locally designated protected areas unless the required environmental permits are approved.

Moreover, specifically for the physical risk, the Bank has launched a research & development effort to introduce new technologies to its processes, in order for the Real Estate Valuations Division to facilitate and provide in depth assessments & information on various environmental risks, concerning the Bank's collaterals.

Furthermore, there is an ongoing effort to introduce certain trigger mechanisms which will be activated in cases of acute physical risks (such as earthquake events, forest wildfires and floods), to provide the Bank with a comprehensive view on the impact of such events on its collateral portfolio, facilitating decision making and operational effectiveness.

### 8.2.6 Risk Control, Monitoring and Reporting

NBG has taken actions in relation to C&E risk data aggregation, analytics and a robust monitoring setup, for internal C&E risk monitoring and reporting purposes, across risk types. An extensive set of C&E metrics, is being employed for monitoring and reporting to the principal overseeing bodies, RAF monitoring and operational needs.

### 8.2.7 ESG data and IT infrastructure-related enhancements

NBG acknowledges the necessity of data enhancements and invests on expansion of its data sources, IT infrastructure development, enhancements of modelling and analytics, thus enabling qualitative and timely risk analysis, monitoring and reporting. Emphasis has been placed on ESG data management and availability, using internal and external sources. The Bank

has incorporated in its Transformation Programme specific initiatives to enhance ESG data and IT infrastructure.

In that regard, the Bank is currently implementing a centralized ESG Reporting architecture aiming at ramping up NBG's ESG reporting capabilities and data collection and governance process. Indicatively, the designed infrastructure will allow for:

- A single access point for ESG-related information, avoiding siloed and dispersed data collection and storage.
- Auditability at every step of the process ensuring a robust, future-proof trail.
- Scalability that addresses current and forthcoming reporting needs arising from ESG standards and regulations.
- A roadmap for the assignment of data owners and for the identification of data gaps and remediation actions.

### 8.2.8 ESG Risk Management - Planned actions

Going forward, NBG is planning to further enhance the incorporation of ESG factors in its Risk Management Framework. For this purpose, a detailed action plan has been formed and is largely included in the Transformation Programme, which is monitored by the Board and Transformation Committee, ensuring execution in a timely and disciplined manner. In parallel, Transformation Programme initiatives are complemented with tactical and interbank initiatives, which contribute to the incorporation of C&E risk aspects in business-as-usual processes. Important actions currently underway refer to the following areas:

- EU Taxonomy implementation & Sustainable Financing Framework
- Nature and Environmental risks
- Scenario Analysis and Stress Testing capabilities
- Expansion of regular monitoring and reporting tools.

### 8.3 Quantitative Disclosures on Climate change transition and physical Risks and mitigating actions

The Bank is committed to fulfill all disclosure requirements set out by the binding standards on Pillar III disclosures published by EBA on January 24, 2022. To that end, NBG has thoroughly studied the disclosure templates and associated instructions and explored synergies with all involved Units to efficiently and effectively source required information from the relevant stakeholders and has further enhanced its core IT systems with C&E related information, aiming to standardise and fully automate this sourcing of information.

The relevant information can be found in the tables below.

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

##### ❖ Summary, comments on content / perimeter

The template includes Group exposures towards non-financial corporates, including loans and advances, debt securities and equity instruments, classified in the accounting portfolios in the banking book, by sector of economic activities using NACE codes based on the principal activity of the counterparty. The template excludes financial assets held for trading or assets held for sale. Exposures to financial corporations, sovereigns, central banks, general and local governments and household exposures to private individuals are also excluded.

GHG financed emissions for the Group exposures included in the specified perimeter are also calculated, based on the methodology established by PCAF as described in detail within the Bank's ESG Report. Furthermore, the Bank is disclosing additional information concerning RES (Renewable Energy Sources) exposures giving a forward looking to its volumes breakdown to sectors that highly contribute to climate change in alignment with its ESG Strategy.

##### ❖ Methodological approach, key assumptions, applicable standards used

In order to identify exposures towards companies excluded from EU Paris-aligned Benchmarks, the Bank based its analysis primarily on the NACE code of the debtor's economic activity (since the large majority of companies that are the Bank's counterparties do not publish information with respect to their revenue mix and/or other activity based metrics) to interpret the conditions for exclusion from the Paris-aligned Benchmarks, in particular points (d) to (g) from the respective Guidance, overriding as appropriate in specific cases (e.g. including big borrowers with known principal activity meeting PAB exclusion conditions or excluding RES-related/flagged borrowers despite their generic NACE-based categorization).

NPE classification is aligned with Stage 3 classification based on the IFRS9 accounting standard and the gross carrying amount of Stage 2 instruments has also been disclosed according to IFRS9 definition.

Exposures are allocated to the relevant maturity bucket depending on the remaining maturity of the corresponding financial instrument. The computation of the average maturity of the exposures has been performed by weighing individual

exposure maturities with the gross carrying amount of the exposures.



## ESG RISKS

**Table 49:** 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2024

	a	b	c	d	e	f g h			
						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			
Gross carrying amount									
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of stage exposures	Of which 2 non-performing exposures	Of which non-performing exposures
<b>1 Exposures towards sectors that highly contribute to climate change*</b>	<b>20,084</b>	<b>2,459</b>	<b>850</b>	<b>913</b>	<b>710</b>	<b>(577)</b>	<b>(89)</b>	<b>(353)</b>	
<b>2 A - Agriculture, forestry and fishing</b>	<b>294</b>	<b>0</b>	<b>0</b>	<b>26</b>	<b>11</b>	<b>(9)</b>	<b>(2)</b>	<b>(4)</b>	
<b>3 B - Mining and quarrying</b>	<b>91</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>(2)</b>	<b>(0)</b>	<b>(1)</b>	
4 B.05 - Mining of coal and lignite	0	0	0	0	0	0	0	0	
5 B.06 - Extraction of crude petroleum and natural gas	0	0	0	0	0	0	0	0	
6 B.07 - Mining of metal ores	68	0	0	0	0	(1)	(0)	(0)	
7 B.08 - Other mining and quarrying	23	0	0	1	2	(1)	(0)	(1)	
8 B.09 - Mining support service activities	0	0	0	0	0	(0)	(0)	0	
<b>9 C - Manufacturing</b>	<b>4,146</b>	<b>753</b>	<b>39</b>	<b>285</b>	<b>224</b>	<b>(197)</b>	<b>(39)</b>	<b>(130)</b>	
10 C.10 - Manufacture of food products	1,013	0	0	143	48	(64)	(30)	(28)	
11 C.11 - Manufacture of beverages	121	0	0	13	10	(6)	(1)	(5)	
12 C.12 - Manufacture of tobacco products	64	0	0	0	0	(1)	0	(0)	
13 C.13 - Manufacture of textiles	114	0	0	8	32	(26)	(2)	(24)	
14 C.14 - Manufacture of wearing apparel	65	0	0	10	22	(11)	(2)	(9)	
15 C.15 - Manufacture of leather and related products	11	0	0	0	1	(1)	(0)	(1)	
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	10	0	0	2	2	(1)	(0)	(1)	
17 C.17 - Manufacture of pulp, paper and paperboard	128	0	0	4	2	(3)	(1)	(1)	
18 C.18 - Printing and service activities related to printing	39	0	0	3	8	(4)	(0)	(3)	
19 C.19 - Manufacture of coke oven products	753	753	8	0	0	(6)	0	(0)	
20 C.20 - Production of chemicals	215	0	0	15	16	(6)	(0)	(4)	
21 C.21 - Manufacture of pharmaceutical preparations	201	0	0	8	5	(6)	(0)	(4)	
22 C.22 - Manufacture of rubber products	165	0	0	13	5	(5)	(1)	(3)	
23 C.23 - Manufacture of other non-metallic mineral products	227	0	5	21	6	(4)	(1)	(3)	
24 C.24 - Manufacture of basic metals	450	0	22	4	33	(29)	(0)	(27)	
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	148	0	0	11	10	(8)	(1)	(6)	
26 C.26 - Manufacture of computer, electronic and optical products	32	0	0	1	1	(1)	(0)	(1)	
27 C.27 - Manufacture of electrical equipment	242	0	4	17	1	(3)	(0)	(1)	
28 C.28 - Manufacture of machinery and equipment n.e.c.	38	0	0	3	11	(9)	(0)	(8)	
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	16	0	0	1	0	(0)	(0)	(0)	
30 C.30 - Manufacture of other transport equipment	16	0	0	0	0	(0)	(0)	(0)	
31 C.31 - Manufacture of furniture	24	0	0	6	1	(2)	(1)	(1)	
32 C.32 - Other manufacturing	31	0	0	1	11	(2)	(0)	(2)	
33 C.33 - Repair and installation of machinery and equipment	24	0	0	1	1	(1)	(0)	(0)	

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

**Table 49:** 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2024 (continued)

	a	b	c	d	e	f	g	h
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of stage exposures	Of which stage 2 non-performing exposures	Of which non-performing exposures
<b>34 D - Electricity, gas, steam and air conditioning supply</b>	<b>3,535</b>	<b>1,152</b>	<b>760</b>	<b>50</b>	<b>9</b>	<b>(33)</b>	<b>(2)</b>	<b>(2)</b>
35 <i>D35.1 - Electric power generation, transmission and distribution</i>	3,276	897	760	49	9	(31)	(2)	(2)
36 <i>D35.11 - Production of electricity</i>	2,528	519	760	48	9	(25)	(2)	(2)
37 <i>D35.2 - Manufacture of gas; distribution of gaseous fuels through mains</i>	255	255	0	0	0	(2)	0	0
38 <i>D35.3 - Steam and air conditioning supply</i>	4	0	0	2	0	(0)	(0)	(0)
<b>39 E - Water supply; sewerage, waste management and remediation activities</b>	<b>56</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>(1)</b>	<b>(0)</b>	<b>(0)</b>
<b>40 F - Construction</b>	<b>549</b>	<b>0</b>	<b>38</b>	<b>61</b>	<b>23</b>	<b>(22)</b>	<b>(7)</b>	<b>(9)</b>
41 <i>F.41 - Construction of buildings</i>	276	0	1	39	13	(14)	(5)	(6)
42 <i>F.42 - Civil engineering</i>	203	0	37	7	8	(5)	(1)	(2)
43 <i>F.43 - Specialised construction activities</i>	71	0	0	15	2	(3)	(1)	(1)
<b>44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	<b>3,333</b>	<b>244</b>	<b>6</b>	<b>219</b>	<b>252</b>	<b>(183)</b>	<b>(21)</b>	<b>(136)</b>
<b>45 H - Transportation and storage</b>	<b>4,690</b>	<b>309</b>	<b>7</b>	<b>40</b>	<b>13</b>	<b>(33)</b>	<b>(9)</b>	<b>(7)</b>
46 <i>H.49 - Land transport and transport via pipelines</i>	410	309	0	15	6	(8)	(2)	(2)
47 <i>H.50 - Water transport</i>	3,040	0	0	20	2	(11)	(6)	(2)
48 <i>H.51 - Air transport</i>	3	0	0	0	0	(0)	0	0
49 <i>H.52 - Warehousing and support activities for transportation</i>	1,231	0	7	5	5	(13)	(0)	(3)
50 <i>H.53 - Postal and courier activities</i>	6	0	0	0	0	(0)	(0)	(0)
<b>51 I - Accommodation and food service activities</b>	<b>1,972</b>	<b>0</b>	<b>0</b>	<b>205</b>	<b>155</b>	<b>(78)</b>	<b>(8)</b>	<b>(56)</b>
<b>52 L - Real estate activities</b>	<b>1,419</b>	<b>0</b>	<b>0</b>	<b>25</b>	<b>21</b>	<b>(20)</b>	<b>(1)</b>	<b>(8)</b>
<b>53 Exposures towards sectors other than those that highly contribute to climate change*</b>	<b>2,081</b>	<b>0</b>	<b>5</b>	<b>64</b>	<b>114</b>	<b>(91)</b>	<b>(17)</b>	<b>(75)</b>
<b>54 K - Financial and insurance activities</b>	<b>33</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>0</b>	<b>(0)</b>	<b>(0)</b>	<b>(0)</b>
<b>55 Exposures to other sectors (NACE codes J, M - U)</b>	<b>2,048</b>	<b>0</b>	<b>5</b>	<b>61</b>	<b>113</b>	<b>(91)</b>	<b>(17)</b>	<b>(75)</b>
<b>56 TOTAL</b>	<b>22,166</b>	<b>2,459</b>	<b>856</b>	<b>978</b>	<b>824</b>	<b>(668)</b>	<b>(106)</b>	<b>(428)</b>

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

**Table 49: 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 31.12.2023**

	a	b	c	d	e	f	g	h
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of stage exposures	Of which 2 non-performing exposures	Of which non-performing exposures
<b>1 Exposures towards sectors that highly contribute to climate change*</b>	<b>18,977</b>	<b>2,014</b>	<b>829.58</b>	<b>1,125</b>	<b>757</b>	<b>(601)</b>	<b>(73)</b>	<b>(396)</b>
<b>2 A - Agriculture, forestry and fishing</b>	<b>348</b>	<b>0</b>	<b>0</b>	<b>62</b>	<b>9</b>	<b>(14)</b>	<b>(4)</b>	<b>(7)</b>
<b>3 B - Mining and quarrying</b>	<b>98</b>	<b>0</b>	<b>0</b>	<b>3</b>	<b>2</b>	<b>(2)</b>	<b>0</b>	<b>(1)</b>
4 B.05 - Mining of coal and lignite	0	0	0	0	0	0	0	0
5 B.06 - Extraction of crude petroleum and natural gas	0	0	0	0	0	0	0	0
6 B.07 - Mining of metal ores	61	0	0	0	0	0	0	0
7 B.08 - Other mining and quarrying	37	0	0	3	2	(1)	0	(1)
8 B.09 - Mining support service activities	0	0	0	0	0	0	0	0
<b>9 C - Manufacturing</b>	<b>4,441</b>	<b>858</b>	<b>94.67</b>	<b>356</b>	<b>290</b>	<b>(240)</b>	<b>(27)</b>	<b>(181)</b>
10 C.10 - Manufacture of food products	1,118	0	0	177	57	(45)	(9)	(29)
11 C.11 - Manufacture of beverages	124	0	0	10	11	(8)	(2)	(5)
12 C.12 - Manufacture of tobacco products	58	0	0	0	1	(1)	0	0
13 C.13 - Manufacture of textiles	118	0	0	13	32	(24)	(2)	(21)
14 C.14 - Manufacture of wearing apparel	70	0	0	11	26	(16)	(2)	(13)
15 C.15 - Manufacture of leather and related products	10	0	0	1	1	(1)	0	(1)
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	12	0	0	2	2	(2)	0	(1)
17 C.17 - Manufacture of pulp, paper and paperboard	136	0	0	12	3	(5)	(2)	(1)
18 C.18 - Printing and service activities related to printing	42	0	0	3	8	(5)	0	(4)
19 C.19 - Manufacture of coke oven products	858	858	5.16	0	0	(7)	0	0
20 C.20 - Production of chemicals	208	0	0.09	8	14	(5)	0	(4)
21 C.21 - Manufacture of pharmaceutical preparations	185	0	0	10	5	(6)	0	(4)
22 C.22 - Manufacture of rubber products	150	0	0	20	6	(5)	(1)	(3)
23 C.23 - Manufacture of other non-metallic mineral products	234	0	0.25	28	4	(4)	(1)	(2)
24 C.24 - Manufacture of basic metals	503	0	63.05	9	80	(79)	(3)	(72)
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	159	0	0.04	11	9	(9)	(1)	(7)
26 C.26 - Manufacture of computer, electronic and optical products	36	0	0	0	1	(1)	0	(1)
27 C.27 - Manufacture of electrical equipment	273	0	26.08	21	1	(3)	0	(1)
28 C.28 - Manufacture of machinery and equipment n.e.c.	36	0	0	5	12	(7)	0	(7)
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	15	0	0	1	0	0	0	0
30 C.30 - Manufacture of other transport equipment	17	0	0	1	0	0	0	0
31 C.31 - Manufacture of furniture	26	0	0	8	3	(3)	(1)	(2)
32 C.32 - Other manufacturing	30	0	0	2	12	(3)	0	(3)
33 C.33 - Repair and installation of machinery and equipment	24	0	0	4	1	0	0	0

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

## ESG RISKS

**Table 49:** 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 31.12.2023 (continued)

	a	b	c	d	e	f	g	h	
	Gross carrying amount					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation	Of which environmentally sustainable (CCM)	Of which stage 2 exposures	Of which non-performing exposures	Of stage exposures	Of which 2 non-performing exposures	Of which non-performing exposures	
34	<b>D - Electricity, gas, steam and air conditioning supply</b>	2,689	613	722.68	27	9	(25)	(1)	(1)
35	D35.1 - Electric power generation, transmission and distribution	2,481	409	722.68	27	9	(23)	(1)	(1)
36	D35.11 - Production of electricity	1,875	403	722.68	27	9	(18)	(1)	(1)
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	205	205	0	0	0	(2)	0	0
38	D35.3 - Steam and air conditioning supply	3	0	0	0	0	0	0	0
39	<b>E - Water supply; sewerage, waste management and remediation activities</b>	52	0	0.25	1	1	(1)	0	(1)
40	<b>F - Construction</b>	510	0	6.66	50	22	(21)	(5)	(10)
41	F.41 - Construction of buildings	242	0	0	38	15	(13)	(4)	(6)
42	F.42 - Civil engineering	204	0	6.66	6	3	(3)	0	(1)
43	F.43 - Specialised construction activities	64	0	0	6	4	(5)	(1)	(3)
44	<b>G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	3,273	228	3.07	224	241	(168)	(19)	(124)
45	<b>H - Transportation and storage</b>	4,334	314	2.25	62	15	(30)	(5)	(7)
46	H.49 - Land transport and transport via pipelines	411	314	0	16	7	(9)	(2)	(3)
47	H.50 - Water transport	2,701	0	0	20	2	(6)	0	(2)
48	H.51 - Air transport	3	0	0	0	0	0	0	0
49	H.52 - Warehousing and support activities for transportation	1,214	0	2.25	23	5	(16)	(2)	(2)
50	H.53 - Postal and courier activities	5	0	0	4	0	0	0	0
51	<b>I - Accommodation and food service activities</b>	1,800	0	0	295	139	(79)	(11)	(55)
52	<b>L - Real estate activities</b>	1,431	0	0	43	29	(22)	(1)	(10)
53	Exposures towards sectors other than those that highly contribute to climate change*	1,918	0	2.99	127	100	(102)	(37)	(64)
54	<b>K - Financial and insurance activities</b>	61	0	0	4	0	0	0	0
55	Exposures to other sectors (NACE codes J, M - U)	1,857	0	2.99	123	100	(101)	(36)	(64)
56	<b>TOTAL</b>	<b>20,895</b>	<b>2,014</b>	<b>832.57</b>	<b>1,252</b>	<b>857</b>	<b>(703)</b>	<b>(109)</b>	<b>(460)</b>

Considering that within sectors that highly contribute to climate change there are RES related exposures, the above balances are recalculated excluding those exposures leading to the following gross carrying amounts and respective percentages.

**Table 50:** 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector excluding RES 30.06.2024

Category	Gross Carrying Amount	Renewables Gross Carrying Amount	Gross Carrying Amount Without Renewables
High Contribution	20,084	2,033	18,051
Low Contribution	2,081	11	2,071
Total	22,166	2,044	20,122

**Table 51:** 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector excluding RES (%) 30.06.2024

	Percentage
High Contribution	90.61%
Low Contribution	9.39%
High Contribution Excluding Renewables	81.44%
Low Contribution Including Renewables from High Contribution	18.56%

**Tablec 49:** 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2024 (continued)

	i	j	k	l	m	n	o	p	
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount	Residual Maturity				Average weighted maturity	
		Of which Scope 3 financed emissions	percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years		
<b>1</b>	<b>Exposures towards sectors that highly contribute to climate change*</b>	<b>14,661,137</b>	<b>7,909,394</b>	<b>37%</b>	<b>10,497</b>	<b>5,075</b>	<b>4,105</b>	<b>407</b>	<b>6</b>
<b>2</b>	<b>A - Agriculture, forestry and fishing</b>	<b>555,798</b>	<b>242,957</b>	<b>0%</b>	<b>218</b>	<b>61</b>	<b>14</b>	<b>0</b>	<b>3</b>
<b>3</b>	<b>B - Mining and quarrying</b>	<b>45,915</b>	<b>14,993</b>	<b>8%</b>	<b>18</b>	<b>73</b>	<b>0</b>	<b>0</b>	<b>7</b>
4	B.05 - Mining of coal and lignite	0	0	0%	0	0	0	0	0
5	B.06 - Extraction of crude petroleum and natural gas	0	0	0%	0	0	0	0	0
6	B.07 - Mining of metal ores	19,263	6,619	19%	5	62	0	0	8
7	B.08 - Other mining and quarrying	26,652	8,374	0%	13	10	0	0	4
8	B.09 - Mining support service activities	0	0	0%	0	0	0	0	1
<b>9</b>	<b>C - Manufacturing</b>	<b>5,676,395</b>	<b>3,609,389</b>	<b>41%</b>	<b>3,108</b>	<b>905</b>	<b>122</b>	<b>11</b>	<b>3</b>
10	C.10 - Manufacture of food products	1,203,238	993,918	5%	728	271	13	1	3
11	C.11 - Manufacture of beverages	60,451	31,520	5%	85	34	2	0	3
12	C.12 - Manufacture of tobacco products	100,769	68,463	1%	62	1	0	0	1
13	C.13 - Manufacture of textiles	57,432	48,218	6%	98	7	9	0	3
14	C.14 - Manufacture of wearing apparel	26,027	21,860	0%	52	12	1	0	3
15	C.15 - Manufacture of leather and related products	6,327	5,990	0%	10	1	0	0	2
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	10,659	8,562	0%	7	2	1	0	5
17	C.17 - Manufacture of pulp, paper and paperboard	49,371	40,409	0%	105	21	2	0	3
18	C.18 - Printing and service activities related to printing	7,893	6,342	0%	29	8	1	0	4
19	C.19 - Manufacture of coke oven products	1,298,345	812,159	61%	752	0	2	0	2
20	C.20 - Production of chemicals	625,000	280,547	2%	165	48	1	0	3
21	C.21 - Manufacture of pharmaceutical preparations	113,234	100,290	0%	120	48	33	0	4
22	C.22 - Manufacture of rubber products	115,719	96,077	1%	125	34	5	1	3
23	C.23 - Manufacture of other non-metallic mineral products	557,146	96,541	78%	174	28	25	1	4
24	C.24 - Manufacture of basic metals	1,037,912	658,382	82%	291	158	0	0	3
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	84,297	73,960	3%	111	22	14	1	4
26	C.26 - Manufacture of computer, electronic and optical products	11,972	8,135	0%	8	23	1	0	5
27	C.27 - Manufacture of electrical equipment	216,198	177,032	77%	73	161	3	5	6
28	C.28 - Manufacture of machinery and equipment n.e.c.	21,388	17,954	0%	33	4	1	0	3
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	17,180	16,624	0%	15	1	0	0	2
30	C.30 - Manufacture of other transport equipment	4,629	4,077	0%	12	0	3	0	3
31	C.31 - Manufacture of furniture	16,729	13,588	0%	15	8	1	0	5
32	C.32 - Other manufacturing	15,818	13,004	0%	20	10	1	0	4
33	C.33 - Repair and installation of machinery and equipment	18,661	15,737	0%	19	1	4	1	4
<b>34</b>	<b>D - Electricity, gas, steam and air conditioning supply</b>	<b>2,640,893</b>	<b>378,522</b>	<b>63%</b>	<b>1,071</b>	<b>667</b>	<b>1,721</b>	<b>76</b>	<b>10</b>
35	D35.1 - Electric power generation, transmission and distribution	2,575,669	362,720	65%	1,004	664	1,532	76	10
36	D35.11 - Production of electricity	1,362,340	300,075	36%	511	550	1,433	34	11
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	48,957	11,676	0%	65	0	190	0	11
38	D35.3 - Steam and air conditioning supply	16,267	4,126	0%	2	3	0	0	5
<b>39</b>	<b>E - Water supply; sewerage, waste management and remediation activities</b>	<b>28,326</b>	<b>16,589</b>	<b>6%</b>	<b>27</b>	<b>18</b>	<b>11</b>	<b>0</b>	<b>5</b>
<b>40</b>	<b>F - Construction</b>	<b>439,348</b>	<b>334,560</b>	<b>21%</b>	<b>343</b>	<b>130</b>	<b>67</b>	<b>10</b>	<b>5</b>
41	F.41 - Construction of buildings	143,061	124,432	1%	171	63	41	0	5
42	F.42 - Civil engineering	194,181	120,490	48%	129	50	15	9	4
43	F.43 - Specialised construction activities	102,106	89,638	0%	43	17	11	1	5
<b>44</b>	<b>G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	<b>3,193,498</b>	<b>2,396,064</b>	<b>8%</b>	<b>2,741</b>	<b>485</b>	<b>93</b>	<b>14</b>	<b>3</b>
<b>45</b>	<b>H - Transportation and storage</b>	<b>1,873,739</b>	<b>802,777</b>	<b>61%</b>	<b>2,270</b>	<b>1,425</b>	<b>702</b>	<b>293</b>	<b>7</b>
46	H.49 - Land transport and transport via pipelines	181,916	94,892	15%	89	296	4	20	10
47	H.50 - Water transport	766,379	23,395	55%	2,004	1,036	0	0	4
48	H.51 - Air transport	29,469	14,139	0%	3	0	0	0	3
49	H.52 - Warehousing and support activities for transportation	890,399	666,838	78%	168	93	698	272	13
50	H.53 - Postal and courier activities	5,576	3,513	0%	5	0	0	0	2
<b>51</b>	<b>I - Accommodation and food service activities</b>	<b>180,379</b>	<b>110,025</b>	<b>2%</b>	<b>529</b>	<b>797</b>	<b>642</b>	<b>3</b>	<b>7</b>
<b>52</b>	<b>L - Real estate activities</b>	<b>26,846</b>	<b>3,518</b>	<b>0%</b>	<b>172</b>	<b>514</b>	<b>733</b>	<b>0</b>	<b>9</b>
<b>53</b>	<b>Exposures towards sectors other than those that highly contribute to climate change*</b>				<b>1,781</b>	<b>173</b>	<b>62</b>	<b>65</b>	<b>3</b>
<b>54</b>	<b>K - Financial and insurance activities</b>	<b>1,361</b>	<b>805</b>	<b>1%</b>	<b>29</b>	<b>3</b>	<b>1</b>	<b>0</b>	<b>2</b>
<b>55</b>	<b>Exposures to other sectors (NACE codes J, M - U)</b>	<b>754,269</b>	<b>663,742</b>	<b>11%</b>	<b>1,752</b>	<b>170</b>	<b>61</b>	<b>65</b>	<b>3</b>
<b>56</b>	<b>TOTAL</b>	<b>15,416,767</b>	<b>8,573,941</b>	<b>36%</b>	<b>12,278</b>	<b>5,248</b>	<b>4,168</b>	<b>472</b>	<b>6</b>

**Table 49: 1.CC - Banking book- Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity 30.06.2023 (continued)**

	i	j	k	l	m	n	o	p
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions (column i): gross carrying amount of the portfolio derived from company-specific reporting	Residual Maturity				Average weighted maturity
		Of which Scope 3 financed emissions	percentage of the portfolio derived from	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	
<b>1 Exposures towards sectors that highly contribute to climate change*</b>	<b>14,506,685</b>	<b>8,299,423</b>	<b>33%</b>	<b>10,617</b>	<b>4,333</b>	<b>3,588</b>	<b>439</b>	<b>5.96</b>
<b>2 A - Agriculture, forestry and fishing</b>	<b>785,822</b>	<b>342,475</b>	<b>0%</b>	<b>252</b>	<b>78</b>	<b>17</b>	<b>0</b>	<b>3.10</b>
<b>3 B - Mining and quarrying</b>	<b>47,824</b>	<b>20,429</b>	<b>55%</b>	<b>34</b>	<b>65</b>	<b>0</b>	<b>0</b>	<b>6.20</b>
4 B.05 - Mining of coal and lignite	0	0	0%	0	0	0	0	0.00
5 B.06 - Extraction of crude petroleum and natural gas	0	0	0%	0	0	0	0	0.00
6 B.07 - Mining of metal ores	19,027	7,957	88%	9	53	0	0	8.16
7 B.08 - Other mining and quarrying	28,797	12,472	0%	25	12	0	0	2.92
8 B.09 - Mining support service activities	0	0	0%	0	0	0	0	1.00
<b>9 C - Manufacturing</b>	<b>6,062,808</b>	<b>3,957,275</b>	<b>40%</b>	<b>3,242</b>	<b>1,065</b>	<b>122</b>	<b>13</b>	<b>3.16</b>
10 C.10 - Manufacture of food products	1,318,063	1,089,419	16%	861	232	23	2	2.87
11 C.11 - Manufacture of beverages	62,056	33,136	8%	86	35	3	0	3.63
12 C.12 - Manufacture of tobacco products	129,336	96,016	39%	57	1	0	0	1.19
13 C.13 - Manufacture of textiles	51,410	42,283	10%	84	5	28	0	4.53
14 C.14 - Manufacture of wearing apparel	23,789	19,816	0%	55	12	2	0	2.83
15 C.15 - Manufacture of leather and related products	4,936	4,670	0%	9	1	0	0	2.22
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	9,339	7,583	0%	9	2	1	0	3.90
17 C.17 - Manufacture of pulp, paper and paperboard	51,601	42,413	0%	97	36	4	0	2.94
18 C.18 - Printing and service activities related to printing	6,439	5,496	0%	37	5	0	0	2.48
19 C.19 - Manufacture of coke oven products	1,968,115	1,331,157	100%	744	113	2	0	2.43
20 C.20 - Production of chemicals	322,053	151,028	9%	162	46	0	0	2.94
21 C.21 - Manufacture of pharmaceutical preparations	107,146	98,314	0%	110	58	16	0	4.10
22 C.22 - Manufacture of rubber products	103,591	82,642	3%	106	41	2	1	3.45
23 C.23 - Manufacture of other non-metallic mineral products	590,948	108,245	37%	135	74	25	1	4.46
24 C.24 - Manufacture of basic metals	1,046,559	645,492	75%	326	177	0	0	3.00
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	70,028	62,519	0%	125	24	5	6	3.74
26 C.26 - Manufacture of computer, electronic and optical products	18,761	12,514	10%	10	25	1	0	5.12
27 C.27 - Manufacture of electrical equipment	117,417	76,544	81%	118	152	3	0	4.38
28 C.28 - Manufacture of machinery and equipment n.e.c.	6,954	3,863	0%	33	2	1	0	2.60
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	15,140	14,648	0%	11	4	0	0	2.90
30 C.30 - Manufacture of other transport equipment	4,886	4,302	0%	16	1	0	0	0.88
31 C.31 - Manufacture of furniture	11,605	9,319	0%	17	6	2	0	4.41
32 C.32 - Other manufacturing	12,495	10,156	0%	18	11	1	0	3.74
33 C.33 - Repair and installation of machinery and equipment	10,141	5,700	0%	16	3	4	1	5.06
<b>34 D - Electricity, gas, steam and air conditioning supply</b>	<b>2,165,671</b>	<b>604,966</b>	<b>30%</b>	<b>994</b>	<b>440</b>	<b>1,156</b>	<b>99</b>	<b>9.82</b>
35 D35.1 - Electric power generation, transmission and distribution	2,016,178	570,172	32%	942	439	1,002	99	9.67
36 D35.11 - Production of electricity	1,049,380	496,657	12%	443	435	935	62	10.67
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	132,620	30,590	0%	51	0	154	0	11.72
38 D35.3 - Steam and air conditioning supply	16,874	4,204	0%	1	1	0	0	3.86
<b>39 E - Water supply; sewerage, waste management and remediation activities</b>	<b>28,962</b>	<b>20,606</b>	<b>2%</b>	<b>25</b>	<b>16</b>	<b>11</b>	<b>0</b>	<b>5.61</b>
<b>40 F - Construction</b>	<b>282,884</b>	<b>238,097</b>	<b>16%</b>	<b>332</b>	<b>127</b>	<b>41</b>	<b>11</b>	<b>4.63</b>
41 F.41 - Construction of buildings	114,334	98,975	22%	161	65	14	2	4.49
42 F.42 - Civil engineering	96,027	75,142	13%	132	49	15	8	4.56
43 F.43 - Specialised construction activities	72,523	63,980	0%	39	13	11	1	5.40
<b>44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles</b>	<b>3,897,333</b>	<b>2,754,180</b>	<b>11%</b>	<b>2,645</b>	<b>504</b>	<b>105</b>	<b>20</b>	<b>3.02</b>
<b>45 H - Transportation and storage</b>	<b>1,061,208</b>	<b>290,008</b>	<b>73%</b>	<b>2,300</b>	<b>977</b>	<b>771</b>	<b>286</b>	<b>7.28</b>
46 H.49 - Land transport and transport via pipelines	126,330	66,732	76%	92	201	98	20	9.88
47 H.50 - Water transport	654,292	9,380	79%	2,022	679	0	0	4.10
48 H.51 - Air transport	35,292	16,933	0%	3	0	0	0	3.01
49 H.52 - Warehousing and support activities for transportation	240,257	193,796	60%	178	97	673	265	13.49
50 H.53 - Postal and courier activities	5,037	3,167	0%	5	0	0	0	2.36
<b>51 I - Accommodation and food service activities</b>	<b>144,715</b>	<b>70,337</b>	<b>2%</b>	<b>436</b>	<b>753</b>	<b>606</b>	<b>5</b>	<b>7.80</b>
<b>52 L - Real estate activities</b>	<b>29,458</b>	<b>1,050</b>	<b>0%</b>	<b>357</b>	<b>307</b>	<b>761</b>	<b>5</b>	<b>9.04</b>
<b>53 Exposures towards sectors other than those that highly contribute to climate change*</b>				<b>1,653</b>	<b>136</b>	<b>31</b>	<b>98</b>	<b>3.98</b>
<b>54 K - Financial and insurance activities</b>				<b>39</b>	<b>3</b>	<b>0</b>	<b>19</b>	<b>16.25</b>
<b>55 Exposures to other sectors (NACE codes J, M - U)</b>				<b>1,614</b>	<b>133</b>	<b>31</b>	<b>79</b>	<b>3.57</b>
<b>56 TOTAL</b>	<b>14,971,615</b>	<b>8,699,737</b>	<b>31%</b>	<b>12,271</b>	<b>4,469</b>	<b>3,619</b>	<b>536</b>	<b>5.78</b>

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

### Banking book- Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 30.06.2024

#### ❖ Summary, comments on content / perimeter

This template shows the gross carrying amount of loans collateralised with commercial and residential immovable property and of repossessed real estate collaterals, including information on the level of energy efficiency of the collaterals measured in terms of kWh/m<sup>2</sup> energy consumption and, in terms of the collateral's Energy Performance Certificate (EPC) label as defined in the EU Energy Performance of Buildings Directive. Non eligible collateral types (e.g., land plots) have been excluded from the distributions to Energy Consumption buckets and EPC classes, as they don't receive Energy Performance Certificate.

Gross carrying amount of exposures covered by RRE and CRE collaterals is grouped and disclosed by energy efficiency buckets, based on either the specific energy consumption of the collateral in kWh/m<sup>2</sup> as indicated in the EPC of the collateral or as estimated in the absence of the EPC. Gross carrying amount is also grouped by the EPC label of the collateral for those collaterals where the EPC is available to the Bank. Column 'Without EPC label of collateral' shows exposures for which the Bank does not have the EPC information of the collateral.

#### ❖ Approach limitations

Energy Performance Certificates are mandatory for all property transactions performed in the EU, according to the requirements set out in the Energy Performance of Buildings Directive (2010/31/EU) and the Energy Efficiency Directive (2012/27/EU). The number of actual EPCs available to the Bank is limited due to the lack of access to a centralized registry/repository at the country level and to the fact that EPCs were not required for older transactions, prior to the enforcement of relevant EU Directives.

Based on the above, the model limitations or considerations for model improvements have been identified as follows: i) The model was developed on externally provided data ii) Common data fields between the Bank's dataset and the data provided by the external provider were scarce. Hence a multitude of potential model drivers and segmentation variables had to be eliminated. Greater systemic availability of internal data (on attributes/features of own collaterals), as well as greater variety of available collateral attributes could significantly ameliorate model performance iii) the energy efficiency estimation did not derive from model development but rather was based on publicly available information from the Ministry of Environment and Energy.

#### ❖ Methodological approach, key assumptions, applicable standards used

Regarding the EPC label estimation, a selection process was performed to identify the candidate segmentation variables (attributes of our collaterals) and drivers of the model. The analysis indicated 2 variables: a) the logarithm of the collateral value divided by the collateral square meters, and b) the year of construction as the models' drivers. Optimization for classification accuracy was conducted by testing the feature 'Geographical location' as a potential segmentation variable in the model development. The key outcome was the location of each collateral grouped in seven regional clusters (Northern-East suburbs, Central-West suburbs, Central-South suburbs,

Center of Athens, Rest of Attiki, prefecture of Thessaloniki, Rest of Greece). Data imputation was also performed to remediate the missing values and outliers and enable the allocation of EPC class to the affected entries (unique collaterals). A property type mapping was applied to categorize buildings with commercial use as residential where appropriate and assess their eligibility to receive an EPC label.

The methodological approach that was followed, was based on externally provided data and required the fit of a K-Nearest Neighbor (KNN) model having as features the available information in the bank's internal database for relevant real estate properties. A separate model was developed for each of seven regional clusters, following a similar development methodology. Additional features from the ones used in the final model, contained within the dataset of the external provider, which however were not available in the bank's internal database. Following the development of the model a set of post-model business rules were applied to the model outcome related to the construction year and predicted EPC class. The rules applied were in line with business intuition driven by the legislative requirements regarding construction permits.

The developed model yielded an accuracy of plus or minus 1 EPC Energy Class label of 75.7% in the training sample, 74.2% for the test sample, which is considered as an acceptable level of model performance. The performance of the model was in line with the expectations set by YPEKA's distribution of EPC classes per year of construction, considering for the differences in representation of the Bank's sample distribution.

Regarding the energy efficiency estimation (in kWh/m<sup>2</sup>) the Bank from 30.06.2023 enhanced its estimation model considering more factors aligning the Energy efficiency property type mapping with the EPC estimation property.

#### ❖ Evolution, plans for enhanced disclosure, timelines

Since the beginning of 2023, the Bank has implemented policy changes and collects actual EPC information from its clients at loan origination through the new NBG collateral valuation reports, which now contain a new section regarding environmental and social data, as well as relative risk factors for buildings and sites, incorporated in the Bank's proprietary valuation software.

In addition, the redesigned Collateral Valuations forms contain ESG relevant fields as extra coefficient factors of the valuation outcome.

As a result of the forementioned actions, the Bank has already collected more than 3.000 actual EPC labels and relevant data. Moving forward, the newly collected actual data will be incorporated into the EPC label estimation model to further optimize its calculated outcome.

Moreover, the Bank is carrying on the effort to incorporate GIS technologies to its processes and location-based analytics to its tools, to meet the requirements on ESG criteria to facilitate and provide in depth assessments and information on various risks, concerning the Bank's collaterals.

**Table 52: 2.CC - Banking book- Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 30.06.2024**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p														
																	Total gross carrying amount amount													
																	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)							Level of energy efficiency (EPC label of collateral)*						
0; <=100	>100; <=200	>200; <=300	>300; <=400	>400; <=500	>500	A	B	C	D	E	F	G	Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated																	
<b>1 Total EU area</b>	<b>10,986</b>	<b>1,387</b>	<b>2,535</b>	<b>2,595</b>	<b>1,242</b>	<b>563</b>	<b>881</b>	<b>30</b>	<b>58</b>	<b>122</b>	<b>238</b>	<b>82</b>	<b>60</b>	<b>110</b>	<b>10,286</b>	<b>83%</b>														
2 Of which Loans collateralised by commercial immovable property	3,929	106	197	654	524	366	699	0	18	61	129	15	11	2	3,693	63%														
3 Of which Loans collateralised by residential immovable property	6,628	1,280	2,302	1,872	663	172	137	29	35	34	49	25	23	53	6,379	97%														
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	429	2	37	69	56	25	45	1	5	27	59	41	27	55	214	11,3%														
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	8,922	1,343	2,441	2,518	1,216	551	853								8,509	100%														
<b>6 Total non-EU area</b>	<b>850</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>850</b>	<b>0%</b>														
7 Of which Loans collateralised by commercial immovable property	423	0	0	0	0	0	0	0	0	0	0	0	0	0	423	0%														
8 Of which Loans collateralised by residential immovable property	423	0	0	0	0	0	0	0	0	0	0	0	0	0	423	0%														
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	4	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0%														
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated																														

\* According to EBA guidelines, EPC labels are reported only for actual data available to the Bank while energy consumption is presented for both actual and estimated values. If estimated EPC labels are included also, more than half of the total volume would fall within the first three EPC classes (A, B, C).

**Table 52: 2.CC - Banking book- Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral 31.12.2023**

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p														
																	Total gross carrying amount amount													
																	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)							Level of energy efficiency (EPC label of collateral)*						
0; <=100	>100; <=200	>200; <=300	>300; <=400	>400; <=500	>500	A	B	C	D	E	F	G	Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated																	
<b>1 Total EU area</b>	<b>11,103</b>	<b>1,427</b>	<b>2,532</b>	<b>2,644</b>	<b>1,211</b>	<b>536</b>	<b>934</b>	<b>23</b>	<b>51</b>	<b>95</b>	<b>251</b>	<b>79</b>	<b>58</b>	<b>113</b>	<b>10,433</b>	<b>83%</b>														
2 Of which Loans collateralised by commercial immovable property	4,076	133	185	689	507	353	783	0	17	52	156	31	17	25	3,778	62%														
3 Of which Loans collateralised by residential immovable property	6,584	1,292	2,305	1,898	657	164	120	22	29	25	45	15	18	39	6,391	98%														
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	443	2	42	57	47	19	31	1	5	18	50	33	23	49	264	7%														
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	9,055	1,382	2,477	2,578	1,175	525	917	0	0	0	0	0	0	0	9,055	100%														
<b>6 Total non-EU area</b>	<b>825</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>825</b>	<b>0%</b>														
7 Of which Loans collateralised by commercial immovable property	426	0	0	0	0	0	0	0	0	0	0	0	0	0	426	0%														
8 Of which Loans collateralised by residential immovable property	395	0	0	0	0	0	0	0	0	0	0	0	0	0	395	0%														
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	4	0	0	0	0	0	0	0	0	0	0	0	0	0	4	0%														
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0%														

\* According to EBA guidelines, EPC labels are reported only for actual data available to the Bank while energy consumption is presented for both actual and estimated values. If estimated EPC labels are included also, more than half of the total volume would fall within the first three EPC classes (A, B, C).



### Banking book – Climate change transition risk: Alignment metrics

NBG disclosed its first set of Net Zero targets as an integral part of its 2022 ESG Report, and subsequently, joined the NZBA, demonstrating its strategy alignment with the Paris Agreement objectives, committing to achieving Net Zero by 2050 via a set of sector/portfolio-specific targets. Following that, [NBG's 2023 ESG Report](#) incorporated progress updates on the Bank's set targets.

The following template discloses four selected carbon intensive sectors monitored as part of NBG's Net Zero journey, which are included in the predefined sector perimeter, and for which alignment is currently measured and monitored.

For each sector, NBG's target setting process incorporated industry accepted and science-based Net Zero pathways, all of which adhere to the 1.5 degrees Celsius scenario. In particular, the selected reference pathways are those of the International Energy Agency (IEA), and, in the case of aluminium, the Making Possible Partnership (MPP) Net Zero 1.5 degrees Celsius scenario, which covers aluminum smelting, a sub-sector specifically targeted by the Bank.

Overall, across portfolios included in its target setting, NBG incorporates on-balance sheet loan, debt securities, and equities exposures to eligible client segments, in accordance with the PCAF methodology. NBG is committed to continuing monitoring progress towards Net Zero and communicating targets for all material carbon-intensive sectors in line with its Net-Zero Banking Alliance (NZBA) pledge.

**Table 53: 3.CC - Banking book - Climate change transition risk: Alignment metrics 30.06.2024**

	a	b	c	d	e	f	g
	Sector	NACE Sectors (a minima) <sup>1</sup>	Portfolio gross carrying amount (Mn EUR) <sup>2</sup>	Alignment metric <sup>3</sup>	Year of reference	Distance to IEA NZE2050 in % <sup>4</sup>	Target (year of reference + 3 years) <sup>5</sup>
1	Power	D35	2,067	131 kgCO <sub>2</sub> e/MWh	30.06.2024	(21)	120
2	Fossil fuel combustion	C19	943	75 indexed tCO <sub>2</sub> e 2022	30.06.2024	9	70
6	Cement, clinker and lime production	C2363, C2351	93	0.63 tCO <sub>2</sub> e/t cementitious	30.06.2024	36	0.52
7	Iron and steel, coke, and metal ore production	C2442	37	11.3 tCO <sub>2</sub> e/taluminium	30.06.2024	84	11.3

<sup>1</sup> Perimeter of NACE sectors included is based on the design choices employed for NBG's Net Zero target setting process, as described in detail in the Bank's 2022 and 2023 ESG Reports, not limited to the indicative list of NACE codes provided for consideration.

<sup>2</sup> Includes Bank's on-balance sheet loan, debt securities, and equities exposures to eligible client segments, in accordance with the PCAF methodology, with reference date 30.06.2024.

<sup>3</sup> Each disclosed sector is monitored for alignment using a single production-based alignment metric, as shown. Alignment metrics are compatible with the respective referenced IEA NZE 2050 and MPP 1.5 degrees scenarios.

<sup>4</sup> Represents the point-in-time distance of the column d Alignment metrics as at reference date to the 2030 interim mark in the referenced scenarios.

<sup>5</sup> Targets shown in this column are the Bank's 2030 interim set targets, as the bank has not publicly disclosed +3-year targets from the current point of reference.

### Banking book- Climate change transition risk: Climate change transition risk: Exposures to top 20 carbon-intensive firms

The Bank has exposure towards one counterparty that is among the top-20 most carbon intensive corporates worldwide. The exposure stems from factoring activities, thus does not constitute a direct exposure.

**Table 54:** 4.CC - Banking book- Climate change transition risk: Climate change transition risk: Exposures to top 20 carbon-intensive firms 30.06.2024 (mio)

	a	b	c	d	e
Gross carrying amount (aggregate)		Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	24	0.11%	0	1	1

\*For counterparties among the top 20 carbon emitting companies in the world as per Climate Accountability Institute (<https://www.thecorporategovernanceinstitute.com/insights/news-analysis/the-20-most-polluting-companies-in-the-world-esg/>)

**Table 53:** 4.CC - Banking book- Climate change transition risk: Climate change transition risk: Exposures to top 20 carbon-intensive firms 31.12.2023 (mio)

	a	b	c	d	e
Gross carrying amount (aggregate)		Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate)*	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	-	-	-	-	-

\*For counterparties among the top 20 carbon emitting companies in the world as per Climate Accountability Institute (<https://www.thecorporategovernanceinstitute.com/insights/news-analysis/the-20-most-polluting-companies-in-the-world-esg/>)

## Banking book- Climate change physical risk: Exposures subject to physical risk

### ❖ Summary, comments on content / perimeter

The template presents information on exposures in the banking book (including loans and advances, debt securities and equity instruments not held-for-trading and not held-for-sale), towards non-financial corporates, broken down by economic activity (NACE code), for the sectors that are sensitive to acute and/or chronic climate change events. It also provides information on loans collateralized with immovable property and on repossessed real estate collateral, exposed to chronic and acute climate-related hazards. Exposures (or the portion thereof) collateralized by other collateral types have been excluded.

All exposures are included in the first column (Gross carrying amount) whereas exposures sensitive to impact from climate change physical events are shown in following columns according to relevant breakdowns presented considering their remaining maturities, climate risk sensitivity and credit quality.

For rows 'Loans Collateralized by Residential Real Estate / Commercial Real Estate' the gross carrying amount of exposures covered by RRE and CRE is grouped according to the climate zone of the collateral.

### ❖ Approach limitations

The materiality assessment for physical risk has been carried out by the Bank for exposures in Greece, covering 85% of total Group exposures.

### ❖ Methodological approach, key assumptions, applicable standards used

Apart from the materiality assessment of transition risk, the Bank is currently performing the materiality assessment for physical risks in the loan portfolio. The Bank has laid down a methodology based on sensitivity and exposure analysis (when separately assessed) to derive vulnerability to physical risk factors. The vulnerability assessment aims to identify potential significant hazards and related risk and forms the basis for the decision to continue the risk assessment, while it is aligned with the Invest EU methodology ("Technical guidance on the climate proofing of infrastructure in the period 2021-2027") and with the "ECB: Good practices for climate related and environmental risk management: Observations from the 2022 thematic review". The analysis is applied to the corporate portfolio per NACE sector (22 NACE codes) at a country level (Greece), while for exposures covered by real estate (RE) properties - collateral the analysis is applied at a regional level for each of the 4 climatic zones in Greece.

The analysis is broken down into three steps, comprising of a sensitivity analysis, an assessment of the exposure, and then a combination of the two for the vulnerability assessment. Therefore, a 3-level sensitivity score from low to high is assigned to each sector taking into consideration the sensitivity of the specific economic activities (e.g. power generation) to physical risks (e.g. drought). The aim of the sensitivity analysis (3-level score) is to identify which climate risks are relevant to the specific type of asset, irrespective of its location. Sources used to assess sensitivity analysis include EU, national reports, and scientific literature publicly available. The aim of the exposure analysis (3-level score) is to identify which climate physical risks (eight acute and eight chronic) are relevant to the location

irrespective of the asset's sector or type, and it is useful to understand how the exposure of different areas will change as a result of changing climate conditions.

For the assessment of exposure to future conditions, climate projections for the hot-house scenario of IPCC AR5 RCP 8.5 with a horizon of 2050 are taken into consideration. Climate projections have been used, from 7 selected state-of-the-art pairs of global / regional climate models (GCMs / RCMs) developed under the EURO-CORDEX program with an horizontal spatial resolution of about 11x11 km.

Analysis indicated that NACE sector A scores a high level of vulnerability both at chronic and acute risks, while sectors B, D and E score a high level of vulnerability at acute risks.

Further analysis shows that the climate vulnerability score for the sub-sector D35.11 Production of electricity is Medium both for chronic, acute and chronic and acute risks.

In parallel, the Bank has developed a methodological approach to estimate the vulnerability of real estate (RE) properties (linked to mortgages/collaterals) to all physical climate risks and to selected risks which are more relevant to buildings type of asset (i. sea level rise, soil & coastal erosion; ii. soil & coastal erosion; iii. wildfire; iv. cyclone/ hurricane/ typhoon/ storm/ tornado; v. floods), taking into consideration their max value per climate zone (four climatic zones). Analysis has been carried out at a regional level, in order to capture at a higher resolution, the impact of climate change. Analysis indicated that the climate vulnerability of RE properties located at Climate Zone D has been estimated as Low, at Climate Zones B and C estimated as Medium, while at Climate Zone A as High for Acute risks.

From those three classifications, exposures to geographical areas with High climate vulnerability, are included in the set of 'exposures sensitive to impact from climate change physical events' under the respective categories of 'chronic', 'acute', 'chronic and acute'.

### ❖ Evolution, plans for enhanced disclosure, timelines

The Bank will continue to assess the vulnerability of its exposures to physical risk factors and will enhance its methodology to increase the granularity and perimeter of relevant inputs along with the level of accuracy of corresponding results screening criteria for Taxonomy-aligned economic activities set out in the Climate Delegated Act. Those guidelines considered in relevant calculations and disclosures to the extent possible.

ESG RISKS

**Table 55: 5.CC - Banking book- Climate change physical risk: Exposures subject to physical risk 30.06.2024**

a	b	c	d	e	f	g	h	i	j	k	l	m	n	n
Gross carrying amount														
	of which exposures sensitive to impact from climate change physical events													
	Breakdown by maturity bucket					Average weighted maturity	of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events*	of which exposures sensitive to impact from both chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	<= 5 years	> 5 <= 10 years	> 10 <= 20 years	> 20 years	of which Stage 2 exposures							Of which non-performing exposures		
1 A - Agriculture, forestry and fishing	294	213	55	14	0	3	-	-	283	25	11	(9)	(2)	(4)
2 B - Mining and quarrying	91	13	69	-	-	7	-	82	-	0	1	(1)	(0)	(0)
3 C - Manufacturing	4,146	-	-	-	-	-	-	-	-	-	-	0	0	0
4 D - Electricity, gas, steam and air conditioning supply	3,535	559	115	288	42	8	-	1,005	-	2	0	(8)	(0)	(0)
5 E - Water supply; sewerage, waste management and remediation activities	56	26	18	11	0	5	-	55	-	1	0	(1)	(0)	(0)
6 F - Construction	549	-	-	-	-	-	-	-	-	-	-	0	0	0
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,333	-	-	-	-	-	-	-	-	-	-	0	0	0
8 H - Transportation and storage	4,690	-	-	-	-	-	-	-	-	-	-	0	0	0
9 L - Real estate activities	1,419	-	-	-	-	-	-	-	-	-	-	0	0	0
10 Loans collateralised by residential immovable property	7,051	53	88	302	533	21	-	976	-	237	54	(21)	(11)	(8)
11 Loans collateralised by commercial immovable property	4,352	292	490	361	3	7	-	1,145	-	147	88	(61)	(22)	(31)
12 Repossessed collaterals	433	-	-	-	-	-	-	63	-	-	-	(10)	-	-
13 Other relevant sectors (breakdown below where relevant)	4,053	-	-	-	-	-	-	-	-	-	-	-	-	-

\* Initial Gross carrying amounts of Loans collateralised by residential or commercial immovable property contain exposures that don't fall within the geographical areas in scope (Climate zones in Greece), thus don't participate in the analysis of sensitivity of collaterals to climate change events.

**Table 54: 5.CC - Banking book- Climate change physical risk: Exposures subject to physical risk 31.12.2023**

a	b	c	d	e	f	g	h	i	j	k	l	m	n	n
Gross carrying amount														
	of which exposures sensitive to impact from climate change physical events													
	Breakdown by maturity bucket					Average weighted maturity	of which exposures sensitive to impact from chronic climate change events	of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact from both chronic and acute climate change events	Of which Stage 2 exposures	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
	<= 5 years	> 5 <= 10 years	> 10 <= 20 years	> 20 years	of which Stage 2 exposures							Of which non-performing exposures		
1 A - Agriculture, forestry and fishing	348	231	72	14	-	3	-	-	318	59	8	(13)	(4)	(6)
2 B - Mining and quarrying	98	23	61	0	-	7	-	84	-	2	1	(1)	0	0
3 C - Manufacturing	4,441	-	-	-	-	-	-	-	-	-	-	-	-	-
4 D - Electricity, gas, steam and air conditioning supply	2,689	492	2	221	-	6	-	715	-	0	0	(6)	0	0
5 E - Water supply; sewerage, waste management and remediation activities	52	21	13	11	-	6	-	-	45	1	0	(1)	0	0
6 F - Construction	510	-	-	-	-	-	-	-	-	-	-	-	-	-
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	3,273	-	-	-	-	-	-	-	-	-	-	-	-	-
8 H - Transportation and storage	4,334	-	-	-	-	-	-	-	-	-	-	-	-	-
9 L - Real estate activities	1,431	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Loans collateralised by residential immovable property	6,979	45	88	308	560	22	-	1,001	-	279	48	(28)	(14)	(12)
11 Loans collateralised by commercial immovable property	4,502	253	504	212	36	8	-	1,005	-	174	65	(42)	(8)	(26)
12 Repossessed collaterals	447	-	-	-	-	-	-	25	-	-	-	(3)	-	-
13 Other relevant sectors (breakdown below where relevant)	3,718	-	-	-	-	-	-	-	-	-	-	-	-	-

### Key performance indicators (KPIs) on the Taxonomy-aligned exposures and assets for the calculation of GAR

GAR KPI illustrates the percentage of the Group's assets dedicated to financing and invested in economic activities aligned with the EU Taxonomy, relative to the total covered assets, excluding exposures to Sovereign, central banks and trading book.

The GAR for the Group for 2023 is 1.8% based on Turnover. For both eligibility and alignment ratios calculation the NBG Group evaluated the relevant criteria for the two environmental objectives of Climate Change Mitigation (CCM) and Climate Change Adaptation (CCA). Aligned amount included in the numerator of GAR refer to exposures to financial corporations, nonfinancial corporations subject to NFRD, as well as exposures related to mortgage loans and repossessed assets. For both eligibility and alignment assessment of financial and non-financial corporations, publicly available information was retrieved regarding the disclosed EU taxonomy relevant KPIs, as well as for the number of employees and listing status of each counterparty, to determine NFRD perimeter. Finally, the European Commission published, on 21st of December, an additional notice regarding the legal interpretation and implementation of the provisions covering the technical screening criteria for Taxonomy-aligned economic activities set out in the Climate Delegated Act. Those guidelines considered in relevant calculations and disclosures to the extent possible.

The eligibility ratio for the rest four environmental objectives, as per the Delegated Acts (Delegated Regulation (EU) 2023/2485 and Delegated Regulation (EU) 2023/2486) released by the European Commission in July of 2023, was not calculated due to data availability constraints.

#### ❖ Considerations

The level of GAR ratio is driven by a set of considerations and assumptions that play a pivotal role in determining the final figure, as highlighted below:

- Given the timing of the disclosure requirements, GAR calculation leverage on published eligibility and alignment ratios of the counterparties for the financial year 2022, reflecting in most cases the latest available data. For financial corporations only eligibility ratios were required to be disclosed in 2022 and therefore used in Group's EU taxonomy assessment.
- NFRD perimeter is limited compared to total Group's portfolio since Greek economy incorporates a lot of unlisted and SMEs that are out of scope of EU taxonomy assessment. Furthermore, in certain cases, non-financial corporations subject to NFRD regulations have reported only eligibility ratios on the backdrop of the difficulty in applying the EU taxonomy criteria.
- Currently, there is no publicly available registry in Greece regarding the properties' energy performance information that could be used as a source of mortgage portfolio alignment assessment by credit institutions. Also, there is lack of actual Energy Performance Certificates (EPCs), as their issuance is mandatory only upon a transaction according to the provisions of the relevant EU Directives (Energy Performance of Buildings Directive (2010/31/EU) and the Energy Efficiency Directive (2012/27/EU)).
- Collection of relevant and adequate documentation as evidence for evaluating the alignment of specialized lending, and, more specifically, for conducting due diligence on the Technical Screening Criteria ("TSC") for Significant Contribution and DNSH, as well as for checking compliance with minimum social safeguards, is also proving a significant challenge.

**Table 56:** 6.CC - Summary of GAR KPIs 30.06.2024

	KPI			% coverage (over total assets)*
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
<b>GAR stock</b>	1.8%	0.0%	1.8%	23.7%
<b>GAR flow</b>	1.0%	0.0%	1.0%	26.6%

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

**Table 55:** 6.CC - Summary of GAR KPIs 31.12.2023

	KPI			% coverage (over total assets)*
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
<b>GAR stock</b>	1.7%	0.0%	1.8%	22%
<b>GAR flow</b>	10.2%	0.2%	10.4%	42%

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

Table 57: 8.CC - GAR (%) KPIs on stock 30.06.2024

% (compared to total covered assets in the denominator)	Disclosure reference date 30.06.2024: KPIs on stock									
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors				
	Of which environmentally sustainable					Of which environmentally sustainable				
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which adaptation	Of which enabling
1 <b>GAR</b>	20.20%	1.79%	1.48%	0.01%	0.07%	0.56%	0.02%	-	-	0.02%
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	56.04%	5.24%	4.34%	0.03%	0.20%	1.64%	0.05%	-	-	0.05%
3 <b>Financial corporations</b>	18.91%	1.19%	-	0.02%	0.08%	0.17%	0.01%	-	-	-
4 Credit institutions	33.98%	1.94%	-	-	0.03%	0.34%	-	-	-	-
5 Other financial corporations	4.56%	0.47%	-	0.03%	0.14%	0.02%	0.01%	-	-	-
6 of which investment firms	2.86%	0.11%	-	-	0.00%	0.00%	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	14.51%	2.60%	0.00%	0.19%	0.95%	0.10%	0.10%	-	-	-
9 <b>Non-financial corporations subject to NFRD disclosure obligations</b>	42.84%	16.51%	14.06%	0.09%	0.61%	5.37%	0.16%	-	-	0.16%
10 Households	72.10%	0.18%	0.18%	-	-	-	-	-	-	-
11 of which loans collateralised by residential immovable property	94.71%	0.28%	0.28%	-	-	-	-	-	-	-
12 of which building renovation loans	100.00%	-	-	-	-	-	-	-	-	-
13 of which motor vehicle loans	100.00%	-	-	-	-	-	-	-	-	-
14 Local government financing	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	-	-	-	-	-	-	-	-	-

Table 56: 8.CC - GAR (%) KPIs on stock 30.06.2024 (continued)

% (compared to total covered assets in the denominator)	Disclosure reference date 30.06.2024: KPIs on stock						Proportion of total assets covered
	<b>TOTAL (CCM + CCA)</b>						
	Proportion of eligible assets funding taxonomy relevant sectors						
	Of which environmentally sustainable						
			Of which specialised lending	Of which transitional/adaptation	Of which enabling		
1 <b>GAR</b>	<b>20.76%</b>	<b>1.81%</b>	<b>1.48%</b>	<b>0.01%</b>	<b>0.08%</b>	<b>23.74%</b>	
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	57.68%	5.29%	4.34%	0.03%	0.24%	23.05%	
3 <b>Financial corporations</b>	<b>19.08%</b>	<b>1.20%</b>	<b>-</b>	<b>0.02%</b>	<b>0.08%</b>	<b>3.14%</b>	
4 Credit institutions	34.32%	1.94%	-	-	0.03%	1.53%	
5 Other financial corporations	4.58%	0.49%	-	0.03%	0.14%	1.61%	
6 of which investment firms	2.87%	0.11%	-	-	-	1.37%	
7 of which management companies	-	-	-	-	-	-	
8 of which insurance undertakings	14.61%	2.70%	-	0.19%	0.95%	0.23%	
9 <b>Non-financial corporations subject to NFRD disclosure obligations</b>	<b>48.21%</b>	<b>16.67%</b>	<b>14.06%</b>	<b>0.09%</b>	<b>0.77%</b>	<b>6.95%</b>	
10 Households	72.10%	0.18%	0.18%	-	-	12.96%	
11 of which loans collateralised by residential immovable property	94.71%	0.28%	0.28%	-	-	8.15%	
12 of which building renovation loans	100.00%	-	-	-	-	1.46%	
13 of which motor vehicle loans	100.00%	-	-	-	-	0.17%	
14 Local government financing	-	-	-	-	-	-	
15 Housing financing	-	-	-	-	-	-	
16 Other local governments financing	-	-	-	-	-	-	
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	-	-	-	-	0.69%	

Table 56: 8.CC - GAR (%) KPIs on stock 31.12.2023

	Disclosure reference date 31.12.2023: KPIs on stock										
	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				
	Proportion of eligible assets funding taxonomy relevant sectors						Proportion of eligible assets funding taxonomy relevant sectors				
	% (compared to total covered assets in the denominator)	Of which environmentally sustainable					Of which environmentally sustainable				
		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which adaptation	Of which enabling			
a	b	c	d	e	f	g	h	i	j		
1	<b>GAR</b>	19.5%	1.7%	1.5%	0.0%	0.1%	0.9%	0.0%	-	-	-
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	55.59%	5.21%	4.4%	0.0%	0.26%	2.79%	0.1%	-	-	-
3	<b>Financial corporations</b>	19.0%	-	-	-	-	-	-	-	-	-
4	Credit institutions	19.8%	-	-	-	-	-	-	-	-	-
5	Other financial corporations	17.4%	-	-	-	-	-	-	-	-	-
6	of which investment firms	21.7%	-	-	-	-	-	-	-	-	-
7	of which management companies	-	-	-	-	-	-	-	-	-	-
8	of which insurance undertakings	3.8%	-	-	-	-	-	-	-	-	-
9	<b>Non-financial corporations subject to NFRD disclosure obligations</b>	32.7%	17.5%	14.7%	0.0%	0.9%	9.5%	0.3%	-	-	-
10	Households	75.6%	0.1%	0.1%	-	-	-	-	-	-	-
11	of which loans collateralised by residential immovable property	91.8%	0.2%	0.2%	-	-	-	-	-	-	-
12	of which building renovation loans	100.0%	-	-	-	-	-	-	-	-	-
13	of which motor vehicle loans	100.0%	-	-	-	-	-	-	-	-	-
14	Local government financing	-	-	-	-	-	-	-	-	-	-
15	Housing financing	-	-	-	-	-	-	-	-	-	-
16	Other local governments financing	-	-	-	-	-	-	-	-	-	-
17	Collateral obtained by taking possession: residential and commercial immovable properties	100.0%	-	-	-	-	-	-	-	-	-

Table 56: 8.CC - GAR (%) KPIs on stock 31.12.2023 (continued)

	Disclosure reference date 31.12.2023: KPIs on stock						
	TOTAL (CCM + CCA)						
	Proportion of eligible assets funding taxonomy relevant sectors						Proportion of total assets covered
	% (compared to total covered assets in the denominator)	Of which environmentally sustainable					
		Of which specialised lending	Of which transitional/ adaptation	Of which enabling			
k	l	m	n	o	p		
1	<b>GAR</b>	20.4%	1.8%	1.5%	0.0%	0.1%	22.18%
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	58.38%	5.31%	4.4%	0.0%	0.26%	21.47%
3	<b>Financial corporations</b>	19.0%	-	-	-	-	2.83%
4	Credit institutions	19.8%	-	-	-	-	1.85%
5	Other financial corporations	17.4%	-	-	-	-	0.98%
6	of which investment firms	21.7%	-	-	-	-	0.75%
7	of which management companies	-	-	-	-	-	-
8	of which insurance undertakings	3.8%	-	-	-	-	0.23%
9	<b>Non-financial corporations subject to NFRD disclosure obligations</b>	42.2%	17.8%	14.7%	0.0%	0.9%	6.29%
10	Households	75.6%	0.1%	0.1%	-	-	12.36%
11	of which loans collateralised by residential immovable property	91.8%	0.2%	0.2%	-	-	8.02%
12	of which building renovation loans	100.0%	-	-	-	-	1.35%
13	of which motor vehicle loans	100.0%	-	-	-	-	0.13%
14	Local government financing	-	-	-	-	-	-
15	Housing financing	-	-	-	-	-	-
16	Other local governments financing	-	-	-	-	-	-
17	Collateral obtained by taking possession: residential and commercial immovable properties	100.0%	-	-	-	-	0.71%

Table 56: 8.CC - GAR (%) KPIs on flows 30.06.2024

% (compared to total covered assets in the denominator)	Disclosure reference date 30.06.2024: KPIs on flows									
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors				
	Of which environmentally sustainable					Of which environmentally sustainable				
1	<b>GAR</b>	<b>9.15%</b>	<b>0.96%</b>	<b>0.61%</b>	<b>0.01%</b>	<b>0.07%</b>	<b>0.08%</b>	<b>0.03%</b>	-	<b>0.03%</b>
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	26.85%	2.85%	1.83%	0.04%	0.22%	0.23%	0.10%	-	0.09%
3	<b>Financial corporations</b>	<b>3.64%</b>	<b>0.21%</b>	-	-	-	<b>0.28%</b>	-	-	-
4	Credit institutions	44.73%	5.45%	-	-	-	15.38%	-	-	-
5	Other financial corporations	2.90%	0.11%	-	-	-	-	-	-	-
6	of which investment firms	2.90%	0.11%	-	-	-	-	-	-	-
7	of which management companies	-	-	-	-	-	-	-	-	-
8	of which insurance undertakings	-	-	-	-	-	-	-	-	-
9	<b>Non-financial corporations subject to NFRD disclosure obligations</b>	<b>27.83%</b>	<b>6.21%</b>	<b>4.01%</b>	<b>0.09%</b>	<b>0.52%</b>	<b>0.30%</b>	<b>0.23%</b>	-	<b>0.22%</b>
10	Households	65.87%	0.52%	0.52%	-	-	-	-	-	-
11	of which loans collateralised by residential immovable property	96.06%	0.98%	0.98%	-	-	-	-	-	-
12	of which building renovation loans	100.00%	-	-	-	-	-	-	-	-
13	of which motor vehicle loans	100.00%	-	-	-	-	-	-	-	-
14	Local government financing	-	-	-	-	-	-	-	-	-
15	Housing financing	-	-	-	-	-	-	-	-	-
16	Other local governments financing	-	-	-	-	-	-	-	-	-
17	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	-	-	-	-	-	-	-	-

Table 56: 8.CC - GAR (%) KPIs on flows 30.06.2024 (continued)

% (compared to total covered assets in the denominator)	Disclosure reference date 30.06.2024: KPIs on flows						
	TOTAL (CCM + CCA)						
	Proportion of eligible assets funding taxonomy relevant sectors						
	Of which environmentally sustainable						
1	<b>GAR</b>	<b>9.22%</b>	<b>0.99%</b>	<b>0.61%</b>	<b>0.01%</b>	<b>0.11%</b>	<b>26.64%</b>
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	27.08%	2.95%	1.83%	0.04%	0.32%	25.63%
3	<b>Financial corporations</b>	<b>3.92%</b>	<b>0.21%</b>	-	-	-	<b>9.66%</b>
4	Credit institutions	60.11%	5.45%	-	-	-	0.17%
5	Other financial corporations	2.90%	0.11%	-	-	-	9.49%
6	of which investment firms	2.90%	0.11%	-	-	-	9.49%
7	of which management companies	-	-	-	-	-	-
8	of which insurance undertakings	-	-	-	-	-	-
9	<b>Non-financial corporations subject to NFRD disclosure obligations</b>	<b>28.13%</b>	<b>6.43%</b>	<b>4.01%</b>	<b>0.09%</b>	<b>0.74%</b>	<b>11.41%</b>
10	Households	65.87%	0.52%	0.52%	-	-	5.46%
11	of which loans collateralised by residential immovable property	96.06%	0.98%	0.98%	-	-	2.94%
12	of which building renovation loans	100.00%	-	-	-	-	0.27%
13	of which motor vehicle loans	100.00%	-	-	-	-	0.51%
14	Local government financing	-	-	-	-	-	-
15	Housing financing	-	-	-	-	-	-
16	Other local governments financing	-	-	-	-	-	-
17	Collateral obtained by taking possession: residential and commercial immovable properties	100.00%	-	-	-	-	0.11%



Table 56: 8.CC - GAR (%) KPIs on flows 31.12.2023

	Disclosure reference date 31.12.2023: KPIs on flows									
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors				
	% (compared to total covered assets in the denominator)	Of which environmentally sustainable			Of which specialised lending	Of which environmentally sustainable			Of which specialised lending	Of which adaptation
Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which adaptation	Of which enabling			
1 <b>GAR</b>	43.5%	10.2%	9.2%	0.0%	0.2%	1.4%	0.2%	-	-	-
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	43.25%	10.25%	9.22%	0.01%	0.19%	1.46%	0.18%	-	-	-
3 <b>Financial corporations</b>	29.0%	-	-	-	-	-	-	-	-	-
4 Credit institutions	23.6%	-	-	-	-	-	-	-	-	-
5 Other financial corporations	31.5%	-	-	-	-	-	-	-	-	-
6 of which investment firms	31.5%	-	-	-	-	-	-	-	-	-
7 of which management companies	-	-	-	-	-	-	-	-	-	-
8 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-
9 <b>Non-financial corporations subject to NFRD disclosure obligations</b>	34.3%	16.8%	15.0%	0.0%	0.3%	2.5%	0.3%	-	-	-
10 Households	73.1%	1.1%	1.1%	-	-	-	-	-	-	-
11 of which loans collateralised by residential immovable property	100.0%	1.9%	1.9%	-	-	-	-	-	-	-
12 of which building renovation loans	100.0%	-	-	-	-	-	-	-	-	-
13 of which motor vehicle loans	100.0%	-	-	-	-	-	-	-	-	-
14 Local government financing	-	-	-	-	-	-	-	-	-	-
15 Housing financing	-	-	-	-	-	-	-	-	-	-
16 Other local governments financing	-	-	-	-	-	-	-	-	-	-
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.0%	-	-	-	-	-	-	-	-	-

Table 56: 8.CC - GAR (%) KPIs on flows 31.12.2023 (continued)

	Disclosure reference date 31.12.2023: KPIs on flows						Proportion of total assets covered
	TOTAL (CCM + CCA)						
	Proportion of eligible assets funding taxonomy relevant sectors						
	% (compared to total covered assets in the denominator)	Of which environmentally sustainable			Of which specialised lending	Of which transitional/adaptation	
Of which specialised lending		Of which transitional	Of which enabling				
1 <b>GAR</b>	45.0%	10.4%	9.2%	0.0%	0.2%	41.97%	
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	44.7%	10.43%	9.22%	0.01%	0.18%	6.51%	
3 <b>Financial corporations</b>	29.0%	-	-	-	-	2.07%	
4 Credit institutions	23.6%	-	-	-	-	4.44%	
5 Other financial corporations	31.5%	-	-	-	-	4.44%	
6 of which investment firms	31.5%	-	-	-	-	-	
7 of which management companies	-	-	-	-	-	-	
8 of which insurance undertakings	-	-	-	-	-	24.92%	
9 <b>Non-financial corporations subject to NFRD disclosure obligations</b>	36.8%	17.1%	15.0%	0.0%	0.3%	10.54%	
10 Households	73.1%	1.1%	1.1%	-	-	6.34%	
11 of which loans collateralised by residential immovable property	100.0%	1.9%	1.9%	-	-	0.65%	
12 of which building renovation loans	100.0%	-	-	-	-	0.60%	
13 of which motor vehicle loans	100.0%	-	-	-	-	-	
14 Local government financing	-	-	-	-	-	-	
15 Housing financing	-	-	-	-	-	-	
16 Other local governments financing	-	-	-	-	-	0.20%	
17 Collateral obtained by taking possession: residential and commercial immovable properties	100.0%	-	-	-	-	42.17%	

Table 58: 7.CC - Mitigating actions: Assets for the calculation of GAR 30.06.2024

		a	b	c	d	e	f	g	h	i	j	k
		2024										
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					
		Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which adaptation	Of which enabling					
<b>GAR - Covered assets in both numerator and denominator</b>												
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	17,194	9,635	901	746	5	34	282	9	0	0	8
2	<b>Financial corporations</b>	2,342	443	28	-	-	2	4	-	-	-	-
3	Credit institutions	1,142	388	22	-	-	-	4	-	-	-	-
4	Loans and advances	498	160	10	-	-	-	2	-	-	-	-
5	Debt securities, including UoP	631	222	12	-	-	-	2	-	-	-	-
6	Equity instruments	13	5	-	-	-	-	-	-	-	-	-
7	<b>Other financial corporations</b>	1,200	55	6	-	-	2	-	-	-	-	-
8	of which investment firms	1,025	29	1	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	1,018	29	1	-	-	-	-	-	-	-	-
11	Equity instruments	7	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	175	25	5	-	-	2	-	-	-	-	-
17	Loans and advances	175	25	5	-	-	2	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial corporations (subject to NFRD disclosure obligations)</b>	5,184	2,221	856	729	5	32	278	8	0	0	8
21	Loans and advances	4,893	2,074	844	729	5	32	278	8	0	0	8
22	Debt securities, including UoP	241	97	12	-	-	-	-	-	-	-	-
23	Equity instruments	49	49	-	-	-	-	-	-	-	-	-
24	<b>Households</b>	9,668	6,971	17	17	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	6,078	5,756	17	17	-	-	-	-	-	-	-
26	of which building renovation loans	1,087	1,087	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	128	128	-	-	-	-	-	-	-	-	-
28	<b>Local governments financing</b>	-	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	516	516	-	-	-	-	-	-	-	-	-
32	<b>TOTAL GAR ASSETS</b>	17,710	10,151	901	746	5	34	282	9	-	-	8
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>												
33	<b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>	13,322										
34	Loans and advances	13,305										
35	Debt securities	11										
36	Equity instruments	6										
37	<b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>	3,659										
38	Loans and advances	3,652										
39	Debt securities	0										
40	Equity instruments	6										
41	Derivatives	112										
42	On demand interbank loans	234										
43	Cash and cash-related assets	792										
44	Other assets (e.g. Goodwill, commodities etc.)	14,429										
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>	50,258										
<b>Other assets excluded from both the numerator and denominator for GAR-calculation</b>												
46	Sovereigns	14,760										
47	Central banks exposure	7,563										
48	Trading book	2,018										
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>	24,341										
50	<b>TOTAL ASSETS</b>	74,599										

Table 57: 7.CC - Mitigating actions: Assets for the calculation of GAR 30.06.2024 (continued)

		l	m	n	o	p
		2024				
		TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
			Of specialised lending	which transitional/adaptation	Of enabling	which
<b>GAR - Covered assets in both numerator and denominator</b>						
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	9,917	910	746	5	42
2	<b>Financial corporations</b>	447	28	-	-	2
3	Credit institutions	392	22	-	-	-
4	Loans and advances	163	10	-	-	-
5	Debt securities, including UoP	224	12	-	-	-
6	Equity instruments	5	-	-	-	-
7	<b>Other financial corporations</b>	55	6	-	-	2
8	of which investment firms	29	1	-	-	-
9	Loans and advances	-	-	-	-	-
10	Debt securities, including UoP	29	1	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which management companies	-	-	-	-	-
13	Loans and advances	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which insurance undertakings	26	5	-	-	2
17	Loans and advances	26	5	-	-	2
18	Debt securities, including UoP	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	<b>Non-financial corporations (subject to NFRD disclosure obligations)</b>	2,499	864	729	5	40
21	Loans and advances	2,352	852	729	5	40
22	Debt securities, including UoP	97	12	-	-	-
23	Equity instruments	49	-	-	-	-
24	<b>Households</b>	6,971	17	17	-	-
25	of which loans collateralised by residential immovable property	5,756	17	17	-	-
26	of which building renovation loans	1,087	-	-	-	-
27	of which motor vehicle loans	128	-	-	-	-
28	<b>Local governments financing</b>	-	-	-	-	-
29	Housing financing	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	516	-	-	-	-
32	<b>TOTAL GAR ASSETS</b>	10,433	910	746	5	42
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>						
33	<b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>					
34	Loans and advances					
35	Debt securities					
36	Equity instruments					
37	<b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>					
38	Loans and advances					
39	Debt securities					
40	Equity instruments					
41	Derivatives					
42	On demand interbank loans					
43	Cash and cash-related assets					
44	Other assets (e.g. Goodwill, commodities etc.)					
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>					
<b>Other assets excluded from both the numerator and denominator for GAR calculation</b>						
46	Sovereigns					
47	Central banks exposure					
48	Trading book					
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>					
50	<b>TOTAL ASSETS</b>					

Table 57: 7.CC - Mitigating actions: Assets for the calculation of GAR 31.12.2023

2023											
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				
		Of specialised lending	Of which transitional	Of which enabling		Of specialised lending	Of which adaptation	Of which enabling			
GAR - Covered assets in both numerator and denominator											
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16,235	9,026	846	715	0	41	454	15	-	-
2	<b>Financial corporations</b>	2,136	406	-	-	-	-	-	-	-	-
3	Credit institutions	1,397	277	-	-	-	-	-	-	-	-
4	Loans and advances	719	118	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	666	159	-	-	-	-	-	-	-	-
6	Equity instruments	12	0	-	-	-	-	-	-	-	-
7	<b>Other financial corporations</b>	739	129	-	-	-	-	-	-	-	-
8	of which investment firms	564	122	-	-	-	-	-	-	-	-
9	Loans and advances	104	104	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	460	18	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	175	7	-	-	-	-	-	-	-	-
17	Loans and advances	175	7	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-
20	<b>Non-financial corporations (subject to NFRD disclosure obligations)</b>	4,757	1,555	832	701	0	41	454	15	-	-
21	Loans and advances	4,470	1,486	828	701	0	41	400	8	-	-
22	Debt securities, including UoP	248	30	4	-	0	0	54	7	-	-
23	Equity instruments	39	39	-	-	-	-	-	-	-	-
24	<b>Households</b>	9,342	7,065	14	14	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	6,066	5,568	14	14	-	-	-	-	-	-
26	of which building renovation loans	1,020	1,020	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	100	100	-	-	-	-	-	-	-	-
28	<b>Local governments financing</b>	-	-	-	-	-	-	-	-	-	-
29	Housing financing	-	-	-	-	-	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	537	537	-	-	-	-	-	-	-	-
32	<b>TOTAL GAR ASSETS</b>	16,772	9,563	846	715	0	41	454	15	-	-
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>											
33	<b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>	12,807									
34	Loans and advances	12,787									
35	Debt securities	10									
36	Equity instruments	10									
37	<b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>	3,327									
38	Loans and advances	3,321									
39	Debt securities	0									
40	Equity instruments	6									
41	Derivatives	99									
42	On demand interbank loans	336									
43	Cash and cash-related assets	874									
44	Other assets (e.g. Goodwill, commodities etc.)	14,914									
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>	49,129									
<b>Other assets excluded from both the numerator and denominator for GAR-calculation</b>											
46	Sovereigns	15,981									
47	Central banks exposure	8,141									
48	Trading book	2,361									
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>	26,483									
50	<b>TOTAL ASSETS</b>	75,612									

Table 57: 7.CC - Mitigating actions: Assets for the calculation of GAR 31.12.2023 (continued)

		l	m	n	o	p
		2023				
		TOTAL (CCM + CCA)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				
			Of specialised lending	which transitional/adaptation	which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>						
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	9,480	861	715	0	41
2	<b>Financial corporations</b>	406	-	-	-	-
3	Credit institutions	277	-	-	-	-
4	Loans and advances	118	-	-	-	-
5	Debt securities, including UoP	159	-	-	-	-
6	Equity instruments	0	-	-	-	-
7	<b>Other financial corporations</b>	129	-	-	-	-
8	of which investment firms	122	-	-	-	-
9	Loans and advances	104	-	-	-	-
10	Debt securities, including UoP	18	-	-	-	-
11	Equity instruments	-	-	-	-	-
12	of which management companies	-	-	-	-	-
13	Loans and advances	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-
15	Equity instruments	-	-	-	-	-
16	of which insurance undertakings	7	-	-	-	-
17	Loans and advances	7	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-
19	Equity instruments	-	-	-	-	-
20	<b>Non-financial corporations (subject to NFRD disclosure obligations)</b>	2,009	847	701	0	41
21	Loans and advances	1,886	836	701	0	41
22	Debt securities, including UoP	84	11	-	0	0
23	Equity instruments	39	-	-	-	-
24	<b>Households</b>	7,065	14	14	-	-
25	of which loans collateralised by residential immovable property	5,568	14	14	-	-
26	of which building renovation loans	1,020	-	-	-	-
27	of which motor vehicle loans	100	-	-	-	-
28	<b>Local governments financing</b>	-	-	-	-	-
29	Housing financing	-	-	-	-	-
30	Other local governments financing	-	-	-	-	-
31	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	537	-	-	-	-
32	<b>TOTAL GAR ASSETS</b>	10,017	861	715	0	41
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>						
33	<b>EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>					
34	Loans and advances					
35	Debt securities					
36	Equity instruments					
37	<b>Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)</b>					
38	Loans and advances					
39	Debt securities					
40	Equity instruments					
41	Derivatives					
42	On demand interbank loans					
43	Cash and cash-related assets					
44	Other assets (e.g. Goodwill, commodities etc.)					
45	<b>TOTAL ASSETS IN THE DENOMINATOR (GAR)</b>					
<b>Other assets excluded from both the numerator and denominator for GAR-calculation</b>						
46	Sovereigns					
47	Central banks exposure					
48	Trading book					
49	<b>TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR</b>					
50	<b>TOTAL ASSETS</b>					

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

Due to the relevant additional guidelines by EBA, the following table shows the exposures of the Bank, by type of instrument, considered as ‘green’ based on own internal standards, excluding those that have been classified as EU taxonomy aligned and reported in the relevant GAR templates (Templates 7 & 8).

**Table 59:** 10.CC - Other climate change mitigating actions that are not covered in the EU Taxonomy 30.06.2024

a	b	c	d	e	f		
Type of financial instrument	Type of counterparty	Gross carrying amount	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions		
1	<b>Bonds (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)</b>	Financial corporations	82	Yes	No	This category pertains to Green and Sustainable Bonds issued by European Financial Institutions. To determine the type of risk mitigated, NBG evaluated the use of proceeds as outlined in the respective frameworks as well as the corresponding Impact Reports (where available).	
2		Non-financial corporations	17	Yes	No		It includes Green bonds issued by corporations. To determine the type of risk mitigated, NBG evaluated the use of proceeds as outlined in the respective frameworks as well as the corresponding Impact Reports (where available).
3		Of which Loans collateralised by commercial immovable property					
4		Households					
5		Of which Loans collateralised by residential immovable property					
6		Of which building renovation loans					
7		Other counterparties					
8	<b>Loans (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)</b>	Financial corporations	138	Yes	No	Exposures classified as ‘Sustainable’ based on NBG’s internal Sustainable Lending Criteria Framework other than those considered as EU Taxonomy aligned. Specifically, exposures refer mainly to customers operating in power generation from renewable sources, as well as sustainability linked loans.	
9		Non-financial corporations	1.913	Yes	No		
10		Of which Loans collateralised by commercial immovable property	111	Yes	No		
11		Households	102	Yes	No		The balance refers mainly to loan exposures to individual customers that NBG S.A has classified as ‘Green’ based on specific characteristics of lending products with a loan purpose of climate change mitigation, such as loans: - for energy improvements in homes - for the purchase, repair or construction of energy upgraded homes - for the purchase of new hybrid and electric vehicles
12		Of which Loans collateralised by residential immovable property	20	Yes	No		The balance mainly refers to loan exposures related to the purchase, repair or construction of energy upgraded homes.
13		Of which building renovation loans	45	Yes	No		The balance mainly refers to loan exposures related to energy improvements in homes.
14		Other counterparties					

Table 58: 10.CC - Other climate change mitigating actions that are not covered in the EU Taxonomy 31.12.2023

a	b	c	d	e	f	
Type of financial instrument	Type of counterparty	Gross carrying amount	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions	
1	Financial corporations	80	Yes	No	This category pertains to Green and Sustainable Bonds issued by European Financial Institutions. To determine the type of risk mitigated, NBG evaluated the use of proceeds as outlined in the respective frameworks as well as the corresponding Impact Reports (where available).	
2	Non-financial corporations	17	Yes	No	It includes Green bonds issued by corporations. To determine the type of risk mitigated, NBG evaluated the use of proceeds as outlined in the respective frameworks as well as the corresponding Impact Reports (where available).	
3	Of which Loans collateralised by commercial immovable property					
4		Households				
5		Of which Loans collateralised by residential immovable property				
6		Of which building renovation loans				
7		Other counterparties				
8		Financial corporations	0	Yes	No	
9		Non-financial corporations	1,417	Yes	No	Exposures classified as 'Sustainable' based on NBG's internal Sustainable Lending Criteria Framework other than those considered as EU Taxonomy aligned.
10	Of which Loans collateralised by commercial immovable property	80	Yes	No	This category mainly consists of loan exposures to Corporate or SME customers that NBG S.A has classified as 'Sustainable' based on the assessment criteria determined in our internal Sustainable Lending Criteria Framework, and loan balances of obligors that are operating in Renewable Energy Sources-related industry. It also includes balances to Small Business customers for the installation of solar panels and the construction of photovoltaic power stations.	
11	Households	121	Yes	No	The balance refers mainly to loan exposures to individual customers that NBG S.A has classified as 'Green' based on specific characteristics of lending products with a loan purpose of climate change mitigation, such as loans: - for energy improvements in homes - for the purchase, repair or construction of energy upgraded homes - for the purchase of new hybrid and electric vehicles	
12	Of which Loans collateralised by residential immovable property	20	Yes	No	The balance mainly refers to loan exposures related to the purchase, repair or construction of energy upgraded homes.	
13	Of which building renovation loans	74	Yes	No	The balance mainly refers to loan exposures related to energy improvements in homes.	
14	Other counterparties					

## 9 SECURITIZATION

### Overview

This section provides details of traditional and synthetic securitization exposures in the banking and trading book based on the Basel III securitization framework.

The Bank treats securitization transactions per the provisions of Chapter 5, Title II, Part Three of Regulation (EU) No 575/2013 of the European Parliament and the Council, of 26 June 2013, on prudential requirements for credit institutions and investment firms as amended by regulation 2401/2017, complementary regulations 2402/201 and 557/2021 regarding STS securitizations, as well as 558/2021 specifying adjustments to the securitisation framework to support the economic recovery in response to the COVID-19 crisis (hereinafter, the CRR).

An explanation of various basic concepts is given below, to make clear the content of this chapter:

- Securitization is a transaction or scheme whereby the credit risk associated with an asset or pool of assets is divided into tranches, having all the following characteristics:
  - Payments in the transaction or scheme are dependent upon the performance of the securitized asset or pool of assets.
  - The subordination of tranches determines the distribution of losses during the ongoing life of the transaction or scheme.
  - Primary recourse for securitization lies with the underlying securitized financial assets.
- Tranche: a contractually established segment of the credit risk associated with an exposure or exposures, where each position in the segment entails a risk of credit loss greater than or less than a position of the same amount in each of the other segments in line with the order of payment priority outlined in the securitization, without taking into account credit protection provided by third parties directly to the holders of positions in the segment in question or other segments. To this end, every securitization position either forms part of a tranche or constitutes a tranche in itself. Therefore, different types of tranches may be distinguished and are typically the following:
  - First loss tranche (or equity tranche): this is the most subordinated tranche in a securitization. It is the first tranche to bear losses incurred on the securitized exposures and, consequently, it protects the second loss tranche and, where relevant, higher ranking tranches.
  - Intermediate risk tranche (or mezzanine tranche): this tranche has a lower ranking than the highest-ranking position in the securitization and ranks lower than any securitization position within the said agreement.
  - High priority tranche (or senior tranche): any tranche that is not a first loss tranche or an intermediate risk tranche. The 'highest priority tranche' is the tranche of the highest priority among the securitisation payments.
- Traditional securitization: securitization involving the economic transfer of the exposures being securitized to a 'securitization special purpose entity' (SSPE) that issues
  - securities. This can be accomplished by the transfer of ownership of the securitized exposures from the originator. Securities issued by SSPEs do not represent any legally binding payment obligations for the originator institution.
  - Synthetic securitization: means a securitization where the transfer of the credit risk of an asset portfolio risk is achieved by the use of credit derivatives or guarantees (mainly Credit Default Swaps (CDS) or Financial Guarantees). In these transactions, protection sellers acquire a position equivalent to that of a direct investor in the tranche that they are securing.
  - Originator institution: An entity which, by itself or through related entities, directly or indirectly, was involved in the original agreement which created the obligations or potential obligations of the obligor or potential obligor, giving rise to the securitization of the exposure.
  - Investor institution: any institution or subject, different from the originator, that holds a securitization position.
  - Arranger: entity responsible for designing the structure of securitization and determining credit enhancements and the different tranches of securities that will be issued. The arranger may also participate in their placing on the market.

### Objectives in relation to securitizations

As originator, the Bank may securitize financial assets (e.g. mortgage or corporate loans) in a traditional or a synthetic transaction, depending on the objectives of it. The objectives pursued through a transaction can vary from funding to the reduction of the credit risk and capital requirements or more sophisticated asset management.

Securitization offers a series of advantages in terms of liquidity and risk management, facilitating the efficient management of the balance sheet, as a tool that allows:

- Generation of liquidity: the transformation of relatively illiquid assets into marketable securities, which can allow liquidity to be gained in wholesale markets either through their sale or use as collateral.
- Diversification of sources of funding: the diversification of the sources that the Group uses to finance its activities, arising from its objective of obtaining liquidity.
- Capital management: securitizations in which there is an effective transfer of risks contribute to optimizing capital management and contribute to the generation of value.
- Asset disposals: securitizations in which large-scale asset disposals are achieved.

The Bank may securitize financial assets in a traditional or a synthetic transaction, depending on the objectives of each transaction.

The Bank considers all aspects of such transaction and makes a comprehensive judgment on the structure and its appropriateness, assessing the effects on the liquidity position, the reduction of credit risk, the cost of capital, the improvement of return on risk as well as any operational effects. Where the Bank intends to securitize assets it has originated, it ensures the terms and conditions applicable to the proposed securitization and any support facilities or dealings are arm's length and market-based and compliant with prudential regulations. Where the Bank has sold assets to an SSPE but retains a servicer role in



managing those assets, the Bank ensures those securitized assets are effectively ring-fenced from the Bank's own assets per the applicable legislation.

The authorization and approval of the various governing bodies are required to realize or execute transactions.

### Risk inherent to securitizations

The risks associated with securitization activities are mainly assumed by the originator institution and/or investor institutions. Specifically, these risks are the following:

- **Credit risk:** the risk of borrowers being unable to honour their contractual obligations in due time and form (e.g. the non-payment of mortgage loan instalments), which leads to the impairment of the asset which is backing the issued securities. This is the main risk transferred to investors through the securities issued or the use of credit derivatives and financial guarantees.
- **Prepayment risk:** risk arising from the early amortization, either in full or in part, of assets that back the securitization. As a result, the actual maturity of the securities issued may be shorter than the contractual maturity of the underlying assets.
- **Basis risk:** the risk that arises when interest rates or the maturity schedule of securitized assets do not coincide with those of issued bonds. This risk may be covered by the originator institution using interest rate swaps.
- **Commingling risk:** this is the risk that affects all investors and which exists in transactions wherein the payment of interest on the underlying portfolio is not immediately transferred from the originator to the accounts of the SSPE.
- **Liquidity risk:** the risk that the issued securities will not be traded in the market with a frequency or volume that will enable the investor to sell positions at any given time.
- **Operational risk:** securitizations are subject to operational risks, associated with the inadequacy of applied processes. In any securitization, the greatest operational risk relates to the operations required to claim and settle payments of cash flows related to the structure.

### Role and involvement of the Bank

The main functions carried out by the Bank are:

- **Originator:** the Bank has completed various securitization programmes in which, the Bank has assigned pools of residential mortgage loans, loans to small and medium-sized enterprises (SMEs), loans to corporates, financial lease rights and personal consumer loans, to be converted into asset-backed securities.
- **Servicer of securitized portfolios:** the Bank may also act as the servicer of securitized assets, managing the collection of principal and interest payments as well as providing cash management services.
- **Provider of financing:** the Bank may act as a provider of financing associated with subordinated loans for the creation of reserve funds and for loans to fund the initial expenses incurred by SSPEs.
- **Counterparty:** additionally, the Bank may act as a counterparty in swaps to mitigate basis risk.

The Bank has taken on the role of the originator as well as an investor for transactions targeting the generation of liquidity.

The Bank has not carried out any synthetic securitizations or re-securitizations.

As an originator and for the purposes of CRR Article 409, in compliance with that outlined in Article 405, the Bank maintains a commitment to consistently retain in a securitization of which it is an originator, a significant net economic interest of at least 5%, which it has done by retaining at least 5% of the bonds or at least 5% of the portfolio of similar assets.

Article 248 of the CRR sets forth that originator institutions, which in respect of a securitization have made use of Article 245(1) and (2) in the calculation of risk-weighted exposure amounts, shall not, with a view to reducing potential or actual losses to investors, provide support to the securitization beyond their contractual obligations. The implicit support to which this article of the CRR refers is a concept linked to the transfer of risk and refers to a situation in which originator institutions may be providing support to a securitization beyond that contractually agreed, as a result of an actual or expected impairment in the credit quality of the portfolio used to reduce the actual or potential losses to investors.

### Accounting policies for securitization

The accounting of securitized transactions is conditional upon the extent and way in which the risks and rewards associated with the assets transferred are passed on to third parties, as outlined in applicable regulations.

Financial assets are derecognised from the balance sheet when their inherent risks and rewards have been substantially transferred to third parties, and no subordinated loans or any other type of credit enhancements of a significant amount are retained.

Securitizations that do not trigger derecognition from the balance sheet are accounted for in the following manner:

- If the transfer does not result in derecognition because NBG has retained substantially all the risks and rewards of ownership of the transferred assets, IFRS 9 requires NBG to continue to recognize the transferred assets in its entirety and recognise a financial liability for any consideration received. In subsequent periods, NBG recognises any income on the transferred assets and any expense incurred on the financial liability.
- The securitized assets are kept on the balance sheet in the same accounting portfolio before and after the transfer and, as such, no changes are applied to the valuation after securitization.

Once the derecognition criteria described above are met the difference between the consideration received (including any new assets obtained) and the carrying amount of the assets transferred represents the gain or loss from the transaction and is recognised in the income statement.

To analyse the possible consolidation of SSPEs to which the Bank transfers assets, the deciding factor is determining who controls the entity. The following are taken into account:

The first step is the performance of a detailed assessment on whether the Bank controls the Issuer, which will acquire the reference portfolio, and hence needs to consolidate it in accordance with IFRS 10.

### Design of the Transaction

In assessing the purpose and design of the Issuer, the involvement and decisions made by the Bank at the Issuer's

inception as part of its design should be taken into consideration and it should be evaluated whether the transaction terms and features of the involvement provide the Bank with rights that are sufficient to give it power over the Issuer. *Being involved in the design of the Issuer alone is not sufficient to give an investor control. However, involvement in the design may indicate that the Bank had the opportunity to obtain rights that are sufficient to give it power over the Issuer* (IFRS 10. B51).

According to IFRS 10.6, an investor controls an investee when it is exposed, or has rights, to variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. *Under IFRS 10.7, control over the investee exists if and only if the investor has all the following:*

- Power over the investee;
- Exposure, or rights, to variable returns from its involvement with the investee; and
- The ability to use its power over the investee to affect the amount of the investor's returns.

An investor shall consider **all facts and circumstances** stated above when assessing whether it controls an investee (IFRS 10.8).

### Calculating risk-weighted exposures in securitization activities

The approaches used to calculate risk weighted exposure amounts in securitization activities differ in terms of the fulfilment or non-fulfilment of conditions required to assume that a significant amount of risk has been transferred, as outlined in Articles 244 and 245 of the CRR.

For securitizations in which the risk has been significantly transferred, the Bank uses either the standardized approach (SEC-SA) to calculate risk weights in accordance with CRR Article 267 or the external ratings-based approach (SEC-ERBA) to calculate risk weights according to the credit quality rating and the maturity as per CRR Article 263. The SEC-ERBA approach can only be applied for exposures with publicly available rating.

Where no risk has been transferred, capital requirements are calculated for the original securitized exposures, in line with the portfolio and the approach used, determined at the outset based on their characteristics.

### Project “Frontier”

On 17 December 2021, NBG completed the Frontier transaction, which involved the securitization of a portfolio of NPEs with a total gross book value of c. €6 billion as of 30 June 2020, following fulfillment of all conditions' precedent, including receipt of all necessary approvals. The portfolio consisted of predominantly secured Large Corporate, Small and Medium Enterprises (“SMEs”), Small Business Lending (“SBL”), Residential Mortgages and Consumer Loans. NBG retained 100.0% of the Senior Notes, which are guaranteed from the State under the Hellenic Asset Protection Scheme (“HAPS” – see below), selling 95.0% of the Mezzanine and Junior Notes to the consortium consisting of affiliates of Bain Capital Credit (“Bain Capital”), Fortress Investment Group and doValue Greece.

The Bank has also serviced the portfolio on behalf of the noteholders for the period between 17 December 2021 and 4 February 2022, when the migration of the portfolio to the long-term servicer (doValue Greece) took place.

### Project “Frontier II”

On 16 February 2024, NBG completed Frontier II transaction, which involved the securitisation of a portfolio of NPEs, with a total gross book value of c. €1 billion as of 31 December 2021, following fulfillment of all conditions' precedent, including receipt of all necessary approvals. The portfolio consisted of predominantly secured Large Corporate, Small and Medium Enterprises (“SMEs”), Small Business Lending (“SBL”), Residential Mortgages and Consumer Loans. NBG retained 100.0% of the Senior Notes, which are guaranteed from the State under the Hellenic Asset Protection Scheme (“HAPS” – see below), selling 95.0% of the Mezzanine and Junior Notes to funds managed by Bracebridge Capital LLC.

### Hellenic Asset Protection Scheme

In December 2019, the Greek parliament voted for the creation of an Asset Protection Scheme (“APS”) (Greek Law 4649/2019) also known as the “Hercules Scheme”. The Hercules Scheme will support banks on deleveraging NPEs through securitisation, with the aim of obtaining greater market stability. The participation in the Hercules Scheme is voluntary and open to all Greek banks and it does not constitute state aid as guarantees are priced on market terms.

In July 2021, following the approval from the Directorate General for the Competition of the European Commission (the “DG Competition”) on 9 April 2021 and based on the Greek Law 4818/2021, the “Hercules” Scheme (named also as “Hercules II”) was extended by 18 months.

Moreover, in December 2023, following the approval from the European Commission on 28 November 2023 and based on the Greek Law 5072/2023, the “Hercules Scheme” (named also as “Hercules III”) was extended by 12 months.

Under the Hercules III Scheme, the Hellenic Republic will provide guarantees up to €2.0 billion on the senior bonds of securitizations of NPEs. The Hercules Scheme will become effective only when the originator has sold at least 50% plus one of junior tranches (and mezzanine if any) and the notes are of such amount that allows the derecognition and the Significant Risk Transfer (“SRT”) of the securitized receivables.

**Table 60:** EU SEC1 - Securitisation exposures in the non-trading book (€ mio) 30.06.2024

	Institution acts as originator				Institution acts as sponsor			Institution acts as investor				
	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
	STS of which SRT	Non-STS of which SRT	of which SRT		STS	Non-STS			STS	Non-STS		
<b>1 Total exposures</b>	<b>8.4</b>	<b>8.4</b>		<b>8.4</b>					<b>473</b>		<b>473</b>	
2 Retail (total)	8.4	8.4		8.4								
3 residential mortgage	8.4	8.4		8.4								
4 credit card												
5 other retail exposures												
6 re-securitisation												
7 Wholesale (total)									473		473	
8 loans to corporates									473		473	
9 commercial mortgage												
10 lease and receivables												
11 other wholesale												
12 re-securitisation												

**Table 59:** EU SEC1 - Securitisation exposures in the non-trading book (€ mio) 31.12.2023

	Institution acts as originator				Institution acts as sponsor			Institution acts as investor				
	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total
	STS of which SRT	Non-STS of which SRT	of which SRT		STS	Non-STS			STS	Non-STS		
<b>1 Total exposures</b>	<b>6.8</b>	<b>6.8</b>		<b>6.8</b>					<b>324</b>		<b>324</b>	
2 Retail (total)	6.8	6.8		6.8								
3 residential mortgage	6.8	6.8		6.8								
4 credit card												
5 other retail exposures												
6 re-securitisation												
7 Wholesale (total)									324		324	
8 loans to corporates									324		324	
9 commercial mortgage												
10 lease and receivables												
11 other wholesale												
12 re-securitisation												

**Table 61:** EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor (€ mio) 30.06.2024

	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 <1250% RW	1250% RW/ deductions	SEC- IRBA	SEC- ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC- IRBA	SEC- ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC- IRBA	SEC- ERBA (including IAA)	SEC-SA
<b>1 Total exposures</b>							<b>8.4</b>				<b>95.2</b>				<b>7.6</b>
2 Traditional transactions							8.4				95.2				7.6
3 Securitisation							8.4				95.2				7.6
4 Retail							8.4				95.2				7.6
5 Of which STS															
6 Wholesale															
7 Of which STS															
8 Re-securitisation															
9 Synthetic transactions															
10 Securitisation															
11 Retail underlying															
12 Wholesale															
13 Re-securitisation															

## SECURITISATION

**Table 60: EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor (€ mio) 31.12.2023**

	Exposure values (by RW bands/deductions)				Exposure values (by regulatory approach)					RWEA (by regulatory approach)					Capital charge after cap				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions		
<b>1 Total exposures</b>				<b>6.8</b>				<b>6.8</b>				<b>77.1</b>				<b>6.2</b>			
2 Traditional transactions				6.8				6.8				77.1				6.2			
3 Securitisation				6.8				6.8				77.1				6.2			
4 Retail				6.8				6.8				77.1				6.2			
5 Of which STS																			
6 Wholesale																			
7 Of which STS																			
8 Re-securitisation																			
9 Synthetic transactions																			
10 Securitisation																			
11 Retail underlying																			
12 Wholesale																			
13 Re-securitisation																			

**Table 62: EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments (€ mio) 30.06.2024**

	Exposures securitised by the institution Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
<b>1 Total exposures</b>	5,785	5,190	
2 Retail (total)	5,785	5,190	
3 residential mortgage	5,785	5,190	
4 credit card			
5 other retail exposures			
6 re-securitisation			
7 Wholesale (total)			
8 loans to corporates			
9 commercial mortgage			
10 lease and receivables			
11 other wholesale			
12 re-securitisation			

**Table 61: EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments (€ mio) 31.12.2023**

	Exposures securitised by the institution Institution acts as originator or as sponsor		
	Total outstanding nominal amount	Of which exposures in default	Total amount of specific credit risk adjustments made during the period
<b>1 Total exposures</b>	<b>5,155</b>	<b>4,547</b>	
2 Retail (total)	5,155	4,547	
3 residential mortgage	5,155	4,547	
4 credit card			
5 other retail exposures			
6 re-securitisation			
7 Wholesale (total)			
8 loans to corporates			
9 commercial mortgage			
10 lease and receivables			
11 other wholesale			
12 re-securitisation			

## SECURITISATION

## Investments in securitisation positions

On June 30th, 2024, the Group held investments in rated collateralized loan obligations (CLOs) with a total carrying amount of € 474 mn. The aforementioned investments are risk weighted using the securitization External Ratings-Based Approach (SEC-ERBA).

**Table 63:** EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor (€ mio) 30.06.2024

	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)					RWEA (by regulatory approach)					Capital charge after cap				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions			
<b>1 Total exposures</b>	<b>436.7</b>		<b>37.1</b>				<b>473.8</b>					<b>121.6</b>				<b>9.7</b>				
2 Traditional transactions	436.7		37.1				473.8					121.6				9.7				
3 Securitisation	436.7		37.1				473.8					121.6				9.7				
4 Retail																				
5 Of which STS																				
6 Wholesale	436.7		37.1				473.8					121.6				9.7				
7 Of which STS																				
8 Re-securitisation																				
9 Synthetic transactions																				
10 Securitisation																				
11 Retail underlying																				
12 Wholesale																				
13 Re-securitisation																				

**Table 62:** EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor (€ mio) 31.12.2023

	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)					RWEA (by regulatory approach)					Capital charge after cap				
	≤20% RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions			
<b>1 Total exposures</b>	<b>277</b>		<b>47</b>				<b>324</b>					<b>98</b>				<b>7.8</b>				
2 Traditional transactions	277		47				324					98				7.8				
3 Securitisation	277		47				324					98				7.8				
4 Retail																				
5 Of which STS																				
6 Wholesale	277		47				324					98				7.8				
7 Of which STS																				
8 Re-securitisation																				
9 Synthetic transactions																				
10 Securitisation																				
11 Retail underlying																				
12 Wholesale																				
13 Re-securitisation																				

## 10 LIQUIDITY RISK

Liquidity Risk is defined as the risk arising from the institution's inability to meet its liabilities when they come due without incurring unacceptable losses.

It reflects the risk stemming from limited or less stable sources of funding over the longer term (i.e., funding risk), or from insufficient available collateral for Eurosystem, secured or wholesale funding (i.e., asset encumbrance risk) or from a concentration in unencumbered assets disrupting the Bank's ability to generate cash in times of reduced market liquidity for certain asset classes (i.e., concentration risk). Therefore, Liquidity Risk captures both the risk of the Bank being unable to liquidate assets in a timely manner with reasonable terms, and the risk of unexpected increases in the Bank's cost of funding.

The Bank's executive and senior management has the responsibility to implement the liquidity risk strategy approved by the Board Risk Committee (BRC) and to develop the policies, methodologies and procedures for identifying, measuring, monitoring and controlling liquidity risk, consistent with the nature and complexity of the relevant activities. The Bank's management is informed of the Bank's Liquidity Risk position daily by Liquidity Risk management, through the Internal Liquidity Report and the LCR Internal Report, ensuring that the Group's Liquidity Risk remains within approved levels.

Finally, Liquidity Risk Management reports monthly to Asset Liability Committee (ALCO), all approved liquidity metrics and indicators, as well as liquidity stress testing outcomes and cost of funding evolution.

### Liquidity Developments in Q2 2024

During the second quarter of 2024, NBG's liquidity position remained robust, supported by the stability of its funding sources, and the high level of its liquidity buffer.

### Sources of liquidity

The Bank's principal sources of liquidity are its customer deposits, wholesale funding through the issuance of (MREL-eligible) securities and repurchase agreements (repos) with FIs. ECB funding and repos with FIs are collateralized mainly by high quality liquid assets, such as, EU sovereign bonds, Greek government bonds and T-Bills, as well as by other assets, such as highly rated corporate loans and own issues of covered bonds.

Group customer deposits increased by €1.5 billion compared to 31 March 2024 and amounted to €57.1 billion on 30 June 2024.

Moreover, the Bank's strong liquidity profile is further supported by zero TLTRO exposure as of March 2024 and secured interbank funding transactions amounted to €0.2 billion as of 30 June 2024.

The Group's LCR and NSFR remained significantly above the regulatory and internal limits. More specifically, on 30 June 2024 the Group's LCR stood at 239.7% and the Group's NSFR at 148.6%. Loan-to-Deposit ratio stood at 59.7% and 60.3% as of 30 June 2024, on a domestic (Greece) and on a Group level, respectively.

Finally, the Bank rests on a very solid cash-value Liquidity Buffer (HQLAs) standing at the highest level of €20.1 billion on 30 June 2024.

The next tables present the key components of NBG's LCR, as per the respective guidelines on LCR disclosure (EBA/ITS/2020/04).

### Strategies and processes in the management of the liquidity risk

NBG Group has established a robust liquidity risk management framework, which is primarily outlined in the Liquidity Risk Management Policy and is further augmented by the Contingency Funding Plan ("CFP") and the Asset Encumbrance Policy. The liquidity policy is designed with an aim to be aligned with NBG Group Risk Strategy and to meet all the requirements set by the European Commission, the European Central Bank and the Bank of Greece.

Moreover, via the Funding Plan, NBG Group explores its capacity to execute planned actions which affect funding, achieving, in the medium to long run, sustainable funding structures that support the planned growth in the Asset side.

### Structure and organisation of the liquidity risk management function

NBG manages, monitors and measures liquidity risk through the Corporate Treasury and the Capital Markets and Structured Finance ("CMSF") that report to the Group Treasurer, and the Risk Management Unit (Financial & Liquidity Risk Management Division) that reports to the CRO.

### Degree of centralisation of liquidity management and interaction between the group's units

NBG follows a centralized liquidity risk governance model and the body in charge of liquidity management is the Group Treasury, which is responsible for coordinating access to the capital markets in order to fulfill the liquidity needs of the Group.

### Scope and nature of liquidity risk reporting and measurement systems

NBG has completed a pivotal infrastructure project, which was the in-house IT liquidity platform. This module enables NBG to fully automate, integrate and seamlessly produce the full set of internal and regulatory liquidity reporting, and stress testing, thus optimizing the monitoring and management of liquidity risk, which proved extremely useful during the pandemic crisis.

Furthermore, the database of the liquidity platform has been complemented with a large set of historical data, which has further enhanced historical analysis capabilities, targeting to support liquidity stress testing exercises.

### Policies for hedging and mitigating the liquidity risk and strategies and processes for monitoring the continuing effectiveness of hedges and mitigants

In the Liquidity Risk Management Policy, it is analyzed how the Bank manages all Liquidity Risk types. Specifically, regarding the managing of intraday liquidity, the Bank's dedicated unit of the Treasury Division (the MM Desk) closely monitors all intraday positions and ensures that any gap in the Central Bank's current account can be mitigated through the available counterbalancing capacity.

### Outline of the bank's contingency funding plans

The Contingency Funding Plan ("CFP") is a dedicated document of the Bank, which describes the governance and the specific corrective actions and measures that could be taken in case of a liquidity emergency and which is periodically updated, if required, in order to ensure its effectiveness.

Based on the CFP, NBG monitors a set of relevant indicators and metrics that could potentially trigger the CFP activation discussion at the ALCO level.

Upon the activation of the CFP, the Group ALCO will prepare and approve (in co-operation with the subsidiary ALCO, in case of a liquidity crisis in a subsidiary) a crisis-specific Action Plan, which adheres to all local regulatory requirements. It should be noted that, given the liquidity contingency state of the Greek market over the previous years, the actions included in the CFP Action Plan have essentially been tested for their effectiveness in a real life environment and have been deemed as successful, since they have allowed NBG to continue to operate, despite the adverse circumstances encountered.

#### Use of stress testing

Liquidity stress tests allow the Bank to assess the potential impact of exceptional but plausible stress scenarios on its liquidity position. The results of the stress tests enable the Bank to assess the adequacy of its liquidity buffer against potential adverse shocks. Stress testing is conducted on a regular basis, while the Bank can also perform it on an ad-hoc basis. Stress testing is performed at least monthly and results are reported to the ALCO & BRC.

Via the ILAAP, the Bank performs annually a comprehensive set of liquidity stress tests, capturing severe market-wide and idiosyncratic economic shocks, including a long-term stress test over a 3-year horizon, in which the Bank's Business Plan is tested under an adverse macroeconomic scenario, designed by the Economic Analysis Unit.

Additionally, other ad-hoc short-term stress test exercises, in order to examine specific extraordinary events, (e.g. the COVID-19 crisis), may be performed when deemed necessary.

#### Adequacy of liquidity risk management arrangements

The Bank maintains and continuously improves its liquidity management framework, approved by ALCO and BRC, that describes how the Bank manages, monitors, measures and reports liquidity risk. The framework contains policies, metrics, and comprehensive processes that are frequently updated and further enhanced to capture market and bank-specific developments.

Additionally, the Bank's liquidity risk management framework is further reviewed and evaluated by the Single Supervisory Mechanism ("SSM") and the Single Resolution Board ("SRB") ensuring its effectiveness, continuous improvement and suitability.

#### Institution's overall liquidity risk profile associated with the business strategy

The Bank's current liquidity state is at its strongest levels historically, as it is outlined by the Basel III regulatory liquidity metrics, which are significantly higher than their respective regulatory minimums. The overall risk profile of NBG also encompasses the maintenance of a very high liquidity buffer and a steadily increasing deposit base. More specifically, the Group's risk appetite, regarding its liquidity position, is summarized in the following statements, expressed in the current Risk Appetite Framework:

- "NBG aims to promote self-funded growth, through preserving a stable funding mix, mainly comprised of customer deposits at a sustainable rate."

- "NBG targets to always preserve the LCR well above minimum regulatory level and also maintain an adequate liquidity buffer going forward."
- "NBG aims to preserve the NSFR level above minimum regulatory levels and extend the average tenor of its liabilities in alignment to its Business Plan, in order to enhance its longer-term available funding."

#### Customised measurement tools or metrics

In order to effectively monitor liquidity risk, the Bank has introduced an additional risk appetite metric with specific related limits, in the current Risk Appetite Framework. Except for the RAF limits on the regulatory metrics of Liquidity Coverage Ratio (LCR) and Net Stable Funding Ratio (NSFR), the Bank also measures and manages an internal liquidity risk metric, the Liquidity Buffer (HQLAs).

#### Liquidity exposures and funding needs at the level of individual legal entities, foreign branches and subsidiaries

The Group's subsidiaries measure, report and manage their own individual Liquidity Risk, ensuring they are self-sufficient in case of a local crisis.

Table 64: EU LIQ1 - Quantitative Information of Liquidity Coverage Ratio 2024

€ mio		Total unweighted value		Total weighted value	
		31.03.2024	30.06.2024	31.03.2024	30.06.2024
Quarter ending on		31.03.2024	30.06.2024	31.03.2024	30.06.2024
Number of data points used in the calculation of averages		12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>					
1	<b>Total high-quality liquid assets</b>			<b>23,037</b>	<b>22,381</b>
<b>CASH-OUTFLOWS</b>					
2	Retail deposits and deposits from small business customers, of which:	<b>35,156</b>	<b>35,244</b>	<b>2,143</b>	<b>2,148</b>
3	Stable deposits	30,176	30,240	1,509	1,512
4	Less stable deposits	4,981	5,004	634	636
5	Unsecured wholesale funding	<b>12,295</b>	<b>12,185</b>	<b>4,912</b>	<b>4,845</b>
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks				
7	Non-operational deposits (all counterparties)	12,295	12,178	4,912	4,838
9	Secured wholesale funding	0	0	0	0
10	Additional requirements	<b>1,402</b>	<b>1,401</b>	<b>1,402</b>	<b>1,401</b>
11	Outflows related to derivative exposures and other collateral requirements	1,402	1,401	1,402	1,401
13	Credit and liquidity facilities				
14	Other contractual funding obligations	<b>193</b>	<b>216</b>	<b>165</b>	<b>187</b>
15	Other contingent funding obligations	<b>14,675</b>	<b>14,871</b>	<b>838</b>	<b>846</b>
16	<b>TOTAL CASH OUTFLOWS</b>			<b>9,460</b>	<b>9,427</b>
<b>CASH-INFLOWS</b>					
18	Inflows from fully performing exposures	758	785	625	639
19	Other cash inflows	254	233	250	228
20	<b>TOTAL CASH INFLOWS</b>	<b>1,012</b>	<b>1,018</b>	<b>876</b>	<b>867</b>
EU-20c	<b>Inflows Subject to 75% Cap</b>	1,012	1,018	876	867
				<b>TOTAL ADJUSTED VALUE</b>	
21	<b>LIQUIDITY BUFFER</b>			<b>23,037</b>	<b>22,381</b>
22	<b>TOTAL NET CASH OUTFLOWS</b>			<b>8,584</b>	<b>8,560</b>
23	<b>LIQUIDITY COVERAGE RATIO (%)</b>			<b>268.5</b>	<b>261.7</b>



## LIQUIDITY RISK

Table 63: EU LIQ1 - Quantitative Information of Liquidity Coverage Ratio 2023

€ mio	Total unweighted value				Total weighted value				
	31.03.23	30.06.23	30.09.23	31.12.23	31.03.23	30.06.23	30.09.23	31.12.23	
Quarter ending on									
Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12	
<b>HIGH-QUALITY LIQUID ASSETS</b>									
1	<b>Total high-quality liquid assets</b>				23,638	23,752	23,568	23,252	
<b>CASH-OUTFLOWS</b>									
2	Retail deposits and deposits from small business customers, of which:	35,894	35,940	35,696	35,351	2,151	2,170	2,168	2,153
3	Stable deposits	31,126	31,034	30,718	30,363	1,556	1,552	1,536	1,518
4	Less stable deposits	4,768	4,905	4,978	4,989	595	618	632	635
5	Unsecured wholesale funding	13,464	13,149	12,652	12,652	5,551	5,348	5,111	4,989
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks								
7	Non-operational deposits (all counterparties)	13,464	13,149	12,652	12,412	5,551	5,348	5,111	4,989
9	Secured wholesale funding	0	0	0	0	2	0	0	0
10	Additional requirements	1,248	1,400	1,406	1,406	1,248	1,400	1,406	1,401
11	Outflows related to derivative exposures and other collateral requirements	1,248	1,400	1,406	1,401	1,248	1,400	1,406	1,401
13	Credit and liquidity facilities								
14	Other contractual funding obligations	360	269	227	227	338	246	203	201
15	Other contingent funding obligations	12,857	13,596	14,102	14,345	736	779	808	820
16	<b>TOTAL CASH OUTFLOWS</b>					10,026	9,943	9,696	9,565
<b>CASH-INFLOWS</b>									
18	Inflows from fully performing exposures	730	701	682	735	594	568	547	603
19	Other cash inflows	187	213	240	260	184	210	236	256
20	<b>TOTAL CASH INFLOWS</b>	917	914	922	996	777	778	783	859
EU-20c	<i>Inflows Subject to 75% Cap</i>	917	914	922	996	777	778	783	859
						<b>TOTAL ADJUSTED VALUE</b>			
21	<b>LIQUIDITY BUFFER</b>					23,638	23,752	23,568	23,252
22	<b>TOTAL NET CASH OUTFLOWS</b>					9,249	9,166	8,913	8,706
23	<b>LIQUIDITY COVERAGE RATIO (%)</b>					255.9	259.8	264.7	267.2

### Explanations on the main drivers of LCR results and the evolution of the contribution of inputs to the LCR's calculation over time

It is evident from the tables above that the Bank's LCR remains significantly above the regulatory limit, despite TLTRO III repayments, reflecting the continuous improvement of NBG's liquidity profile, driven by the customer deposits growth, and the successful MREL issuances

### Explanations on the changes in the LCR over time

LCR level followed an upward trend over time, in line with the growth of deposits and the successful MREL issuances.

### Explanations on the actual concentration of funding sources

NBG has comfortably achieved full disengagement from ECB funding during the first quarter of 2024, following which, over 90% of the Bank's funding comes from its well-diversified, mostly retail, deposit base, whilst the remaining funding consists of long-term debt issuances.

### High-level description of the composition of the institution's Liquidity buffer

The Bank's robust Liquidity Buffer is comprised mainly of cash deposited with the Bank of Greece, collateral eligible for funding with the ECB and unencumbered tradable collateral that could be used for secured funding with Financial Institutions.

### Derivative exposures and potential collateral calls

The Bank's derivatives portfolio is mostly used for hedging purposes.

The risk associated with additional cash collateral, which the Bank could potentially post for margin calls, is captured in the LCR calculation through the input "Additional requirements" and it could also be comfortably mitigated by its robust liquidity buffer.

### Currency mismatch in the LCR

The Currency mismatch risk of the Bank is low as approximately 95% of NBG's assets are denominated in EUR and therefore EUR is the only material currency for the LCR calculation.

There are no other items in the LCR calculation, which are considered relevant for the Bank's liquidity profile and are not captured in the LCR disclosure template.

## LIQUIDITY RISK

Table 65: EU LIQ2 - Net Stable Funding Ratio 30.06.2024

€ mio		Unweighted value by residual maturity				Weighted value
		No maturity	< 6m	6m to < 1yr	≥ 1yr	
<b>Available stable funding (ASF) Items</b>						
1	Capital items and instruments	8,254	86	0	1,019	9,273
2	Own funds	8,254	86	0	1,019	9,273
3	Other capital instruments	0	0	0	0	0
4	Retail deposits	0	40,100	3,077	1,357	42,058
5	Stable deposits	0	34,241	2,613	1,133	36,144
6	Less stable deposits	0	5,858	464	224	5,914
7	Wholesale funding:	0	12,835	2	2,264	8,273
8	Operational deposits	0	0	0	0	0
9	Other wholesale funding	0	12,835	2	2,264	8,273
10	Interdependent liabilities	0	0	0	0	0
11	Other liabilities:	249	2,060	0	27	27
12	NSFR derivative liabilities	249				
13	All other liabilities and capital instruments not included in the above categories		2,060	0	27	27
14	<b>TOTAL AVAILABLE STABLE FUNDING (ASF)</b>					<b>59,632</b>
<b>Required stable funding (RSF) Items</b>						
15	Total high-quality liquid assets (HQLA)	0	0	0	0	465
EU-15a	Assets encumbered for more than 12m in cover pool	0	0	0	0	0
16	Deposits held at other financial institutions for operational purposes	0	0	0	0	0
17	Performing loans and securities:	0	5,093	2,483	29,307	28,162
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut	0	0	0	0	0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions	0	1,485	1	385	534
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:	0	3,271	2,141	18,646	18,555
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0	0	0	0	0
22	Performing residential mortgages, of which:	0	250	192	6,080	5,389
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0	0	0	0	0
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	0	87	148	4,196	3,684
25	<b>Interdependent assets</b>	0	0	0	0	0
26	<b>Other assets:</b>	0	3,085	31	9,931	10,960
27	Physical traded commodities	0	0	0	0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs	0	839	0	0	713
29	NSFR derivative assets	0	31	0	0	31
30	NSFR derivative liabilities before deduction of variation margin posted	0	1,383	0	0	69
31	All other assets not included in the above categories	0	830	31	9,931	10,146
32	<b>Off-balance sheet items</b>	0	0	0	5,427	543
33	<b>TOTAL REQUIRED STABLE FUNDING (RSF)</b>					<b>40,130</b>
34	<b>NET STABLE FUNDING RATIO (%)</b>					<b>148.6</b>

## LIQUIDITY RISK

Table 64: EU LIQ2 - Net Stable Funding Ratio 31.12.2023

€ mio		Unweighted value by residual maturity				Weighted value
		No maturity	< 6m	6m to < 1yr	≥ 1yr	
<b>Available stable funding (ASF) Items</b>						
1	Capital items and instruments	7,626	0	0	938	8,564
2	Own funds	7,626	0	0	938	8,564
3	Other capital instruments	0	0	0	0	0
4	Retail deposits	0	39,135	3,941	1,065	41,682
5	Stable deposits	0	33,569	3,388	911	36,020
6	Less stable deposits	0	5,566	553	154	5,661
7	Wholesale funding:	0	14,128	758	1,917	8,359
8	Operational deposits	0	0	0	0	0
9	Other wholesale funding	0	14,128	758	1,917	8,359
10	Interdependent liabilities	0	0	0	0	0
11	Other liabilities:	90	2,140	0	26	26
12	NSFR derivative liabilities	90				
13	All other liabilities and capital instruments not included in the above categories		2,140	0	26	26
14	<b>TOTAL AVAILABLE STABLE FUNDING (ASF)</b>					<b>58,630</b>
<b>Required stable funding (RSF) Items</b>						
15	Total high-quality liquid assets (HQLA)	0	0	0	0	468
EU-15a	Assets encumbered for more than 12m in cover pool	0	0	0	0	0
16	Deposits held at other financial institutions for operational purposes	0	0	0	0	0
17	Performing loans and securities:	0	5,743	2,672	27,830	26,756
18	Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut	0	1,003	0	0	0
19	Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions	0	1,600	1	232	393
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:	0	2,802	2,410	17,433	17,425
21	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0	0	0	0	0
22	Performing residential mortgages, of which:	0	254	191	6,144	5,445
23	With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk	0	0	0	0	0
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	0	83	70	4,021	3,494
25	Interdependent assets	0	0	0	0	0
26	Other assets:	0	2,485	23	10,220	11,253
27	Physical traded commodities	0	0	0	0	0
28	Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs	0	850	0	0	722
29	NSFR derivative assets	0	125	0	0	125
30	NSFR derivative liabilities before deduction of variation margin posted	0	693	0	0	35
31	All other assets not included in the above categories	0	818	23	10,220	10,371
32	Off-balance sheet items	0	0	0	5,197	520
33	<b>TOTAL REQUIRED STABLE FUNDING (RSF)</b>					<b>38,997</b>
34	<b>NET STABLE FUNDING RATIO (%)</b>					<b>150.3</b>

# List of abbreviations

Abbreviation	Definition	Abbreviation	Definition
<b>ABS</b>	Asset-Backed Securities	<b>IAS</b>	International Accounting Standards
<b>ACC</b>	Additional Credit Claims	<b>ICAAP / ILAAP</b>	Internal Capital / Liquidity Adequacy Assessment Process
<b>AFS</b>	Available for Sale	<b>ICMA</b>	International Capital Markets Association
<b>A-IRB</b>	Advanced Internal Ratings Based (Approach)	<b>ICT</b>	Information and Communication Technology
<b>ALCO</b>	Asset Liability Committee	<b>IFRS</b>	International Financial Reporting Standards
<b>ALM</b>	Asset Liquidity Management	<b>IMA</b>	Internal Model Approach
<b>AMC</b>	Asset Management Companies	<b>IRB</b>	Internal Ratings Based (approach)
<b>AML</b>	Anti-Money Laundering	<b>IRRBB</b>	Interest Rate Risk in the Banking Book
<b>APP</b>	Asset Purchasing Program	<b>IRS</b>	Interest Rate Swaps
<b>APS</b>	Asset Protection Scheme	<b>ISDA</b>	International Swaps and Derivatives Association
<b>ATHEX</b>	Athens Exchange	<b>IT</b>	Information Technology
<b>BAC</b>	Board Audit Committee	<b>ITS</b>	Implementing Technical Standards
<b>BC</b>	Bankruptcy Code	<b>IVS</b>	International Valuation Standards
<b>BCBS</b>	Basel Committee on Banking Supervision	<b>JST</b>	Joint Supervisory Team
<b>BoG</b>	Bank of Greece	<b>KPI</b>	Key Performance Indicator
<b>BoS</b>	Board of Supervisors (EBA)	<b>KRI</b>	Key Risk Indicator
<b>bps</b>	Basis Point	<b>LCR</b>	Liquidity Coverage Ratio
<b>BRC</b>	Board Risk Committee	<b>LGD</b>	Loss Given Default
<b>BRRD</b>	Bank Recovery and Resolution Directive	<b>LR</b>	Leverage Ratio
<b>BTAR</b>	Banking Book Taxonomy Alignment Ratio	<b>M&amp;A</b>	Mergers and Acquisitions
<b>BU</b>	Business Unit	<b>MDA</b>	Maximum Distributable Amount
<b>C&amp;E</b>	Climate & Environment	<b>MIS</b>	Management Information System
<b>CBR</b>	Combined Buffer Requirements	<b>ML</b>	Money Laundering
<b>CCB</b>	Capital Conservation Requirement	<b>MoB</b>	Months on Book
<b>CCF</b>	Credit Conversion Factor	<b>MRA</b>	Moody's Risk Advisor
<b>CCM</b>	Climate Change Mitigation	<b>MREL</b>	Minimum Requirements for Own Funds & Eligible Liabilities
<b>CCO</b>	Chief Credit Officer	<b>MRO</b>	Main Refinancing Operations
<b>CCP</b>	Code of Civil Procedure	<b>MVS</b>	Model Validation Sector
<b>CCR</b>	Counterparty Credit Risk	<b>MVU</b>	Model Validation Unit
<b>CCyB</b>	Countercyclical Capital Buffer	<b>NACE</b>	Nomenclature of Economic Activities
<b>CDS</b>	Credit Default Swap	<b>NBG</b>	National Bank Of Greece, S.A
<b>CEBS</b>	Committee of European Banking Supervisors	<b>NCA</b>	National Competent Authority
<b>CEF</b>	Credit Equivalent Factor	<b>NFC</b>	Non-Financial Corporates
<b>CEO</b>	Chief Executive Officer	<b>NII</b>	Net Interest Income
<b>CET1</b>	Common Equity Tier 1	<b>NMRF</b>	Non-Modellable Risk Factors
<b>CFO</b>	Chief Financial Officer	<b>NPE</b>	Non Performing Exposure
<b>CMS</b>	Collateral Management System	<b>NPL</b>	Non Performing Loan
<b>COO</b>	Chief Operations Officer	<b>NPV</b>	Net Present Value
<b>CPRS</b>	Climate Policy Relevant Sectors	<b>NRA</b>	National Resolution Authorities
<b>CRD</b>	Capital Requirements Directive	<b>NSFR</b>	Net Stable Funding Ratio
<b>CRM</b>	Corporate Rating Model	<b>NZ Framework</b>	Net Zero Framework
<b>CRO</b>	Chief Risk Officer	<b>O/N</b>	Overnight
<b>CRR</b>	Capital Requirements Regulation	<b>OCP</b>	Open Currency Position
<b>CSA</b>	Credit Support Annex	<b>OCR</b>	Overall Capital Requirement
<b>CSPP</b>	Corporate Sector Purchasing Program	<b>OCW</b>	Out-of-Court Workout
<b>CSRBB</b>	Credit Spread Risk in the Banking Book	<b>OR</b>	Operational Risk

<b>CSR</b>	Corporate Social Responsibility	<b>ORCO</b>	Operational Risk Management Committee
<b>CVA</b>	Credit Valuation Adjustment	<b>ORMF</b>	Operational Risk Management Framework
<b>DCD</b>	Domestic Credit Division	<b>ORR</b>	Obligors' Risk Rating
<b>DGSD</b>	Deposit Guarantee Schemes Directive	<b>O-SII</b>	Other Systemically Important Institution
<b>dpd</b>	days past due	<b>OTC</b>	Over-the-counter
<b>DoD</b>	Definition of Deafult	<b>P&amp;L</b>	Profit and Loss
<b>DTA</b>	Deferred Tax Asset	<b>P2G</b>	Pillar 2 Guidance
<b>DTC</b>	Deferred Tax Credit	<b>P2R</b>	Pillar 2 Requirement
<b>EAD</b>	Exposure at Default	<b>PD</b>	Probability of Default
<b>EBA</b>	European Banking Authority	<b>PE</b>	Performing Exposures
<b>EBF</b>	European Banking Federation	<b>PELTROs</b>	Pandemic Emergency Long-Term Refinancing Operations
<b>EBITDA</b>	Earnings Before Interest, Tax, Depreciation and Amortization	<b>PEPP</b>	Pandemic Emergency Purchase Program
<b>EC</b>	European Commission	<b>PMO</b>	Project Management Office
<b>ECAI</b>	External Credit Assessment Institutions	<b>ppts</b>	Percentage points
<b>ECB</b>	European Central Bank	<b>PSE</b>	Public Sector Entity
<b>ECL</b>	Expected Credit Losses	<b>PSI</b>	Private Sector Involvement
<b>EDIS</b>	European Deposit Insurance Scheme	<b>QCCP</b>	Qualifying Central Counterparty
<b>EFSF</b>	European Financial Stability Facility	<b>RAF</b>	Risk Appetite Framework
<b>EIB</b>	European Investment Bank	<b>RAPM</b>	Risk-Adjusted Performance Metrics
<b>EIF</b>	European Investment Fund	<b>RCF</b>	Risk Culture Framework
<b>EIOPA</b>	European Insurance & Occupational Pensions Authority	<b>RCSA</b>	Risk and Control Self-Assessment
<b>EL</b>	Expected Loss	<b>RES</b>	Renewable Energy Resources
<b>ELA</b>	Emergency Liquidity Assistance	<b>RIMA</b>	Risk identification & materiality assessment
<b>EPC</b>	Energy Performance Certificate	<b>RTS</b>	Regulatory Technical Standards
<b>ERBA</b>	External Ratings Based Approach	<b>RWA</b>	Risk Weighted Assets
<b>ESA</b>	European Supervisory Authorities	<b>SA</b>	Standardized Approach
<b>ESG</b>	Environmental, Social & Governance	<b>SAU</b>	Special Assets Unit
<b>ESM</b>	European Stability Mechanism	<b>SB(L)</b>	Small Business (Lending)
<b>ESMA</b>	European Securities & Markets Authority	<b>SEC</b>	Securities and Exchange Commission
<b>ESRB</b>	European Systemic Risk Board	<b>SFDR</b>	Sustainable Finance Disclosure Regulation
<b>ETEAN</b>	Hellenic Fund for Entrepreneurship and Development	<b>SGP</b>	Stability & Growth Pact
<b>EU</b>	European Union	<b>SICR</b>	Significant Increase of Credit Risk
<b>EVE</b>	Economic Value of Equity	<b>SL</b>	Specialised Lending
<b>EVS</b>	European Valuation Standards	<b>SME</b>	Small & Medium Enterprises
<b>EW</b>	Early Warning	<b>SPPI</b>	Solely Payments of Principal and Interest
<b>ExCo</b>	Executive Committee	<b>SPV</b>	Special Purpose Vehicle
<b>FBE</b>	Forborne Exposures	<b>SR</b>	Securitization Repositories
<b>FI</b>	Financial Institution	<b>SRB</b>	Single Resolution Board
<b>F-IRB</b>	Foundation internal ratings-based (approach)	<b>SRCO</b>	Segment Risk & Control Officer
<b>FRTB</b>	Fundamental Review of the Trading Book	<b>SREP</b>	Supervisory Review and Evaluation Process
<b>FSB</b>	Financial Stability Board	<b>SRM</b>	Single Resolution Mechanism
<b>FVTOCI</b>	Fair Value Through Other Comprehensive Income	<b>SSM</b>	Single Supervisory Mechanism
<b>FVTPL</b>	Fair Value Through Profit or Loss	<b>ST</b>	Stress Test
<b>FX</b>	Foreign Exchange	<b>STS</b>	Single, Transparent, Standardized (securitization)
<b>GAAP</b>	Generally Accepted Accounting Principles	<b>sVaR</b>	Stressed Value at Risk
<b>GAR</b>	Green Asset Ratio	<b>TF</b>	Terrorist Financing
<b>GHG emissions</b>	Greenhouse Gas Emissions	<b>TFEU</b>	Treaty on the Functioning of the European Union
<b>GGB</b>	Greek Government Bond	<b>TLAC</b>	Total Loss Absorbing Capacity
<b>GHOS</b>	Governors and Heads of Supervision	<b>TLTRO</b>	Targeted Long-Term Refinancing Operations
<b>GICD</b>	Group International Credit Division	<b>TRIM</b>	Targeted Review of Internal Models
<b>GL</b>	Guidelines	<b>TSCR</b>	Total SREP Capital Requirement

## APPENDIX

<b>GMORM(D)</b>	Group Market & Operational Risk Management (Division)	<b>URCO</b>	Unit Risk & Control Officer
<b>GMRA</b>	Global Master Repurchase Agreement	<b>UAT</b>	User Acceptance Testing
<b>GRC</b>	Governance Risk & Compliance	<b>UTP</b>	Unlikelihood to Pay
<b>GRCA(D)</b>	Group Risk Control & Architecture (Division)	<b>VaR</b>	Value at Risk
<b>GRCD</b>	Group Retail Credit Division	<b>VCV</b>	Variance-Covariance
<b>G-SII</b>	Global Systemically Important Institution	<b>WAM</b>	Weighted Average Maturity
<b>HCMC</b>	Hellenic Capital Market Commission		
<b>HDB</b>	Hellenic Development Bank		
<b>HFSF</b>	Hellenic Financial Stability Fund		
<b>HRRC</b>	Human Resources and Remuneration Committee		
<b>HTCS</b>	Held to Collect and Sell		